



SUNDARAM MUTUAL
UNEARTHING OPPORTUNITIES

SCHEME INFORMATION DOCUMENT

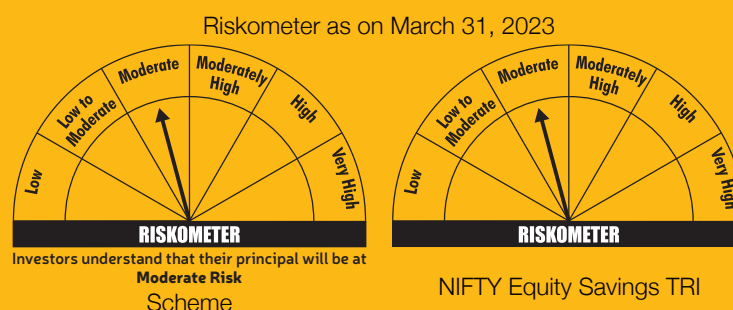
Sundaram Equity Savings Fund

An open ended scheme investing in equity, arbitrage and debt

This product is suitable for investors who are seeking*

- Long term capital appreciation and income,
- Investment in equity & equity related instruments, arbitrage opportunities, and investments in debt and money market opportunities.

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



Pursuant to the acquisition of Principal Asset Management Private Limited by Sundaram Asset Management Company Limited on 31/12/2021, Sundaram Equity Savings Fund got merged with Principal Equity Savings Fund and the name of the merged funds has been retained as Sundaram Equity Savings Fund.

Mutual Fund
Trustee Company
Asset Management Company
Address
Website

Sundaram Mutual Fund
Sundaram Trustee Company Limited
Sundaram Asset Management Company Limited
Sundaram Towers, I & II Floor, 46, Whites Road, Chennai - 600 014. India
www.sundarammutual.com

The particulars of the Scheme have been prepared in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations 1996 as amended till date and filed with Securities and Exchange Board of India along with a Due Diligence Certificate from Sundaram Asset Management Limited. The units being offered for public subscription have not been approved or recommended by SEBI; SEBI has also not certified the accuracy or adequacy of the Scheme Information Document.

The Scheme Information Document should be read in conjunction with the SAI and not in isolation

The Scheme Information Document sets forth concisely the information about the Scheme that a prospective investor ought to know before investing. Investors should also ascertain about any further changes to this document after the date of this Document from the Mutual Fund/Investor Service Centres/Distributors/Brokers or visit www.sundarammutual.com.

Investors are advised to refer to the Statement of Additional Information (SAI) for details of Sundaram Mutual Fund, tax and legal issues and general information. The Statement of Additional Information is available at www.sundarammutual.com and www.amfiindia.com

Statement of Additional Information is incorporated by reference and is legally a part of the Scheme Information Document. For a free copy of the current Statement of Additional Information, please contact your nearest Investor Service Centre or visit www.sundarammutual.com.

This Scheme Information Document is dated March 31, 2023.

Contact No. 1860 425 7237 (India)
+91 40 2345 2215 (NRI)

SMS SFUND to 56767
+91 95000 57237 (WhatsApp Chatbot)

E-mail: customerservices@sundarammutual.com
(NRI): nriservices@sundarammutual.com

www.sundarammutual.com

Sundaram Mutual Fund

Trustee**Sundaram Trustee Company Limited**

CIN: U65999TN2003PLC052058

Corporate Office: Sundaram Towers, I & II Floor, 46 Whites Road, Chennai 600 014 India

Phone : 044 28583362 Fax : 044 28583156

Investment Manager**Sundaram Asset Management Company Limited**

CIN: U93090TN1996PLC034615

Corporate Office: Sundaram Towers, I & II Floor, 46 Whites Road, Chennai 600 014 India

Phone : 044 28583362 Fax : 044 28583156

www.sundarammutual.com**Sponsor****Sundaram Finance Limited**

CIN: L65191TN1954PLC002429

Registered Office: 21, Patullos Road,

Chennai 600 002

India

www.sundaramfinance.in

If you wish to reach indicated telephone number from outside India, please use +91 or 0091 followed by 44 and the eight number.

Sponsor

The Sponsor of Sundaram Mutual Fund is Sundaram Finance Limited. Sundaram Finance holds the entire paid capital of Sundaram Asset Management Company Limited and Sundaram Trustee Company Limited. A detailed background of the sponsor-Sundaram Finance Limited-is available in the Statement of Additional Information, which can be accessed at www.sundarammutual.com.

Name of the Scheme

Sundaram Equity Savings Fund.

Pursuant to the acquisition of Principal Asset Management Private Limited by Sundaram Asset Management Company Limited on 31/12/2021, Sundaram Equity Savings Fund got merged with Principal Equity Savings Fund and the name of the merged funds has been retained as Sundaram Equity Savings Fund.

Scheme Type (Fundamental Attribute)

An open ended scheme investing in equity, arbitrage and debt.

Offer Price: NAV

Investment Objective: (Fundamental Attribute)

The investment objective of the Scheme is to provide capital appreciation and income distribution to the investors by using equity and equity related instruments, arbitrage opportunities, and investments in debt and money market instruments, however, there can be no assurance that the investment objective of the Scheme will be realized or that income will be generated and the scheme does not assure or guarantee any returns

No Guarantee: There is no guarantee or assurance that the investment objective of the scheme will be achieved. Investors are neither being offered any guaranteed / indicated returns nor any guarantee on repayment of capital by the Schemes. There is also no guarantee of capital or return either by the Mutual Fund or by the sponsor or by the Trustee or Asset Management Company.

Segregated Portfolio: Enabled

Asset Allocation (Fundamental Attribute)

a) Asset allocation under normal circumstances:			
Instrument Type	Minimum	Maximum	Risk Profile
Equity & Equity related instruments (Including Derivatives)	65%	90%	Very High
Derivatives includes Index Futures, Stock Futures, Index Options, Stock Options, etc., backed by underlying equity	15%	75%	
Unhedged Equity position	15%	50%	
Fixed Income and money market**	10%	35%	Low to Medium
Units issued by REITs/InvITs	0%	10%	Medium to high

b) Asset Allocation under defensive considerations:

Instrument Type	Minimum	Maximum	Risk Profile
Equity & Equity related instruments (Including Derivatives)	65%	90%	Very High
Derivatives includes Index Futures, Stock Futures, Index Options, Stock Options, etc., backed by underlying equity	15%	75%	
Unhedged Equity position	15%	50%	
Fixed Income and money market**	10%	35%	Low to Medium
Units issued by REITs/InvITs	0%	10%	Medium to high

**The scheme may invest in securitized debt upto 20% of the net assets of the Fixed Income portion.

- The scheme shall engage in securities lending subject to a maximum of 20% and 5% for a single counter party. The scheme would limit its exposure, with regards to securities lending, for a single intermediary, to the extent of 5% of the total net assets of the scheme at the time of lending
- The Scheme shall not invest in ADR/GDR/ Overseas securities.
- The Scheme may use derivatives for trading, hedging and portfolio balancing. Exposure to derivatives will be as per the asset allocation table given above.
- The scheme may invest in repo in corporate bond up to 10% of the net assets of the scheme.

Exposure is calculated as a percentage of the notional value to the net assets of the Scheme. The Scheme will maintain cash or securities to cover exposure to derivatives. The cumulative gross exposure to equity, debt, money market instruments, REITs/InvITs and derivatives shall not exceed 100% of the net assets of the scheme, subject to SEBI circular No. Cir/ IMD/ DF/ 11/ 2010 dated August 18, 2010 and Circular No. SEBI/HO/IMD/DF2/CIR/P/2021/024 dated March 04, 2021. The same-security wise hedge positions would be excluded from computing the percentage. It must be clearly understood that the percentages stated above are only indicative and not absolute and that they can vary substantially depending upon the perception of the Investment Manager, the intention being at all times to seek to protect the interests of the unit holders. Such changes in the investment pattern will be for short term and defensive considerations under the circumstances such as (i) The debt/ money market instruments offer better returns than the arbitrage opportunities available; (ii) Adequate arbitrage opportunities not available; (iii) unwinding of the existing position and booking short term profit.

Pending deployment in line with the investment objective, the funds of the Scheme may be invested in short-term deposits

SOB
No.
14

SOB
No.
4

with scheduled commercial banks in accordance with SEBI Circulars SEBI/IMD/CIR No.9/20306/03 dated November 12, 2003 and SEBI/IMD/Cir No.1/91171/07 dated April 16, 2007.

Portfolio rebalancing/Changes in Investment Pattern:

Subject to SEBI Regulations, the asset allocation pattern may change from time to time for a short term and for defensive considerations, keeping in view the market conditions/ applicable regulations/political & economic factors, the perception of the Investment Manager the intention being at all times to seek to protect the interests of the Unit holders. Rebalancing across sectors and stocks based on valuation levels relative to growth shall be a dynamic exercise, as this is crucial to performance. The fund manager of the Scheme shall examine factors such as the overall macro-economic conditions, valuation levels, sector specific factors, company-specific factors and trends in liquidity, to name a few, and reduce the equity exposure, if warranted, to lower levels and raise the fixed income component of the portfolio as a tactical call. The fund manager shall seek to raise the equity exposure if the environment is conducive. This process of rebalancing may take place in a dynamic manner on a regular basis. Cash calls (with deployment in appropriate money-market and fixed-income securities), derivatives, changes in the degree of overweight and underweight to sectors and changes in allocation levels to stocks with varying attributes can be used to balance the portfolio. If the macro-economic conditions and market levels warrant, the fund manager may on an exceptional basis, reduce the equity exposure and raise the fixed-income component of the portfolio beyond the asset allocation boundary indicated in the table. Such an allocation in exceptional circumstances shall be adopted with the approval of the Internal Investment Committee of Sundaram Asset Management. In the event of deviations, the fund manager will carry out rebalancing within 30 days. Where the portfolio is not rebalanced within 30 days, justification for the same shall be placed before the Internal Investment Committee and reasons for the same shall be recorded in writing. The Internal Investment Committee of the Investment Manager, shall then decide on the course of action. However, at all times the portfolio will adhere to the overall investment objectives of the Scheme

SOB
No.9

Benchmark

Nifty Equity Savings Index

The NIFTY Equity Savings index captures performance of a portfolio having exposure to equity, equity arbitrage and debt instruments. This index is a total return index capturing price return and dividend/coupon income.

The NIFTY Equity Savings Index includes the following components: 35% exposure to NIFTY 50 Total Return (TR) Index ; 30% exposure to equity arbitrage (long position in NIFTY 50 TR Index and equivalent short position in NIFTY 50 Futures Index) ; 30% exposure to NIFTY Short Duration Debt

Index & 5% exposure to NIFTY 1D Rate Index

The Trustee reserves the right to change the Benchmark..

Fund Managers

Sudhir Kedia & Rohit Seksaria (Equity) &
Dwijendra Srivastava. (Fixed Income)

The Trustee reserves the right to change the fund manager(s).

Read Risk Factors

Prospective investors should not rely solely on the information contained in this Scheme Information Document. They should read the risk factors presented in this document –scheme specific, general and securities-specific and also note that the risk factors are only illustrative and not exhaustive. The Trustee accepts no responsibility for unauthorised information.

Summary of Indicative Scheme-Specific Risks

*Risks associated with the Scheme's Arbitrage Strategy

- The Scheme proposes to invest in equity and equity related instruments by identifying and exploiting price discrepancies in cash and derivative segments of the market. These investments by nature are volatile as the prices of the underlying securities are affected by various factors such as liquidity, time to settlement date, news flow, spreads between cash and derivatives market at different points of time, trading volumes, etc.
- There is no guarantee that the Fund Manager will be able to spot investment opportunities or correctly exploit price discrepancies in the different segments of the market.
- The risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.
- The Scheme is also expected to have a high portfolio churn, especially in a volatile market.
- There is an execution risk while implementing arbitrage strategies across various segments of the market, which may result in missed investment opportunities, or may also result in losses/high transaction costs.
- In case of a large outflow from the Scheme, the Scheme may need to reverse the spot-futures transaction before the settlement of the futures trade. While reversing the spot-futures transaction on the Futures and Options exchange, there could be a risk of price of the market being different from the price at which the actual reversal is processed.
- While future market are typically more liquid than underlying cash market, there can be no assurance that ready liquidity would exists at all point in time for the Scheme to purchase and close out a specific futures contract.
- In case of arbitrage, if futures are allowed to expire

SOB
No.10

without corresponding buy/sell in cash market, there is a risk that price at which futures expires, may/may not match with the actual cost at which it is bought/sold in the cash market in last half an hour of the expiry day (Weighted average price for buy or sell).

- * Investment in Equities and Equity related instruments involve risks such as Stock Market Volatility, Equity Price Risk, Dependency Risk, Temporary Investment Risk, Non-diversification Risk, Regulation-Change Risk and etc.
- * Investments in Debt Securities and Money Market Instruments involve risks such as Interest Rate Risk, Credit Risk, Price Risk, Market Risk, Liquidity Risk, Risk relating to investment pattern, Risks relating to duration, Non-diversification Risk, Limited Liquidity, Price Risk and etc.
- i) Engaging in securities lending will involve risks such as counter party risk, liquidity risk and other market risk.
- j) Investment in REITs/InvITs instruments involve risks such as Interest-Rate Risk, Risk of lower than expected distributions, Liquidity Risk, Price-Risk and etc.
- k) Investment in Repo in Corporate Bond involve risks such as counter party risk, Market Risk, Credit Risk and etc.

Any change in policy by the Government/RBI/Regulator can have an adverse impact on the Scheme.

Suitability

The Scheme is appropriate for investors who have a moderately high risk-appetite and understand the risks involved, as the investment strategy that may be adopted by the Investment Manager may be an aggressive approach in order to seek to optimise the objective the Scheme. The Scheme is appropriate only for investors who have a sizeable allocation to equity in their portfolio and wish to allocate a part of their corpus for a differentiated strategy to investing in the equity market.

Income Distribution Policy

The Trustee Company reserves the right to distribute income subject to availability of distributable surplus. Any distribution and frequency of such distribution will be entirely at the discretion of the Trustee.

Investment Plans and Options

Plans: Regular Plan and Direct Plan

Options/Sub-Option: Growth, Quarterly and Half-yearly Income Distribution cum Capital Withdrawal (IDCW): Payout, Re-Investment & Transfer sub-options

If no option is indicated, the default option will be Growth. If an investor chooses the Quarterly /Halfyearly IDCW Option but fails to indicate a sub option, the default sub-option shall be IDCW Transfer (Default Target Scheme- Sundaram Money Fund – Growth Option), when the IDCW payable is Rs. 500

or more and IDCW Reinvestment in the same scheme when IDCW payable is less than Rs.500 in the respective option.

Regular Plan and Direct Plan have the same features (i.e. Investment Objective, Asset Allocation Pattern, Investment Strategy, Risk factors) and facilities offered including terms and conditions except that Direct Plan shall have a lower expense ratio excluding distribution expenses, commission etc. and no commission for distribution of Units will be paid / charged under Direct Plan.

The following matrix will be applied for processing the applications in the Regular or Direct Plan:

Broker Code mentioned by the investor	Plan mentioned by the investor	Plan under which units will be allotted
Not mentioned	Not mentioned	Direct Plan
Not mentioned	Direct	Direct Plan
Not mentioned	Regular	Direct Plan
Mentioned	Direct	Direct Plan
Direct	Not Mentioned	Direct Plan
Direct	Regular	Direct Plan
Mentioned	Regular	Regular Plan
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 endeavour to contact the investor/distributor 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

MF Utility Platform

All financial and non-financial transactions pertaining to Schemes of Sundaram Mutual Fund can be done through MFU either electronically on www.mfuonline.com 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 as may be updated from time to time. The Online Transaction Portal of MFU i.e. www.mfuonline.com and the POS locations of MFUI will be in addition to the existing Official Points of Acceptance ("OPA") of the AMC. The uniform cut-off time as prescribed by SEBI and as mentioned in the SID / KIM of respective schemes shall be applicable for applications received on the portal of MFUI i.e. 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 / Mutual Fund / the AMC from time to time and any law for the time being in force.

International Security Identification Number (ISIN)

The Investor has an option to hold the units either in the physical or demat mode in accordance with his/her own choice. International Security Identification Numbers (ISIN) in respect of the plans/options of the schemes have been created and admitted in National Securities Depository Limited (NSDL) and Central Depository Services Limited (CDSL). The details of ISIN are as follows

Regular Plan	IDCW Quarterly Payout	INF173K01262
Regular Plan	IDCW Quarterly Reinvestment	INF173K01270
Direct Plan	IDCW Quarterly	INF173K01HF9
Direct Plan	IDCW Quarterly Reinvestment	INF173K01HG7
Regular Plan	Growth	INF173K01213
Regular Plan	IDCW Payout	INF173K01247
Regular Plan	IDCW Reinvestment	INF173K01254
Direct Plan	Growth	INF173K01GZ9
Direct Plan	IDCW Payout	INF173K01HC6
Direct Plan	IDCW Reinvestment	INF173K01HD4
Direct Plan	IDCW Quarterly Payout	INF173K01HF9

With effect from October 01, 2012, subscription under Institutional Plan in respect of all the schemes covered in this document has been discontinued.

The ISINs as mentioned in the table above are also available for subscription and redemption in NSE MFSS and BSE Star platform.

In case the unitholder desires to hold the units in Dematerialized / Rematerialized form at a later date, the request for conversion of units held in non-DEMAT form into DEMAT (electronic form) or vice-versa should be submitted along with a DEMAT/REMAT request form to their Depository Participants.

Liquidity (Fundamental Attribute)

Liquidity will be available to the investors through sale and repurchase of units on an ongoing basis. Unitholders can subscribe to and get their units repurchased on all business days at NAV related prices (subject to exit load as mandated by AMC from time to time).

As per SEBI Regulations, the Mutual Fund shall dispatch Redemption proceeds within 10 Business Days of receiving the Redemption request. A penal interest of 15% or such other rate as may be prescribed by SEBI from time to time will be paid in case the redemption proceeds are not dispatched within 10 Business Days of the date of Redemption request. However, under normal circumstances, the Mutual Fund will endeavor to dispatch the Redemption proceeds well before 10 Business Days from the acceptance of the duly completed Redemption request.

Load Structure

Entry Load: Not Applicable.

Exit Load: Nil

Any imposition or enhancement in the load shall be applicable on prospective investments only and will be calculated on First in First out (FIFO) basis.

Applicable NAV

Pursuant to SEBI Circular No. SEBI/HO/IMD/DF2/CIR/P/2020/175 dated September 17, 2020, Investors are requested to note the revised provisions for applicability of NAV, with effect from February 1, 2021:

Applicable NAV for Subscriptions / Switch-ins (irrespective of application amount):

1. In respect of valid applications received upto 3.00 p.m on a Business Day at the official point(s) of acceptance and funds for the entire amount of subscription/purchase (including switch ins) as per the application are credited to the bank account of the respective Schemes before the cut-off time of the same day i.e., available for utilization before the cut-off time - the closing NAV of the day shall be applicable.
2. In respect of valid applications received after 3.00 p.m on a Business Day at the official point(s) of acceptance and funds for the entire amount of subscription/purchase (including switch ins) as per the application are credited to the bank account of the respective Schemes before the cut-off time of the next Business Day i.e available for utilization before the cut-off time of the next Business Day - the closing NAV of the next Business Day shall be applicable.
3. Irrespective of the time of receipt of application at the official point(s) of acceptance, where funds for the entire amount of subscription/purchase as per the application are credited to the bank account of the respective Schemes before the cut-off time on any subsequent Business Day - i.e. available for utilization before the cut-off time on any subsequent Business Day - the closing NAV of such subsequent Business Day shall be applicable.
4. For Switch-ins of any amount:

For determining the applicable NAV, the following shall be ensured:

- Application for switch-in is received before the applicable cut-off time.
- Funds for the entire amount of subscription / purchase as per the switch-in request are credited to the bank account of the Scheme before the cut-off time.
- The funds are available for utilization before the cut-off time.
- In case of 'switch' transactions from one scheme to another, the allocation and settlement shall be in line with redemption payouts.

To clarify, for investments through systematic investment routes such as Systematic Investment Plans (SIP), Systematic Transfer Plans (STP) and Transfer IDCW, etc. the units will be allotted as per the closing NAV of the day on which the funds are available for utilization before the cut-off time by the Target

Scheme irrespective of the installment date of the SIP, STP or record date of IDCW.

Transaction Charge to Distributors

- 1 The Distributor would be allowed to charge the Mutual Fund Investor a Transaction Charge where the amount of investment is Rs. 10,000/- and above on a per subscription basis
- 2 For an investor other than First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 100/- per subscription of Rs. 10,000/- and above
For a First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 150/- per subscription of Rs. 10,000/- and above
- 3 The Transaction Charge, where applicable based on the above criteria, will be deducted by the Investment Manager from the subscription amount remitted by the Investor and paid to the distributor; and the balance (net) amount will be invested in the scheme. Thus units will be allotted against the net investment.
- 4 No Transaction charges shall be levied:
 - a) Where the distributor/agent of the investor has not opted to receive any Transaction Charges;
 - b) Where the investor purchases the Units directly from the Mutual Fund;
 - c) Where total commitment in case of SIP / Purchases / Subscriptions is for an amount less than Rs. 10,000/-;
 - d) On transactions other than purchases / subscriptions relating to new inflows.
Switches / Systematic Transfers / Allotment of Bonus Units / IDCW reinvestment Units / Transfer / Transmission of units, etc will not be considered as subscription for the purpose of levying the transaction charge.
 - e) Purchases / subscriptions carried out through stock exchange(s).

The distributors can opt-in / opt-out of levying transaction charges based on 'type of the Product/Scheme' instead of 'for all Schemes'. Accordingly, the transaction charges would be deducted from the subscription amounts, as applicable.

However, the distributor shall not be able to opt-in or opt-out at the investor-level i.e. a distributor shall not charge one investor and choose not to charge another investor.

The transaction charges are in addition to the existing system of commission permissible to the Distributors. On subscription through Distributors, the upfront commission if any will be paid directly by the Investors to the Distributor by a separate cheque based on their assessment of various factors including the service rendered by the Distributor.

Any circular/clarification issued by SEBI in this regard will automatically become applicable and will be incorporated in

the SID/SAI/KIM wherever applicable.

Initial Issue Expenses

Not applicable

Annual Fee & Recurring Expenses

The total annual recurring expenses of the Scheme, excluding deferred revenue expenditure written off, issue or redemption expenses, but including the investment management/advisory fee that can be charged to the scheme shall be within the limits specified in Regulation 52 of SEBI (Mutual Funds) Regulations. Details are available in Part IV of the Scheme Information Document. The Investment Management Fees and other recurring expenses will be calculated on the basis of daily net assets.

Repatriation Basis

NRIs, registered FIIs and registered sub account of FIIs may invest in the Scheme on full repatriation basis, subject to necessary RBI approvals, if any.

Minimum Investment Amount

New Investor/Existing – Rs.100/- for Quarterly IDCW, Halfyearly IDCW and Growth Option and any amount thereafter under each Plan/ option.

Systematic Investment Plan: Minimum Six installments of Rs. 100/- for Monthly SIP, Rs.750 for Quarterly SIP, Rs.1,000 for Weekly SIP and in multiples of Re.1/- thereafter.

SIP Dates: Any Day (1st of 31st) Weekly (Every Wednesday)

Systematic Transfer Plan:

Daily: Rs.1,000/- (6 Instalments);

Weekly: Rs.1,000/-; (6 Instalments) Monthly: Rs.100/-(6 Instalments); Quarterly: Rs.750/-(6 Instalments)

Semi Annual /Annual: Rs.1000/- (6 Instalments)

STP Dates: Investors can choose any date of the month/quarter for availing the STP facility. Any Day STP is applicable only for monthly and quarterly frequencies.

Systematic Withdrawal Plan: Monthly / Quarterly / Semi Annual/ Annual : Rs.100/- (6 instalments)

SWP Dates: 1st, 11th, 21st

SIP Top-up facility – Half yearly/Annual Minimum 500 and in multiples of Re.1/-

Minimum Redemption Limit

The minimum amount for redemption/switch out will be:

The minimum amount for redemption/switch out will be:
Regular & Direct Plan: Rs.100/- or 1 unit or account balance, whichever is lower.

Valuation of Assets

The assets of the Scheme will be valued in conformity with SEBI Regulations / Guidelines as applicable from time to time.

For more details please refer to Statement of Additional Information(SAI). Valuation of securities will be based on the principles laid down by SEBI, as amended from time to time. The detailed policy on valuation of securities is available in the Investment Manager's website, www.sundarammutual.com and in Statement of Additional Information.

Transparency: NAV

SOB
No.
17

Investment manager calculates and discloses the NAVs of the scheme on all business days. The Investment Manager will prominently disclose the NAVs of all schemes under a separate head on its website and on the website of association of Mutual Funds in India (AMFI). Further, the Investment Manager will extend facility of sending latest available NAVs to unitholders through SMS, upon receiving a specific request in this regard.

NAV will be updated on the websites of Sundaram asset Management (www.sundarammutual.com) and the association of Mutual Funds of India (www.amfiindia.com) Sundaram asset Management shall update the NAVs on the website of association of Mutual Funds in India before 11.00 p.m. every business day.

In case of any delay, the reasons for such delay would be explained to AMFI by the next day. If the NAVs are not available before commencement of working hours on the following day due to any reason, the Fund shall issue a press release providing reasons and explaining when the Fund would be able to publish the NAVs.

Information Access

Investors may access NAV, performance charts, portfolio details, Scheme features, fact sheet, product note/guide, Scheme Information Document, Statement of Additional Information, FAQs and any relevant Scheme-specific material on www.sundarammutual.com.

Investor Relations Manager

Dhiren H Thakker

Head- Customer Services

Sundaram Asset Management Company Limited,
Unit No. 002, Ground floor, B (West) Wing, Satellite Gazebo,
Andheri Ghatkopar Link Road, Chakala, Andheri East,
Mumbai – 400093.

Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI)

Email us at : customerservices@sundarammutual.com

(NRI): nriservices@sundarammutual.com

Custodian

Standard Chartered Bank, Mumbai registered with SEBI, vide Registration No IN/CUS/006, has been appointed custodian for the securities in the Scheme. The responsibilities of the custodian include:

- to keep in safe custody all the securities and instruments belonging to the Scheme;
- to ensure smooth inflow/outflow of securities and instruments as and when necessary in the best interest of the investors;
- to ensure that the benefits due on the holdings are received and
- to be responsible for the loss or damage to the securities due to negligence on its part or on the part of its approved agents.

The Trustee reserves the right to appoint any other custodian(s) approved by SEBI.

In addition a foreign custodian may also be appointed for overseas securities/assets.

Fund Accountant:

Sundaram Fund Services Limited,

CIN:U67120TN2008PLC068388

No. 221 (Old No.162), Metro Plaza, 1st Floor,

Above Raymond's Showroom,

Anna Salai (Mount Road),

Chennai - 600 002

The activities inter-alia include:

- Record accounting entries to the fund.
- Reconcile account balances for the fund.
- Establish policies and procedures to assure proper fund accounting.
- Maintain proper documentation.
- Update computer system records.
- Perform fund valuations of unit trusts and custodian accounts.
- Prepare schedules and tailor-made client reports.
- Coordinate preparation of annual accounts and audit unit trusts and custodian accounts.

However, the Fund administration part would continue to be handled by the Operations Department of the Investment Manager.

Registrar

KFin Technologies Private Limited

CIN: U72400TG2017PTC117649

Unit: Sundaram mutual Fund,

Tower- B, Plot No. 31 & 32,

Selenium building, Gachibowli Road, Financial District,

Nanakramguda, Serilingampally Mandal,

Hyderabad 500032.

Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI)

Email us at: customerservices@sundarammutual.com

The Trustee reserves the right to appoint any other entity registered with SEBI as the registrar.

Information to Unit Holders

On acceptance of a valid application for subscription, units will be allotted and a confirmation specifying the number of

units allotted by way of email and/or SMS within 5 Business Days from the date of receipt of transaction request will be sent to the Unit holder's registered e-mail address and/or mobile number. Subject to SEBI Regulations, Statement of Accounts will be sent in physical to those unitholders whose registered email address / mobile number is not available with the Mutual Fund. Money would be refunded in respect of applications rejected, within five business days from the date of credit identification.

Periodical updates

Any circular/clarification issued by SEBI will automatically become applicable and shall be incorporated in the SID/SAI/KIM wherever applicable.

Pursuant to SEBI circular no. SEBI/HO/IMD/DF3/CIR/P/2020/197 dated October 05, 2020 The Investment Manager shall disclose the portfolio (along with ISIN and Risk-o-meter) as on the last day of the month / half-year for all the schemes in its website www.sundarammutual.com and on the website of AMFI within 10 days from the close of each month/ half-year respectively in a user-friendly and downloadable machine readable format. Any Change in the risk-o-meter will be communicated to the unit holders on the monthly basis.

In case of unitholders whose e-mail addresses are registered, the Investment Manager 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.

Pursuant to SEBI Circular SEBI/HO/IMD/DF3/CIR/P/2020/197 dated 5th October 2020 any change in risk-o-meter shall be communicated by way of Notice cum Addendum and by way of an e-mail or SMS to unitholders of that particular scheme.

Half-Yearly Disclosure

The Investment Manager will publish an advertisement every half-year disclosing the hosting of the half-yearly statement of its schemes portfolio on their respective website and on the website of AMFI and the modes such as SMS, telephone, email or written request (letter) through which a unitholder can submit a request for a physical or electronic copy of the statement of scheme portfolio. Such advertisement will be published in the all India edition of at least two daily newspapers, one each in English and Hindi.

The Investment Manager will provide a physical copy of the statement of its scheme portfolio, without charging any cost, on specific request received from a unitholder.

Sundaram Mutual fund shall make half yearly disclosures of unaudited financial results on its website www.sundarammutual.com in the prescribed format within one month from the close of each half year, i.e. on 31st March and on 30th September. The half-yearly unaudited financial results shall contain details as specified in Twelfth Schedule

and such other details as are necessary for the purpose of providing a true and fair view of the operations of the mutual fund. In addition, Sundaram Mutual Fund shall publish an advertisement disclosing the hosting of such financial results in its website, in atleast 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 Sundaram mutual fund is situated.

Annual Report

Pursuant to Regulation 56 of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular No. Cir/IMD/DF/16/2011 dated September 8, 2011, read with SEBI Mutual Fund (Second Amendment) Regulation 2018, the Scheme-wise annual report or an abridged summary thereof shall be provided by AMC/Mutual Fund within four months from the date of closure of relevant accounting year in the manner specified by the Board.

The scheme wise annual report will be hosted on the websites of the Investment Manager and AMFI. The Investment Manager will display the link on its website and make the physical copies available to the unitholders, at its registered offices at all times.

The Investment Manager will e-mail the scheme annual reports or abridged summary thereof to those unitholders, whose email addresses are registered with the Mutual Fund.

The Investment Manager will provide a physical copy of the abridged summary of the Annual Report, without charging any cost, on specific request received from a unitholder. The unit holders, if they so desire, may request for the annual report of the AMC. Further, the annual report of AMCs shall be displayed on their websites in machine readable format.

The Investment Manager will provide a physical copy of the abridged summary of the Annual Report, without charging any cost, on specific request received from a unitholder.

Table of Contents

Definitions	11
Abbreviations & Interpretation	12
Part I Risk Factors	13
Part II Scheme Information	25
Part III Units & Offer	39
Part IV Fees, Expenses, Load Structure	62
Part V Rights of Unit Holders	65
Part VI Penalties & Pending Litigation	65
Customer care centre of Sundaram AMC	66-68

Investment Objective & Asset Allocation of existing comparable equity Schemes of Sundaram Mutual Fund

Name of the Scheme	Asset Allocation Pattern	Investment Objective
Sundaram Aggressive Hybrid Fund	Equity & Equity Related Instruments: 65-80% Debt and Money Market Instruments including Cash and Cash Equivalents and units of Liquid/ Money Market/ Debt Mutual Fund Schemes and Securitised Debt* 20-35% Units issued by REITs & InvITs : 0-10%	An open ended hybrid scheme investing predominantly in equity and equity related instruments. To provide long-term appreciation and current income by investing in a portfolio of equity, equity related securities and fixed income securities
Sundaram Balanced Advantage Fund	Equity and Equity related instruments: 0-100%; Fixed Income, Money Market Instruments and Govt. Securities, Cash and Cash equivalents: 0-100%; Units issued by REITs/InvITs: 0-10%	An open ended dynamic asset allocation fund. The investment objective of the Scheme is to provide accrual income and capital appreciation by investing in a mix of equity, debt, REITs/InvITs and equity derivatives that are managed dynamically
Sundaram Arbitrage Fund	Under Normal Circumstances: Equity and equity related instruments: 65-100%; @ Derivatives including Index Futures, Stock Futures, Index Options and Stock Options, etc.: 65-100%; Debt securities, Money Market Instruments & cash and cash equivalents : 0-35%	An open ended scheme investing in arbitrage opportunities. To generate income with minimal volatility by investing in equity, arbitrage strategies which fully offset the equity exposure and investments in debt instruments

Differentiating aspect of the scheme: Sundaram Equity Savings Fund is an open ended fund providing capital appreciation and income distribution to the investors by using equity and equity related instruments, arbitrage opportunities, and investments in debt and money market instruments. This fund will be categorised under Equity Savings Category as per SEBI Categorization. Sundaram Asset Management Company Limited do not have any other fund in this category.

Track Record							
Fund/Benchmark	Returns (in %)					Folios	AUM
	Inception	One year	Three years	Five years	Since Inception	#	(Rs. crore)
Sundaram Aggressive Hybrid Fund	Jan-00	0.0	20.7	9.2	10.2	84,310	2,993
<i>Crisil Hybrid 35+65 - Aggressive Index</i>		1.1	20.4	10.9	N.A		
Sundaram Balanced Advantage Fund	Dec-10	2.3	14.3	8.7	9.3	41,833	1,530
<i>Nifty 50 Hybrid Composite Debt 50:50 Index</i>		2.4	16.9	10.5	9.6		
Sundaram Arbitrage Fund	Apr-16	4.8	3.5	2.7	3.5	2,397	77
<i>Nifty 50 Arbitrage Index</i>		5.2	3.8	4.6	4.7		

Past performance may or may not be sustained in the future; Returns in %. Returns computed on compounded annualised basis based on the NAV of Regular Plan -Growth option. Performance, Folios & AUM as on March 31, 2023; Relevant benchmarks highlighted in italics.

Definition

In this document, the following words and expressions shall have the meaning specified herein, unless the context otherwise requires:

Benchmark: The index for evaluating the performance of the Scheme.

Business Day

A day other than

- A Saturday;
- A Sunday;
- A day on which there is no RBI clearing/settlement of securities;
- A day on which the Reserve Bank of India and/or banks in Mumbai are closed for business/clearing;
- A day on which the Stock Exchange, Mumbai or National Stock Exchange of India or RBI and/or banks are closed;
- A day which is a public and/or bank holiday at an investor centre where the application is received;
- A day on which sale/redemption/switch of units is suspended by the Investment Manager / Trustee;
- A day which falls within a book closure period announced by the Trustee / Investment Manager and
- A day on which normal business cannot be transacted due to storms, floods, bandh, strikes or such other events as the Investment Manager may specify from time to time.

The Investment Manager reserves the right to declare any day as a business day or otherwise at any or all branches / Investor Service Centres.

Custodian: A person who has been granted a certificate of registration to carry on the business of custodian of securities under the Securities and Exchange Board of India (Custodian of Securities) Regulation, 1996 and includes any entity appointed to act as custodian in respect of foreign securities (including approved banks).

First Time Mutual Fund Investor: An investor who invests for the first time ever in any mutual fund either

by way of purchase/subscription or Systematic Investment Plan.

Investment Management Agreement: Investment Management Agreement dated August 24, 1996, executed between the Trustee and the Investment Manager as amended from time to time.

Investment Manager: Sundaram Asset Management Company Limited incorporated under the provisions of the Companies Act, 1956 and approved by the Securities and Exchange Board of India to act as the Investment Manager for the Schemes of Sundaram Mutual Fund. AMC is also called as Investment Manager alternatively.

Investor Service Centres or Official Points of acceptance of transactions: Designated branches of Sundaram Asset Management Limited or such other centres/offices as may be designated by the Investment Manager or its registrars from time to time.

Mutual Fund or the Fund: Sundaram Mutual Fund, a trust set up under the provisions of the Indian Trust Act, and registered with SEBI vide Registration No.MF/034/97/2.

NAV: The Net Asset Value per unit of the Scheme, calculated in the manner provided in the Scheme Information Document, as may be prescribed by SEBI Regulation from time to time.

Regulations: SEBI (Mutual Funds) Regulation 1996 as amended from time to time.

Trustee: Sundaram Trustee Company Limited, as incorporated under the Provisions of the Companies Act, 1956, and approved by SEBI to act as Trustee to the Schemes of Sundaram Mutual Fund.

Trust Deed: The Trust Deed dated 24th August 1996 (as amended from time to time) establishing the Mutual Fund.

Unit Holder: The term unit holder and investor has been used interchangeably in this document.

Abbreviation

In this document, an investor may find the following abbreviations.

AMC	Asset Management Company
AMFI	Association of Mutual Funds in India
AML	Anti-Money Laundering
AUM	Assets Under Management
BSE	Bombay Stock Exchange Limited
CCC	Customer Care Centre
CDSC	Contingent Deferred Sales Charge
ECS	Electronic Clearing System
EFT	Electronic Funds Transfer
FATCA	Foreign Account Tax Compliance Act
FPI	Foreign Portfolio Investor
FRA	Forward Rate Agreement
HUF	Hindu Undivided Family
IDCW	Income Distribution cum Capital Withdrawal
IMA	Investment Management Agreement
IRS	Interest Rate Swap
KIM	Key Information Memorandum
KYC	Know Your Customer
MFU	Mutual Fund Utility
NAV	Net Asset Value
NRI	Non-Resident Indian
NSE	National Stock Exchange of India Limited
PAN	Permanent Account Number
PIO	Person of Indian Origin
PMLA	Prevention of Money Laundering Act, 2002
POS	Points of Service
RBI	Reserve Bank of India
RTGS	Real Time Gross Settlement
SAI	Statement of Additional Information
SEBI	Securities and Exchange Board of India
SEBI Act	Securities and Exchange Board of India Act, 1992
NEFT	National Electronic Funds Transfer
SFS	Sundaram Fund Services Limited
SI	Standing Instructions
SID	Scheme Information Document
SIP	Systematic Investment Plan
STP	Systematic Transfer Plan
SWP	Systematic Withdrawal Plan
TREPS	Triparty Repo Trades

Interpretation

The words and expressions used in this document and not defined shall have the meanings respectively assigned to them therein under the SEBI Act or the SEBI Regulation.

For the purpose of this document, except as otherwise expressly provided or unless the context otherwise requires:

- the terms defined in this Scheme Information Document include the singular as well as the plural;
- pronouns having a masculine or feminine gender shall be deemed to be all inclusive;
- all references to 'dollars' or '\$' refers to the United States dollars;
- Rs refers to Indian Rupee;
- A crore means ten million or 100 lakh;
- A lakh means a hundred thousand;
- References to timings relate to Indian Standard Time (IST) and
- References to a day are to a calendar day including non-Business Day.

SOB
No.
24

Due Diligence by Sundaram Asset Management Company Limited

It is confirmed that:

- The Scheme Information Document forwarded to SEBI is in accordance with the SEBI (Mutual Funds) Regulation, 1996 and the guidelines and directives issued by SEBI from time to time.
- All legal requirements connected with the launch of the Scheme as also the guidelines, and instructions issued by the Government of India and any other competent authority in this behalf, have been duly complied.
- The disclosures made in this Scheme Information Document are true, fair and adequate to enable the investors to make a well-informed decision regarding an investment in the Scheme.
- The intermediaries named in this Scheme Information Document and the Statement of Additional Information are registered with SEBI and the registration is valid as on date.

Chennai
March 31, 2023

R Ajith Kumar
Secretary & Compliance Officer

General Risk Factors

- Mutual Funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the Scheme will be achieved.
- The main types of risks to which the Scheme is exposed are risk of capital loss, market risk, currency risk, liquidity risk, credit risk, counter party default risk, to name a few.
- As with any investment in securities, the NAV of the Units issued under the Scheme can go up or down depending on the factors and forces affecting the capital markets.
- The NAV may be affected by factors such as market conditions, level of interest rates, market-related factors, trading volumes, settlement periods, transfer procedures, price/interest rate risk, credit risk, government policy, volatility and liquidity in markets, exchange rate, geo-political development, to name a few.
- Trading volumes in the securities in which the Scheme invest may inherently restricts the liquidity of the Scheme's investments.
- Change in Government policy in general and changes in tax benefits applicable to mutual funds may impact the returns to Investors in the Scheme.
- The tax benefits available under the Scheme is as available under the present taxation laws and subject to relevant conditions. The information given is included for general purposes only and is based on advice that the Investment Manager has received regarding the law and the practice that is now in force in India.
- Unit holders should be aware that the relevant fiscal rules and their interpretation might 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 investment in the Scheme will endure indefinitely. In view of the individual nature of tax consequences, each Investor/Unit holder is advised to consult his/her own professional tax advisor.
- Investors/unit holders are also urged to read the detailed clause(s) titled 'Special considerations'.
- FATCA imposes tax withholding upto 30% on any payments (including redemption and IDCW proceeds) made by the Fund/AMC to a US Person classified as recalcitrant account holder in respect of whom the applicable documentation and reporting requirements are not met

This is only an illustrative list and not an exhaustive list factors that could affect the NAV of the Scheme. They should read the risk factors presented in this document though the list is no way exhaustive. Potential investors should rely solely on the information contained in this Scheme Information Document and are advised to consult their investment advisors before taking investment decisions.

Liquidity Risk**For Equity Asset Class, and Equity & Equity Oriented schemes:**

Sundaram Asset Management Company (SAMC) evaluates both stock level and portfolio level liquidity of the equity schemes and the concentration of investors and Distributors in the AUM of each Equity scheme. The portfolio level liquidity of each scheme is estimated every month for very short time horizons as a % of AUM assuming 20% participation in the combined daily average market volume (across all exchanges) for the last three months and the trend of excessive liquidity over the Top Investors and Top Distributors concentration is evaluated. The monthly trend of estimated portfolio liquidity of the scheme, contribution by Top Investors and Top Distributors to the scheme AUM is analysed regularly by the Investment Manager to make relevant changes in the portfolio to maintain adequate portfolio liquidity.

At each investee company's stock level, number of days to liquidate (DTL) a stock position held across by all the schemes of SAMC based on the volume assumptions as mentioned above is measured and monitored every month for increase or decrease in the liquidity levels of the stock position. Exposure to stocks with more than high levels of DTL at the fund house level is monitored every month along with scheme level exposure for such stocks. Cumulative exposure across all schemes to overall free float levels of each stock and significant changes in the free float level of each stock is

monitored on a monthly basis.

The trends of the trading volume at the stock level are monitored and significant changes in the trading volume at stock level is discussed during the monthly risk review meetings. The impact cost levels of the Stocks are monitored every month and exposure to the top stocks in terms of impact cost is closely monitored. In addition to this, the bulk / block trades are regularly monitored. The monthly trend of the Liquidity Risk Score for each scheme under the Risk-o-Meter framework is monitored.

For Debt Asset Class, Debt and Debt Oriented Schemes:

Liquidity Risk evaluation Framework for Debt and Debt Orientation Schemes of SAMC is based on the following principles –

- Regular estimation of the scheme portfolio assets by assigning liquidity grades / scores to each category of securities by factoring in the credit rating, maturity levels, sector, issuer type, structure etc.,
- Regular estimation of potential liabilities at the investor level and at the distributor level based on the concentration levels and fund category level redemption probabilities.
- Use of liquidity ratios/tools for monitoring liquidity
- System-based preparation of cash flows with adequate maker/ check controls
- Linkage with stress testing policy, stress events and early warning signals

Liquidity Risk Management (LRM) framework:

A Liquidity Risk Management (LRM) framework was introduced by AMFI during July 2021 (as per AMFI Best Practices Guidelines Circular No.93 / 2021-22) in accordance with the SEBI circular issued during Nov 2020 and Jun 2021. The fund-category wise redemption probability data provided by AMFI which is used for arriving at the Redemption-at-Risk (RaR) and Conditional Redemption-at-Risk (CRaR) requirements, covers all possible outflow (liquidity requirement) scenarios including stress scenarios. Further the factors used for arriving at the potential liquidity requirements for each category of fund is derived from industry data based on last 11-year period.

The redemption probability data for RaR & CRaR would be updated annually thereby fulfilling the criteria of both near terms as well as longer term (through the cycle) liquidity events. The LRM framework thus effectively addresses Liquidity Risk evaluation and adequate buffers for managing such requirements through the RaR and CRaR requirements on the asset side for a period of 0-30 days.

The LRM approach focuses on management of mismatch in putative liabilities (arising in short term period of up to 30 days) vis-à-vis the liquid and eligible assets of each scheme, and include the below liquidity ratios –

- Liquidity ratio based on 30-day Redemption at Risk (LR-RaR) requirements
- Liquidity ratio based on Conditional Redemption at Risk (LR-CRaR) requirements

The LRM framework also highlights additional factors contributing to the Liquidity Risk like Investor Concentration and Distributor concentration, for which additional mark-up in the Liquidity Ratio would be applied if the concentration levels are beyond certain maximum thresholds.

Back testing of the RaR and CRaR is done for each scheme every month by comparing RaR and CRaR fixed at the start of the month with the actual redemptions that have occurred during the month to evaluate the need for further mark-up in the RaR and CRaR levels. Comparison of LR-CRaR with the proportion of the fund AUM beyond the exit load period and proportion of the fund AUM beyond the long-term capital gain window (3 year holding period) is also be done to evaluate the adequacy of the LR-CRaR.

Asset-Liability Management (ALM):

With up to 30-day Liquidity Risk Management Covered under the LRM Framework, the ALM framework is intended to address a slightly longer-term asset Liability matching up to a period of 90 days.

The redemption probability data input on the liability side and the value realization assumptions on the asset side for these calculations has been provided by AMFI and is based on similar methodology used for the LRM Framework, i.e., 11 years industry level fund category wise redemption data ending October 2020. In line with the LRM framework, this data will also be revised by AMFI once a year.

The ALM framework calculates potential liquidity requirements (net AUM change) over a 90-day period with a confidence interval of 95% for the four liability buckets mentioned in the LRM circular i.e., Rs. 0-1 Cr, Rs.1 to 5 Cr, Rs. 5 to 100 Cr and more

than Rs.100 Cr. Against this data, the asset side is expected to be evaluated by applying haircuts in line with Risk-o-Meter scores in an accelerated (non – linear) manner.

The adequacy on the asset side vs the liability side is measured monthly (like under the LRM framework). Any negative gaps in this ALM framework would trigger asset realignment in the fund portfolio or any other appropriate efforts at the sales side in terms of moderating the investor concentration.

Stress Testing Framework:

Liquidity Risk is also evaluated under the Stress Testing Framework by assuming certain liquidity stress impact scenarios for various rating categories, maturity buckets and issuer types of securities.

SAMC regularly evaluates the intraday liquidity requirements and ensure that there are sufficient liquid assets, back up facilities in terms of intra-day bank limits, short term borrowing limits etc., for meeting the liquidity requirements considering seasonal / event based factors.

As a part of the Liquidity Risk evaluation framework for debt asset class/schemes, SAMC regularly evaluate the trend of the top investor and top distributor concentration and the trend of the liquidity risk score under the Risk-o-Meter Framework.

Risk of Capital Loss

The Net Asset Value (NAV) of the Scheme is exposed to market fluctuations, and its value can go up as well as down. Investors may lose their entire principal.

Risk Factors - Debt Markets

- **Interest Rate Risk:** Changes in the prevailing rates of interest may affect the value of the Scheme's holdings and consequently the value of the Scheme's Units. Increased rates of interest, which frequently accompany inflation and /or a growing economy, may have a negative effect on the value of the Units. The value of debt securities held by the Scheme generally will vary inversely with the changes in prevailing interest rates.
- While it is the intent of the fund manager to invest primarily in high rated debt securities, the Scheme may from time to time invest in higher yielding, low rated securities. As a result, an investment in the Scheme may be accompanied by a higher degree of risk relative to an investment consisting exclusively of high rated, lower yielding securities.
- **Credit Risk:** Credit Risk refers to the risk of failure of interest (coupon) payment and /or principal repayment. All debt instruments carry this risk. Government securities carry sovereign credit risk. The assets of the Scheme will be partly or entirely invested in fixed income securities issued by a corporate entity, bank, financial institution and/or a public sector undertaking owned by the Government of India or by a government in any state. The credit risk associated with the aforementioned issuers of debt is higher than that of government securities.
- **Price Risk:** As long as the Scheme will be invested, its Net Asset Value (NAV) is exposed to market fluctuations, and its value can go up as well as down. The portfolio of fixed-income securities that the Scheme invest in would be exposed to price changes on a day-to-day basis.
- These price changes may occur due to instrument-specific factors as well as general macroeconomic conditions. In general, price of fixed-income securities go up when interest rates fall, and vice versa.
- **Market Risk:** The Scheme may also be subject to price volatility due to such factors as interest sensitivity, market perception or the creditworthiness of the issuer and general market liquidity .
- **Liquidity Risk:** A lower level of liquidity affecting an individual security (ies) or an entire market may have an adverse bearing on the value of the Scheme's assets. This may more importantly affect its ability to sell particular securities with minimal impact cost as and when necessary to meet requirement of liquidity or to sell stocks in response to triggers such as a specific economic/corporate event. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of a few of the investments.

- **Risk relating to investment pattern:** Different types of securities in which the Scheme would invest as given in the Scheme Information Document carry different levels and types of risk. Accordingly the Scheme's risk may increase or decrease depending upon its investment pattern. e.g. corporate debt carry credit risk unlike Government securities. Further even among corporate debt, AAA rated debt is comparatively less risky (in credit risk terms) than those rated lower (say AA or A).
- **Risks relating to duration:** Fixed Income securities of any issuer that has higher duration could be more risky in terms of price movements relative to those with lower duration. Thus any impact of interest rate changes would be higher on securities with higher duration irrespective of the status of the issuer of the security.
- **Non-diversification Risk:** The Scheme may pursue only a limited degree of diversification. It may invest a greater proportion of assets in the securities of one issuer (within the limit permitted by regulation) as compared to a diversified fund. This could have implications for the performance of the Scheme. The Scheme may be more sensitive to economic, business, political or other changes and this may lead to sizeable fluctuation in the Net Asset Value of the Scheme.
- **Limited Liquidity & Price Risk:** Presently, secondary market for fixed income papers is not very liquid. There is no assurance that a deep secondary market will develop for such securities. This could limit the ability of the investor to resell them. Even if a secondary market develops and sales were to take place, these secondary transactions may be at a discount to the initial issue price due to changes in the interest rate structure.

Risk Factors - Equity Markets

Stock Market Volatility: Stock markets are volatile and can decline significantly in response to adverse issuer, political, regulatory, market, or economic developments. Different parts of the market can react differently to these developments. The stock-specific volatility may also change over a period of time as the characteristic of the stock undergoes a change in terms of market-cap category.

Equity Price Risk: Stock prices may rise or decline based on a number of factors. These could be a combination of company-specific and system-specific factors. Their impact on different types of stocks may vary. Prices change due to events that impact entire financial markets or industries (for example, changes in inflation, consumer demand, supply situation and GDP growth). Company-specific factors may include the likes of success or failure of a new product, mergers, takeovers, earnings announcement and changes in management, to name a few. Securities owned by the Scheme may offer opportunities for growth because of high potential earnings growth; they may also involve greater risks than securities that do not have the same potential.

Dependency Risk: The Scheme may invest in stocks and mutual funds. Equity confers a proportionate share of the ownership of a company. Its value will depend on the success of the company's business, income paid to stockholders by way of IDCW, the value of the company's assets, quality of its corporate governance practice, its attractiveness relative to peers and general market conditions. The fund may also invest in convertible securities and warrants. Convertible securities generally are fixed-income securities or preference shares that may be converted into common stock after a prescribed period.

Temporary Investment Risk: If the fund manager is of the view that market or economic conditions may become unfavourable for investors in equities, he may invest a higher proportion of the fund's assets in high quality short-term and medium-term fixed income instruments as well as near-cash equivalents. This may be a defensive and temporary strategy. The fund manager may also adopt such a strategy while zeroing in on appropriate investment opportunities or to maintain liquidity. At times, such investments may lead to lower returns. In these circumstances, the Scheme may be unable to achieve its investment goal. Such temporary investment shall not exceed for period more than 30 days

Non-diversification Risk: The Scheme may pursue only a limited

degree of diversification. It may invest a greater proportion of assets in the securities of one issuer (within the limit permitted by regulation) as compared to a diversified fund. This could have implications for the performance of the Scheme. The Scheme may be more sensitive to economic, business, political or other changes and this may lead to sizeable fluctuation in the Net Asset Value of the Scheme.

Regulation-Change Risk: If the Government of India, RBI and/or SEBI decide to alter the regulatory framework for investment in overseas financial assets by mutual funds, it may have an impact on the Scheme's ability to adhere to the investment objective. If and when such an eventuality materialises, the Trustee reserves the right to alter the investment objective of the Scheme or wind up the Scheme. In such cases of fundamental attribute change, the procedure in accordance with SEBI Regulations as highlighted in this document under the heading "F. Fundamental Attributes" will be adhered to.

Detailed Scheme-Specific Risks

*Risks associated with the Scheme's Arbitrage Strategy

- a) The Scheme proposes to invest in equity and equity related instruments by identifying and exploiting price discrepancies in cash and derivative segments of the market. These investments by nature are volatile as the prices of the underlying securities are affected by various factors such as liquidity, time to settlement date, news flow, spreads between cash and derivatives market at different points of time, trading volumes, etc.
- b) There is no guarantee that the Fund Manager will be able to spot investment opportunities or correctly exploit price discrepancies in the different segments of the market.
- c) The risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.
- d) The Scheme is also expected to have a high portfolio churn, especially in a volatile market.
- e) There is an execution risk while implementing arbitrage strategies across various segments of the market, which may result in missed investment opportunities, or may also result in losses/high transaction costs.
- f) In case of a large outflow from the Scheme, the Scheme may need to reverse the spot-futures transaction before the settlement of the futures trade. While reversing the spot-futures transaction on the Futures and Options exchange, there could be a risk of price of the market being different from the price at which the actual reversal is processed.
- g) While future market are typically more liquid than underlying cash market, there can be no assurance that ready liquidity would exist at all point in time for the Scheme to purchase and close out a specific futures contract.
- h) In case of arbitrage, if futures are allowed to expire without corresponding buy/sell in cash market, there is a risk that price at which futures expires, may/may not match with the actual cost at which it is bought/sold in the cash market in last half an hour of the expiry day (Weighted average price for buy or sell).
- * Investment in Equities and Equity related instruments involve risks such as Stock Market Volatility, Equity Price Risk, Dependency Risk, Temporary Investment Risk, Non-diversification Risk, Regulation-Change Risk and etc.
- * Investments in Debt Securities and Money Market Instruments involve risks such as Interest Rate Risk, Credit Risk, Price Risk, Market Risk, Liquidity Risk, Risk relating to investment pattern, Risks relating to duration, Non-diversification Risk, Limited Liquidity, Price Risk and etc.
- i) Engaging in securities lending will involve risks such as counterparty risk, liquidity risk and other market risk.
- j) Investment in REITs/InvITs instruments involve risks such as Interest-Rate Risk, Risk of lower than expected distributions,

Liquidity Risk, Price-Risk and etc.

- k) Investment in Repo in Corporate Bond involve risks such as counterparty risk, Market Risk, Credit Risk and etc.

Any change in policy by the Government/RBI/Regulator can have an adverse impact on the Scheme.

Risk Factors - Repo in Corporate Bond

Participation of scheme of Sundaram Mutual Fund in repo of corporate debt securities. Presently, the Scheme invests in repo on Government Securities, Treasury Bills and other money market instruments. It is also proposed to invest in the repo of corporate debt securities.

In accordance with SEBI circular no. CIR / IMD / DF / 19 / 2011 dated November 11, 2011 and CIR/IMD/DF/23/2012 dated November 15, 2012; scheme of Sundaram Mutual Fund (SMF) shall participate in the corporate bond repo transactions w.e.f. June 21, 2013 as per the guidelines issued by Reserve Bank of India (RBI) from time to time.

Currently the applicable guidelines are as under:

- The gross exposure of the scheme to repo transactions in corporate debt securities shall not be more than 10% of the net assets of the concerned scheme.
- The cumulative gross exposure through repo transactions in corporate debt securities along with equity, debt and derivatives shall not exceed 100% of the net assets of the concerned scheme.
- Mutual Funds shall participate in repo transactions only in AA and above rated corporate debt securities.
- In terms of Regulation 44 (2) mutual funds shall borrow through repo transactions only if the tenor of the transaction does not exceed a period of six months.

The investment restrictions applicable to the Scheme's participation in the corporate bond repos will also be as prescribed or varied by SEBI or by the Board of Sundaram Trustee Company Limited (subject to SEBI requirements) from time to time.

The following guidelines shall be followed by Sundaram Mutual Fund for participating in repo in corporate debt securities, which have been approved by the Board of AMC and Trustee Company.

- (i) Category of counterparty to be considered for making investment:
All entities eligible for transacting in corporate bond repos as defined by SEBI and RBI shall be considered for repo transactions.
- (ii) Credit rating of counterparty to be considered for making investment
The schemes shall participate in corporate bond repo transactions with counterparties having a minimum investment grade rating and is approved by the Investment Committee/Credit Committee on a case-to-case basis. In case there is no rating available, the Investment Committee/Credit Committee will decide the rating of the counterparty, and report the same to the Board from time to time.
- (iii) Tenor of Repo and collateral as a repo seller, the scheme will borrow cash for a period not exceeding 6 months or as per extant regulations.
As a repo buyer, the Scheme is allowed to undertake the transactions for maximum maturity upto one year or such other terms as may be approved by the Investment Committee.
There shall be no restriction / limitation on the tenor of collateral.
- (iv) Applicable haircuts As per RBI circular RBI/2012-13/365 IDMD.PCD. 09/14.03.02/2012-13 dated 07/01/2013, all corporate bond repo transaction will be subject to a minimum haircut given as given below:
 - (1) AAA : 07.50%
 - (2) AA+ : 08.50%
 - (3) AA : 10.00%

The haircut will be applicable on the prevailing market value of the said security on the prevailing on the date of trade.

However, the fund manager may ask for a higher haircut (while lending)

or give a higher haircut (while borrowing) depending on the market prevailing liquidity situation.

Risk envisaged and mitigation measures for repo transactions:

Credit risks could arise if the counterparty does not return the security as contracted on due date. This risk is largely mitigated, as the choice of counterparties is largely restricted and their credit rating is taken into account before entering into such transactions. Also operational risks are lower as such trades are settled on a DVP basis.

In the event of the scheme being unable to pay back the money to the counterparty as contracted, the counter party may dispose of the assets (as they have sufficient margin) and the net proceeds may be refunded to us. Thus the scheme may suffer losses. This risk is normally mitigated.

In addition to the above, the Investment Committee/Credit Committee of the AMC shall prescribe limits, restrictions and conditions for the enhancement proposed. The Investment Committee / Credit Committee will also periodically review the limits, restrictions and conditions at its meeting.

Risk Factor - Securitised debt

The Scheme proposes to invest in asset based and mortgage based securities not exceeding 25% of the net assets of the Scheme.

Depending upon the Investment Manager's views, the Scheme may invest in domestic debt such as ABS or MBS. The investments in domestic securitized debt will be made only after giving due consideration to factors such as but not limited to the securitization structure, quality of underlying receivables, credentials of the servicing agent, level of credit enhancement, liquidity factor, returns provided by the securitized paper vis-a-vis other comparable investment alternatives.

Although the returns provided by securitized debt could be higher, one must not lose sight of the fact that risks also exist with regard to investments in securitized debt. Investments in pass-through certificates of a securitization transaction represent an undivided beneficial interest in the underlying receivables and do not represent an obligation of either the issuer or the seller, or the parent of the seller, or any affiliate of the seller or the issuer or the trustee in its personal capacity, save to the extent of credit enhancement to be provided by the credit enhancer. The trust's principal asset will be the pool of underlying receivables. The ability of the trust to meet its obligations will be dependent on the receipt and transfer to the designated account of collections made by the servicing agent from the pool, the amount available in the cash collateral account, and any other amounts received by the trust pursuant to the terms of the transaction documents. However, the credit enhancement stipulated in a securitization transaction represents a limited loss cover only. Delinquencies and credit losses may cause depletion of the amount available under the cash collateral account and thereby the scheduled payouts to the investors may get affected if the amount available in the cash collateral account is not enough to cover the shortfall.

Further Unit holders are requested to refer below the disclosure relating to investments in securitized debt, in the SEBI prescribed format:

(i) How the risk profile of securitized debt fits into the risk appetite of the Scheme:

The Scheme seeks to generate an attractive return, consistent with prudent risk, from a portfolio which is substantially constituted of quality debt securities. In line with the investment objective, securitised debt instruments having a high credit quality commensurate with other debt instruments in the portfolio will be considered for investment.

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

The parameters used to evaluate originators are

- Track record
- Willingness to pay, through credit enhancement facilities etc.
- Ability to pay
- Business risk assessment,

wherein following factors are considered: -

Outlook for the economy (domestic and global)

Outlook for the industry - Company specific factors.

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

Critical Evaluation Parameters (for pool loan) regarding the originator / underlying issuer:

Default track record/ frequent alteration of redemption conditions / covenants

- High leverage ratios of the ultimate borrower - both on a standalone basis as well on a consolidated level/ group level
- Higher proportion of re-schedulement of underlying assets of the pool or loan, as the case may be
- Higher proportion of overdue assets of the pool or the underlying loan, as the case may be
- Poor reputation in market
- Insufficient track record of servicing of the pool or the loan, as the case may be.

(iii) Risk mitigation strategies for investments with each kind of originator

Analysis of originator: An independent Credit Risk Team analyses and evaluates each originator and sets up limits specifying both the maximum quantum and maximum tenor for investments and investments are considered only within these limits.

Originator analysis typically encompasses:

- Size and reach of the originator
- Collection process, infrastructure and follow-up mechanism
- Quality of MIS
- Credit enhancement for different type of originator

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

Eligible assets: Only assets with an established track record of low delinquencies and high credit quality over several business cycles will be considered for investment.

Analysis of pool: Characteristics such as average pool maturity (in months), average loan to value ratio, average seasoning of the pool, maximum single exposure, geographical distribution and average single exposure are studied to determine pool quality.

Risk mitigating measures: Credit enhancement facilities (including cash, guarantees, excess interest spread, subordinate tranches), liquidity facilities and payment structure are studied in relation to historical collection and default behaviour of the asset class to ensure adequacy of credit enhancement in a stress scenario.

(v) Minimum retention period of the debt by originator prior to securitization

We will follow the guidelines on minimum holding period requirements as laid down by SEBI and RBI from time to time.

(vi) Minimum retention percentage by originator of debts to be securitized

We will follow the guidelines on minimum holding period requirements as laid down by SEBI and RBI from time to time.

(vii) The mechanism to tackle conflict of interest when the Mutual Fund invests in securitized debt of an originator and the originator in turn makes investments in that particular Scheme of the Fund

The AMC has an independent Credit Risk team which is distinct from the Sales function and the Investments function and has a

separate reporting and appraisal structure designed to avoid conflict of interest. Investments can be initiated by the fund managers only after the Credit Risk team has assigned limits for the originator. The originator wise limits specify both the maximum quantum and maximum tenor for investments.

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

The AMC has a rigorous risk management process for all fixed income investments, which also encompasses securitized debt. A dedicated Credit Risk team is responsible for monitoring risks including credit and liquidity risk. The functions of the Credit Risk team include:

- Detailed credit analysis of issuers: based on the management evaluation, operating strength and financial strength to determine suitability for investment. Periodic reviews on a quarterly/annual basis are under taken for eligible issuers. Ratings are monitored on a daily basis and any changes are immediately recorded and suitable action taken.
- Credit Risk team monitors adherence to single and group level exposure norms, minimum rating requirements, liquidity requirements, and ensures that only eligible securities are included in the fund, in line with the Scheme information document/internal templates.

For securitized pool loan exposures, the analysis includes pool seasoning, pool asset quality, diversification, collateral margin, originator analysis and credit enhancement mechanisms. Pool performance statistics published by rating agencies are analysed for performance of other securitised pools of the same originator as well as for the performance of the asset class as a whole. Regular interactions with the rating agencies are done to discuss performance trends. Documents are vetted by the legal and compliance team. In addition, monthly payout reports from the trustees are analysed for collection performance and adequacy of cash collateral.

Framework that is applied while evaluating investment decision relating to a pool securitization transaction: **Refer Annexure A**

The Scheme will not be investing in foreign securitised debt.

Some of the risk factors typically analyzed for any securitization transaction are as follows:

- **Risks associated with investments in Securitised Assets**
A securitization transaction involves sale of receivables by the originator (a bank, non-banking finance company, housing finance company, or a manufacturing/service company) to a Special Purpose Vehicle (SPV), typically set up in the form of a trust. Investors are issued rated Pass Through Certificates (PTCs), the proceeds of which are paid as consideration to the originator. In this manner, the originator, by selling his loan receivables to an SPV, receives consideration from investors much before the maturity of the underlying loans. Investors are paid from the collections of the underlying loans from borrowers. Typically, the transaction is provided with a limited amount of credit enhancement (as stipulated by the rating agency for a target (rating), which provides protection to investors against defaults by the underlying borrowers.
- **Some of the risk factors typically analyzed for any securitization transaction are as follows:**
- **Risks associated with asset class:** Underlying assets in securitised debt may assume different forms and the general types of receivables include commercial vehicles, auto finance, credit cards, home loans or any such receipts. Credit risks relating to these types of receivables depend upon various factors including macro economic factors of these industries and economies. Specific factors like nature and adequacy of collateral securing these receivables, adequacy of documentation in case of auto finance and home loans and intentions and credit profile of the

borrower influence the risks relating to the asset borrowings underlying the securitised debt.

- **Risks associated with pool characteristics:**
- (a) **Size of the loan:** This generally indicates the kind of assets financed with loans. While a pool of loan assets comprising of smaller individual loans provides diversification, if there is excessive reliance on very small ticket size, it may result in difficult and costly recoveries.
- (b) **Loan to Value Ratio:** This indicates how much percentage value of the asset is financed by borrower's own equity. The lower LTV, the better it is. This ratio stems from the principle that where the borrowers own contribution of the asset cost is high, the chances of default are lower. To illustrate for a Truck costing Rs. 20 lakh, if the borrower has himself contributed Rs.10 lakh and has taken only Rs. 10 lakh as a loan, he is going to have lesser propensity to default as he would lose an asset worth Rs. 20 lakh if he defaults in repaying an installment. This is as against a borrower who may meet only Rs. 2 lakh out of his own equity for a truck costing Rs. 20 lakh. Between the two scenarios given above, the later would have higher risk of default than the former.
- (c) **Original maturity of loans and average seasoning of the pool:** Original maturity indicates the original repayment period and whether the loan tenors are in line with industry averages and borrower's repayment capacity. Average seasoning indicates whether borrowers have already displayed repayment discipline. To illustrate, in the case of a personal loans, if a pool of assets consist of those who have already repaid 80% of the instalments without default, this certainly is a superior asset pool than one where only 10% of instalments have been paid. In the former case, the portfolio has already demonstrated that the repayment discipline is far higher.
- (d) **Default rate distribution:** This indicates how much % of the pool and overall portfolio of the originator is current, how much is in 0-30 DPD (days past due), 30-60 DPD, 60-90 DPD and so on. The rationale here is very obvious, as against 0-30 DPD, the 60-90 DPD is certainly a higher risk category.
- **Credit Rating and Adequacy of Credit Enhancement:** Unlike in plain vanilla instruments, in securitisation transactions, it is possible to work towards a target credit rating, which could be much higher than the originator's own credit rating. This is possible through a mechanism called "Credit enhancement". The process of "Credit enhancement" is fulfilled by filtering the underlying asset classes and applying selection criteria, which further diminishes the risks inherent for a particular asset class. The purpose of credit enhancement is to ensure timely payment to the investors, if the actual collection from the pool of receivables for a given period is short of the contractual payout on securitisation. Securitisation is normally non-recourse instruments and therefore, the repayment on securitisation would have to come from the underlying assets and the credit enhancement. Therefore the rating criteria centrally focus on the quality of the underlying assets.
- The Scheme will predominantly invest in those securitisation issuances which have AA and above rating indicating high level of safety from credit risk point of view at the time of making an investment. However, there is no assurance by the rating agency either that the rating will remain at the same level for any given period of time or that the rating will not be lowered or withdrawn entirely by the rating agency.
- **Limited Liquidity & Price Risk:** Presently, the secondary market for securitised papers is not very liquid. There is no assurance that a deep secondary market will develop for such securities. This could limit the ability of the investor to resell them. Even if a secondary market develops and sales were to take place, these secondary transactions may be at a discount to the initial issue price due to changes in the interest rate structure.

Annexure A

Characteristics / Type of Pool Mortgage Loan Commercial Vehicle and Construction Equipment CAR 2 wheelers Others	Mortgage Loan	Commercial Vehicle and Construction Equipment	CAR	2 wheelers	Others
Approximate Average maturity (in Months)	In line with average maturity of mortgage loans as per industry norms. Typically less than 10 years.	In line with average maturity of Commercial Vehicle and Construction Equipment loans as per industry norms. Typically less than 4 years.	In line with average maturity of car loans as per industry norms. Typically less than 4 years.	In line with average maturity of two wheeler loans as per industry norms. Typically less than 4 years.	In line with average maturity of the asset class as per industry norms.
Collateral margin (including cash, guarantees, excess interest spread, subordinate tranche)	The collateral margin will be adequate for the pool to achieve a rating in the high safety category at the time of initial rating. The collateral margin will ensure at least a 3 times cover over historical losses observed in the asset class.	The collateral margin will be adequate for the pool to achieve a rating in the high safety category at the time of initial rating. The collateral margin will ensure at least a 3 times cover over historical losses observed in the asset class.	The collateral margin will be adequate for the pool to achieve a rating in the high safety category at the time of initial rating. The collateral margin will ensure at least a 3 times cover over historical losses observed in the asset class.	The collateral margin will be adequate for the pool to achieve a rating in the high safety category at the time of initial rating. The collateral margin will ensure at least a 3 times cover over historical losses observed in the asset class.	The collateral margin will be adequate for the pool to achieve a rating in the high safety category at the time of initial rating. The collateral margin will ensure at least a 3 times cover over historical losses observed in the asset class.
Average Loan to Value Ratio	In line with average Loan to Value ratio of mortgage loans as per industry norms. Typically less than 80 per cent.	In line with average Loan to Value ratio of Commercial Vehicle and Construction Equipment loans as per industry norms. Typically less than 85 per cent.	In line with average Loan to Value ratio of car loans as per industry norms. Typically less than 85 per cent.	In line with average Loan to Value ratio of two-wheeler loans as per industry norms. Typically less than 85 per cent.	In line with average Loan to Value ratio of the asset class loans as per industry norms.
Average seasoning of the Pool	In line with industry norms and guidelines laid down by RBI/SEBI from time to time. Typically, more than 3 months	In line with industry norms and guidelines laid down by RBI/SEBI from time to time. Typically, more than 3 months	In line with industry norms and guidelines laid down by RBI/SEBI from time to time. Typically, more than 3 months	In line with industry norms and guidelines laid down by RBI/SEBI from time to time. Typically, more than 3 months	In line with industry norms and guidelines laid down by RBI/SEBI from time to time.
Maximum single exposure range	Not more than 10%	Not more than 10%	Not more than 10%	Not more than 10%	Not more than 10%
Average single exposure range %	Not more than 10%	Not more than 10%	Not more than 10%	Not more than 10%	Not more than 10%

* Kindly note that all references to single loan securitization has been removed as securitization of single corporate loans are no longer envisaged under revised RBI guidelines on securitization

- **Limited Recourse to Originator & Delinquency:** Securitised transactions are normally backed by pool of receivables and credit enhancement as stipulated by the rating agency, which differ from issue to issue. The credit enhancement stipulated represents a limited loss cover to the investors. These Certificates represent an undivided beneficial interest in the underlying receivables and there is no obligation of either the Issuer or the seller or the originator, or the parent or any affiliate of the seller, issuer and originator. No financial recourse is available to the Certificate Holders against the Investors Representative. Delinquencies and credit losses may cause depletion of the amount available under the credit enhancement and thereby the investor pay outs may get affected if the amount available in the credit enhancement facility is not enough to cover the shortfall. On persistent default of an obligor to repay his obligation, the servicer may repossess and sell the underlying Asset. However many factors may affect, delay or prevent the repossession of such asset or the length of time required to realize the sale proceeds on such sales. In addition, the price at which such asset may be sold may be lower than the amount due from that Obligor.
- **Risks due to possible prepayments:** Weighted Tenor / Yield: Asset securitisation is a process whereby commercial or consumer credits are packaged and sold in the form of financial instruments. Full prepayment of underlying loan contract may arise under any of the following circumstances:
 - a. Obligor pays the receivable due from him at any time prior to the scheduled maturity date of that receivable; or
 - b. Receivable is required to be repurchased by the seller consequent to its inability to rectify a material misrepresentation with respect to that Receivable; or
 - c. The servicer recognizing a contract as a defaulted contract and hence repossessing the underlying asset and selling the same.
 - d. In the event of prepayments, investors may be exposed to changes in tenor and yield.
- **Bankruptcy of the Originator or Seller:** If originator becomes subject to bankruptcy proceedings and the court in the bankruptcy proceedings concludes that the sale from originator to trust was not a sale then an Investor could experience losses or delays in the payments due. All possible care is generally taken in structuring the transaction so as to minimize the risk of the sale to Trust not being construed as a 'True Sale'. Legal opinion is normally obtained to the effect that the assignment of Receivables to Trust in trust for and for the benefit of the Investors, as envisaged herein, would constitute a true sale.
- **Risk of co-mingling:** The AMC may deposit subscriptions into a General Collection account from where it will be transferred into the specific Scheme account later. In the interim, there is a risk of co-mingling of funds.
- **Risks relating to tax incidence on securitization Special Purpose Vehicles:** In October 2011, the income tax authorities issued a claim on certain securitisation SPVs, stating that the gross income of such SPVs was liable to tax. The Finance Act, 2013, has sought to clarify the tax position by stating that securitisation SPVs are not liable to pay income tax. However, any tax incidence on gross income of SPVs could result in dilution of pay-outs to investors.

Risk Factors for Special Bonds

The risk factors are:

Risk of non-payment of Interest / Coupon:

The issuing bank of Perpetual Tier 1 Bonds and Upper Tier II Bonds under BASEL II framework shall not be liable to pay interest if its capital adequacy is below the minimum regulatory requirement or if interest payment will result in bank's CRAR to go below minimum regulatory requirement which is a minimum of 9% capital to risk-weighted asset ratio (CRAR). Also, the issuing bank of Perpetual Tier 1 Bonds and Upper Tier II Bonds under

BASEL II framework must obtain prior approval of the RBI for paying interest when the impact of such payment may result in net loss or increase in net loss, provided the CRAR remains above the regulatory norm.

The issuing bank of Additional Tier 1 (AT1) Bonds under BASEL III framework always has the full discretion to cancel interest payments without any condition. Cancellation of discretionary payments would not be considered event of default. In case if the Common Equity Tier 1 Capital Ratio for the issuing bank falls below 8% the bank must mandatorily cancel interest payment.

The interest payouts of Tier 1 Bonds under BASEL II and BASEL III framework and the Upper Tier II Bonds under BASEL II framework are non-cumulative in nature and hence cancellation of the payment for one period will never be compensated and hence it would be a permanent loss of interest/coupon.

- b) Risk of Principal Loss Absorption either via a Temporary or Permanent write-down or conversion into equity:

As per the RBI guidelines, the AT1 Bonds issued under the BASEL III framework, at the option of RBI, will have to be either temporarily written down or converted into Common Equity upon the occurrence of the trigger event of Common Equity Tier-1 (CET-1) ratio of the bank falling below the minimum threshold of 6.125% of Risk Weighted Assets (RWAs).

However, the AT Bonds and Tier II bonds issued under BASEL III framework must be permanently written off or converted to equity, at the occurrence of point of non-viability (PONV), which is the earlier of: Decision by the RBI for conversion to equity /permanent write-off, without which the firm would become non-viable.

Decision by relevant authority to make a public sector injection of capital, or equivalent support, without which the firm would become non-viable.

- c) Risk of instrument not being called by the Issuer Banks:

The Tier 1 and Tier II bonds issued under BASEL II and BASEL III framework will mostly have an embedded call option providing the issuing banks an option to call back the instrument, subject to meeting the RBI guidelines, normally after a period of 5 years from the date of issuance and typically annually thereafter hence providing early liquidity to the holders of the bond. However, the issuing bank may not exercise the call option on first call date if it is facing a liquidity issue or if the interest rate scenario is not favourable or if it is not meeting any condition stipulated by the RBI. In such scenario where the Tier 1 or Tier 2 bonds which are held by the Scheme are not called the scheme may have to unexpectedly hold the instruments for an extended period and such scenarios may also cause the yields of these bonds go up leading to fall in prices and the liquidity of the bonds becoming low.

- d) Gaps in Yield and Duration assumptions for Tier 1 and Tier 2 Instruments:

The calculation of the Yields and the Duration of Tier 1 and Tier 2 bonds in the schemes are based on the SEBI guidelines which requires the scheme to calculate the yield on a Yield to Maturity Basis and requires to ignore the call dates and calculate the duration assuming a maturity date. However, the Tier 1 and Tier 2 bonds trade in the secondary market on a Yield to Call basis with the assumption that the Tier 1 and Tier 2 bonds will be called on the call dates as the secondary market participants include other entities such as Banks, Insurance Companies, Non-Banking Financial Companies, Corporate Treasuries, etc., which are not directly regulated by SEBI. Hence, in line with the SEBI guidelines, the Yield and Duration assumption for Tier 1 and Tier 2 bonds in our scheme portfolios are generally higher compared to the market convention.

- e) Liquidity Risk – These instruments may have low liquidity and the Fund Manager may not be able to exit it when required and may be forced to sell it at a steep discount / loss.
- f) Volatility Risk – given the nature of these instruments they are susceptible to higher volatility which may affect the Scheme's

SOB
No.
5

performance

- g) Price risk – Like all other securities these are also exposed to price risk due to a variety of general and specific factors. Severe price drop is possible leading to losses on the portfolio.
- h) Regulatory Risk – These instruments are subject to both global and domestic regulatory risk. Any adverse regulatory change can impact the value of these bonds adversely leading to severe losses in the portfolio.

Risk Factors - Derivatives

Derivatives are highly leveraged instruments. Even a small price movement in the underlying instrument could have a large impact on their value. Also, the market for derivative instruments is nascent in India. The Scheme may use techniques such as interest rate swaps, options on interest rates, futures, warrants, forward rate agreement and other derivative instruments that are / may be permitted under SEBI/RBI Regulation. These techniques and instruments, if imperfectly used, have the risk of the Scheme incurring losses due to mismatches, particularly in a volatile market. The Scheme ability to use these techniques may be limited by market conditions, regulatory limits and tax considerations (if any).

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

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

The Scheme may also use various derivative and hedging products from time to time, as would be available and permitted by SEBI/RBI, in an attempt to protect the value of the portfolio.

As and when the Scheme trades in the derivatives market there are risk factors and issues concerning the use of derivatives that investors should understand.

Derivative products are specialised instruments that require investment techniques and risk analysis. The use of a derivative requires an understanding not only of the underlying instrument but also of the derivative itself. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price or interest rate movements correctly.

- Counter Party Risk: This is the risk of default of obligations by the counter party.
- Market risk: Derivatives carry the risk of adverse changes in the market price.
- Illiquidity risk: The risk that a derivative cannot be sold or purchased quickly enough at a fair price, due to lack of liquidity in the market.
- Basis Risk: the risk that the movements in swap rates does not actually reflect the expected movement in benchmark rates, thus, creating a mismatch with what was intended.

Risk Factors - Securities Lending

Securities Lending means the lending of securities to another person or entity for a fixed period of time, at a negotiated compensation in order to enhance returns of the portfolio. The borrower will return the securities lent on the expiry of the stipulated period or the lender can call the same back i.e. the scheme before its expiry. The fund may lend the securities for a specific period, to generate better returns on those stocks, which are otherwise bought with the intention to hold for a long period of time. Subject to the SEBI (MF) Regulations and in accordance with Securities Lending Scheme, 1997, SEBI Circular No MFD/CIR/01/ 047/99 dated February 10, 1999, SEBI Circular no. SEBI /IMD / CIR No 14 / 187175/ 2009 dated December 15, 2009 and framework for short selling and borrowing and lending of securities notified by SEBI vide circular No MRD/DoP/SE/ Dep/Cir-14/2007 dated December 20, 2007, as may be amended from time to time, the

Scheme seeks to engage in Securities Lending.

The AMC shall adhere to the following limits should it engage in Securities Lending.

1. The exposure of the Scheme at the time of lending will be restricted to 20% of its total assets and 5% for a single counter party.
2. The exposure to a single approved intermediary will not exceed 10% of the Total Assets of the Scheme or Rs.5 crore whichever is higher.

Risk associated with Securities Lending: Risks associated with Securities Lending may include counter party risk, liquidity risk and other market risks.

The Fund may not be able to get back the securities lent thereby incurring losses. However this is mitigated as the counter party would be of high credit quality and typically a clearing house or national stock exchange.

Risk factors associated with potential change in tax structure

An equity oriented fund has been defined under the Income Tax Act as a scheme of a mutual fund where the investible funds are invested in equity shares of domestic companies to the extent of more than 65 per cent of the total assets of such scheme. The percentage of equity shareholding of the scheme shall be computed with reference to the annual average of the monthly averages of the opening and closing figures.

As per the asset allocation, under normal circumstances, the Scheme shall invest minimum 65% of its total assets in Equity and Equity Related instruments. However, under defensive circumstances, where the debt / money market instruments offer better returns than the arbitrage opportunities available in cash and derivatives segments of equity markets, then the investment manager may choose to have a lower equity exposure for a prolonged period. In such a case, the fund may be regarded as a debt oriented fund as per extant Income Tax laws and consequently may not enjoy the favourable tax provisions available for equity oriented mutual funds in that particular financial year. In such situation, a Unitholder who has redeemed the units during that financial year may end up paying capital gain tax as applicable to a debt fund and consequently would also not be able to derive any benefit of STT paid at the time of redemption.

Risk Factors - REITs/InvITs

- **Interest-Rate Risk:** REITs/InvITs carry interest-rate risk, as investors may compare the yield on the REITs/InvIT to prevailing interest rates and the price of the REIT/InvIT may move in line with changing interest rates. Though it should be remembered that REIT/INVIT are not debt instruments and their price/value depends to a large extent on the underlying assets. Generally, when interest rates rise, prices of existing securities fall and when interest rates drop, such prices increase.
- **Risk of lower than expected distributions:** The distributions by the REITs/InvITs will be based on the net cash flows available for distribution. The amount of cash available for distribution principally depends upon the amount of cash that the REITs/InvITs receives as dividends or the interest and principal payments from portfolio assets. The cash flows generated by portfolio assets from operations may fluctuate based on, among other things
 - success and economic viability of tenants and off-takers
 - economic cycles and risks inherent in the business which may negatively impact valuations, returns and profitability of portfolio assets
 - debt service requirements and other liabilities of the portfolio assets and fluctuations in the working capital needs
 - ability of portfolio assets to borrow funds and access capital markets
 - amount and timing of capital expenditures on portfolio assets
- **Liquidity Risk:** This refers to the ease with which REITs/InvITs units can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence there would be time when trading in the units could be infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities for which a liquid market exists.
- **Price-Risk:** The valuation of the REITs/InvITs units may fluctuate

based on economic conditions, fluctuations in markets (eg. real estate) in which the REITs/InvITs operates. As an indirect shareholder of portfolio assets, unit holders rights are subordinated to the rights of creditors, debt holders and other parties specified under Indian law in the event of insolvency or liquidation of any of the portfolio assets.

The above are some of the common risks associated with investments in REITs/InvITs. There can be no assurance that a Scheme's investment objectives will be achieved, or that there will be no loss of capital. Investment results may vary substantially on a monthly, quarterly or annual basis.

Standard Risk Factors:

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

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

Tri-party Repo i.e. TREPS facilitates, borrowing and lending of funds, in Triparty Repo arrangement. CCIL would be the Central Counterparty to all trades from Tri Party Repo Dealing System (TREPS) and would also perform the role and responsibilities of Triparty Repo Agent, in terms of Repurchase Transactions (Repo) (Reserve Bank) Directions, 2018 as amended from time to time. The mutual fund is a member of securities segment and Tri-party Repo trade settlement of the Clearing Corporation of India (CCIL). All TREPS trades are settled anonymously and centrally through the infrastructure and settlement systems provided by CCIL. Further the settlement is guaranteed by CCIL. This is a collateralized investment whereby borrowers have to give adequate amount of securities on which a haircut is applied by CCIL. CCIL periodically prescribes a list of securities eligible for contributions as collateral by members. Presently, all Central Government securities and Treasury bills are accepted as collateral by CCIL. The risk factors may undergo change in case the CCIL notifies securities other than Government of India securities as eligible for contribution as collateral." CCIL has several risk management processes in place such as initial margin, borrowing limits, identification of eligible collateral, haircuts on eligible collateral, mark to market margins (MTM) and volatility margin are applicable for Triparty Repo trades. There is a default fund for Triparty Repo trades. The exposure monitoring is online and on a pre-order basis, ensuring that orders can be placed only if the member has sufficient initial margin and/or borrowing limits to support the resultant trades. CCIL may temporarily impose volatility margin in case of a sudden increase in volatility in interest rates. Thus the settlement and counterparty risks are considerably low. In the event of a clearing member failing to honour his settlement obligations, the default Fund is utilized to handle any shortfall arising out of such default and to complete the settlement. The sequence in which the above resources are used is known as the "Default Waterfall". As per the waterfall mechanism, after the defaulter's margins and the defaulter's contribution to the default fund have been appropriated, CCIL's contribution is used to meet the losses. Post utilization of CCIL's contribution if there is a residual loss, it is appropriated from the default fund contributions of the non-defaulting members. Thus the scheme is subject to risk of the initial margin and default fund contribution being invoked in the event of failure of any settlement

obligations. In addition, the fund contribution is allowed to be used to meet the residual loss in case of default by the other clearing member (the defaulting member).

The Securities Market

The market for fixed-income securities can be broadly classified into

- The market for money market (short-term) instruments: Money-market securities are generally discount securities maturing within one year from the date of issuance. Instruments satisfying this criterion are treasury bills (obligations of the government), commercial paper (obligations of the corporate sector) and certificate of deposit (obligations of banks).
- The market for Government Securities: Government securities are medium-/long-term Fixed Income Securities of the government. The market for government securities is the most liquid segment of the fixed-income market in India. Most of the secondary market trading is concentrated in government securities. Trading in government securities is now done mostly through an electronic trading, reporting and settlement platform developed by the Reserve Bank of India (RBI) called Negotiated Dealing System. The role of brokers, which was an important element of the Indian bond market, is now less significant in this segment than in the past.
- The market for corporate bonds: Trading in corporate bonds is relatively subdued (in comparison to government securities). Price discovery and trading in this segment are still through the telephone. Attempts at improving the trading, settlement and risk-management practices for trading corporate bonds are currently underway.
- The market for floating-rate securities: The coupon rate in floating-rate securities is linked to an acceptable benchmark. Floating-rate securities generally have a coupon rate, which is reset over a regular period depending on the benchmark chosen. The market widely uses the MIBOR benchmarks announced by Independent agencies such as NSE and Reuters. When benchmark interest rate rises, the income generated on these floating-rate securities may also rise. When the benchmark interest rates decline, the income generated on these floating-rate securities may decline. Increasingly more companies are raising resource through floating-rate securities. Most of such securities are in the form of floating-rate debentures at a spread over NSE MIBOR. The other popular benchmark is the Indian Government securities benchmark yield (known as INBMK). The reset in such cases happen after a period of time, generally six months. The Government of India has also started issuing floating-rate securities using INBMK 1 year as the benchmark.

The Fixed-Income Derivatives Market

The interest-rate derivatives market is at a developing stage in India. Instruments broadly transacted are • Interest Rate Swaps • Interest Rate Futures and • Forward Rate Agreements.

- Interest Rate Swaps: This is an agreement between two parties to exchange stated interest obligations for an agreed period in respect of a notional principal amount. The most common form is a fixed-to-floating-rate swap where one party receives a fixed (pre-determined) rate of interest while the other receives a floating (variable) rate of interest.
- Interest Rate Future (IRF): An interest rate futures contract is "an agreement to buy or sell a debt instrument at a specified future date at a price that is fixed today." Interest rate futures are derivative contracts which have a notional interest bearing security as the underlying instrument. The buyer of an interest rate futures contract agrees to take delivery of the underlying debt instruments when the contract expires and the seller of interest rate futures agrees to deliver the debt instrument. The fund can effectively use interest rate futures to hedge from increase in interest rates.
- Forward Rate Agreement: This is basically a forward-starting interest-rate swap. It is an agreement between two parties to pay or receive the difference between an agreed fixed rate (the FRA rate) and the interest rate (reference rate) prevailing on a stipulated future date, based on a notional principal amount for an agreed period. The only

cash flow is the difference between the FRA rate and the reference rate. The notional amounts are not exchanged.

(v) Market Participants:

Given the large size of the trades, the debt market has remained predominantly a wholesale market.

Primary Dealers

Primary Dealers (PDs) act as underwriters in the primary market, and as market makers in the secondary market.

Brokers

Brokers bring together counterparties and negotiate terms of the trade.

Investors

Banks, Insurance Companies, Mutual Funds are important players in the debt market. Other players are Trusts, Provident and pension funds.

(vi) Trading Mechanism:

Government Securities and Money Market Instruments

Negotiated Dealing System (NDS) is an electronic platform for facilitating dealing and online reporting of transactions. Government Securities (including T-bills), call money, notice/term money, repos in eligible securities, etc. are available for negotiated dealing through NDS. Currently G-Sec deals are done telephonically and reported on NDS.

Corporate Debt is basically a phone driven market where deals are concluded verbally over recorded lines. The reporting of trade is done on the NSE Wholesale Debt Market segment.

Minimum Number of Investors & Single-Investor Limit

The Scheme 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 Mutual Fund will endeavor 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.

Special Considerations

Prospective investors should review / study this Scheme Information Document carefully and in its entirety and shall not construe the contents hereof or regard the summaries contained herein as advice relating to legal, taxation, or financial/ investment matters and are advised to consult their own professional advisor(s) as to the legal or any other requirements or restrictions relating to the subscription, gifting, acquisition, holding, disposal (sale, transfer, switch or redemption or conversion into money) of units and to the treatment of income (if any), capitalisation, capital gains, any distribution, and other tax consequences relevant to their subscription, acquisition, holding, capitalisation, disposal (sale, transfer, switch or redemption or conversion into money) of units within their jurisdiction / of nationality, residence, domicile etc. or under the laws of any jurisdiction to which they or any managed Scheme to be used to purchase/gift units are subject, and (also) to determine possible legal, tax, financial or other consequences of subscribing / gifting to, purchasing or holding units before making an application for units.

Neither this Scheme Information Document nor the units have been registered in any jurisdiction outside India. The distribution of this Scheme Information Document in certain jurisdictions may be restricted or subject to registration requirements and, accordingly, persons who come into possession of this Scheme Information Document in certain jurisdictions

are required to inform themselves about, and to observe, any such restrictions. No person receiving a copy of this Scheme Information Document or any accompanying application form in such jurisdiction may treat this Scheme Information Document or such application form as constituting an invitation to them to subscribe for units, nor should they in any event use any such application form, unless in the relevant jurisdiction such an invitation could lawfully be made to them and such application form could lawfully be used without compliance with any registration or other legal requirements. Neither the delivery of this Scheme Information Document nor any sale made hereunder shall, under any circumstances, create any implication that the information contained herein is correct.

Creation of segregated portfolio in case of credit event

SEBI vide circular number SEBI/HO/IMD/DF2/CIR/P/2018/160 and dated 28th December 2018 prescribed the procedure for segregation of portfolio in mutual fund schemes. Following is the extract from the circular:

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, 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 and implemented at the ISIN level.
3. Creation of segregated portfolio shall be optional and at the discretion of the AMC. It should be created only if the SID of the scheme has provisions for segregated portfolio with adequate disclosures.
4. AMCs shall have a detailed written down policy on creation of segregated portfolio and the same shall be approved by the trustees.
5. Process for creation of segregated portfolio
 - a. AMC shall decide on creation of segregated portfolio on the day of credit event. Once an AMC decides to segregate portfolio, it shall
 - i. seek approval of trustees prior to creation of the segregated portfolio.
 - ii. immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors.
 - iii. 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 shall be suspended for processing with respect to creation of units and payment on redemptions.
 - b. Once trustee approval is received by the AMC,
 - i. Segregated portfolio shall be effective from the day of credit event
 - ii. AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information shall also be submitted to SEBI.
 - iii. An e-mail or SMS should be sent to all unit holders of the concerned scheme.
 - iv. The NAV of both segregated and main portfolio shall be disclosed from the day of the credit event.
 - v. All existing investors in the scheme as on the day of the credit event shall be allotted equal number of units in the segregated portfolio as held in the main portfolio.
 - vi. No redemption and subscription shall be allowed in the

segregated portfolio. However, in order to facilitate exit to unit holders in segregated portfolio, AMC shall enable listing of units of segregated portfolio on the recognized stock exchange within 10 working days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests.

- c. If the trustees do not approve the proposal to segregate portfolio, AMC shall issue a press release immediately informing investors of the same.
6. Valuation and processing of subscriptions and redemptions
 - a. the valuation should 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).
 - b. All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as per the existing circular on applicability of NAV 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 (scheme portfolio including the securities affected by the credit event).
7. Disclosure Requirements
 - a. 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 working days of creation of the segregated portfolio.
 - b. Adequate disclosure of the segregated portfolio shall appear in all scheme related documents.
 - c. The Net Asset Value (NAV) of the segregated portfolio shall be declared on daily basis.
 - d. The information regarding number of segregated portfolios created in a 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.
 - e. The scheme performance required to be disclosed at various places shall include the impact of creation of segregated portfolio. The scheme performance should 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.
 - f. 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.
 - g. 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.
8. TER for the Segregated Portfolio
 - a. AMC shall 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.
 - b. 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.

- c. 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.
- d. The costs related to segregated portfolio shall in no case be charged to the main portfolio.
9. Monitoring by Trustees
 - a. In order to ensure timely recovery of investments of the segregated portfolio, trustees shall ensure that:
 - i. The AMC puts in sincere efforts to recover the investments of the segregated portfolio.
 - ii. 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.
 - iii. An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated portfolio is placed in every trustee meeting till the investments are fully recovered/ written-off.
 - iv. The trustees shall monitor the compliance of this circular and disclose in the half-yearly trustee reports filed with SEBI, the compliance in respect of every segregated portfolio created.
 - b. In order to avoid mis-use of segregated portfolio, trustees shall ensure to have a mechanism in place to negatively impact the performance incentives of Fund Managers, Chief Investment Officers (CIOs), etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of the AMC, including claw back of such amount to the segregated portfolio of the scheme.
10. The existence of the provisions for segregated portfolio should not encourage the AMCs to take undue credit risk in the scheme portfolio.

In partial modification to SEBI Circular No. SEBI/HO/IMD/DF2/CIR/P/2018/160 dated December 28, 2018 on 'Creation of segregated portfolio in mutual fund schemes', it has been decided by SEBI to permit creation of segregated portfolio of unrated debt or money market instruments by mutual fund schemes of an issuer that does not have any outstanding rated debt or money market instruments, vide circular number SEBI/HO/IMD/DF2/CIR/P/2019/127, dated 07th November 2019. subject to the following:

- a. Segregated portfolio of such unrated debt or money market instruments may be created only in case of actual default of either the interest or principal amount.
- b. AMCs will inform AMFI immediately about the actual default by the issuer. Upon being informed about the default, AMFI shall immediately inform the same to all AMCs. Pursuant to dissemination of information by AMFI about actual default by the issuer, AMCs may segregate the portfolio of debt or money market instruments of the said issuer in terms of SEBI circular dated December 28, 2018.

The Scheme intends to have the ability to create a segregated portfolio in line with the above SEBI circular No. SEBI/HO/IMD/DF2/CIR/P/2018/160 dated December 28, 2018.

Example of Segregation:

The below table shows how a security affected by a credit event will be segregated and its impact on investors. Whether the distressed security is held in the original portfolio or the segregated portfolio, the value of

the investors holdings will remain the same on the date of the credit event . Over time, the NAV of the portfolios are subject to change.

Key Assumptions: We have assumed a Scheme consists of 3 Securities (A, B, and C) . It has two investors with total of 10,000 units. (Investors 1 – 6,000 Units , Investors 2- 4,000 units)

Total Portfolio Value of Rs. 30 Lakhs (Each Security invested Rs. 10 Lakh)

Current NAV : $30,00,000/10,000 = \text{Rs. } 300$ Per Unit

Suppose Security A is downgraded to below investment grade and consequently the value of the security falls from Rs. 10,00,000 to Rs. 4,00,000 and the AMC decides to segregate the security into a new portfolio. Investors will be allotted the same number of units in the segregated portfolio as they hold in the main portfolio. So, Investor 1 will get 6,000 Units and Investor 2 will get 4,000 units in the segregated portfolio.

With Segregation – Portfolio Value is Rs. 24,00,000 (Now B & C Securities worth Rs. 20 Lakh and Security A has fallen from Rs. 10,00,000 to Rs. 4,00,000)

	Main Portfolio (Security of B & C)	Segregated Portfolio (Security A)
Net Assets	Rs. 20,00,000	Rs. 4,00,000
Number of Units	10,000	10,000
NAV per Unit	Rs. 20,00,000/ 10,000 = Rs. 200	Rs. 4,00,000/ 10,000 = Rs. 40

With respect to Investors.

	Investor 1	Investor 2
Units held in Main portfolio (No. of Units)	6,000	4,000
NAV of Main Portfolio	Rs. 200 per Unit	Rs. 200 per unit
Value of Holding in Main Portfolio (A) – Rs.	12,00,000	8,00,000
Units Held in Segregated Portfolio	6,000	4,000
NAV of Segregated Portfolio	Rs. 40 Per unit	Rs. 40 Per unit
Value of Holding in Segregated Portfolio (B) – Rs.	2,40,000	1,60,000
Total Value of Holdings (A) + (B) – Rs.	14,40,000	9,60,000

In case if it does not segregate (Total Portfolio would be)

Net Assets of the Portfolio	No. of Units	NAV per unit Rs.
Rs. 24,00,000	10,000	24,00,000/ 10,000= Rs. 240
(Rs. 4,00,000 in Security A and Rs. 10,00,000 in Security B and Rs. 10,00,000 in Security C)		
	Investor 1	Investor 2
Units held in Original portfolio (No. of Units)	6,000	4,000
NAV of Original Portfolio	Rs. 240 Per Unit	Rs. 240 Per Unit
Value of Holding – Rs.	14,40,000	9,60,000

Note:

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.

Details under FATCA/Common Reporting Standards (CRS)/Foreign Tax Laws

Compliance under Foreign Account Tax Compliance Act /Common Reporting Standard requirements: Foreign Account Tax Compliance Act: Foreign Account Tax Compliance Act ("FATCA") is a United States (US) law aimed at prevention of tax evasion by US citizens and residents ("US Persons") through use of offshore accounts. FATCA obligates foreign financial institution (FFIs), including Indian financial institutions to provide

the US Internal Revenue Service (IRS) with information on the accounts of to report accounts held by specified US Persons. FATCA requires enhanced due diligence processes by the FFI so as to identify US reportable accounts. With respect to individuals, the US reportable accounts would cover those with US citizenship or US residency. The identification of US person will be based on one or more of following "US indicia" • Identification of the Account Holder as a US citizen or resident; Unambiguous indication of a US place of birth; • Current US mailing or residence address (including a US post office box); • Current US telephone number; • Standing instructions to transfer funds to an account maintained in USA; • Current effective power of attorney or signing authority granted to a person with a US address; or • An "in-care of or "hold mail" address that is the sole address that the Indian Financial Institution has on the file for the Account Holder. Since domestic laws of sovereign countries, (including India) may not permit sharing of confidential client information by FFIs directly with US IRS, the U.S. has entered into Inter-Governmental Agreement (IGA) with various countries. The IGA between India and USA was signed on 9th July, 2015, which provides that the Indian FIs will provide the necessary information to Indian tax authorities, which will then be transmitted to USA automatically. Common Reporting Standard - The New Global Standard for Automatic Exchange of Information: On similar lines as FATCA, the Organization of Economic Development (OECD), along with the G20 countries, of which India is a member, has released a "Standard for Automatic Exchange of Financial Account Information in Tax Matters", in order to combat the problem of offshore tax evasion and avoidance and stashing of unaccounted money abroad, requiring cooperation amongst tax authorities. The G20 and OECD countries have together developed a Common Reporting Standard (CRS) on Automatic Exchange of Information (AEOI). The CRS on AEOI was presented to G20 Leaders in Brisbane on 16th November, 2014. On June 3, 2015, India has joined the Multilateral Competent Authority Agreement (MCAA) on AEOI. The CRS on AEOI requires the financial institutions of the "source" jurisdiction to collect and report information to their tax authorities about account holders "resident" in other countries, such information having to be transmitted "automatically" annually. The information to be exchanged relates not only to individuals, but also to shell companies and trusts having beneficial ownership or interest in the "resident" countries. Accordingly with effect from November 1, 2015 all investors will have to mandatorily provide the details and declaration pertaining to FATCA/CRS for all new accounts opened, failing which the AMC shall reject the application.

Sundaram Mutual Fund / the AMC is classified as a 'Foreign Financial Institution' under the FATCA provisions. Accordingly, the AMC / Mutual Fund will be required to undertake due diligence process and identify US reportable accounts and collect such information / documentary evidences of the US and / or non-US status of its investors / Unit holders and disclose such information (directly or through its agents or service providers) as far as may be legally permitted about the holdings / investment returns to US Internal Revenue Service (IRS) and / or the Indian Tax Authorities. The AMC has registered with US Internal Revenue Service (IRS) and has obtained a Global Intermediary Identification Number (GIIN): EY9227.99999.SL.356 for the said reporting purposes.

FATCA/CRS due diligence will be directed at each investor / Unit holder (including joint investor) and on being identified as a reportable person / specified US 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 furnish such information as and when sought by the AMC in order to comply with the information reporting requirements stated in IGA and circulars issued by SEBI/Government of India in this regard from time to time. The information disclosed may include (but is not limited to) the identity of the investors and their direct or indirect beneficiaries, beneficial owners and controlling persons. Investors / Unitholders should consult their tax advisors regarding FATCA/CRS requirements with respect to their situation.

A. Type (Fundamental Attribute)

An open ended scheme investing in equity, arbitrage and debt

B. Investment Objective (Fundamental Attribute)

The investment objective of the Scheme is to provide capital appreciation and income distribution to the investors by using equity and equity related instruments, arbitrage opportunities, and investments in debt and money market instruments, however, there can be no assurance that the investment objective of the Scheme will be realized or that income will be generated and the scheme does not assure or guarantee any returns

No Guarantee: There is no guarantee or assurance that the investment objective of the scheme will be achieved. Investors are neither being offered any guaranteed / indicated returns nor any guarantee on repayment of capital by the Schemes. There is also no guarantee of capital or return either by the Mutual Fund or by the sponsor or by the Trustee or Asset Management Company.

C. Indicative Asset Allocation (Fundamental Attribute)**a) Asset allocation under normal circumstances:**

Instrument Type	Minimum	Maximum	Risk Profile
Equity & Equity related instruments (Including Derivatives)	65%	90%	Very High
Derivatives includes Index Futures, Stock Futures, Index Options, Stock Options, etc., backed by underlying equity	15%	75%	
Unhedged Equity position	15%	50%	
Fixed Income and money market**	10%	35%	Low to Medium
Units issued by REITs/InvITs	0%	10%	Medium to high

b) Asset Allocation under defensive considerations:

Instrument Type	Minimum	Maximum	Risk Profile
Equity & Equity related instruments (Including Derivatives)	65%	90%	Very High
Derivatives includes Index Futures, Stock Futures, Index Options, Stock Options, etc., backed by underlying equity	15%	75%	
Unhedged Equity position	15%	50%	
Fixed Income and money market**	10%	35%	Low to Medium
Units issued by REITs/InvITs	0%	10%	Medium to high

**The scheme may invest in securitized debt upto 20% of the net assets of the Fixed Income portion.

- The scheme shall engage in securities lending subject to a maximum of 20% and 5% for a single counter party. The scheme would limit its exposure, with regards to securities lending, for a single intermediary, to the extent of 5% of the total net assets of the scheme at the time of lending
- The Scheme shall not invest in ADR/GDR/ Overseas securities.
- The Scheme may use derivatives for trading, hedging and

portfolio balancing. Exposure to derivatives will be as per the asset allocation table given above.

- The scheme may invest in repo in corporate bond up to 10% of the net assets of the scheme.

Exposure is calculated as a percentage of the notional value to the net assets of the Scheme. The Scheme will maintain cash or securities to cover exposure to derivatives. The cumulative gross exposure to equity, debt, money market instruments, REITs/InvITs and derivatives shall not exceed 100% of the net assets of the scheme, subject to SEBI circular No. Cir/ IMD/ DF/ 11/ 2010 dated August 18, 2010 and Circular No. SEBI/HO/IMD/DF2/CIR/P/2021/024 dated March 04, 2021. The same-security wise hedge positions would be excluded from computing the percentage. It must be clearly understood that the percentages stated above are only indicative and not absolute and that they can vary substantially depending upon the perception of the Investment Manager, the intention being at all times to seek to protect the interests of the unit holders. Such changes in the investment pattern will be for short term and defensive considerations under the circumstances such as (i) The debt/ money market instruments offer better returns than the arbitrage opportunities available; (ii) Adequate arbitrage opportunities not available; (iii) unwinding of the existing position and booking short term profit.

Pending deployment in line with the investment objective, the funds of the Scheme may be invested in short-term deposits with scheduled commercial banks in accordance with SEBI Circulars SEBI/IMD/CIR No.9/20306/03 dated November 12, 2003 and SEBI/IMD/Cir No.1/91171/07 dated April 16, 2007.

Portfolio rebalancing/Changes in Investment Pattern: Subject to SEBI Regulations, the asset allocation pattern may change from time to time for a short term and for defensive considerations, keeping in view the market conditions/ applicable regulations/political & economic factors, the perception of the Investment Manager the intention being at all times to seek to protect the interests of the Unit holders. Rebalancing across sectors and stocks based on valuation levels relative to growth shall be a dynamic exercise, as this is crucial to performance. The fund manager of the Scheme shall examine factors such as the overall macro-economic conditions, valuation levels, sector specific factors, company-specific factors and trends in liquidity, to name a few, and reduce the equity exposure, if warranted, to lower levels and raise the fixed income component of the portfolio as a tactical call. The fund manager shall seek to raise the equity exposure if the environment is conducive. This process of rebalancing may take place in a dynamic manner on a regular basis. Cash calls (with deployment in appropriate money-market and fixed-income securities), derivatives, changes in the degree of overweight and underweight to sectors and changes in allocation levels to stocks with varying attributes can be used to balance the portfolio. If the macro-economic conditions and market levels warrant, the fund manager may on an exceptional basis, reduce the equity exposure and raise the fixed-income component of the portfolio beyond the asset allocation boundary indicated in the table. Such an allocation in exceptional circumstances shall be adopted with the approval of the Internal Investment Committee of Sundaram Asset Management. In the event of deviations, the fund manager will carry out rebalancing within 30 days. Where the portfolio is not rebalanced within 30 days, justification for the same shall be placed before the Internal Investment Committee and reasons for the same shall be recorded in writing. The Internal Investment Committee of the Investment Manager, shall then decide on the course of action. However, at all times the portfolio will adhere to the overall investment objectives of the Scheme.

SOB
No.
15**D. Indicative Investment Universe**

In order to achieve the investment objective, the corpus of the Scheme can be invested in the following securities (subject to the Investment Objective / Asset Allocation):

- Equity and equity-related securities including Convertible bonds and debentures and warrants carrying the right to obtain equity shares and derivative instruments. (For limits on Derivatives, please refer the Section "Derivatives")
- Debt securities of the Government of India, State and local Governments, Government agencies, Statutory bodies, Public Sector Undertakings, Public Financial Institutions, Scheduled Commercial Banks, Non-Banking Finance Companies, Development Financial Institutions, Supranational Financial Institutions, Corporate entities, Housing Finance Companies (HFCs).
- Debt and Money Market securities and such other securities as may be permitted by SEBI and RBI regulation from time to time.
- Money market instruments including but not limited to, Treasury Bills, Commercial Paper of Public Sector Undertakings and Private Sector Corporate entities, Reverse Repo Agreements on Gsecs, TREPS (Triparty Repo Trades), Certificates of Deposit of Scheduled Commercial Banks and Development Financial Institutions, Government Securities with unexpired maturity of one year or less and other money market securities as may be permitted by SEBI/RBI regulation.
- The non-convertible part of convertible securities.
- Units of Mutual funds as may be permitted by regulation.
- The Scheme shall engage in securitized debt, securities lending and Repo in Corporate Bonds as per SEBI Regulations and limits.
- The scheme shall invest in REITs/InvTs up to 10%.

The scheme may invest in derivative instruments for the purpose of hedging, portfolio balancing and trading and arbitrage. The limits and conditions and restrictions prescribed by SEBI vide circular No. Cir/IMD/DF/ 11/ 2010 dated August 18, 2010 and Circular No SEBI/HO/IMD/DF2/CIR/P/2021/024 dated March 04, 2021 shall be followed

- Any other instruments as may be permitted by RBI / SEBI / such other Regulatory Authority from time to time.

The securities mentioned above and such other securities the Scheme is permitted to invest in, could be listed, unlisted, privately placed, secured, unsecured, rated or unrated and of any maturity bearing fixed-rate or floating coupon rate. The securities may be acquired through Initial Public Offerings (IPO s), secondary market operations, private placement, rights offers or negotiated deals. The Scheme may also enter into repo and reverse repo obligations on Gsecs held by it as per the guidelines and regulation applicable to such transactions.

- The Scheme shall invest in the instruments rated as investment grade or above by a recognised rating agency. In case, the instruments are not rated, specific approval of the Board of the Investment Manager shall be obtained.
- Pending deployment of funds in terms of investment objectives of the Scheme, the funds may be invested in short term deposits with Scheduled Commercial Banks in accordance SEBI Circulars SEBI/IMD/CIR No.9/20306/03 dated November 12, 2003, SEBI/IMD/Cir No.1/91171/07 dated April 16, 2007, SEBI/HO/IMD/DF4/CIR/P/2019/093 dated August 16, 2019.

Brief note on fixed-income and money market in India**(i) Debt Instrument Characteristics:**

A Debt Instrument is basically an obligation which the borrower has to service periodically and generally has the following features:

Face Value: Stated value of the paper /Principal Amount

Coupon: Zero, fixed or floating

Frequency: Semi-annual; annual, sometimes quarterly

Maturity: Bullet, staggered

Redemption: FV; premium or discount

Options: Call/Put

Issue Price: Par (FV) or premium or discount

A debt instrument comprises of a unique series of cash flows for each paper, terms of which are decided at the time of issue. Discounting these cash flows to the present value at various applicable discount rates (market rates) provides the market price.

(ii) Types of Debt Market Instruments:

The Indian Debt market comprises of the Money Market and the Long Term Debt Market.

Money market instruments are Commercial Papers (CPs), Certificates of Deposit (CDs), Treasury bills (T-bills), Repos, Inter-bank Call money deposit, Reverse Repo and TREPS etc. They are mostly discounted instruments that are issued at a discount to face value.

Money market instruments have a tenor of less than one year while debt market instruments typically have a tenor of more than one year.

Long Term Debt market in India comprises mainly of two segments viz., the Government securities market and the corporate securities market.

Government securities include central, state and local issues. The main instruments in this market are dated securities (Fixed or Floating) and Treasury Bills (Discounted Papers). The Central Government securities are generally issued through auctions on the basis of 'Uniform price' method or 'Multiple price' method while State Govt. are through on-tap sales.

Corporate Debt segment on the other hand includes bonds/debentures issued by private corporates, public sector units (PSUs) and development financial institutions (DFIs). The debentures are rated by a rating agency and based on the feedback from the market, the issue is priced accordingly. The bonds issued may be fixed or floating. The floating rate debt market has emerged as an active market in the rising interest rate scenario. Benchmarks range from Overnight rates or Treasury benchmarks.

Debt derivatives market comprises mainly of Interest Rate Swaps linked to Overnight benchmarks called MIBOR (Mumbai Inter Bank Offered Rate) and is an active market. Banks and corporate are major players here and of late Mutual Funds have also started hedging their exposures through these products.

The following table gives approximate yields prevailing during the month of April 2023 on some of the instruments. These yields are indicative and do not indicate yields that may be obtained in future as interest rates keep changing consequent to changes in macro economic conditions and RBI policy

Issuer	Instruments	Maturity	Yields (p.a)
GOI	Treasury Bill	91 days	6.73
GOI	Treasury Bill	364 days	6.98
GOI	Short Dated	1-3 Yrs	6.94-7.00
GOI	Medium Dated	3-5 Yrs	7.00-7.07
GOI	Long Dated	5-10 Yrs	7.07-7.22
Corporates	Bonds (AAA)	1 - 3 years	7.55-7.63

SOB
No.
12

Corporates	Bonds (AAA)	3 - 5 years	7.629-7.63
Corporates	CPs (A1+)	3 months - 1 yr	7.38-7.95
Banks	CDs	3 months - 1 yr	7.29-7.90

Source: Bloomberg.

As on April 18, 2023

(iii) Regulators:

The RBI operates both as the monetary authority and the debt manager to the government. In its role as a monetary authority, the RBI participates in the market through open-market operations as well as through Liquidity Adjustment Facility (LAF) to regulate the money supply. It also regulates the bank rate and repo rate, and uses these rates as indirect tools for its monetary policy. The RBI as the debt manager issues the securities at the cheapest possible rate. The SEBI regulates the debt instruments listed on the stock exchanges.

(iv) Fixed income and money market segments

The market for fixed-income securities in India can be briefly divided into the following segments:

- The money market – The market for borrowing / lending money;
- The securities market – The market for trading in securities and
- The derivatives market – The market for fixed income derivatives.

In this predominantly institutional market, the key market players are banks, financial institutions, insurance companies, mutual funds, primary dealers and companies. Provident / pension funds, though present, are not active players.

The Money Market

The money market can be classified into two broad categories

The market for clean borrowing/lending without backing of any collateral:

- Call Money: The market for overnight borrowing/lending.
- Notice Money: The market for borrowing/lending from 2 days to a fortnight.
- Term Money: The market for borrowing/lending from a fortnight to six months.

The market for collateralised borrowing/lending:

- Repo transactions: These are redemption-obligation transactions in which the borrower tenders securities to the lender; these securities are bought back by the borrower on the redemption date. The price difference between the sale and redemption of the securities is the implicit interest rate for the borrowing/lending. The eligible underlying securities for these transactions are Government securities and Treasury Bills. Corporate bonds are not allowed as eligible securities for repo transactions. The minimum repo term (lending /borrowing period) is one day.

The Securities Market

The market for fixed-income securities can be broadly classified into

- The market for Money market (short-term) instruments: Money-market securities are generally discount securities maturing within one year from the date of issuance. Instruments satisfying this criterion are Treasury Bills (obligations of the government), Commercial Paper (obligations of the corporate sector) and Certificate of Deposit (obligations of banks).
- The market for Government securities: Government securities are medium-/long-term fixed income securities of the government. The market for Government securities is the most liquid segment of the fixed-income market in India. Most of the secondary market trading is concentrated in Government securities. Trading in Government securities is now done mostly through an electronic trading, reporting and settlement platform developed by the Reserve Bank of India (RBI) called Negotiated Dealing System.

The role of brokers, which was an important element of the Indian bond market, is now less significant in this segment than in the past.

- The market for Corporate Bonds: Trading in Corporate Bonds is relatively subdued (in comparison to Government securities). Price discovery and trading in this segment are still through the telephone. Attempts at improving the trading, settlement and risk-management practices for trading corporate bonds are currently underway.
- The market for floating-rate securities: The coupon rate in floating-rate securities is linked to an acceptable benchmark. Floating-rate securities generally have a coupon rate, which is reset over a regular period depending on the benchmark chosen. The market widely uses the MIBOR benchmarks announced by Independent agencies such as NSE and Reuters. When benchmark interest rate rises, the income generated on these floating-rate securities may also rise. When the benchmark interest rates decline, the income generated on these floating-rate securities may decline. Increasingly more companies are raising resource through floating-rate securities. Most of such securities are in the form of floating-rate debentures at a spread over NSE MIBOR. The other popular benchmark is the Indian Government securities benchmark yield (known as INBMK). The reset in such cases happen after a period of time, generally six months. The Government of India has also started issuing floating-rate securities using INBMK 1 year as the benchmark.

The Fixed-Income Derivatives Market

The interest-rate derivatives market is at a developing stage in India. Instruments broadly transacted are • Interest Rate Swaps • Interest Rate Futures and • Forward Rate Agreements.

- *Interest Rate Swaps*: This is an agreement between two parties to exchange stated interest obligations for an agreed period in respect of a notional principal amount. The most common form is a fixed-to-floating-rate swap where one party receives a fixed (pre-determined) rate of interest while the other receives a floating (variable) rate of interest.
- *Interest Rate Future (IRF)*: An interest rate futures contract is "an agreement to buy or sell a debt instrument at a specified future date at a price that is fixed today." Interest rate futures are derivative contracts which have a notional interest bearing security as the underlying instrument. The buyer of an interest rate futures contract agrees to take delivery of the underlying debt instruments when the contract expires and the seller of interest rate futures agrees to deliver the debt instrument. The fund can effectively use interest rate futures to hedge from increase in interest rates.
- *Forward Rate Agreement*: This is basically a forward-starting interest-rate swap. It is an agreement between two parties to pay or receive the difference between an agreed fixed rate (the FRA rate) and the interest rate (reference rate) prevailing on a stipulated future date, based on a notional principal amount for an agreed period. The only cash flow is the difference between the FRA rate and the reference rate. The notional amounts are not exchanged.

(v) Market Participants:

Given the large size of the trades, the debt market has remained predominantly a wholesale market.

Primary Dealers

Primary Dealers (PDs) act as underwriters in the primary market, and as market makers in the secondary market.

Brokers

Brokers bring together counterparties and negotiate terms of the trade.

Investors

Banks, Insurance Companies, Mutual Funds are important players in the debt market. Other players are Trusts, Provident and pension funds.

(vi) Trading Mechanism:

Government securities and Money Market Instruments

Negotiated Dealing System (NDS) is an electronic platform for facilitating dealing and online reporting of transactions. Government securities (including T-bills), call money, notice/term money, repos in eligible securities, etc. are available for negotiated dealing through NDS. Currently G-Sec deals are done telephonically and reported on NDS.

Corporate Debt is basically a phone driven market where deals are concluded verbally over recorded lines. The reporting of trade is done on the NSE Wholesale Debt Market segment.

Equity Derivatives

The scheme may invest in derivative instruments for the purpose of hedging, portfolio balancing and trading. The limits and conditions and restrictions prescribed by SEBI vide circular No. Cir/ IMD/ DF/ 11/ 2010 dated August 18, 2010 and Circular No. SEBI/HO/IMD/DF2/CIR/P/2021/024 dated March 04, 2021. shall be followed.

Derivatives are financial contracts or instruments that derive their value from an underlying asset. Derivatives may be used for hedging, portfolio balancing and trading purposes to seek to optimise performance in the Scheme and will be subject to applicable Regulations of SEBI/RBI from time to time.

Portfolio balancing includes any type of deals in derivatives as long as they are fully covered by holding a position in the underlying securities/ cash/cash equivalents/options/ futures. Trading is permitted only in exchange-traded derivatives. The derivatives shall be marked-to-market by the Investment Manager at all times.

Transactions in derivatives include a wide range of instruments, including, but not limited to futures, options, swaps, and Interest Rate Swaps, Forward Rate Agreements and any other instrument as may be permitted by SEBI/RBI from time to time.

Trading in derivatives

- Derivatives are high risk, high return instruments as they may be highly leveraged. A small price movement in the underlying security could have a large impact on their value and may also result in a loss.
- Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies.
- The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments.
- The fund may use derivative instruments like Interest Rate Swaps, Forward Rate Agreements or other fixed income derivatives.
- Credit Risk:** The credit risk in a derivative transaction is the risk that the counter party will default on its obligations and is generally low, as there is no exchange of principal amounts in a derivative transaction.

- Market risk:** Derivatives carry the risk of adverse changes in the market price.
- Illiquidity risk:** The risk that a derivative cannot be sold or purchased quickly enough at a fair price, due to lack of liquidity in the market.
- It may be mentioned here that the guidelines issued by Reserve Bank of India from time to time for Forward Rate Agreements and Interest Rate Swaps and other derivative products would be adhered to.

The Fund's trading in derivatives would be in line that is permitted by SEBI Regulations from time to time. The Fund may use derivatives instruments like Interest Rate Swaps, Forward Rate Agreements or such other derivative instruments as may be introduced from time to time for the purpose of hedging and portfolio balancing and as may be permitted under the Regulations and guidelines and any hedging techniques that are permissible now or in future, under SEBI regulations, in consonance with the scheme's investment objective, including investment in derivatives such as interest rate swaps. The Fund shall fully cover its position in the derivatives market by holding underlying securities / cash or cash equivalents / option and / or obligation for acquiring underlying assets to honour the obligations contracted in the derivatives market. The Fund shall maintain separate records for holding the cash and cash equivalents / securities for this purpose. The securities held shall be marked to market by the AMC to ensure full coverage of investments made in derivative products at all times.

SEBI has also vide circular DNPd/Cir-29/2005 dated 14th September 2005 permitted Mutual Funds to participate in the derivatives market at par with Foreign Institutional Investors (FII). Accordingly, Mutual Funds shall be treated at par with a registered FII in respect of position limits in index futures, index options, stock options and stock futures contracts.

Interest Rate Swaps

Interest Rate Swaps is a strategy in which one party exchanges a stream of interest for another party's stream. Interest Rate Swaps are normally 'fixed against floating', but can also be 'fixed against fixed' or 'floating against floating' rate swaps. Interest Rate Swaps will be used to take advantage of interest-rate fluctuations, by swapping fixed-rate obligations for floating rate obligations, or swapping floating rate obligations to fixed-rate obligations. A floating-to-fixed swap increases the certainty of an issuer's future obligations. Swapping from fixed-to-floating rate may save the issuer money if interest rates decline. Swapping allows issuers to revise their debt profile to take advantage of current or expected future market conditions..

Forward Rate Agreement (FRA)

A FRA is basically a forward starting IRS. It is an agreement between two parties to pay or receive the difference between an agreed fixed rate (the FRA rate) and the interest rate (reference rate) prevailing on a stipulated future date, based on a notional principal amount for an agreed period. The only cash flow is the difference between the FRA rate and the reference rate. As is the case with IRS, the notional amounts are not exchanged in FRAs.

i) Advantages of Derivatives

The volatility in Indian debt markets has increased over last few months. Derivatives provide unique flexibility to the Scheme to hedge part of their portfolio. Some of the advantages of specific derivatives are as under:

ii) Interest Rate Swaps and Forward rate Agreements

Bond markets in India are not very liquid. Investors run the risk of illiquidity in such markets. Investing for short-term periods for

liquidity purposes has its own risks. Investors can benefit if the Fund remains in call market for the liquidity and at the same time take advantage of fixed rates by entering into a swap. It adds certainty to the returns without sacrificing liquidity.

iii. Illustration: Interest Rate Swap (IRS)

Assume that a Mutual Fund has INR 10 crore, which is to be deployed in overnight products for 7 days. This money will be exposed to interest rate risk on daily basis. The fund can buy an Interest Rate Swap receiving fixed interest rate and paying NSE MIBOR.

(R. in Crore)	Principal (P)	NSE MIBOR	Interest	Amount (I)	(P) + (I)
Day 1	10		8.10%	0.0022192	10.00221918
Day 2		10.00222	8.20%	0.0022466	10.00446575
Day 3		10.00447	8.30%	0.002274	10.00673973
Day 4 (for 2 days)	Saturday	10.00674	8.15%	0.0044658	10.01120548
Day 5	Sunday		Holiday		
Day 6		10.01121	8.40%	0.0023014	10.01350685
Day 7		10.01351	8.50%	.0023288	10.01583562
Floating Interest Payable					.0158356164
Fixed Interest Receivable					.0167808219
Net Receivable for Mutual Fund receiving fixed					.0009452055

In this example Mutual Fund stands to gain by receiving fixed rates. As the NSE MIBOR floating rate is decided daily, in adverse scenario, the Mutual Fund may have to pay the difference.

The counter-party providing Swap, Options, Forward Rate Agreements (FRAs) will do the same at a cost.

Risk factors Interest Rate Swaps strategy:

Risk Factor: The risk arising out of uses of the above derivative strategy as under:

- Lack of opportunities available in the market.
- The risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.
- Interest Rate Swaps require the maintenance of adequate controls to monitor the transactions entered into, the ability to forecast failure of another party (usually referred to as the 'counter party') to comply with the terms of the derivatives contract.

Further the exposure limits for trading in derivatives by Mutual Funds specified by SEBI vide its Circular No. Cir/IMD/DF/11/2010 dated August 18, 2010 and March 04, 2021 are as follows:

1. The cumulative gross exposure through equity, debt and derivative positions should not exceed 100% of the net assets of the scheme.
2. Mutual Funds shall not write options or purchase instruments with embedded written options.
3. The total exposure related to option premium paid must not exceed 20% of the net assets of the scheme.
4. Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.
5. Exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
 - a. Hedging positions are the derivative positions that reduce

possible losses on an existing position in securities and till the existing position remains.

- b. Hedging positions cannot be taken for existing derivative positions. Exposure due to such positions shall have to be added and treated under limits mentioned in Point 1.
 - c. Any derivative instrument used to hedge has the same underlying security as the existing position being hedged.
 - d. The quantity of underlying associated with the derivative position taken for hedging purposes does not exceed the quantity of the existing position against which hedge has been taken.
6. Mutual Funds may enter into plain vanilla Interest Rate Swaps for hedging purposes. The counter party in such transactions has to be an entity recognized as a market maker by RBI. Further, the value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the scheme. Exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the scheme.
 7. Exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated under the limits mentioned in point 1.
 8. Definition of Exposure in case of Derivative Positions
 9. Each position taken in derivatives shall have an associated exposure as defined under. Exposure is the maximum possible loss that may occur on a position. However, certain derivative positions may theoretically have unlimited possible loss. Exposure in derivative positions shall be computed as follows:

Position	Exposure
Long Future	Futures Price, Lot Size, Number of Contracts
Short Future	Futures Price, Lot Size, Number of Contracts
Option bought	Option Premium Paid, Lot Size, Number of Contracts

iv. The risks involved in derivatives are:

1. The cost of hedge can be higher than adverse impact of market movements
2. The derivatives will entail a counter-party risk to the extent of amount that can become due from the party.
3. An exposure to derivatives in excess of the hedging requirements can lead to losses.
4. An exposure to derivatives can also limit the profits from a genuine investment transaction.
5. Efficiency of a derivatives market depends on the development of a liquid and efficient market for underlying securities and also on the suitable and acceptable benchmarks.
6. Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies.

v. Methods to tackle these risks:

1. Hedging will not be done on a carpet basis but based on a view about interest rates, economy and expected adverse impact.
2. Limits of appropriate nature will be developed for counter parties
3. Such an exposure will be backed by assets in the form of cash

or securities adequate to meet cost of derivative trading and loss, if any, due to unfavorable movements in the market.

vi The losses that may be suffered by the investors as a consequence of such investments:

1. As the use of derivatives is based on the judgment of the Fund Manager, the view on market taken may prove wrong resulting in losses.
2. The upside potential of investments may be limited on account of hedging which may cause opportunity losses.

vii. The use of derivatives for hedging will give benefit of:

1. Curtailing the losses due to adverse movement in interest rates
2. Securing upside gains at cost

Viii. Valuation of Derivatives

- i. The traded derivatives shall be valued at market price in conformity with the stipulations of sub clauses (i) to (v) of clause 1 of the Eighth Schedule to the SEBI Regulations.
- ii. The valuation of untraded derivatives shall be done in accordance with the valuation method for untraded investments prescribed in sub clauses (i) and (ii) of clause 2 of the Eighth Schedule to the SEBI Regulations.

Ix. Reporting of Derivatives

The AMC shall cover the following aspects in their reports to trustees periodically, as provided for in the Regulations:

- i. Transactions in derivatives, both in volume and value terms.
- ii. Market value of cash or cash equivalents / securities held to cover the exposure.
- iii. Any breach of the exposure limit laid down in the scheme Information document.
- iv. Shortfall, if any, in the assets covering investment in derivative products and the manner of bridging it.

The Trustees shall offer their comments on the above aspects in the report filed with SEBI under sub regulation (23) (a) of regulation 18 of SEBI Regulations.

SOB
No.
7

E. Investment Strategy

The investment strategy is aimed at generating income by investing in arbitrage opportunities in the cash and derivatives segments of the equity markets and in debt securities and at the same time attempting to enhance returns through long exposure in equity and equity related instruments.

If suitable arbitrage opportunities are not available in the opinion of the Fund Manager, the Scheme may predominantly invest in debt and money market securities.

Net Long Equity :

The Scheme will invest its assets in a portfolio of equity and equity related instruments including units of Equity mutual Funds Schemes.

The focus of the investment strategy would be to identify stocks which can provide capital appreciation in the long term. Companies selected for the portfolio which in the opinion of the AMC would possess some of the characteristics mentioned below:

- Superior management quality
- Distinct and sustainable competitive advantage
- Good growth prospects; and
- Strong financial strength

Equity Derivatives:

The Scheme will endeavor to invest predominantly in arbitrage opportunities between spot and futures prices of exchange traded equities. In absence of profitable arbitrage opportunities available in

the market, the Scheme may predominantly invest in short-term debt and money market securities.

The fund manager will evaluate the difference between the price of a stock in the futures market and in the spot market. If the price of a stock in the futures market is higher than in the spot market, after adjusting for costs and taxes the Scheme shall buy the stock in the spot market and sell the same stock in equal quantity in the futures market, simultaneously.

For example, on December 4, 2014, the Scheme buys a share of XYZ Company on spot @ Rs. 1000 and at the same time sells XYZ Company futures for December 2014 expiry @ Rs. 1020. The Scheme thus enters into a fully hedged transaction by selling the equity position in the futures market for expiry on say December 24, 2014. If the Scheme holds this position till expiry of the futures, the Scheme earns profit of Rs. 20 on the date of expiry before accounting for trading costs and taxes.

In case the Scheme has to unwind the transaction prior to the expiry date on account of redemption pressures or any other reason, the returns would be a function of the spread at which the transaction is unwound. For example, if spot is sold at Rs. 980 and the futures are bought at Rs. 1010 then there would be negative returns on the trade. If the spot is sold at Rs. 1020 and the futures are bought at Rs. 1015 then there would be positive returns from the trade. On the date of expiry, if the price differential between the spot and futures position of the subsequent month maturity still remains attractive, the Scheme may rollover the futures position and hold onto the position in the spot market. In case such an opportunity is not available, the Scheme would liquidate the spot position and settle the futures position simultaneously. Rolling over of the futures transaction means unwinding the short position in the futures of the current month and simultaneously shorting futures of the subsequent month maturity while holding onto the spot position. There could also be occasions when both the spot and the future position is unwound before the expiry of the current-month future to increase the base return or to meet redemption. Return enhancement through the use of arbitrage opportunity would depend primarily on the availability of such opportunities. The Scheme will strive to build similar positions that offer an arbitrage potential for e.g. buying the basket of index constituents in the cash segment and selling the index futures. The Scheme would also look to avail of opportunities between one futures contract and another. For example on 16 December 2014, the Scheme buys 1000 futures contracts of ABC Ltd. for December expiry at Rs.3000 each and sells an equivalent 1000 futures contract of ABC Ltd. for January expiry at Rs.3030. Closer to the expiry date of the December contract, the Scheme has two options. 1) Unwind the transaction by selling the 1000 December contracts and buying 1000 January contracts of ABC. The returns are a function of the spread between the sale price of the January contract and the buy price of the December contract. If this spread is less than Rs. 30, the returns are positive else the returns are negative. 2) On the expiry date i.e. 24 December, 2014, the Scheme would let the December contract expire and square off 1000 contracts that it holds for January maturity. The returns would be a function of the spread between settlement price of the December contract and the price at which January contracts are squared-off. If this spread is lower than Rs. 30 then the returns are positive and if it is higher than Rs. 30 the returns are negative. The Scheme can also initiate the transaction in the opposite direction i.e. by selling the December futures and buying the January futures, if it sees a profit potential. In addition to stock specific futures, the Scheme can also take offsetting positions in index futures of different calendar month.

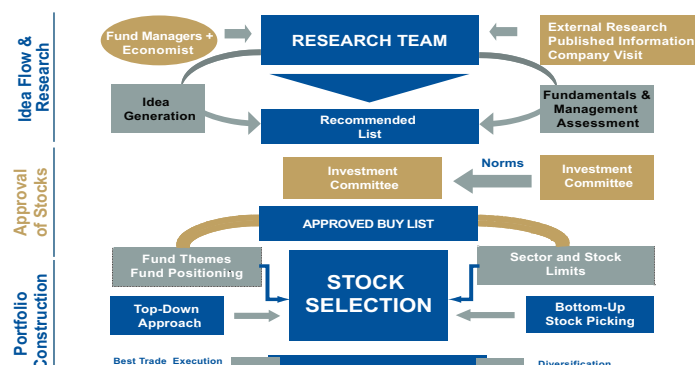
The debt and money market instruments include any margin money

that has to be maintained for the derivative position. The margin money could also be maintained partly as Fixed deposits with Scheduled commercial banks.

Debt Instruments:

The Scheme would invest in a range of fixed income and money market instruments including units of Debt/Liquid/Money Market Mutual Fund Schemes. Further the Scheme may also invest in financial derivatives such as options and futures & Interest Rate Swap (IRS) that are permitted or may become permissible under SEBI/RBI Regulations. The proportion of assets to be so invested would be decided by the AMC at the appropriate time, and would be done in accordance with the relevant guidelines to be issued by SEBI/RBI and other authorities.

Procedure for investment decisions - Equity



Research & Analysis: Research is meant to look at opportunities differently from the market and competition. The Investment Manager has a research set up that works to identify Investment opportunities through continuous research on sectors and companies that are relevant to the theme and investment objectives of the Scheme. The analysis focuses on the performance and future prospects of the company and the business, financial health, competitive edge, managerial quality and practices, minority shareholder fairness, transparency. In order to get a good understanding of the Company being researched and its business management contact either by way of visit, or any other form of communication is made to assess the potential of the Company. Companies that adequately satisfy the prescribed criteria are included in the portfolio. The weight of individual companies will be based on their upside potential relative to downside risk and will be decided by the Fund Manager.

Approval of Securities: On completion of the research the analyst will put up the Research Report for approval by the Investment Committee. The Investment Committee comprises of the CEO / Managing Director, CIO – Equity, Head of Risk, COO and Head of Compliance. On approval by the Investment Committee, the stock will be included in the investment universe.

Portfolio Construction & Selection of Stock for Investment / Sale:

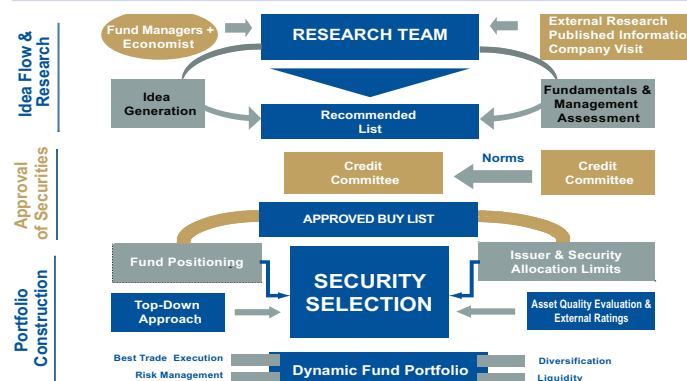
The Fund Manager will construct the portfolio with stocks in the investment universe within the guidelines set in the Scheme Information Document. The Fund Manager will be the sole deciding authority in relation to stock selection, allocation of weight, sale & purchase of stocks and other issues that are related to portfolio construction. The reasons for purchase / sale are recorded in the system/Deal Tickets.

Monitoring: The Investment Committee reviews the performance of the Scheme on a monthly basis. Apart from performance various other subjects are also discussed covering Risk (volatility, liquidity, top holdings, concentration risk etc., in the portfolios), Fund Manager / Economist views on the economy and markets and validation of the

same and it's reflection in the sector weights and portfolio positioning etc. The Research team also constantly monitors the sectors and companies assigned to them and updates the Fund Management team on an ongoing basis changes if any occurring to the companies in the portfolio and the sectors. The Research team also actively monitors for new investment opportunities.

An independent risk management team is in place to oversee and monitor portfolio risk on a day-to-day basis. Internal risk control guidelines are in place and the portfolio contours are tracked on a daily basis to ensure adherence. Any deviation is brought to the notice of the Managing Director and the fund manager for corrective action. Follow up actions are made to ensure that the deviation is corrected within the time period prescribed in internal risk control guidelines. Adherence to limits from SEBI regulations as well as stipulations in the Scheme Information Document is monitored by the Compliance team. The Risk Management team reports to the CEO / MD.

Procedure for investment decisions - Debt



Credit Evaluation / Approval / Monitoring: The Investment Manager has an independent Credit Department reporting to the MD responsible for credit evaluation. The team undertakes evaluation of companies for probable investment in the Fixed Income portfolios based on requests from the Fund Management team and also of its own accord. The analysis involves detailed study of the financial performance as well as analysis of the business / industry the company operates in and the outlook for the company and the sector. The current economic status including the credit outlook is evaluated and forms part of the evaluation process. Apart from quantitative analysis qualitative analysis is also undertaken with a view to form an opinion on the Corporate governance status of the company. Based on the analysis the Credit team puts out a detailed Credit Review for approval by the Credit committee. The Credit Review inter alia will specify the quantum of limits and tenor of the approval.

The Credit Committee comprises of CIO – Fixed Income, Head – Credit, CEO/MD, COO, Head of Risk & Head-Compliance. The Credit Review needs to be approved by at least two members of the Committee. On approval the Company will be included in the Credit Investment universe and will be eligible for making investments in. The weight of individual companies in the portfolio will be decided by the Fund Manager keeping in mind the market outlook, the mandate of the scheme etc., The Fund Manager will be the sole deciding authority in relation to stock selection, allocation of weight, sale & purchase of stocks and other issues that are related to portfolio construction. The Committee reviews the reports prepared by the risk officers. The Committee also reviews the risk guidelines and sets/modifies limits, reviews the credit quality of the portfolio etc.,

Ongoing Monitoring and Review: The Credit Department is

responsible for ongoing monitoring of the companies that are in the investment universe. The ongoing monitoring comprises of analysis of quarterly financials. Any adverse development is noted and further evaluated and concerns if any shared with the Credit Committee and recommendations may include reduction of limits to exiting the exposure. At the same time if there has been a positive development the Credit team will evaluate if the development merits an increase in limits or an extension of the tenor of exposure. Apart from the quarterly analysis the Credit team is constantly looking at all news flows on the companies in the universe and adverse new flows are immediately highlighted with a plan of action as may warrant considering the severity of the news. The Credit team also monitors the industry / sector news and policy announcements etc., affecting the companies in the investment universe and any adverse development in the industry / sector is analysed for its likely impact on the companies in the investment universe.

Apart from the ongoing monitoring by the Credit Department there are weekly reports and monthly meetings of the Credit Committee wherein portfolios are reviewed. At the monthly meeting report covering various parameters like liquidity, investor concentration, credit rating downgrades and upgrades, high yielding securities under various buckets like short term / long term, comparison of yields with market, significant deviations in yield, adverse news flows etc., are tabled and discussed.

Risk Mitigation: An independent risk management team is in place to oversee and monitor portfolio risk on a day-to-day basis. Internal risk control guidelines are in place and the portfolio contours are tracked on a daily basis to ensure adherence. Any deviation is brought to the notice of the Managing Director and the fund manager for corrective action. Follow up actions are made to ensure that the deviation is corrected within the time period prescribed in internal risk control guidelines. Adherence to limits from SEBI regulations as well as stipulations in the Scheme Information Document is monitored by the Compliance team. The Risk Management team reports to the CEO / MD.

Risk Process / Guidelines: Risk Management is an independent function and the Risk team reports directly to the MD. Broadly the function is divided into two – Regulatory and Internal. Regulatory risk consists of ensuring adherence to all the rules prescribed by the SEBI as well as the limits prescribed in the Offer documents. Internal risk monitoring consists of a host of other parameters that the risk team monitors on a continuous basis like internal limits (i.e. soft limits established to red flag potential breach in SEBI prescribed limits), adherence to fund style, operational and preparation of reports etc., The primary mechanism that the Risk team employs to monitor is through Bloomberg. All the rules (regulatory and internal) are uploaded into Bloomberg which thereafter monitors its adherence on a continuous basis. All trades are routed through Bloomberg systems and hence no deviation can occur without an alert being triggered by the Bloomberg system. Any breach in limits consequent to inputting of a trade is flagged off with various levels of concern and needs specific approvals in order to proceed.

Portfolio turnover

Portfolio turnover is defined as the lower of the aggregate value of purchases or sales, as a percentage of the average corpus of the Scheme during a specified period of time. This will exclude purchases and sales of money market securities.

It is difficult to estimate with any reasonable measure of accuracy, the likely turnover in the portfolio(s), but being a closed end scheme, it is estimated to be low. It will be the endeavour of the Fund Manager to optimise the portfolio turnover rate and keep it as low as possible. There may be trading opportunities that present

themselves from time to time, where in the opinion of the fund manager, there is an opportunity to enhance the total returns of the portfolio. The fund manager will endeavour to balance the increased cost on account of higher portfolio turnover, if any, with benefits likely to be derived from such an approach.

F. Fundamental Attributes

- (i) **Type of a scheme:** An open ended scheme investing in equity, arbitrage and debt.
- (ii) **Investment Objective** - The investment objective of the scheme is to generate income by investing in debt and arbitrage opportunities in the cash and derivatives segment of the equity market, and capital appreciation through a moderate exposure in equity. however, there can be no assurance that the investment objective of the Scheme will be realized.
- (iii) **Investment pattern** - As indicated in this Scheme Information Document (Indicated in Highlights & Scheme Summary and Part II of this document).
- (iv) **Terms of Issue-Provisions in respect redemption of units, fees and expenses:** As indicated in this Scheme Information Document.
 - Liquidity provisions such as listing, repurchase/redemption.: As indicated in this Scheme Information Document (Indicated in Highlights & Scheme Summary and Part III of this document).
 - Aggregate fees and expenses charged to the scheme. As indicated in this Scheme Information Document (Indicated in Highlights & Scheme Summary and Part IV of this document).
 - Any safety net or guarantee; There is no such safety net/Guarantee (The Schemes covered in this document does not offer safety net or guarantee).

In accordance with Regulation 18(15A) of the SEBI Regulation, the Trustee shall ensure that no change in the fundamental attributes of the Scheme the Trustee, fee & expenses and any other change which would modify the Scheme and affect the interests of unit holders is carried out unless:

 - A written communication about the proposed change is sent to each unit holder
 - An advertisement is given in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where the Head Office of the Mutual Fund is situated; and
 - The unit holders are given an option for a period of 30 days to exit at the prevailing Net Asset Value without any exit load.

G. Benchmark

Nifty Equity Savings Index

The NIFTY Equity Savings index captures performance of a portfolio having exposure to equity, equity arbitrage and debt instruments. This index is a total return index capturing price return and Dividend/coupon income.

The NIFTY Equity Savings Index includes the following components: 35% exposure to NIFTY 50 Total Return (TR) Index ; 30% exposure to equity arbitrage (long position in NIFTY 50 TR Index and equivalent short position in NIFTY 50 Futures Index) ; 30% exposure to NIFTY Short Duration Debt Index & 5% exposure to NIFTY 1D Rate Index

The Trustee reserves the right to change the Benchmark.

SOB
No.
8

SOB
No.
9

H. Fund Managers

The details of Fund Managers of Sundaram Equity Savings Fund are as follows:

Name, Age & Tenure [^]	Educational Qualifications	Experience (last 10 years)	Other Fund(s) Managed
Mr. Sudhir Kedia 41, 3.5 Years	B.Com, CA and PGPFB	Sundaram Asset Management Co. Jan 2022 to till date Fund Manager-Equity Principal Asset Management Co . Oct 2019 to Dec 2021, Fund Manager – Equity Mirae Asset (India) Mutual Fund, Mar 2017 to Oct 2019, Fund Manager – Equity. ASK Investment Managers, Apr 2011 to Mar 2017, Associate Portfolio Manager	Funds Managed: Sundaram Multi Cap Fund*, Sundaram Tax Savings Fund*, Sundaram Multi Cap Fund - Series I-II*, Sundaram Multi Cap Series I & II*, Sundaram Select Micro Cap Series XVI - XVII*, Sundaram Large Cap Fund*, Sundaram Emerging Small Cap Series II - VII*, and Sundaram Long Term Tax Advantage Series I-IV*, Sundaram Long Term Micro Cap Tax Advantage Series II-VISundaram Large Cap Fund*, Sundaram Focused Fund*, Sundaram Flexi Cap Fund*
Rohit Seksaria , 44, 1.3 Years	B.Com, PGDM, CFA	Sundaram Asset Management Co. Jan 2017 to till date Assistant Fund Manager – Equity Progress Capital Pte , Singapore Jun 2013 to Dec 2016 Senior Analyst Matchpoint Investment Management Asia , Hong Kong Jul 2010 to Mar 2013 Progress Capital Pte , Singapore Jul 2007 to Jul 2010 Senior Analyst Irevna Research Services Dec 2002 to Jul 2007 Head of Research UTI Mutual Fund May 2002 to Dec 2002 Manager	Funds Managed: Sundaram Financial Services Opportunities Fund*, Sundaram Arbitrage Fund*, Sundaram Small Cap Fund*, Sundaram Select Micro Cap Series XVI - XVII*, Sundaram Tax Savings Fund*, Sundaram Nifty 100 Equal Weight Fund*, Sundaram Select Micro Cap Series XVI - XVII*, Sundaram Global Brand Fund, Sundaram Emerging Small Cap Series II-VII*, Sundaram Long Term Tax Advantage Series I-IV*, and Sundaram Debt Oriented Hybrid Fund (Equity Portion)*, Sundaram Multi Cap - Series I-II*, Sundaram Flexi Cap Fund*, Sundaram Diversified Equity Fund (Suspended for inflows)*, Sundaram Services Fund Dedicated Fund Manager for investments in overseas securities.
Dwijendra Srivastava 47, 1.3 Years (Fixed Income Portion)	Bachelor of Technology (Textile Technology), CFA, PGDM (Finance),	Sundaram Asset Management Company Limited Apr 2014 – till date Chief Investment Officer - Debt Jul 2010 – Apr 2014 Head – Fixed Income Deutsche Asset Management (India) Limited Jul 2007 – Jul 2010 Vice President and Fund Manager JM Financial Asset Management Limited May 2006 – Jul 2007 Fund Manager Tata Asset Management Company Private Limited Jan 2003 – May 2006 Manager (Investments)	Joint fund Manager Sundaram Overnight Fund, Sundaram Balanced Advantage Fund, Sundaram Equity Savings Fund, Sundaram Arbitrage Fund, Sundaram Aggressive Hybrid Fund, Sundaram Corporate Bond Fund, Sundaram Banking & PSU Debt Fund, Sundaram Low Duration Fund, Sundaram Short Duration Fund, Sundaram Medium Term Bond Fund, Sundaram Debt Oriented Hybrid Fund, Sundaram Liquid Fund, Sundaram Money Market Fund, Sundaram Ultra Short Duration Fund

[^] Cut-off date considered for calculation of tenure is March 31, 2023.

SOB
No.
11&13**I. Investment Restrictions**

As per the Trust Deed read with the SEBI (MF) Regulations, the following investment restrictions, wherever applicable shall apply in respect of the Schemes at the time of making investments. However, all investments by the Schemes will be made in accordance with the investment objective, asset allocation and where will the schemes invest, described earlier, as well as the SEBI (MF) Regulations, including schedule VII thereof, as amended from time to time. SEBI vide notification No. SEBI/LADNRO/ GN/2015-16/034 dated February 12, 2016 pertaining to Securities and Exchange Board of India (Mutual Funds) (Amendment) Regulations, 2016 and vide circular no SEBI/HO/IMD/DF2/CIR/P/2016/35 dated February 15, 2016 made amendment in Investment Restrictions. The modified Investment restrictions as follows:

- 1 The Scheme shall not invest more than 10% of its NAV in debt instruments issued by a single issuer, which are rated not below investment grade by a credit rating agency authorized to carry out such activity under the Securities and exchange Board of India Act, 1992. Such investment limit may be extended to 12% of the Scheme with the prior approval of the Board of Trustee and the Board of the Investment Manager. The limit shall not be applicable for investments in Government securities, Treasury Bills and Collateralised Borrowing and Lending Obligation.
- 2 A mutual fund Scheme shall not invest more than 10% of its NAV in un-rated debt instruments issued by a single issuer and the total investment in such instruments shall not exceed 25% of the NAV of the Scheme.
- 3 The Schemes shall not invest more than 10% of their NAV in money market instruments of an issuer. Such limit shall not be applicable for investments in Government securities, Treasury Bills and Collateralised Borrowing and Lending Obligation.
- 4 The Fund under all its Schemes shall not own more than 10% of any company's paid up capital carrying voting rights.
- 5 Transfer of investments from one Scheme to another Scheme, including this Scheme shall be allowed only if such transfers are made at the prevailing market price for quoted securities on a spot basis and the securities so transferred shall be in conformity with the investment objective of the Scheme to which such transfer has been made.

Further SEBI vide Circular no. SEBI/ho/IMD/DF4/Cir/P/2020/202 dated october 08, 2020 on Inter Scheme Transfer has prescribed additional safeguards.

- i. Key requirements of the circular are stated below:
 - IST shall be permitted only if other resources such as cash and cash equivalent, market borrowing, and selling securities in the market are exhausted.
 - ISTs will be permitted for the rebalancing of a portfolio only if there is a passive breach of regulatory limits or where duration, issuer, sector, and group rebalancing are required in both the transferor and transferee schemes.
 - no inter-scheme transfer of a security shall be allowed, if

there is negative news or rumour in the mainstream media or an alert is generated about the security, based on internal credit risk assessment.

- If the security gets downgraded within a period of four months following such a transfer, the fund manager of the buying scheme will have to provide detailed justification to the trustees for buying such a security.
- ii. The securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.
 - iii. Such transfer shall be carried out at the price obtained from valuation agencies in accordance with the guidelines provided in the SeBI circular no. SEBI/ho/IMD/DF4/Cir/P/2019/102 dated September 24, 2019.
 - iv. If prices are not received from any valuation agencies within the turn-around-time, such transfers shall be 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.]
- 6 The Scheme may invest in other Schemes under the same AMC or any other Mutual Fund without charging any fees, provided the aggregate inter-Scheme investment made by all the Schemes under the same management or in Schemes under management of any other asset management company shall not exceed 5% of the Net Asset Value of the Fund.
 - 7 The Scheme shall buy and sell securities on the basis of deliveries and shall in all cases of purchases, take delivery of relative securities and in all cases of sale, deliver the securities. The mutual fund may enter into derivatives transactions in a recognized stock exchange in accordance with the guidelines/framework specified by SEBI.
 - 8 The scheme shall get the securities purchased/ transferred in the name of the Fund on account of the concerned Scheme, wherever investments are intended to be of a long-term nature.
 - 9 No mutual fund Scheme shall make any investments in; a any unlisted security of an associate or group company of the sponsor; or b any security issued by way of private placement by an associate or group company of the Sponsor; or c the listed securities of group companies of the Sponsor which is in excess of 25% of its net assets.
 - 10 No mutual fund Schemes shall invest more than 10% of its NAV in equity or equity related instrument of any company.
 - 11 A mutual fund scheme shall not invest more than 5% of its NAV in the unlisted equity shares or equity related instruments.
 - 12 All investments by a mutual fund scheme in equity shares and equity related instruments shall only be made provided such securities are listed or to be listed.
 - 13 No loans for any purpose can be advanced by the Scheme.
 - 14 The Fund shall not borrow except to meet temporary liquidity needs of the Fund for the purpose of repurchase/ redemption

of units or payment of interest and IDCW to the unit holders. Such borrowings shall not exceed more than 20% of the net assets of the individual Scheme and the duration of the borrowing shall not exceed a period of 6 months.

- 15 The Scheme will comply with provisions specified in Circular dated August 18, 2010 and March 04, 2021 related to overall exposure limits applicable for derivative transactions as stated below:

- i. The cumulative gross exposure through equity, debt and derivative positions should not exceed 100% of the net assets of the scheme.
- ii. Mutual Funds shall not write options or purchase instruments with embedded written options.
- iii. The total exposure related to option premium paid must not exceed 20% of the net assets of the scheme.
- iv. Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.
- v. exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
 - a. hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains.
 - b. hedging positions cannot be taken for existing derivative positions. exposure due to such positions shall have to be added and treated under limits mentioned in Point 1.
 - c. Any derivative instrument used to hedge has the same underlying security as the existing position being hedged.
 - d. The quantity of underlying associated with the derivative position taken for hedging purpose does not exceed the quantity of the existing position against which hedge has been taken.
- vi. Mutual Funds may enter into interest rate swaps for hedging purposes. The counterparty in such transactions has to be an entity recognized as a market maker by RBI. Further, the value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the scheme. exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the scheme.
- vii. exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated under the limits mentioned in point i.

- 15 • The scheme shall not invest in securitised debt and credit default swaps.
- The scheme shall not engage in short selling.

15A Applicable Investment Limits in REIT and InvIT

- a. At the Mutual Fund level:-

Not more than 10% of units issued by a single issuer of REIT and InvIT;

- b. At a single Mutual Fund scheme level: -
 - i. not more than 10% of its NAV in the units of REIT and InvIT; and
 - ii. not more than 5% of its NAV in the units of REIT and InvIT issued by a single issuer.

The limits mentioned in sub- clauses (i) and (ii) above will not be applicable for investments in case of index fund or sector or industry specific scheme pertaining to REIT and InvIT.

16 SECTOR EXPOSURES

- a) Sectoral exposure in debt oriented mutual fund schemes put a limit of 25% at the sector level and an additional exposure not exceeding 15% (over and above the limit of 25%) in financial services sector only to housing Finance Companies (HFCs)
- b) Mutual Funds/AMCs shall ensure that total exposure of debt schemes of mutual funds in a particular sector (excluding investments in Bank CDs, TREPS, G-Secs, TBills, short term deposits of scheduled commercial banks and AAA rated securities issued by Public Financial Institutions and Public Sector Banks) shall not exceed 25% of the net assets of the scheme;

Provided that an additional exposure to financial services sector (over and above the limit of 25%) not exceeding 15% of the net assets of the scheme shall be allowed only by way of increase in exposure to housing Finance Companies (HFCs);

Provided further that the additional exposure to such securities issued by HFCs are rated AA and above and these HFCs are registered with National housing Bank (NhB) and the total investment/ exposure in HFCs shall not exceed 25% of the net assets of the scheme.

An additional exposure to financial services sector (over and above the 25% limit stated above) not exceeding 15% of the net assets of the scheme is permitted by way of increase in exposure to housing

Finance Companies (HFC) only, subject to the following conditions:

- (i) Such securities issued by HFCs are rated AA and above;
- (ii) These HFCs are registered with National housing Bank (NHB).
- (iii) The total investment in HFCs does not exceed 25% of the net assets of the scheme

The Trustee may alter the above restrictions from time to time to the extent that changes in the Regulations may allow or as deemed fit in the general interest of the unit holders. All the Investment restrictions will be considered at the point of Investment. The Trustee /AMC may alter the above stated limitations from time to time, and also to the extent the SEBI (MF) Regulations change, so as to permit the Schemes to make their investments in the full spectrum of permitted

investments in order to achieve their investment objective.

17 GROUP EXPOSURES

- a) Mutual Funds / AMCs shall ensure that total exposure of debt schemes of mutual funds in a group (excluding investments in securities issued by Public Sector Units, Public Financial Institutions and Public Sector Banks) shall not exceed 20% of the net assets of the scheme. Such investment limit may be extended to 25% of the net assets of the scheme with the prior approval of the Board of Trustees.
 - b) For this purpose, a group means a group as defined under regulation 2 (mm) of SEBI (Mutual Funds) Regulations, 1996 (Regulations) and shall include an entity, its subsidiaries, fellow subsidiaries, its holding company and its associates.
- 18 The Schemes will comply with any other Regulation applicable to the investments of mutual funds from time to time. Pursuant to SEBI Circular No: SEBI/HO/IMD/DF2/CIR/P/2016/57 dated May 31, 2016.

18. Debt instruments with special features

As per SEBI Circular SEBI/HO/IMD/DF4/CIR/P/2021/032 dated march 10, 2021 following restrictions are placed with regard to investment in debt instruments with special features like Additional Tier I bonds and Tier 2 bonds issued under Basel III framework and the valuation of such perpetual bonds.

The debt instruments having such special features, which otherwise are Non-Convertible Debentures, may be treated as debt instruments until converted to equity.

Close ended schemes shall not invest in Perpetual bonds.

Mutual Fund under all its schemes shall own more than 10% of such instruments issued by a single issuer.

A Mutual Fund scheme shall not invest – more than 10% of its NAV of the debt portfolio of the scheme in such instruments; and more than 5% of its NAV of the debt portfolio of the scheme in such instruments issued by a single issuer.

The above investment limit for a mutual fund scheme shall be within the overall limit for debt instruments issued by a single issuer, as specified at clause 1 of the Seventh Schedule of SEBI (Mutual Fund) Regulations, 1996, and other prudential limits with respect to the debt instruments.

The investments of mutual fund schemes in such instruments in excess of the limits specified as above as on the date of the circular is grandfathered and such mutual fund schemes shall not make any fresh investment in such instruments until the investment comes below the specified limits.

Segregation of Portfolio

If the said instrument is to be written off or converted to equity pursuant to any proposal, the date of said proposal may be treated as the trigger date. However, if the said instruments are written off or converted to equity without proposal, the date of write off or conversion of debt instrument to equity may be treated as the trigger date. All other conditions as specified in relevant provisions of SEBI Circular No.

SEBI/HO/IMD/DF2/CIR/P/2018/160 dated December 28, 2018, SEBI Circular No. SEBI/HO/IMD/DF2/CIR/P/2019/127 dated November 07, 2019 with respect of Creation of segregation portfolio in mutual fund schemes.

Valuation

As regards the valuation of bonds with call and/or put options, it is clarified that the bonds shall be valued in line with the SEBI circular No. MRD/CIR/8/92/2000 dated September 18, 2000 irrespective of the nature of issuer. Further, the maturity of all perpetual bonds shall be treated as in line with SEBI Circular no. SEBI/HO/IMD/DF4/CIR/P/2021/034 dated March 22, 2021 for the purpose of valuation.

19. Cash and Cash Equivalents

Pursuant to SEBI Circular SEBI/HO/IMD-II/DOF3/OW/P/2021/31487/1 dated 3rd November 2021 cash equivalent shall consist of following securities having residual maturity less than 91 days: (a) Government Securities, (b) T - Bills and (c) Repo on Government Securities.

SHORT TERM DEPOSITS:

Pending deployment of funds of the Schemes in terms of the investment objective of the Schemes, the Mutual Fund may invest them in short term deposits of scheduled commercial banks in accordance with applicable SEBI guidelines as stated below:

- a) "Short Term" for parking of funds by Mutual Funds shall be treated as a period not exceeding 91 days.
- b) Such deposits, if made, shall be held in the name of the scheme.
- c) The scheme shall not park more than 15% of its net assets in short term deposits of all scheduled commercial banks put together. This limit however may be raised to 20% with prior approval of the Trustees. Also, parking of funds in short term deposits of associate and sponsor scheduled commercial banks together shall not exceed 20% of the total deployment by the scheme in short term deposits.
- d) The scheme shall not park more than 10% of the net assets in short term deposits with any one scheduled commercial bank including its subsidiaries.
- e) Trustees shall ensure that funds of a particular scheme are not parked in short term deposit of a bank which has invested in that scheme.
- f) AMC(s) shall not charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks
- g) half Yearly portfolio statements shall disclose all funds parked in short term deposit(s) under a separate heading. Details shall also include name of the bank, amount of funds parked, percentage of NAV.
- h) Trustees shall, in the half Yearly Trustee Reports certify that provisions of the Mutual Funds Regulations pertaining to parking of funds in short term deposits pending deployment are complied with at all points of time. The AMC(s) shall also

certify the same in its CTR(s).

The Trustee of the Mutual Fund may alter these limitations/objectives from time to time to the extent the SEBI Regulation change, so as to permit the Scheme to make its investments in the full spectrum of permitted investments for the mutual fund in order to achieve its investment objective. All investments of the Scheme will be made in accordance with the SEBI Regulation. All the Investment restrictions will be considered at the point of Investment.

Securities Lending by the Fund

Securities Lending means the lending of securities to another person or entity for a fixed period of time, at a negotiated compensation in order to enhance returns of the portfolio. The borrower will return the securities lent on the expiry of the stipulated period or the lender can call the same back i.e. the scheme before its expiry. The fund may lend the securities for a specific period, to generate better returns on those stocks, which are otherwise bought with the intention to hold for a long period of time. Subject to the SEBI (MF) Regulations and in accordance with Securities Lending Scheme, 1997, SEBI Circular No MFD/CIR/01/ 047/99 dated February 10, 1999, SEBI Circular no. SEBI /IMD / CIR No 14 / 187175/ 2009 dated December 15, 2009 and framework for short selling and borrowing and lending of securities notified by SEBI vide circular No MRD/DoP/SE/ Dep/Cir-14/2007 dated December 20, 2007, as may be amended from time to time, the Scheme seeks to engage in Securities Lending.

The AMC shall adhere to the following limits should it engage in Securities Lending.

1. The exposure of the Scheme at the time of lending will be restricted to 20% of its total assets and 5% for a single counter party.
2. The exposure to a single approved intermediary will not exceed 10% of the Total Assets of the Scheme or Rs.5 crore whichever is higher.

Restriction on redemption in Mutual Funds

- a. 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:

- i. *Liquidity issues* - when market at large becomes illiquid affecting almost all securities rather than any issuer specific security. AMCs should have in place sound internal liquidity management tools for schemes.

Restriction on redemption cannot be used as an ordinary tool in order to manage the liquidity of a scheme. Further, restriction on redemption due to illiquidity of a specific security in the portfolio of a scheme due to a poor investment decision, shall not be allowed.

- ii. 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.
- iii. 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.

- b. Restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period.
- c. Any imposition of restriction would require specific approval of Board of AMCs and Trustees and the same should be informed to SEBI immediately.
- d. When restriction on redemption is imposed, the following procedure shall be applied:
 - i. No redemption requests upto INR 2 lakh shall be subject to such restriction.
 - ii. Where redemption requests are above INR 2 lakh, AMCs shall redeem the first INR 2 lakh without such restriction and remaining part over and above INR 2 lakh shall be subject to such restriction.
- e. Disclosure:

The above information to investors shall be disclosed prominently and extensively in the scheme related documents regarding the possibility that their right to redeem may be restricted in such exceptional circumstances and the time limit for which it can be restricted.

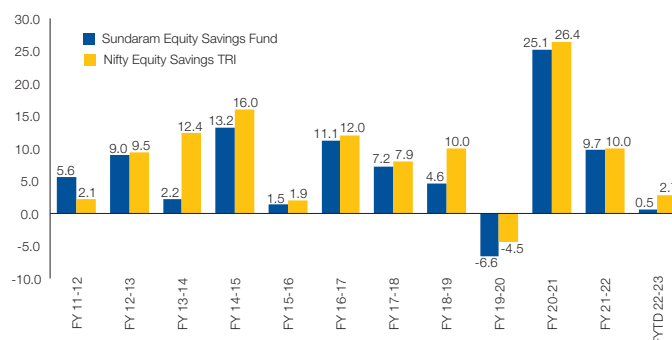
J. Scheme Performance

Sundaram Equity Savings Fund

Fund/Benchmark	One Year	Three Years	Five Years	Since Launch
Equity Savings Fund	2.0	11.9	6.5	7.7
Nifty Equity Savings Index	3.5	12.9	8.6	N.A

Past performance may or may not be sustained in the future.

Returns are in %. Returns computed on compounded annualised basis based on the NAV of Regular Plan - Growth option. Relevant benchmarks highlighted in italics. NAV & performance as on March 31, 2023.



For information on comparable schemes, their performance, fund size and number of folios, please refer the table provided in Highlights & Scheme Summary.

K. Additional Scheme Related Disclosure(s)**A. Portfolio Related Disclosures (as on March 31, 2023) - Sundaram Equity Savings Fund**

Portfolio-Top 10 Holdings(Issuer-Wise)		Sector Allocation(% of Net Assets)	
Issuer	% to NAV	Sector Allocation	% to NAV
HDFC Bank Ltd	8.1	Banks	23.9
ICICI Bank Ltd	6.4	IT - Software	11.1
Infosys Ltd	5.2	Finance	6.2
Tech Mahindra Ltd	3.5	Automobiles	3.6
Hindustan UniLever Ltd	3.0	Diversified Fmcg	3.0
Housing Development Finance Corporation Ltd	3.0	Capital Markets	2.8
Ashok Leyland Ltd	2.6	Consumer Durables	2.7
State Bank of India	2.6	Ction Vehicles	2.6
Axis Bank Ltd	2.3	Electrical Equipment	2.1
Maruti Suzuki India Ltd	1.8	Petroleum Products	1.8
TOTAL	38.5	Transport Services	1.4
		Auto Components	1.3
		Industrial Products	1.3
		Insurance	1.1
		Ferrous Metals	1.0
		Beverages	0.7
		Construction	0.7
		Pharmaceuticals & Biotechnology	0.7
		Chemicals & Petrochemicals	0.6
		Leisure Services	0.6
		Agricultural Food & Other Products	0.4
		Textiles & Apparels	0.3
		Retailing	0.3
		Cement & Cement Products	0.1
		Cash & Others	29.7
		TOTAL	100.0

Portfolio Turnover Ratio Sundaram Equity Savings Fund -Last 1 Year: 394%

- Aggregate of equity securities and debt instruments held by the Scheme at issuer level/sectors are as of the date indicated.
- Top 10 holdings disclosure do not include cash & cash equivalents, fixed deposits and/or exposure in derivative instruments, if any.
- Others under sector disclosure include cash & cash equivalents.
- For complete details and latest monthly portfolio, investors are requested to visit www.sundarammutual.com/StatutoryDisclosures

B. Aggregate value of Investments held in the Scheme by the following category of person(s) as on March 31, 2023

Scheme Name	Net Asset Value of Units held (Rs. In Cr.)		
	AMC's Board of Directors	Fund Manager(s)	Key Managerial Personnel* (other than Scheme's Fund Manager(s))
Sundaram Equity Savings Fund	0.01	0.03	0.01

* Managing Director of the AMC is covered under the category of Key Managerial Personnel.

A. New Fund Offer Details

This section does not apply as the scheme covered in this document is available on an on-going basis for subscription and redemption.

B. Ongoing Offer Details

Ongoing offer period	The Scheme is available for subscription and redemption on all business days.
Ongoing price for subscription This is the price you need to pay for purchase / switch-in.	At applicable NAV and Stamp Duty (Face Value Rs. 10/- per unit)
Ongoing price for redemption This is the price you will receive redemptions / switch outs	At the applicable NAV subject to prevailing exit load. Net Asset Value - Applicable Exit Load. Example regarding Redemption price: Redemption Price = Applicable NAV * (1-Sales Load, if any) Applicable NAV is Rs. 10.00 Exit Load: 1 per cent Redemption Price = $10 * (1 - .01) = \text{Rs. } 9.90$. Applicable exit load shall be subject to the tenure of investment of the investor in the scheme vis-à-vis the exit load structure applicable when investor had invested in the scheme The Fund shall ensure that the redemption Price is not lower than 95% of the NAV.
Cut off timing This is the time before which your application (complete in all respects) should reach the official points of acceptance.	Pursuant to SEBI Circular No. SEBI/HO/IMD/DF2/CIR/P/2020/175 dated September 17, 2020, Investors are requested to note the revised provisions for applicability of NAV, with effect from February 1, 2021: Applicable NAV for Subscriptions / Switch-ins (irrespective of application amount): 1. In respect of valid applications received upto 3.00 p.m on a Business Day at the official point(s) of acceptance and funds for the entire amount of subscription/purchase (including switch ins) as per the application are credited to the bank account of the respective Schemes before the cut-off time of the same day i.e., available for utilization before the cut-off time - the closing NAV of the day shall be applicable. 2. In respect of valid applications received after 3.00 p.m on a Business Day at the official point(s) of acceptance and funds for the entire amount of subscription/purchase (including switch ins) as per the application are credited to the bank account of the respective Schemes before the cut-off time of the next Business Day i.e available for utilization before the cut-off time of the next Business Day - the closing NAV of the next Business Day shall be applicable. 3. Irrespective of the time of receipt of application at the official point(s) of acceptance, where funds for the entire amount of subscription/purchase as per the application are credited to the bank account of the respective Schemes before the cut-off time on any subsequent Business Day - i.e. available for utilization before the cut-off time on any subsequent Business Day - the closing NAV of such subsequent Business Day shall be applicable. 4. For Switch-ins of any amount: For determining the applicable NAV, the following shall be ensured: • Application for switch-in is received before the applicable cut-off time. • Funds for the entire amount of subscription / purchase as per the switch-in request are credited to the bank account of the Scheme before the cut-off time. • The funds are available for utilization before the cut-off time. • In case of 'switch' transactions from one scheme to another, the allocation and settlement shall be in line with redemption payouts. To clarify, for investments through systematic investment routes such as Systematic Investment Plans (SIP), Systematic Transfer Plans (STP) and Transfer IDCW, etc. the units will be allotted as per the closing NAV of the day on which the funds are available for utilization before the cut-off time by the Target Scheme irrespective of the installment date of the SIP, STP or record date of IDCW.

Where can the applications for purchase / redemption / switches be submitted	Subscription/redemption request can be submitted on any business day at branches of Sundaram Asset Management, the Registrar and at Investor Service Centres of the registrar. Registrar & Transfer Agent KFin Technologies Private Limited CIN: U72400TG2017PTC117649 Unit: Sundaram mutual Fund, Tower- B, Plot No. 31 & 32, Selenium building, Gachibowli Road, Financial District, Nanakramguda, Serilingampally Mandal, Hyderabad 500032. Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI) Email us at: customerservices@sundarammutual.com Applications can be submitted at branches of Sundaram Asset Management Company Ltd, details of which are furnished on back cover page of this document. Applications can also be submitted at the authorised POS of MF Utility India. Please refer section on MF Utility Platform under Highlights & Scheme Summary Section for further information in this regard. The Investment Manager may modify, from time to time, the places for acceptance of applications in the interest of investors. For details investors may also refer to the website of the Asset Management Company / use the Toll Free Number provided in this document.
Transaction Charge to Distributors	1 The Distributor would be allowed to charge the Mutual Fund Investor a Transaction Charge where the amount of investment is Rs. 10,000/-and above on a per subscription basis 2 For an investor other than First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 100/- per subscription of Rs. 10,000/- and above For a First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 150/- per subscription of Rs. 10,000/- and above 3 The Transaction Charge, where applicable based on the above criteria, will be deducted by the Investment Manager from the subscription amount remitted by the Investor and paid to the distributor; and the balance (net) amount will be invested in the scheme. Thus units will be allotted against the net investment. 4 No Transaction charges shall be levied: a) Where the distributor/agent of the investor has not opted to received any Transaction Charges; b) Where the investor purchases the Units directly from the Mutual Fund (i.e. not through any distributor); c) Where total commitment in case of SIP / Purchases / Subscriptions is for an amount less than Rs. 10,000/-; d) On transactions other than purchases / subscriptions relating to new inflows. Switches / Systematic Transfers / Allotment of Bonus Units / IDCW reinvestment Units / Transfer / Transmission of units, etc will not be considered as subscription for the purpose of levying the transaction charge. e) Purchases / subscriptions carried out through stock exchange(s), as applicable. The distributors can opt-in / opt-out of levying transaction charges based on 'type of the Product/Scheme' instead of 'for all Schemes'. Accordingly, the transaction charges would be deducted from the subscription amounts, as applicable. However, the distributor shall not be able to opt-in or opt-out at the investor-level i.e. a distributor shall not charge one investor and choose not to charge another investor. 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/Switch requests (including under fresh registrations of Systematic Investment Plan (SIP)/ Systematic Transfer Plan (STP) or under SIPs/STPs registered prior to the suspension period) received during the suspension period shall be processed under Direct Plan and shall continue to be processed under Direct Plan perpetually*, with a suitable intimation to the unitholder/s mentioning that the distributor has been suspended from doing mutual fund distribution. * If the AMC receives a written request / instruction from the unitholder/s to shift back to Regular Plan under the ARN of the distributor post the revocation of suspension of ARN, the same shall be honored. 3. Any Purchase/Switch or SIP/STP transaction requests received through the stock exchange platform, from any distributor whose ARN has been suspended, shall be rejected. 4. Additionally, where the ARN of a distributor has been terminated permanently, the AMC shall advise the concerned unitholder(s), who may at their option, either continue their existing investments under regular/distributor Plan under any valid ARN holder of their choice or switch their existing investments from regular/distributor Plan to Direct Plan subject to tax implications and exit load, if any. The transaction charges are in addition to the existing system of commission permissible to the Distributors. On subscription through Distributors, the upfront commission if any will be paid directly by the Investors to the Distributor by a separate cheque based on their assessment of various factors including the service rendered by the Distributor. Any circular/clarification issued by SEBI in this regard will automatically become applicable and will be incorporated in the SID/SAI/KIM wherever applicable.

Allotment on on-going basis	For subscription to units by the investors, the units shall be allotted to them, provided the application is complete in every respect and in order. Otherwise the application may be rejected.
How to apply	Please refer to the Statement of Additional Information and Key Information Memorandum, which is a part of the Application Form (available free of cost with the offices of the Investment Manager and can be downloaded from the Website of the Investment Manager (www.sundarammutual.com)).
Minimum investment amount	New Investor/Existing – Rs. 100/- for both Quarterly, Half-yearly IDCW and Growth Option and any amount thereafter under each Plan/ option. Stamp Duty: Pursuant to Notification No. S.O. 1226(E) and G.S.R. 226(E) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of The Finance Act, 2019, notified on February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India, a stamp duty @0.005% of the transaction value of units would be levied on applicable mutual fund inflow transactions, with effect from July 1, 2020. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including IDCW reinvestment and switch-in) to the Unit holders would be reduced to that extent.
Minimum amount for Redemption/Switches	The minimum amount for redemption/switch out will be: Regular & Direct Plan: Rs.100/- or 1 unit or account balance, whichever is lower.
Minimum balance to be maintained	Nil
Special facilities / products available	(1) Systematic Investment Plan (SIP) Minimum Six installments of Rs. 100/- for Monthly SIP, Rs.750 for Quarterly SIP, Rs.1,000 for Weekly SIP and any amount thereafter SIP Dates: Any Day (1st to 31st) Any Day SIP: Investors can choose any preferred date of the month as SIP debit date. In case the chosen date falls on a non-business day, the SIP will be processed on the immediate next business day. In case chosen date is not available in a particular month, the SIP will be processed on the last business day of the month. The weekly SIP requests shall be processed on Wednesday of every week. If Wednesday is not a business day, the SIP installment will be processed on the next business day. SIP default date is 7th of every month, if no date is mentioned. Perpetual SIP: Perpetual SIP means an SIP wherein the maximum period/installment of investment under SIP is not mentioned by the investor and therefore, the installments will be recurring until the investor communicates his intention to close/stop the SIP investment. The minimum amount of SIP and the load structure will all remain the same. If the investor does not mention the period/installments of SIP in the application form, the SIP will be deemed to be for perpetuity unless and until the investor communicates his intention otherwise. SIP will be terminated automatically if there are three consecutive failures. This will apply for SIP through Auto Debit and post-dated cheques. The Fund reserves the right to recover the related bank charges incurred. SIP Top-up feature The top-up feature under the Systematic Investment Plan is to enable the investors increase their contribution in an SIP at pre-determined intervals by a fixed amount during the tenure of SIP. This feature is optional and is available to investors under all Schemes offering SIP facility w.e.f. April 21, 2014. The terms & conditions of the Top-Up feature are stated below: Frequency for Top-up: Monthly & Quarterly For monthly SIP, the top-up options are: Half Yearly Top-up: Under this option, the amount of investment through SIP installment shall be increased by an amount chosen by the Investor post every 6th (sixth) SIP installment. Yearly Top-up: Under this option, the amount of investment through SIP installment shall be increased by an amount chosen by the Investor post every 12th (twelfth) SIP installment. For Quarterly SIP, the top option is

- **Yearly Top-up:** Under this option, the amount of investment through SIP installment shall be increased by an amount chosen by the Investor post every 4th (fourth) SIP installment.

In case the investor who has registered under quarterly SIP has opted for half yearly Top-up, the SIP will be registered and processed as Yearly Top-up.

The Top-up feature shall not be available for weekly SIPs.

2. **Minimum Top-up Amount:** Rs. 500 and in multiples of Re. 1/- thereafter.

3. **Default Top-up Frequency and amount:**

- a. In case the investor does not specify either the frequency or the amount for Top-up, the applications shall be processed with following default options: Default frequency - Yearly Default Amount - Rs. 500
 - b. In case the investor does not specify the frequency for Top-up and amount for Top-up, the application form may be processed as SIP without Top-up feature, subject to it being valid and complete in all other aspects.
4. The SIP period has to be for a minimum of seven complete months in case of half-yearly top up and thirteen complete months for yearly top up.
 5. SIP instalment amount has to be a minimum of Rs. 500/- in order to avail the top-up feature under monthly SIP. Otherwise, the transaction would be processed as a SIP without Top-up feature subject to it being valid and complete in all other aspects.
 6. The Top-up option must be specified by the investors while enrolling for the SIP facility. The top-up feature can be availed only at the time of registration or renewal of SIP.
 7. The Top-up feature shall be available for SIP Investments only through ECS (Debit Clearing) / Direct Debit Facility/Standing Instruction.
 8. The top-up feature shall not be available in the following cases: (i) SIP registration under perpetual mode. (ii) SIP registrations which are received through Channel Partners, Exchanges and ISIPs. (iii) Registrations under COMBO SIP facility.
 9. The Top-up details cannot be modified once enrolled. In order to make any changes, the investor must cancel the existing SIP and enroll for a fresh SIP with the revision in Top-up details.

For further details please refer the Key Information Memorandum cum Applicatio Form.

SIP Pause Facility

The existing investor who has an ongoing SIP will have an option to pause the SIP with effect from 23rd April 2020. The investor will have to submit the signed SIP Pause facility form duly complete in all respects to avail this facility.

The terms and conditions for availing the 'SIP Pause Facility' shall be as follows:

1. The SIP Pause Facility is available for SIP registration with monthly frequency only.
2. The request for SIP Pause should be submitted at least 21 days prior to the subsequent SIP date.
3. The request for SIP Pause can be for minimum 1 instalment and maximum 6 instalments
4. Investor can opt for the SIP Pause facility only once during the tenure of particular SIP.
5. The SIP shall continue from the subsequent instalment after the completion of Pause period automatically.

(2) Systematic Withdrawal Plan (SWP)

SWP may be appropriate for those seeking regular inflow of funds for their needs. The minimum amount, which the unit holder can withdraw, is Rs.100/-. The unit holder may avail himself of this plan by sending a written request to the Investment Manager or the Registrar. Withdrawals through SWP are effected on the specified redemption dates, at an interval of the investor's choice (monthly, quarterly, semi-annual or annual). The amount thus withdrawn by this option will be converted into units at the applicable redemption price on that date and will be subtracted from the units balance to the credit of the unit holder. Unit holders may change the amount indicated in the SWP, subject to the minimum amount specified above. The SWP may be terminated on written notice from the unit holder and it will terminate automatically when all the units of the unit holder are liquidated or withdrawn from the account. The unit holders can opt for either fixed or variable amount withdrawal under this facility.

Fixed amount withdrawal

The unit holder can withdraw a fixed amount (subject to a minimum amount of Rs.100/- on the Specified Redemption Dates. In this case, the withdrawal could affect the capital, reducing it or enhancing it based on the amount withdrawn and returns generated by the fund.

Example

Amount Invested: Rs.50,000/- in a Scheme of Sundaram Mutual Fund – Growth Option.

If the unit holder decides to withdraw Rs. 5,000/- every month, and the appreciation in a month is Rs. 1750/-, then such redemption proceeds will comprise of Rs. 1750/- from the capital appreciation and Rs.3250/- from the unit holder's capital account.

(3) Systematic Transfer Plan (STP)

STP is a facility wherein a unit holder of a Sundaram Mutual Fund scheme can opt to transfer a fixed amount or capital appreciation amount at regular intervals to another scheme of Sundaram Mutual Fund. The amount transferred under the STP from the Transferor scheme to the Transferee scheme, shall be effected by redeeming units of Transferor scheme and subscribing to the units of the Transferee scheme.

Investors can choose any date of the month/quarter for availing the STP facility. Any Day STP is applicable only for monthly and quarterly frequencies.

If Wednesday is not a business day, the STP installment will be processed on the next business day.

Daily: rs.1,000/- (6 Instalments);

Weekly: rs.1,000/- (6 Instalments)

Monthly: rs.100/- (6 Instalments);

Quarterly: rs.750/- (6 Instalments)

Semi Annual /Annual: rs.1,000/- (6 Instalments)

STP may be terminated automatically if the balance falls below the minimum account balance. The capital appreciation portion will be subject to capital gains tax at applicable rates. Investors may opt to exit from the facility by giving a written notice to the Registrar at least 14 days prior to the next transfer date. STP may be terminated automatically if the balance falls below the minimum account balance or upon the receipt of notification of death/incapacity of the unit holders by the Fund. The Investment Manager reserves the right to have differential load structures for investors who opt for the STP. Rules relating to the STP may be changed from time to time by the Investment Manager.

Note: Where the specified dates are not business days, the next business day will be relevant. The Trustee can change the prescribed dates/installment amounts or any other feature at their discretion.

1. In case the STP date is not mentioned/not legible, then the STP will be registered with 07th as default STP date, as applicable.
2. Any Day STP shall be triggered and processed only on Business days.
3. Minimum Any Day STP Amount/installment: As stated in the respective Scheme Information Document (SID) / Key Information Memorandum (KIM) and satisfying the minimum criteria of source and target schemes.
4. Any day STP is eligible for cycle dates of 1st to 31st
 - i. For the dates from 1 to 28:
 - STP shall be processed on the given the day if that day is a business day. In case the specified date is a non-business day, it shall be processed on the next business day.
 - ii. For the dates from 29 to 31:
 - If the selected date is available in that month and it is a business day, any day STPs should be triggered for processing on that date. If the selected date is not a business day, any day STP shall be triggered for processing on the next business date.
 - If the selected date itself is not available in that month, any day STP shall be triggered for processing on its previous business day.
 - For example, if 29 is not available in the month of February, any day STP shall be triggered for processing on the last business day of February.
 - For example, if 31 is not available in any of the months, any day STP shall be triggered for processing on 30th of that month, provided it is a business day, else last business day of the month shall be considered for any day STP processing.
5. Discontinuation of STP, for all frequencies
 - a) When the outstanding balance in "transferor Scheme" does not cover any of the STP instalment amount, all outstanding units will be liquidated and STP will be effected for such outstanding balance (subject to the transfer amount satisfying the minimum investment criteria in the destination scheme) and STP will be terminated for subsequent instalments.
 - b) STP will be terminated if all units from the Transferor Scheme are pledged or upon receipt of intimation of death of first/sole unit holder.
 - c) Investors can also choose to terminate the STP by giving a written notice of at least 7 Business Days in advance to the Official Points of Transactions and accordingly, termination of STP shall be effected on receipt of valid request.

6. STP trigger under any frequency will start on a day as opted by the investor falling not later than the 5th working day from the date of receipt of a valid request.

The Trustee/AMC reserves the right to change/modify the terms of SIP.

(3A) Daily Systematic Transfer Plan (Daily STP) facility

Daily STP is a facility provided wherein the unit holder(s) of "Transferor Scheme(s)" can opt to transfer a fixed amount at daily intervals (Business days) from their existing investments under "Transferor Scheme(s)" to eligible "Transferee Scheme(s)" which is available for investment at that time.

Investors are requested to note the following terms and conditions with respect to availing Daily STP facility:

i. Date of transfer

Daily Interval (on all business days). Investors should note that in case of Daily STP, the commencement date for transfers shall be the 15th working day from the date of receipt of a valid request and thereafter, transfers shall be effected on all business days at NAV based prices, subject to applicable load. Thus, in the event of an intervening non-business day (e.g. Saturday and Sunday), STP triggers will not take place and consequently the total number of Daily STP instalments opted by the investor will be adjusted to that extent i.e., For e.g. if the investor has opted for 20 instalments and if 5 non business days happen to occur in the intervening period, then only 15 Daily STP instalments shall be triggered. In view of the intervening non business days, investors are advised to extend the period by including possible non business days during the transfer period for covering the intended instalments.

ii. Load Structure of the Transferor Scheme & Transferee Schemes as on the date of enrolment of STP shall be applicable.

iii. Discontinuation of Daily STP

- a) Daily STP will be automatically terminated if all units are liquidated or withdrawn from the Transferor Scheme or pledged or upon receipt of intimation of death of unit holder. Further, if the outstanding balance in "Transferor Scheme" does not cover any of the Daily STP instalment amount, all outstanding units will be liquidated and Daily STP will be effected for such outstanding balance and Daily STP will be terminated for subsequent instalments.
- b) Investors can also choose to terminate the Daily STP by giving a written notice of at least 7 Business Days in advance to the Official Points of Transactions and accordingly, termination of Daily STP shall be effected from 8th Business Day of receipt of valid request.

iv. The provision of 'Minimum redemption amount' specified in the SID of Transferor Scheme and 'Minimum application amount' specified in the SID of the Transferee Schemes will not be applicable for Daily STP.

v. The Trustee / AMC reserve the right to change / modify the terms of the Daily STP or withdraw this facility from time to time.

(4)

A. As per SEBI Circular SEBI/HO/IMD/IMD-I DOF2/P/CIR/2022/161 as on November 25, 2022.

- a. In partial modification of paragraph II(c) of SEBI Circular SEBI/IMD/CIR No.1/64057/06 dated April 4, 2006, the record date shall be two working days from the issue of public notice, wherever applicable, for the purpose of payment of dividend
- b. The payment of dividend to the unitholders shall be made within seven working days from the record date

B. IDCW Transfer Facility (DSO)

Sundaram Trustee Company Limited, the Trustee to Sundaram Mutual Fund has introduced Transfer IDCW Option into all open ended schemes from any schemes (open ended and close ended) of Sundaram Mutual Fund.

The terms and conditions of the Transfer IDCW Option are as follows:

- 1) Transfer IDCW Option is a facility wherein unit holder(s) of eligible scheme(s) [hereinafter referred to as "Source Scheme(s)"] of Sundaram Mutual Fund can opt to automatically invest the IDCW (as reduced by the amount of applicable statutory levy, if any) declared by the eligible Source Scheme(s) into other eligible Scheme(s) [hereinafter referred to as "**Target Scheme(s)**"] of Sundaram Mutual Fund.
- 2) DSO facility is available to unit holder(s) only under the IDCW Plan / Option of the Source Scheme(s). However, the DSO facility will not be available to unit holder(s) under the Daily IDCW Option in the Source Scheme(s). Unit holder's enrolment under the DSO facility will automatically override any previous instructions for 'IDCW Payout' or 'IDCW Reinvestment' facility in the Source Scheme.
- 3) The enrolment for DSO facility should be for all units under the respective IDCW Plan / Option of

the Source Scheme. Instructions for part IDCW Transfer and part IDCW Payout / Reinvestment will not be accepted. The IDCW amount will be invested in the Target Scheme under the same folio. Accordingly, the unit holder(s) details and mode of holding in the Target Scheme will be same as in the Source Scheme.

- 4) The enrolment to avail of DSO facility has to be specified for each Scheme/Plan/Option separately and not at the folio level.
- 5) Under DSO, IDCW declared (as reduced by the amount of applicable statutory levy and deductions, if any) in the Source scheme (subject to minimum of Rs.500/-) will be automatically invested into the Target Scheme, as opted by the unit holder, on the date of realisation of funds in the target scheme, subject to applicable load as specified under paragraph 8 below and accordingly equivalent units will be allotted in the Target Scheme, subject to the terms and conditions of the Target Scheme.
- 6) The provision for '**Minimum Application Amount**' specified in the respective Target Scheme's Scheme Information Document (SID) will not be applicable under DSO.
- 7) **Load Structure:** The IDCW amount to be invested under the DSO from the Source Scheme to the Target Scheme shall be invested by subscribing to the units of the Target Scheme at applicable NAV.

Entry Load (Target Scheme): Nil for all type of plans

Exit Load (Target Scheme): As per the relevant SID(s) The Trustee/AMC reserves the right to change the load structure at any time in future on a prospective basis.

- 8) The account statement will be issued by Email or by post/courier (if opted by the unitholder) to the unit holder once in a month, in case of any transactions made during the month.
- 9) Unitholders who wish to enroll for DSO facility are required to fill DSO Enrolment Form available with the ISCs, distributors/agents and also displayed on the website www.sundarammutual.com. The DSO Enrolment Form should be completed in English in Block Letters only. Please tick (✓) in the appropriate box, where boxes have been provided. The DSO Enrolment Form complete in all aspects should be submitted at any of the Investor Services centre (ISCs) of Sundaram Mutual Fund.
- 10) The request for enrolment for DSO must be submitted at least 10 days prior to the Record Date for the IDCW. In case of this condition not being met, the enrolment would be considered valid from the immediately succeeding Record Date of the IDCW.
- 11) Unitholder(s) are advised to read the SID(s) of Target Scheme(s) carefully before investing. The SID(s) / Key Information Memorandum(s) of the respective Scheme(s) are available with the ISCs of Sundaram Mutual Fund, brokers / distributors and also displayed on the Sundaram Mutual Fund website i.e. – www.sundarammutual.com
- 12) Unit holders will have the right to discontinue the DSO facility at any time by sending a written request to the ISC. Notice of such discontinuance should be received at least 10 days prior to the IDCW Record Date. On receipt of such request, the DSO facility will be terminated. At the time of discontinuation of DSO facility, the Unit holders should indicate their choice of option i.e. IDCW reinvestment or IDCW payout. In the event the Unitholder does not indicate his choice of IDCW option, the IDCW, if any, will be reinvested (compulsory payout if IDCW reinvestment option is not available) in the Source Scheme. Once the request for DSO is registered, then it shall remain in force unless it is terminated as aforesaid.
- 13) The Trustee reserves the right to change/ modify the terms and conditions of the DSO at a later date on a prospective basis.

(5) Pledge

Pledge of units will be recognised. For details please contact our Investor Service Centres. In case of Pledge of Units held in Demat Form, the prescribed procedures of DP will have to be followed. Transfer/Withdrawal facility will not be available in respect of Units which are subject to Lock-in or pledge

(6) Online Transaction

Investors desirous of using online services can do so after obtaining a login password by executing an IPIN agreement. For more details please refer to Statement of Additional Information and website www.sundarammutual.com.

(7) Purchase/Redemption through NSE and BSE Exchange Platform

MFSS of NSE / BSE Star MF Platform The Trustee may, at its sole discretion, at a later date offer a facility to subscribe and redeem the units of schemes through the infrastructure of the MFSS of NSE / BSE Star MF Platform introduced by NSE & BSE for transacting in units of the scheme. A suitable public announcement will be made if any such move is initiated.

Investor may also purchase the units through MF Utility.

(8) KFINKART Facility

In addition to the existing investor service centers and other modes of investment, investors / unit

Account statement

Consolidated Account Statement:

1) A Consolidated Account Statement (CAS)^ for each calendar month to the Unit holder(s) in whose folio(s) transaction**(s) has/have taken place during the month shall be sent on or before 15th of the succeeding month by mail/e-mail.

^Consolidated Account Statement (CAS) shall contain details relating to all the transactions** carried out by the investor across all schemes of all mutual funds during the month and holding at the end of the month including transaction charges paid to the distributor, if any.

****The word 'transaction'** shall include purchase, redemption, switch, IDCW payout, IDCW reinvestment, systematic investment plan, systematic withdrawal plan, systematic transfer plan and bonus transactions.

2) In case of a specific request received from the Unit holders, the AMC/Mutual Fund will provide the account statement to the investors within 5 Business Days from the receipt of such request.

3) In case the mutual fund folio has more than one registered holder, the first named Unit holder shall receive the CAS/account statement.

4) For the purpose of sending CAS, common investors across mutual funds shall be identified by their Permanent Account Number (PAN).

5) The CAS shall not be received by the Unit holders for the folio(s) not updated with PAN details. The Unit holders are therefore requested to ensure that the folio(s) are updated with their PAN.

6) Further, the CAS detailing holding across all schemes of all mutual funds at the end of every six months (i.e. September/ March), shall be sent by mail/e-mail on or before 21st day of succeeding month, to all such Unit holders in whose folios no transaction has taken place during that period. The half yearly CAS will be sent by e-mail to the Unit holders whose e-mail address is available, unless a specific request is made to receive in physical. Such Consolidated Account Statement shall reflect the latest closing balance and value of the Units prior to the date of generation of the account statement.

7) The statement of holding of the beneficiary account holder for units held in DEMAT will be sent by the respective DPs periodically.

Any circular/clarification issued by SEBI in this regard will automatically become applicable and shall be incorporated in the SID/SAI/KIM wherever applicable.

8) Pursuant to SEBI circular CIR/MRD/DP/31/2014 dated November 12, 2014, investors having Mutual Fund investments and holding securities in Demat account shall receive a single Consolidated Account Statement (CAS) from the Depository. Consolidation of account statement shall be done on the basis of Permanent Account Number (PAN). In case of multiple holding, it shall be PAN of the first holder and pattern of holding. The CAS shall be generated on a monthly basis. If there is any transaction in any of the Demat accounts of the investor or in any of his mutual fund folios, depositories shall send the CAS within ten days from the month end. In case, there is no transaction in any of the mutual fund folios and demat accounts then CAS with holding details shall be sent to the investor on half yearly basis.

9) Pursuant to SEBI circular SEBI/HO/IMD/DF2/CIR/P/2016/89 dated September 20, 2016, the following points have been incorporated to increase the transparency of information to the investors.

A Each CAS issued to the investors shall also provide the total purchase value / cost of investment in each scheme.

B Further, CAS issued for the half-year (ended September/ March) shall also provide:

(i) The amount of actual commission paid by AMCs/Mutual Funds (MFs) to distributors (in absolute terms) during the half-year period against the concerned investor's total investments in each MF scheme. The term 'commission' here refers to all direct monetary payments and other payments made in the form of gifts / rewards, trips, event sponsorships etc. by AMCs/MFs to distributors. Further, a mention may be made in such CAS indicating that the commission disclosed is gross commission and does not exclude costs incurred by distributors such as service tax (wherever applicable, as per existing rates), operating expenses, etc.

(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 each scheme's applicable plan (regular or direct or both) where the concerned investor has actually invested in.

C. Such half-yearly CAS shall be issued to all MF investors, excluding those investors who do not have any holdings in MF schemes and where no commission against their investment has been paid to distributors, during the concerned half-year period.

10) As per SEBI Circular no. SEBI/HO/IMD/DF3/CIR/P/2020/194 dated October 05, 2020 on IDCW option/plans in mutual fund schemes, whenever distributable surplus is distributed under IDCW Plan, the AMCs are required to clearly segregate and disclose, income distribution (appreciation in NAV) and capital distribution (Equalisation Reserve) in the Consolidated Account Statement provided to the investors. The above provisions is effective from 1 April 2021.

Any circular/clarification issued by SEBI in this regard will automatically become applicable and shall be incorporated in the SID/SAI/KIM wherever applicable.

IDCW	The IDCW warrant/cheque shall be dispatched to the unit holders within 15 days of the date of declaration of the IDCW. The Investment Manager shall be liable to pay interest to the unit holders at such rate as may be specified by SEBI for the period of such delay. The prescribed rate at present is 15% per annum. In case of delay, the AMC shall be liable to pay interest @ 15 per cent per annum to the unit holders. It may be noted that the Mutual Fund is not guaranteeing or assuring any IDCW. IDCW payment may also be done by Direct Credit subject to availability of necessary facility at each location. For further details please refer to the Application Form.
Redemption	SEBI has clarified that the AMCs are required to obtain PAN and KYC documentation before processing any redemption requests. As per SEBI Circular SEBI/HO/IMD/IMD-I DOF2/P/CIR/2022/161 as on November 25, 2022. The redemption or redemption proceeds shall be dispatched to the unit holders within three working days from the date of redemption. During circumstances such as market closure / breakdown / calamity / strike / violence / bandh, extreme price volatility/SEBI Directives etc, the Trustee can stop/suspend sale/redemption of Units.
Delay in payment of repurchase / redemption proceeds	The redemption proceeds will be dispatched to the Unitholders within 10 Business days from the date of maturity. For any delay in this regard the Investment Manager will be liable to pay interest @ 15% p.a. (or such other rate as may be prescribed by SEBI).
Policy on unclaimed redemption and IDCW amounts	The treatment of unclaimed redemption & IDCW amount will be as per SEBI circular dated Feb 25, 2016. The unclaimed redemption and IDCW amounts, that were earlier allowed to be deployed only in call money market or money market instruments. Alternatively, it is also be allowed to be invested in a separate plan of Liquid scheme / Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts. In this regard, Board of AMC and Trustee of Sundaram Mutual Fund have approved the introduction of unclaimed Amount Plan for the investor to ascertain any unclaimed IDCW or redemption proceeds shall be deployed in Sundaram Liquid Fund unclaimed plan on behalf of the investor under his/her applicable folios and the same has been provided under following link https://mfs.kfintech.com/mfs/sundaram_unclaimed.aspx . The Investment Manager shall make a continuous effort to remind the investors through letters to take their unclaimed amounts. The overall TER for unclaimed plan including AMC Fee is restricted to 50 bps. please check the circulars and addendum issued for introduction of unclaimed plan.
Bank account details	As per the directives issued by SEBI, it shall be mandatory for the Unitholders to mention their bank account numbers in their applications. Unitholders are requested to give the full particulars of their Bank Account i.e. nature and number of account, name, Nine digit MICR code No. (For Electronic Credit Facility), IFSC code for NEFT a 11 digit number, branch address of the bank at the appropriate space in the application form. Proceeds of any redemption will be sent only to a bank account that is registered and validated in the Investor's folio at the time of redemption transaction processing. With a view to monitor, as part of Standard KYC Norms, that third party payment Instruments are not be accepted for subscription, the Mutual Funds will be providing a facility for investors to do a one-time registration of all their bank accounts (subject to a maximum of 5 accounts) where they are one of the holders and from where they expect to make a payment for mutual fund subscription. For further details please refer to the instructions in the Application Forms/SAI and the Website of the Mutual Fund.
Registration of Bank Account	The Unitholders may choose to receive the redemption/IDCW proceeds in any of the bank accounts, the details of which are registered with the AMC by specifying the necessary details in the "Bank Accounts Registration form" which will be available at our office/KFin Technologies Private Limited and on the website of www.sundarammutual.com. Individuals, HUFs, Sole proprietor firms can register up to five bank accounts and other type of investors can register up to ten bank accounts in a folio. The unitholder can choose anyone of the registered bank accounts as default bank account. In case the investor fails to mention any preference, then by default the first number indicated in the list shall be the preferred account number. If unit holder(s) provide a new unregistered bank mandate/ a change of bank mandate request with a specific redemption proceeds such bank account may not be considered for payment of redemption proceeds, or the Fund may withhold the payment for up to 10 calendar days to ensure validation of new bank mandate mentioned. Duly filled and valid change of bank mandate requests with supporting documents will be processed within ten business days of necessary documents reaching the head office of the RTA and any financial transaction request received in the interim will be carried based on previous details only. For more details please refer our websites www.sundarammutual.com. For any queries and clarifications that you may have, please get in touch with us at our office or call our toll free number 1860 425 7237.

SOB
No.19

Non Acceptance of Third Party Instruments

Applications accompanied by a Third Party Instrument will be rejected. Applications accompanied by pre-funded instruments (such as demand drafts, pay order etc.) will also be rejected unless accompanied by a banker's certificate evidencing the source of the funds. In case such pre-funded instruments are purchases through cash for value of Rs 50,000/- and above the same shall also be rejected irrespective of being supported with banker's certificate.

Following are the exceptional situations when Third-Party Payments can be made with relevant declaration and KYC/PAN of such Third Party:

- (i) Payment made by an employer on behalf of its employee(s) under Systematic Investment Plans through payroll deductions;
- (ii) Custodian on behalf of an FII or a client.

The above list is not a complete list and is only indicative in nature and not exhaustive. Any other method of payment, as introduced by the Fund will also be covered under these provisions. The AMC may also request for additional documentation as may be required in this regard from the investor/person making the payment. When payment is made through pre-funded instruments (such as Pay Order, Demand Draft, Banker's cheque, etc.), a certificate from the issuing banker must accompany the application stating the account holder's name and the account number which has been debited for the issue of the instrument. If payment is made by RTGS, NEFT, ECS, bank transfer, etc., a copy of the instruction to the bank stating the account number debited must accompany the application. The AMC may, at its discretion, reject any application which is incomplete or not accompanied with valid documents.

Plans / Options offered

Plans: Regular Plan and Direct Plan

Options/Sub-Option: Growth, Quarterly and Half-yearly Income Distribution cum Capital Withdrawal (IDCW): Payout, Re-Investment & Transfer sub-options

If no option is indicated, the default option will be Growth. If an investor chooses the Quarterly /Halfyearly IDCW Option but fails to indicate a sub option, the default sub-option shall be IDCW Transfer (Default Target Scheme- Sundaram Money Fund – Growth Option), when the IDCW payable is Rs. 500 or more and IDCW Reinvestment in the same scheme when IDCW payable is less than Rs.500 in the respective option.

In the following cases, the applications shall be processed under the Direct Plan:

1. Distributor code is mentioned in the application form, but "Direct Plan" is indicated against the Scheme name
2. Where application is received for Regular Plan without Distributor code or the word "Direct" is mentioned in the ARN column.
3. Neither the plan nor the distributor code is mentioned in the application form

In the following cases, the applications shall be processed under the Regular Plan:

1. The application form contains the distributor code but does not indicate the plan.
2. Where application is received for Regular Plan with Distributor code.

The following matrix will be applied for processing the applications in the Regular or Direct Plan:

Broker Code mentioned by the investor	Plan mentioned by the investor	Plan under which units will be allotted
Not mentioned	Not mentioned	Direct Plan
Not mentioned	Direct	Direct Plan
Not mentioned	Regular	Direct Plan
Mentioned	Direct	Direct Plan
Direct	Not Mentioned	Direct Plan
Direct	Regular	Direct Plan

	Mentioned	Regular	Regular Plan
	Mentioned	Not Mentioned	Regular Plan
Plans / Options offered	In cases of wrong/ invalid/ incomplete ARN codes mentioned on the application form, the application shall be processed under Regular Plan. The Investment Manager 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. International Security Identification Number (ISIN) The Investor have an option to hold the units either in the physical or demat mode in accordance with his/her own choice. International Security Identification Numbers (ISIN) in respect of the plans/options of the schemes have been created in National Securities Depository Limited (NSDL) and Central Depository Services Limited (CDSL). The details of ISIN are provided in Highlights and Scheme Summary section of this document. In case the unitholder desires to hold the units in Dematerialized / Rematerialized form at a later date, the request for conversion of units held in non-DEMAT form into DEMAT (electronic form) or vice-versa should be submitted along with a DEMAT/REMAT request form to their Depository Participants. Growth Option: Investors who prefer to accumulate the income and also do not have a need to receive the cash flow to meet specific financial goals can opt for the growth option. The income earned on the units will remain invested in the Scheme and will be reflected in the Net Asset Value. No IDCW will be declared under this option. If units of this option are held as a capital asset for a period of at least 12 months from the date of allotment, income from such units will be treated as long-term capital gains for tax purposes. IDCW Option: IDCW may be declared by the Trustee at its discretion from time to time subject to the availability of distributable surplus calculated in accordance with the Regulations. There is no assurance/guarantee with respect to the quantum or the frequency or the certainty of IDCW distribution. The decision on whether to declare a IDCW or not will depend on the performance of the scheme and availability of distributable surplus. The IDCW pay out may also vary from time to time. The decision of the Trustee will be final in this regard. Unit holders opting for the IDCW Option only will be eligible to receive IDCWs. All unit holders whose names appear in the Register of the Scheme in the IDCW Option category as on the Record Date will be entitled to the IDCW. The IDCW payment will be subject to the distribution tax, if any, payable by the Mutual Fund as per the Income Tax Act or other laws in force. After the record date for distribution of IDCW, the NAV per unit will decline to the extent of the pay out and distribution tax, if any. Investors can opt either for IDCW Pay-Out Option or IDCW Sweep or IDCW Re-investment Option. • IDCW Pay-Out: The Investment Manager shall dispatch the dividend for IDCW option holders through cheque / warrant within 15 days of declaration of income distribution. The cheques / warrant will be drawn in the name of the sole/first holder and will be posted/mailed to the address indicated by the investor in the application form. Investors are required to provide bank account details - the name of the bank, branch and account number - in the application form. Such payment may also be done by Direct Credit subject to availability of necessary facility at each location. • IDCW Re-Investment: Investors have the option to re-invest the income by way of buying additional units of the scheme. Additional units will be allotted based on the ex-NAV of the IDCW Option on the next business day after the Record date for the IDCW. No entry load will be charged for such re-investment of first income. The re-investment of first income shall automatically be deemed to be constructive payment of income distributed to the unit holder and constructive receipt		

Plans / Options offered	by the unit holder. If the distributed amount payable to unitholders in IDCW payout option of the scheme under a folio is less than or equal to ₹ 500/, then such amount shall be compulsorily reinvested in the same plan / option instead of payout. If additional units issued under this option are held as a capital asset for a period of more than 36 months (as applicable) from the date of allotment, any gain over the cost of acquisition will be treated as long-term capital gains for tax purposes. • IDCW Transfer Facility (DSO): This option will be available only when the amount payable to the investor's account on the Record Date in a folio is equal to or more than Rs.500/. The distributed income so payable will be automatically swept into the Target Scheme (Open ended schemes) as opted by the unitholder, on the date of realisation of funds in the target scheme (DSO form available in the website www.sundarammutual.com) after the Record Date at the applicable NAV of the Target Scheme, subject to applicable load and accordingly equivalent units will be allotted in the Target Scheme (Open ended schemes), subject to the terms and conditions of the Target Scheme depending upon whether the investment was registered with or without broker code of the chosen scheme at the applicable NAV. Investors should indicate the Plan and Option in the application form by ticking the appropriate box provided for this purpose. If no option is indicated, the default option will be Growth. If an investor chooses the IDCW Option but fails to indicate a sub option, the default sub-option shall be IDCW Transfer (Default destination Scheme- Sundaram Money Fund - Growth), when the IDCW payable is Rs. 500 or more and IDCW Reinvestment in the same scheme when IDCW payable is less than Rs.500 in the respective sub option. The chosen Plan and Option can be changed by sending a request in writing signed by all the unit holder(s) to the Registrar.
International Security Identification Number (ISIN)	The Investor have an option to hold the units either in the physical or demat mode in accordance with his/her own choice. International Security Identification Numbers (ISIN) in respect of the plans/options of the schemes have been created in National Securities Depository Limited (NSDL) and Central Depository Services Limited (CDSL). The details of ISIN are provided in Highlights and Scheme Summary section of this document. In case the unitholder desires to hold the units in Dematerialized / Rematerialized form at a later date, the request for conversion of units held in non-DEMAT form into DEMAT (electronic form) or vice-versa should be submitted along with a DEMAT/REMAT request form to their Depository Participants.
Income Distribution cum Capital Withdrawal (IDCW) policy	IDCW may be declared by the Trustee at its discretion subject to the availability of distributable surplus as calculated in accordance with the Regulations. There is no assurance/guarantee with respect to the quantum or the frequency or the certainty of IDCW distribution. The decision on whether to declare a IDCW or not will depend on the performance of the scheme and availability of distributable surplus. The rate of IDCW may also vary from time to time. The decision of the Trustee will be final in this regard. IDCW will be declared on the face value of Rs 10 per unit. Unit holders opting for the IDCW Option only will be eligible to receive IDCWs. All unit holders whose names appear in the Register of the Scheme in the IDCW Option category as on the Record Date will be entitled to the IDCW. The IDCW payment will be subject to the distribution tax, if any, payable by the Mutual Fund as per the Income Tax Act or other laws in force. <i>Effect of IDCW:</i> In the IDCW option, after the record date for distribution of IDCW, the NAV per unit will decline to the extent of the pay out and distribution tax, if any. IDCW will be paid within 30 days from date of declaration. Post declaration of IDCW the NAV of the Units under the in IDCW option will stand reduced by the amount of IDCW declared and applicable IDCW distribution tax/any other statutory levy. In case of delay, the Investment Manager will be liable to pay interest to the unit holders at such rate as may be specified by SEBI for the period of such delay. The prescribed rate at present is 15% per annum. However if Bank Details are not properly provided by the Investor, the provision regarding payment of interest for delay will not apply.

Know Your Customer (KYC) / CKYC

The Securities and Exchange Board of India has issued detailed guidelines on 18/01/2006 and measures for prevention Money Laundering and had notified SEBI (KYC Registration Agency) Regulations, 2011 on December 02, 2011 with a view to bring uniformity in KYC Requirements for the securities market and to develop a mechanism for centralization of the KYC records. SEBI has also issued circulars from time to time on KYC compliance and maintenance of documentation pertaining to unit holders of mutual funds. Accordingly the following procedures shall apply:

- KYC acknowledgement is mandatory for all investors.
- An application without acknowledgement of KYC compliance will be rejected
- New Investors are required to submit a copy of Income Tax PAN card, address proof and other requisite documents along with the KYC application form to any of the intermediaries registered with SEBI, including Mutual Funds to complete KYC effective from January 01, 2012. The KYC application form is available at **www.sundarammutual.com**
- The Mutual Fund shall perform initial KYC of its new investors and send the application form along with the supporting documents to the KYC Registration Agency (KRA).
- During the KYC process, the Mutual Fund will also conduct In Person Verification (IPV) in respect of its new investors effective from January 01, 2012. Sundaram Asset Management Company Limited and the NISM / AMFI certified distributors who are KYD compliant are authorized to carry out the IPV for investors in mutual funds. In case of applications received directly from the investors (i.e. not through the distributors), mutual funds may rely upon the IPV performed by the scheduled commercial banks.
- The KRA shall send a letter to the investor within 10 business days of the receipt of the KYC documents from Mutual Fund, confirming the details thereof.
- Investors who have obtained the acknowledgement after completing the KYC process can invest in Scheme of the Mutual funds by quoting the PAN in the application form.
- Investors are required to complete KYC process only once to enable them to invest in Scheme of all mutual funds.
- Existing Investors, who have already complied with the KYC requirements, can continue to invest as per the current practice.

Pursuant to SEBI circular no. MIRSD/Cir-5/2012 dated April 13, 2012, mutual fund investors who were KYC compliant on or before December 31, 2011 are required to submit 'missing/not available' KYC information and complete the 'In Person Verification' (IPV) requirements if they wish to invest in a new mutual fund, where they have not invested / opened a folio earlier, effective from December 03, 2012: Individual investors have to complete the following missing/not available KYC information:

- a) Father's/Spouse Name,
- b) Marital Status,
- c) In-Person Verification (IPV).

To update the missing information, investors have to use the "KYC Details Change Form" for Individuals Only available at **www.sundarammutual.com** or **www.amfiindia.com**. Section B of the form highlights 'Mandatory fields for KYCs done before 1 January 2012' which has to be completed.

In case of Non Individuals, KYC needs to be done afresh due to significant and major changes in KYC requirements by using "KYC Application form" available for Non-Individuals only in the websites stated above.

Additional details like Nationality, Gross Annual Income or Net worth as on recent date, Politically Exposed Person, and Non Individuals providing specific services have to be provided in Additional KYC details form available in the website of the Investment Manager.

Duly filled forms with IPV can be submitted along with a purchase application, to the new mutual fund where the investor is investing / opening a folio. Alternatively, investors may also approach their existing mutual funds at any investor service centre to update their 'missing/not available' KYC information.

Ultimate Beneficial Owner Pursuant to Prevention of Money Laundering Act, 2002 (PMLA) and Rules framed thereunder and SEBI Master circular dated December 31, 2010 on Anti Money Laundering (AML), sufficient information to identify persons who beneficially own or control the securities account is required to be obtained. Also, SEBI had vide its circular no. CIR / MIRSD / 2 /2013 dated January 24, 2013 prescribed guidelines regarding identification of Ultimate Beneficial Owner(s) ('UBO'). 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 'Declaration for UBO' available in the website of the Investment Manager for detailed guidelines on identification of UBO. The provisions relating to UBO are not applicable where 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.

Central KYC

Central KYC Registry is a centralized repository of KYC records of customers in the financial sector with uniform KYC norms and inter-usability of the KYC records across the sector with an objective to reduce the burden of producing KYC documents and getting those verified every time when the customer creates a new relationship with a financial entity. KYC means the due diligence procedure prescribed by the Regulator for identifying and verifying the proof of address, proof of identity and compliance with rules regulations, guidelines and circulars issued by the Regulators or Statutory Authorities under the Prevention of Money Laundering Act, 2002.

The Central Govt. vide notification dt. Nov, 26, 2015 has authorised Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI) to act as and to perform the functions of the CKYC Registry including receiving, storing, safeguarding and retrieving the KYC records in digital form of a Client. A 14 digit CKYC identification Number (KIN) would be issued as identifier of each client.

As per PMLA (Maintenance of Records) Amendment rules, 2015, Rule 9(IA), every reporting entity shall within three days after the commencement of an account based relationship with an individual, file the electronic copy of the client's KYC records with the Central KYC Registry. Institutions need to upload the common KYC template along with the scanned copy of the certified supporting documents (Pol/PoA), cropped signature and photograph. SEBI vide its circular dated November 10, 2016 has advised all mutual funds to upload the KYC records of all existing customers into the CKYC database.

Since the records are stored digitally, it helps intuitions de-duplicate data so that they don't need to do KYC of customers multiple times. It helps institutions find out if the client is KYC compliant based on Aadhaar, PAN and other identity proofs. If the KYC details are updated on this platform by one entity, all other institutions get a real time update. Thus, the platform helps firms cut down costs substantially by avoiding multiplicity of registration and data upkeep.

Please note that PAN is mandatory for investing in MF's (Except Micro KYC and other exempted scenarios). If CKYC is done without submission of PAN, then he/she will have to submit a duly self-certified copy of the PAN card alongwith KIN.

First time investing Financial Sector (New investor) New to KRA-KYC: while on boarding investors who are new to the MF & do not have KYC registered as per existing KRA norms, such investors should fill up CKYC form (attached). This new KYC form is in line with CKYC form guidelines and requirements and would help to capture all information needed for CKYC as well mandatory requirements for MF. Investors should submit the duly filled form along with supporting documents, particularly, self-certified copy of the PAN Card as a mandatory identity proof. If prospective investor submits old KRA KYC form, which does not have all information needed for registration with CKYC, such customer should either submit the information in the supplementary CKYC form or fill the CKYC form.

Updation of Permanent Account Number (PAN) for processing redemption and related transactions in non-PAN exempt folios and various communication(s) sent in this regard from time to time, it is reiterated that, it is mandatory to complete the KYC requirements for all unit holders, including for all joint holders and the guardian in case of folio of a minor investor.

Accordingly, financial transactions (including redemptions, switches and all types of systematic plans) and non-financial requests will not be processed if the unit holders have not completed KYC requirements.

Unit holders are advised to use the applicable KYC Form for completing the KYC requirements and submit the form at the point of acceptance. Further, upon updation of PAN 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.

Investors who have obtained the KIN through any other financial intermediary, shall provide the 14 digit number for validation and updating the KYC record.

Nomination for Mutual Fund Unit Holders

Pursuant to SEBI Circulars Ref. No. SEBI/HO/IMD/IMD-II DOF3/P/CIR/2022/82, dated June 15, 2022, and SEBI/HO/IMD/IMD-I DOF1/P/CIR/2022/105 dated July 29, 2022 on the Nomination Facility to the mutual fund Unit-holders.

Investors are requested to take a note of following changes to be made in SID of all the schemes of Sundaram Mutual Fund.

1. New Investors

- (i) Investors who are subscribing to units of Sundaram Mutual Fund on or after October 1, 2022, shall submit either the nomination form or the prescribed declaration form for opting out of nomination in physical or online as per the choice of the unit holder(s).
 - a. In case of physical option: The forms shall carry the wet signature of all the unit holder(s).
 - b. In case of online option:
 - (1) The unit holder(s) shall submit the form by using e-Sign facility recognized under Information Technology Act, 2000; or
 - (2) through two factor authentication (2FA) in which one of the factors shall be a One-Time Password sent to the unit holders at their email/phone number registered with the KYC Registration Authority or AMC.

The above changes will be applicable to the transactions which are received through Physical / Channel / Exchange Non-Demat / MFU / MF CENTRAL / digital transactions of Websites of AMC/RTA. This requirement will not be applicable for the Exchange-Demat Transactions.

- (ii) On or after October 01, 2022, the application will be rejected if the investor does not provide the nomination or does not provide declaration form for opting out of nomination, duly signed in physical form or through online modes.

2. Existing Investors

All existing individual unitholders of Sundaram Mutual Fund, holding the units either solely or jointly, are requested to provide the nomination or the declaration for opting out of nomination duly signed in physical form or through online modes on or before March 31, 2023, failing which the folios shall be frozen for debits.

The nomination can be made only by individuals applying for/holding units on their own behalf singly or jointly. Non-individuals including a Society, Trust, Body Corporate, Partnership Firm, Karta of Hindu undivided family, a Power of Attorney holder and/or Guardian of Minor unitholder cannot nominate. The application will be rejected if the holder aforesaid non individual sign the nomination form.

Who can invest

This is an indicative list and investors are requested to consult a financial/investment/tax/legal advisor to ascertain whether the Scheme is suitable to their risk profile. Investors need to comply with KYC/PAN verification norms, as elaborated in Statement of Additional Information. The following persons, subject to subscription to units of mutual funds being permitted under respective constitution and relevant statutory regulation, are eligible and may apply for subscription to the units of the Scheme:

- 1 Resident adult individuals either singly or jointly (not exceeding three)
- 2 Minors through parents/ lawful guardians
- 3 Companies/Bodies Corporate/Public Sector Undertakings registered in India
- 4 Religious and Charitable Trusts under the provisions of 11(5)(xii) of Income Tax Act 1961 read with Rule 17C of Income Tax Rules, 1962.
- 5 Wakf Boards or endowments and Registered societies (including registered co operative societies) and private trusts, authorised to invest in units.
- 6 Partnership firm/Limited Liability Partnership
- 7 Trustee of private trusts authorised to invest in mutual fund Scheme under the Trust Deed
- 8 Karta of Hindu Undivided Family (HUF)
- 9 Banks, including Co-operative Banks and Regional Rural Banks, and Financial Institutions
- 10 Non-Resident Indian (NRI) and Persons of India Origin on full repatriation basis subject to RBI approval, if any
- 11 A mutual fund subject to SEBI regulation
- 12 Foreign Institutional Investors (FIIs) registered with SEBI and sub-accounts of FIIs on full repatriation basis subject to RBI approval, if any
- 13 Army/Air Force/Navy/Para-Military Funds and other eligible institutions
- 14 Non-Government Provident/Pension/Gratuity and such other funds as and when permitted to invest
- 15 Scientific and/or industrial research organisations authorised to invest in mutual fund units
- 16 International Multilateral Agencies approved by the Government of India
- 17 Non-Government Provident/Pension/Gratuity funds as and when permitted to invest
- 18 A Scheme of the Sundaram Mutual Fund, subject to the conditions and limits prescribed by SEBI, Trustee, the Investment Manager and the Sponsor. The Investment Manager shall not charge any fees on such investments.
- 19 Other associations and institutions authorised to invest in mutual fund units.
- 20 Any individual, being a foreign national who meets the residency tests as laid down in Foreign Exchange Management Act, 1999 or such other act / guidelines / regulations as issued by the RBI / SEBI from time to time.
- 21 Qualified Foreign Investors (QFI) as may be permitted by SEBI from time to time
- 22 Any other category of persons who are permitted to invest in the Schemes of Mutual Fund as per the guidelines and / or directions issued by the Government of India / SEBI / RBI from time to time.
- 23 Foreign Portfolio Investor registered under SEBI (Foreign Portfolio Investor) Regulations, 2014 As per Notification No. LAD-NRO/GN/2014-15/01 dated May 06, 2014 on SEBI (Mutual Funds) (Amendment) Regulations, 2014 the sponsor of Sundaram Mutual Fund or Sundaram Asset Management Company Limited shall invest not less than one percent of the assets under management of each of the scheme covered in this document as on date of notification of these regulations i.e., May 06, 2014 or fifty lakh rupees, whichever is less, in the growth option of the scheme and such investment shall not be redeemed unless the scheme is wound up. Such amount shall be invested within one year from the date of notification of these regulations.

In addition, Sundaram Asset Management may invest in the Scheme depending upon its cash flows and investment opportunities. In such an event, the Investment Manager will not charge management fees on its investment for the period it is retained in the Scheme. Such investment shall not exceed 25% of the net assets of the Scheme on the date of investment.

The Trustee/Mutual Fund reserves the right to include/exclude a category of investors, subject to SEBI Regulation and other prevailing statutory regulation, if any.

- it is expressly understood that the investor has the necessary legal authority and has complied with applicable internal procedures for subscribing to the units. The Investment Manager/Trustee will not be responsible in case any transaction made by an investor is ultra vires the relevant constitution/internal procedures.
- Non-Resident Indians, Persons of Indian Origin residing abroad and Foreign Institutional Investors (FIIs) have been granted a general permission by the Reserve Bank of India [Schedule 5 to the

SOB
No.
1

	Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulation, 2000] for investing in/redeeming units of mutual funds subject to conditions set out in the aforesaid regulation. • In the case of an application under a power of attorney or by a limited company, other corporate body, an eligible institution, a registered society, a trust fund, the original power of attorney or a certified true copy duly notarised or the relevant resolution or authority to make the application, as the case may be, or a duly notarised copy along with a certified copy of the memorandum and articles of association and/or bye-laws and/or trust deed and/or partnership deed and certificate of registration should be submitted. The officials should sign the application under their official designation. A list of duly certified/attested specimen signatures of the authorised officials should also be attached to the application. In case of a trust/fund, it shall submit a resolution from trustee(s) authorising the purchase. • The Investment Manager/Trustee/Registrar may need to obtain documents for verification of identity or such other details relating to a subscription for units as may be required under any applicable law, which may result in delay in processing the application. It is mandatory for every applicant to provide the name of the bank, branch, address, account type and number as per SEBI requirement. Any Application Form without these details will be treated as incomplete. Such incomplete applications will be rejected. The Registrar/Investment Manager may ask the investor to provide a blank cancelled cheque or its photocopy for the purpose of verifying the bank account number. • Unitholder information (mandatory): In terms of SEBI circular PAN shall be the sole identification number for all participants transacting in the securities market, irrespective of the amount of transaction. However in the case of investments under Micro SIP simplified alternative identification documents are allowed as per SEBI Circular. For further details please refer to Statement of Additional Information. • Small investors, who may not be tax payers and may not have PAN/bank accounts, such as farmers, small traders/businessmen/workers can invest in the scheme through the mode of cash payment for fresh purchases/additional purchases upto Rs.50,000/- per investor, per mutual fund, per financial year subject to: (i) Compliance with Prevention of Money Laundering Act, 2002 and Rules framed there under; (ii) SEBI Circular(s) on Anti Money Laundering (AML) and other applicable AML rules, regulations and guidelines; and (iii) Sufficient systems and procedures put in place by the AMC / Mutual Fund. However, payment to such investors towards redemptions, IDCW, etc. with respect to aforementioned investments shall be paid only through banking channel. Sundaram Mutual Fund / Investment Manager is yet to set up appropriate systems and procedures for the said purpose
Who cannot invest	1. Persons residing in countries which require licensing or registration of Indian Mutual Fund products before selling the same in its jurisdiction. 2. Citizens of US/Canada 3. Persons residing in any Financial Action Task Force (FATF) declared non-compliant country or territory. 4. Overseas Corporate Bodies as specified by RBI in its A.P. (DIR Series) Circular No. 14 dated September 16, 2003, 5. Such other persons as may be specified by AMC from time to time.
Allotment	Allotment is assured to eligible applicants as long as applications are complete in every respect and in order. The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 Business Days of receipt of valid application/transaction to the Unit holders registered e-mail address and/or mobile number. The Trustee may reject any application that is not valid and/or complete. The Trustee reserves the right to recover from an investor any loss caused to the Scheme on account of dishonour of cheques issued for purchase of units. Dispatch of account statements to NRI/PIO/FIIs will be subject to RBI approval.

Refund	The refund should be made within five business days from the date of receipt of application and money failing which an interest @15% shall be paid for the belated refunds.
Restrictions, if any, on the right to freely retain or dispose of unit being offered.	The Trustee may, in the general interest of the unit holders of the Scheme and when considered appropriate to do so based on unforeseen circumstances/unusual market conditions limit the total number of units that may be redeemed on any Business Day to 5% of the total number of units then in issue in the Scheme, plan (s) and option(s) thereof or such other percentage as the Trustee may determine. Any units that are not redeemed on a particular Business Day, will be carried forward for redemption to the next Business Day in order of receipt. Redemption of such carried forward units will be priced on the basis of the applicable NAV, subject to the prevailing load, of the Business Day on which redemption is processed. under such circumstances, to the extent multiple redemption requests are received at the same time on a single Business Day, redemptions will be made on a pro-rata basis based on the size of each redemption request; the balance amount will be carried forward for redemption to the next Business Day. In addition, the Trustee reserves the right, in its sole discretion, to limit redemption with respect to any single account to Rs.1 lakh on a single business day.
Allotment Advice (for DEMAT holders)	On acceptance of a valid application for subscription, units will be allotted and a confirmation specifying the number of units allotted by way of email and/or SMS within 5 Business Days from the date of receipt of valid application / transaction to the Unit holder's registered e-mail address and/or mobile number. Subject to SEBI Regulations, Statement of Accounts will be sent to those unitholders whose registered email address / mobile number is not available with the Mutual Fund, unless otherwise required. Money would be refunded in respect of applications that are rejected. The Units allotted will be credited to the DP account of the Unit holder as per the details provided in the application form.
Dematerialisation	If any investor, who holds the units in physical form, wishes to convert the same to DEMAT form, he shall do so in accordance with the provisions of SEBI (depositories and participants). Regulations, 1996 and procedure laid down by NSDL or CDSL, which may be amended time to time.
Rematerialisation	If the applicant desires to hold the units in physical form (statement of account mode), the Investment Manager shall issue the statement subject to rematerialization of Units in accordance with the provisions of SEBI (Depositories & Participants) Regulations, 1996 as may be amended from time to time. All Units will rank pari passu, among Units within the same Option in the Scheme concerned as to assets, earnings and the receipt of IDCW distributions, if any, as may be declared by the Trustee.

C. Periodic Disclosures

Net Asset Value This is the value per unit of the Scheme on a particular day. An investor can ascertain the value of his holdings by multiplying the units owned with the NAV.	The Investment Manager will prominently disclose the NAVs of all schemes under a separate head on its website and on the website of Association of Mutual Funds in India (AMFI). Further, the Investment Manager will extend facility of sending latest available NAVs to unitholders through SMS, upon receiving a specific request in this regard. NAV will be updated on the website of Association of Mutual Funds of India www.amfiindia.com before 11.00 p.m. every business day and on the website of AMC www.sundarammutual.com. In case of any delay, the reasons for such delay would be explained to AMFI by the next day. If the NAVs are not available before commencement of working hours on the following day due to any reason, the Fund shall issue a press release providing reasons and explaining when the Fund would be able to publish the NAVs.
Methodology of calculating the sale and repurchase price of units	Sale Price: Applicable NAV and applicable Stamp Duty Repurchase Price: The exit fee is usually a percentage of the Net Asset Value (NAV) of the mutual fund held by investors. Once the AMC deducts the exit load from the total Net Asset Value, the remaining amount gets credited to the investor's account. Suppose, an investor has invested Rs.10,000 in mutual fund schemes in January 2017. The NAV of the scheme is Rs. 100 and the exit fee for redeeming before one year is 1%. In March 2017, the investor opt for an additional investment of 50 units at Rs 105 in the same fund. He redeems all his investments in the fund in November 2017, when the NAV is Rs. 110 in scenario 1 and Rs 115 in scenario 2 (February 2018)? His exit load is as follows: 100 Units bought in January 2017 @ Rs 100 = Rs 10,000 50 units bought in March 2017 @ Rs 105 = Rs 5,250 Scenario 1 (Full Redemption before expiry of 1 year) Exit charges on redemption in November 2017. Exit Load: 1% of [(100 units x Rs. 110) + (50 units x Rs. 110)] = Rs 165. The amount credited the investor: Rs. 16,500 (Rs. 110*150 units) – Rs. 165 = Rs. 16,335 (Total NAV – Exit fee) In scenario 1 exit load is applicable on 150 units purchased in January and March 2017 as the holding period is less than 1 year Scenario 2 (Full Redemption after expiry of 1 year) Investor redeems 50 units Exit charges on redemption in February 2018. Exit Load: 1% of (50 units x Rs. 115) = Rs 57.5 The amount credited the investor: Rs.17,250 (Rs. 115*150 units) – Rs.57.5= Rs.17,192.5 (Total NAV-Exit fee) In scenario 2 exit load is not applicable on 100 units purchased in January 2017 as the holding period is more than 1 year
Annual Report	Pursuant to Regulation 56 of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular No. Cir/IMD/DF/16/2011 dated September 8, 2011, read with SEBI Mutual Fund (Second Amendment) Regulation 2018, the Scheme-wise annual report or an abridged summary thereof shall be provided by AMC/Mutual Fund within four months from the date of closure of relevant accounting year in the manner specified by the Board. The annual report containing accounts of the AMC should be displayed on the websites of the mutual funds immediately after approval in Annual General Meetings within a period of four months, from the date of closing of the financial year. It should also be mentioned in the annual report of mutual fund schemes that the unitholders, if they so desire, may request for the annual report of the AMC. Further, the annual report of AMCs shall be displayed on their websites in machine readable format. The physical copies available to the unitholders, at its registered offices at all times. The Investment Manager will e-mail the scheme annual reports or abridged summary thereof to those unitholders, whose email addresses are registered with the Mutual Fund. In case of unitholders whose email addresses are not registered with the Mutual Fund, the Investment Manager will communicate to the unitholders, through a letter enclosing self-addressed envelope

SOB
No.17

	enabling unitholders to 'opt-in' within 30 days, to continue receiving a physical copy of the scheme-wise annual report or abridged summary thereof. The Investment Manager will conduct one more round of similar exercise for those unitholders who have not responded to the 'opt-in' communication as stated above, after a period of not less than 30 days from the date of issuance of the first communication. Further, a period of 15 days from the date of issuances of the second communication will be given to unitholders to exercise their option of 'opt-in' or 'opt-out'. The Investment Manager will publish an advertisement every year disclosing the hosting of the scheme wise annual report on its website and on the website of AMFI and the modes such as SMS, telephone, email or written request (letter), etc. through which unitholders can submit a request for a physical or electronic copy of the scheme wise annual report or abridged summary thereof. Such advertisement will be published in the all India edition of at least two daily newspapers, one each in English and Hindi. Go Green E-Update/Mobile Services: Registration of Contact Details: By opting to receive the Account Statement and Abridged Scheme Annual Report in a paperless mode by e-mail, you contribute to the environment. The investor is deemed to be aware of security risks including interception of documents and availability of content to third parties. Sundaram Asset Management provides interesting information on the economy, markets and funds. If you wish to receive documents such as The Wise Investor, India Market Outlook, Global Outlook, Fact Sheet and One Page Product updates, to name a few, please choose the 'yes' option. Go Green Call Service: If you are an existing investor and wish to register your email ID & mobile number with us, please call our Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI) between 9.00 & 6.00 pm on any business day. Provide e-mail ID of either Self or Family Member with Relationship. 'Family' for this purpose shall mean self, spouse, dependent children, dependent parents as specified in SeBI Circular No.CIR/MIRSD/15/2011 dated Aug 02, 2011 As per AMFI Best practices Guidelines Circular No.77/2018-19, Primary holder's own email address and mobile number should be provided for speed and ease of communication in a convenient and cost-effective manner, and to help prevent fraudulent transactions. The Investment Manager will provide a physical copy of the abridged summary of the Annual Report, without charging any cost, on specific request received from a unitholder.																									
Associate Transactions	Please refer to Statement of Additional Information.																									
Taxation	The information is provided for general information only. However, in view of the individual nature of the implications, each investor is advised to consult his or her own tax advisors/authorised dealers with respect to the specific amount of tax and other implications arising out of his or her participation in the Scheme. For the Mutual Fund: Income of Sundaram Mutual Fund: Exempt from Tax The rates are applicable for the financial year 2023-24 as per Finance Act, 2023. Tax Implications on Income distribution under Income Distribution cum Capital Withdrawal(IDCW) Option received by Unit holders. Pursuant to SEBI circular no. SEBI/HO/IMD/DF3/CIR/P/2020/194 dated October 05, 2020, there was a change in nomenclature of Dividend to Income Distribution cum Capital Withdrawal(IDCW) available across all the plans offered by the schemes of the Fund with effect from April 01, 2021. The Finance Act, 2020 abolished income distribution tax and instead introduced taxing of income from mutual fund units in the hands of the unit holders. <table><tr><th colspan="4">Income Distributed by a Mutual Fund</th></tr><tr><th>IDCW</th><th>Individual/HUF</th><th>Domestic Companies</th><th>NRI</th></tr><tr><td>Equity oriented schemes</td><td>At applicable slab rates~</td><td>30%^^/25%^^^/ 22%^^^^/15%^^^^^</td><td>At applicable slab rates~</td></tr><tr><td>Other than Equity oriented schemes</td><td>At applicable slab rates~</td><td>30%^^/25%^^^/ 22%^^^^/15%^^^^^</td><td>At applicable slab rates~</td></tr></table> ~ Kindly refer Income Tax rates for the applicable rates in case of individuals. Further, tax needs to be deducted at source as detailed below: <table><tr><th>Type of Investor</th><th>Withholding Tax rate</th><th>Section</th></tr><tr><td>Resident@</td><td>10%*</td><td>194K</td></tr><tr><td>NRI/FPI</td><td>20% or rate as per applicable tax treaty*** (whichever is lower)</td><td>196A***/196D****</td></tr></table> * Tax not deductible if income distribution in respect of units of a mutual fund is below ₹ 5,000 in a financial year. However, on account of practical difficulties involved due to unique nature of	Income Distributed by a Mutual Fund				IDCW	Individual/HUF	Domestic Companies	NRI	Equity oriented schemes	At applicable slab rates~	30%^^/25%^^^/ 22%^^^^/15%^^^^^	At applicable slab rates~	Other than Equity oriented schemes	At applicable slab rates~	30%^^/25%^^^/ 22%^^^^/15%^^^^^	At applicable slab rates~	Type of Investor	Withholding Tax rate	Section	Resident@	10%*	194K	NRI/FPI	20% or rate as per applicable tax treaty*** (whichever is lower)	196A***/196D****
Income Distributed by a Mutual Fund																										
IDCW	Individual/HUF	Domestic Companies	NRI																							
Equity oriented schemes	At applicable slab rates~	30%^^/25%^^^/ 22%^^^^/15%^^^^^	At applicable slab rates~																							
Other than Equity oriented schemes	At applicable slab rates~	30%^^/25%^^^/ 22%^^^^/15%^^^^^	At applicable slab rates~																							
Type of Investor	Withholding Tax rate	Section																								
Resident@	10%*	194K																								
NRI/FPI	20% or rate as per applicable tax treaty*** (whichever is lower)	196A***/196D****																								

mutual fund investments and different schemes involved, Sundaram Mutual Fund shall deduct TDS from each dividend declared once it exceeds Rs. 4,000 threshold benefit on cumulative basis in a Financial year (Consolidate on PAN basis). In case the total TDS exceeds the actual tax liability of any investor, he/she can claim a refund while filing income-tax return.

TDS will not be deducted in the following cases

- The resident individual (not being a company or firm) can submit Form No. 15G to Mutual Fund for non-deduction of TDS under section 194K of the Act provided that the tax on his estimated total income (including such income received from Mutual Fund) of the financial year is NIL and the aggregate income shall not exceed the maximum amount which is not chargeable to tax.
- Form 15H to be submitted by a resident individual (aged 60 years or more) for non-deduction of TDS under section 194K of the Act provided that the tax on his estimated total income (including such income received from Mutual Fund) of the financial year is NIL.
- Certificate from ITO for lower deduction/NIL deduction of TDS under section 197,
- Entities falling under Circular 18/2017 dated 29th May 2017.

The Form 15G or Form 15H or Certificate from ITO should be submitted on an annual basis at the start of the financial year at any of the Official Points of Acceptance of Sundaram Mutual Branch or customer care center of KFin Technologies Pvt Ltd.

It may be noted that exemption from tax deduction will be granted only from the date of receipt of Form 15G or Form 15H or Certificate from ITO and any tax deducted and remitted to the government on or before that date cannot be refunded under any circumstances.

Fresh Form 15G or Form 15H to be submitted again when there is a change in the estimated total income already declared, even though the investors might have already furnished the forms for the current financial year.

** The base tax is to be further increased by surcharge at the rate of:

- 37% on base tax where total income exceeds ₹ 5 crore;
- 25% where total income exceeds ₹ 2 crore but does not exceed ₹ 5 crore;
- 15% where total income exceeds ₹ 1 crore but does not exceed ₹ 2 crore; and
- 10% where total income exceeds ₹ 50 lakhs but does not exceed ₹ 1 crore
- In case investor is opting for 'New Regime' as mentioned, the rate of surcharge not to exceed 25%.

Further, "Health and Education Cess" is to be levied at 4% on aggregate of base tax and surcharge.

*** Tax treaty benefit can be claimed subject to fulfillment of stipulated conditions as well as interpretation of Article of relevant tax treaty.

**** As per the provisions of section 196D of the Act which is specifically applicable in case of FPI/FIL, the withholding tax rate of 20% (plus applicable surcharge and cess) on any income in respect of securities referred to in section 115AD(1)(a) credited / paid to FIL shall apply. The Finance Act, 2021 inserted a proviso to section 196D(1) of the Act to grant relevant tax treaty benefits with effect from 1 April 2021 at the time of withholding tax on income with respect to securities of FPIs, subject to furnishing of tax residency certificate and such other documents as may be required. As per section 196D(2) of the Act, no TDS shall be made in respect of income by way of capital gain arising from the transfer of securities referred to in section 115AD of the Act.

@ **Non linking of PAN with Aadhaar** - As per section 139AA of the Income tax Act, 1961 ('the Act') read with rule 114AAA of the Income-tax Rules, 1962, in the case of a resident person, whose PAN has become inoperative due to PAN – Aadhaar not being linked on or before 30 June 2023 or as extended by Govt., it shall be deemed that he has not furnished the PAN and tax could be withheld at a higher rate of 20% as per section 206AA of the Act. For linking PAN with Aadhaar after 31 March 2022, fees Rs. 500 till 30 June 2022 and Rs. 1,000 till 31 March 2023 has been prescribed.

Capital Gains

	Individual/HUF \$	Domestic Company @	NRI \$
Equity Oriented schemes */+			
Long Term Capital gain ((Units held for more than 12 months)	10% without indexation	10% without indexation	10% without indexation
Short Term Capital Gains (Units held for 12 months or less)	15%	15%	15%
Other than Specified Mutual Fund & other than Equity Oriented Schemes (funds investing more than 35% & less than 65% of its total proceeds in the equity shares of domestic companies)			
Long Term Capital gain ((Units held for more than 36 months)	20% with indexation	20% with indexation	Listed - 20% with indexation Unlisted - 10% without indexation

Short Term Capital Gains (Units held for 36 months or less)	30%^	30%^/25%^/22%^/15%^	30%^
Specified Mutual Fund Other Than Equity Oriented Schemes \$\$			
Short Term Capital Gains	30%^	30%^/25%^/22%^/15%^	30%^
Tax Deducted at Source (Applicable only to NRI Investors #)			
	Short term capital gains \$	Long term capital gains \$	
Equity Oriented Scheme	15%	10% without indexation	
Other than Specified Mutual Fund & other than Equity Oriented Schemes (funds investing more than 35% & less than 65% of its total proceeds in the equity shares of domestic companies)	30%^	Listed - 20% with indexation	
Unlisted - 10% without indexation"			
Specified Mutual Fund Other Than Equity Oriented Schemes \$\$		30%^	
* \$ ** \$\$ @ # ## ^ ^^ ^^^ ^^^^ ^^^^^ +	<i>Income-tax at the rate of 10% (without indexation benefit and foreign exchange fluctuation) to be levied on long-term capital gains exceeding Rs. 1 lakh provided transfer of such units is subject to Securities Transaction Tax ('STT'). Further, for Units acquired before the 1st day of February, 2018 the 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.</i> Surcharge to be levied at: • 37% on base tax where specified income** exceeds ₹ 5 crore; • 25% where specified income** exceeds ₹ 2 crore but does not exceed ₹ 5 crore; • 15% where total income exceeds ₹ 1 crore but does not exceed ₹ 2 crore; and • 10% where total income exceeds ₹ 50 lakhs but does not exceed ₹ 1 crore. In case total income includes income by way of dividend on shares and short-term capital gains on units of equity oriented mutual fund schemes and long-term capital gains on mutual fund schemes, the rate of surcharge on the said type of income not to exceed 15%. In case investor is opting for 'New Regime' the rate of surcharge not to exceed 25%. Specified income – Total income excluding income by way of dividend on shares and short-term capital gains on units of equity oriented mutual fund schemes and long-term capital gains on mutual fund schemes. Further, Health and Education Cess to be levied at the rate of 4% on aggregate of base tax and surcharge. As per amendment to Finance Bill, 2023 gains arising on transfer, redemption or maturity of specified mutual funds acquired on or after 1 April 2023 will deemed to be 'short-term capital gains' (regardless of the period of holding). Specified mutual fund means a mutual fund by whatever name called, where not more than 35% of its total proceeds is invested in the equity shares of domestic companies. Surcharge at the rate of 7% is levied for domestic corporate unit holders where the income exceeds ₹ 1 crore but less than ₹ 10 crores and at the rate of 12%, where income exceeds ₹ 10 crores. However, Taxation Laws (Amendment) Ordinance, 2019 provides for surcharge at flat rate of 10 percent on base tax for the companies opting for lower rate of tax of 22%/15%. Short term/ long term capital gain tax (along with applicable Surcharge and "Health and Education Cess") will be deducted at the time of redemption/switches of units in case of NRI investors only. Tax treaty benefit can be claimed for withholding tax on capital gains subject to fulfillment of stipulated conditions. The base year for indexation purpose has been shifted from 1981 to 2001 to calculate the cost of acquisition or to take fair market value of the asset as on that date. Further, it provides that cost of acquisition of an asset acquired before 1 April 2001 shall be allowed to be taken as fair market value as on 1 April 2001. Assuming the investor falls into highest tax bracket. This rate applies to companies other than companies engaged in manufacturing business who are taxed at lower rate subject to fulfillment of certain conditions. If total turnover or gross receipts during the financial year 2020-21 does not exceed ₹ 400 crores. This lower rate is optional and subject to fulfillment of certain conditions as provided in section 115BAA. This lower rate is optional for companies engaged in manufacturing business (set-up & registered on or after 1 October 2019) subject to fulfillment of certain conditions as provided in section 115BAB. Securities Transaction Tax (STT) will be deducted on equity oriented funds at the time of redemption / switch to other schemes / sale of units. Further, Minimum Alternate Tax (MAT) applicable to domestic companies (except for those who opt for lower rate of tax of 22%/15%) are not considered in the above tax rates. Taxability of segregated portfolios of a mutual fund scheme The Finance Act, 2020 has rationalized capital gains taxability in relation to mutual fund portfolio segregation as per SEBI regulations as follows: - ▷ The period of holding for units in the segregated portfolio to be reckoned from the period for which the original units in the main portfolio were held by the taxpayer. ▷ Acquisition cost of units in segregated portfolio to be proportionate to the NAV of assets transferred to the		

	segregated portfolio to the NAV of the total portfolio immediately before the segregation. The cost of acquisition of the original units in the main portfolio to be reduced by the acquisition cost of units in the segregated portfolio. Stamp Duty Pursuant to Notification No. S.O. 1226(E) and G.S.R. 226(E) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of The Finance Act, 2019, notified on February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India, with effect from July 1, 2020, mutual fund units issued against Purchase transactions (whether through lump-sum investments or SIP or STP or switch-ins or dividend reinvestment) would be subject to levy of stamp duty @ 0.005% of the amount invested. Transfer of mutual fund units (such as transfers between demat accounts) are subject to payment of stamp duty @ 0.015%. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including dividend reinvestment and switch-in) to the Unit holders would be reduced to that extent. The Stamp duty should be considered for the purpose of cost of the investments while calculating capital gains. Special provision for deduction of tax at source for non-filers of income-tax return -Tax to be deducted at twice the applicable rate in case of payments to specified person (except non-resident not having permanent establishment in India) who has not furnished the return of income for the assessment year relevant to previous year immediately preceding the financial year in which tax is required to be deducted, for which time limit for filing return has expired and the aggregate of tax deducted at source in his case is ₹ 50,000 or more in the said previous year. Additionally, if provisions of section 206AA are also applicable then tax to be deducted at higher of the two rates provided i.e. rate as per section 206AB or section 206AA. Disclaimer: The information set out above is included for general information purposes only and does not constitute legal or tax advice. In view of the individual nature of the tax consequences, each investor is advised to consult his or her own tax consultant with respect to specific tax implications arising out of their participation in the Scheme. Income Tax benefits to the mutual fund & to the unit holder is in accordance with the prevailing tax laws. Any action taken by you on the basis of the information contained herein is your responsibility alone. Sundaram Mutual Fund will not be liable in any manner for the consequences of such action taken by you. The information contained herein is not intended as an offer or solicitation for the purchase and sales of any schemes of Sundaram Mutual Fund.
Change in Recurring Expenses & Fee:	Additional Expenses under Regulation 52(6A)(c) upto 0.20% of daily net assets of the scheme incurred towards the different heads mentioned under Regulation 52(2) & 52(4) of the SEBI (Mutual Fund) Regulations, 1996 has been reduced to 0.05% w.e.f. 30th May, 2018. However, such additional expenses will not be charged to schemes where the exit load is not levied or not applicable.
Investor services	Prospective investors and existing unit holders are welcome to contact Customer Service using the Toll Free 1860 425 7237 (India) +91 91 40 2345 2215 (NRI). Investors may also contact the Investor Relations Manager. Dhiren H Thakker Head- Customer Services, Sundaram Asset Management Company Limited, Satellite Gazebo, Unit No. 002, Ground floor, B (West) Wing, Satellite Gazebo, Andheri Ghatkopar Link Road, Chakala, Andheri East, Mumbai – 400093. Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI) Email us at : customerservices@sundarammutual.com (NRI): nriservices@sundarammutual.com The Mutual Fund endeavours to complete all monetary and non-monetary transactions within ten business days from the date of receipt of request.

D. Computation of NAV

The Net Asset Value (NAV) is the most widely accepted yardstick for measuring the performance of any Scheme of a Mutual Fund. NAV calculations shall be based upon the following formula:

$$\frac{(\text{Market value of the Scheme's investments} + \text{other current assets} + \text{deposits} - \text{all liabilities except unit capital, reserves and Profit \& Loss Account})}{\text{Number of units outstanding of the Scheme}}$$

Valuation will be according to the valuation norms, as specified in Schedule VIII of the Regulation and will be subject to such rules or Regulation that SEBI may prescribe. Please refer the valuation policy on our website https://www.sundarammutual.com/uploaddir/Others/Valuation_Policy_12_2020_040321_184105.pdf

NAV of the Scheme – Plan/Option wise - will be calculated and disclosed up to four decimals.

For details of Valuation of Overseas Securities, please refer Statement of Additional Information.

IV. Fees, Expenses & Load Structure**A. New Fund Offer Expenses**

Not applicable

B. Recurring Expenses & Fee (Fundamental Attribute)

- The total annual recurring expenses of the Scheme, excluding deferred revenue expenditure written off, issue or redemption expenses, but including the investment management and advisory fee that can be charged to the scheme shall be within the limits specified in Regulation 52 of SEBI (Mutual Funds) Regulations.

The expenses chargeable to the scheme shall include investment management & advisory fee, Trustee fee, custodian fee, Registrar and Transfer Agent fee, Audit fee, Marketing and Selling expenses and other expenses as listed in the table below:

Expense Head	% of daily Net Assets
Investment Management and Advisory Fees	Upto 2.25%
Trustee fee	
Audit fees	
Custodian fees	
RTA Fees	
Marketing & Selling expense incl. agent commission	
Cost related to investor communications	
Cost of fund transfer from location to location	
Cost of providing account statements and IDCW redemption cheques and warrants	
Costs of statutory Advertisements	
Cost towards investor education & awareness (at least 2 bps)	
Brokerage & transaction cost over and above 12 bps and 5 bps for cash and derivative market trades resp.	
GST on expenses other than investment and advisory fees	
GST on brokerage and transaction cost	
Other Expenses	
Maximum total expense ratio (TER) permissible under Regulation 52 (4) and (6) (c)	Upto 2.25%
Additional expenses for gross new inflows from specified cities under regulation 52 (6A) (b)	Upto 0.30%
Additional expenses under regulation 52 (6A) (c)	Upto 0.05%

The current expense ratios will be updated on a daily basis in the website viz. www.sundarammutual.com/Ter and in case of any proposed changes via notice at least three working days prior to the effective date of change will be sent to investor and available under the link: <https://www.sundarammutual.com/Ter>.

Expenses charged under the said parameters shall be in line with the Regulation 52 of SEBI (MF) Regulations or such other basis as specified by SEBI from time to time.

The maximum total expense ratio (TER) permissible under Regulation 52 (4) and (6) (c) that can be charged to the scheme as a percentage of daily net assets shall be as follows:

First Rs 500 crore:	2.25%
Next Rs 250 crore:	2.00%
Next Rs 1,250 crore:	1.75%
Next Rs 3,000 crore:	1.60%
Next Rs 5,000 crore:	1.50%
Next Rs 40,000 crore:	Total expense ratio reduction of Rs.5,000 crores or part thereof.
On balance of assets:	1.05%

In addition to the above, following expenses can be charged to the Scheme:

- Up to 5 basis points (bps) under Regulation 52(6A)(c),
- Up to 30 bps for gross new inflows from retail investors from B30 cities, and
- Goods and Services Tax (GST) on investment management and advisory fees. Commission expenses will not be charged in Direct Plan and no commission shall be paid from Direct Plan.

As per Regulation 52(6A)(b), an additional expense upto 0.30% (30 basis points) on the daily net assets shall be charged to the scheme if new inflows into the scheme from beyond top 30 cities as specified by SEBI, from time to time, are at least:

- 30% of the gross new inflows in the scheme (or)
- 15% of the average assets under management (year to date) of the scheme, whichever is higher.

In case the inflows from such cities is less than the higher

of (i) or (ii) above, expenses shall be charged to the scheme on a proportionate basis as prescribed in the SEBI circular dated September 13, 2012.

The amount so charged shall be utilised for distribution expenses incurred for bringing inflows from such cities. However, the amount incurred as expense on account of inflows from such cities shall be credited back to the Scheme(s) in case the said inflows are redeemed within a period of one year from the date of investment.

Additional TER can be charged based on inflows only from retail investors from B30 cities. Inflows of amount upto Rs.2 lakhs per transaction by individual investors shall be considered as inflows from "retail investor".

Top 30 cities shall mean top 30 cities based on Association of Mutual Funds in India (AMFI) data on 'AUM by Geography - Consolidated Data for Mutual Fund Industry' as at the end of the previous financial year.

Note: The above percentage is based on the prevailing expenses ratio. Any change in the above mentioned distribution expenses/commission will be replaced while filing the final SID.

SEBI vide Circular dated October 22, 2018 made the following changes with regard to Total Expense Ratio and the substance of the circular is as under:

A. Transparency in TER

All scheme related expenses including commission paid to distributors, by whatever name it may be called and in whatever manner it may be paid, shall necessarily be paid from the scheme only within the regulatory limits and not from the books of the Asset Management Companies (AMC), its associate, sponsor, trustee or any other entity through any route. All fees and expenses charged in a direct plan (in percentage terms) under various heads including the investment and advisory fee shall not exceed the fees and expenses charged under such heads in a regular plan.

No pass back, either directly or indirectly, shall be given by MFs/ AMCs/ Distributors to the investors.

Training sessions and programmes conducted for distributors should continue and should not be misused for providing any reward or non-cash incentive to the distributors.

B. Additional TER of 30 bps for penetration in B-30 cities

Additional TER can be charged based on inflows only from retail investors from B30 cities. Inflows of amount upto Rs 2,00,000/- per transaction, by individual investors shall be considered as inflows from "retail investor. The additional commission for B 30 cities shall be paid as trail only.

The Investment Manager will comply with the above circular.

Value of Rs.10000 on 12% annual returns in 1 year, considering 1% Expense Ratio

Amount Invested	10,000.00
NAV at the time of investment	10
No. of units	1,000.00
Assume gross appreciation	12%
Gross NAV	11.2
Expenses (assuming 1% Expense Ratio on average of opening & closing NAV)	0.11
Actual NAV at the end of 1 year post expenses (assuming Expense Ratio as above)	11.09
Value of Investment at the end of 1 year (Before Expenses)	11,200.00
Percentage Return	12%
Value of Investment at the end of 1 year (After Expenses)	11,094.00
Percentage Return	10.94%

Note: Please note that the above is an approximate illustration of the impact of expense ratio on the returns, where the Gross NAV has been simply reduced to the extent of the expenses. In reality, the actual impact would vary depending on the path of returns over the period of consideration. Expenses will be charged on daily net assets.

2. Brokerage and transaction costs which are incurred for execution of trades and included in the cost of investment shall be charged to the Scheme(s) in addition to the total expense limits prescribed under Regulation 52 of the SEBI (Mutual Funds) Regulations. These expenses shall not exceed 0.12% of the value of trades in case of cash market transactions and 0.05% of the value of trades in case of derivatives transactions. Payment towards brokerage and transaction cost in excess of 0.12% and 0.05% for cash market transactions and derivatives

transactions respectively shall be charged to the scheme within the maximum limits prescribed under regulation 52 of the SEBI (Mutual Funds) Regulations, 1996. Any expenditure (including brokerage and transaction cost, if any) in excess of the prescribed maximum limit shall be borne by the Investment Manager or by the Trustee or Sponsor.

3. The Investment Manager shall set apart at least 0.02% (2 basis points) on the daily net assets of the scheme(s) within the maximum limit of total expense ratio prescribed under Regulation 52 of SEBI (Mutual Funds) Regulations for initiatives towards investor education and awareness taken by Sundaram Mutual fund.

4. GST:

- Pursuant to SEBI circular no CIR/IMD/DF/24/2012 dated November 19, 2012, GST on brokerage and transaction cost paid for execution of trade, if any, shall be within the expenses limit prescribed under Regulation 52 of SEBI (Mutual Funds) Regulations.
- GST on investment management and advisory fee shall be charged to the scheme in addition to the maximum limit of total expense ratio as prescribed in Regulation 52 of SEBI (Mutual Funds) Regulations.
- GST for services other than investment management and advisory shall be charged to the scheme within the maximum limit of total expense ratio as prescribed in Regulation 52 of SEBI (Mutual Funds) Regulations.

SOB
No.16

Any circular/clarification issued by SEBI in regard to expenses chargeable to the Scheme / Plan(s) will automatically become applicable and will be incorporated in the SID/SAI / KIM accordingly.

C. Load Structure

Entry Load: Nil.

Exit Load: Nil

Applicability

- (a) Units issued on reinvestment of distribute income shall not be subject to exit load.
- (b) Prescribed exit load will be applicable for switch out and every instalment under a Systematic Transfer Plan and Systematic Withdrawal Plan. The period indicated for exit load shall be reckoned from the date of allotment.

- (c) Switch of existing investments from Regular Plan to Direct Plan where the transaction has been received without broker code in the Regular Plan shall not be subject to exit load.

However, any subsequent switch / redemption of such investment shall be subject to exit load based on the original date of investment in the Regular Plan and not from the date of switch into Direct Plan. (effective from April 01, 2013)

- (d) In case of switch of investments from Regular Plan to Direct Plan received with broker code in the Regular Plan, the exit load as applicable to redemption of units under the respective scheme(s) shall apply.

However, any subsequent switch-out or redemption of such investment shall not be subject to exit load. (effective from April 01, 2013)

- (e) In case of switch of investments from Direct Plan to Regular Plan, no exit load shall be levied. However, any subsequent switch-out or redemption of such investment shall be subject to exit load based on the original date of investment in the Direct Plan and not from the date of switch into Regular Plan. (effective from April 01, 2013)

- (f) Investors wishing to transfer their accumulated unit balance held under discontinued plans and Regular Plan (through lumpsum / systematic investments made with Distributor code) to Direct Plan can switch their investments (subject to applicable Exit Load, if any) to Direct Plan. However, any subsequent switch-out or redemption of such investment shall not be subject to exit load. (effective from April 01, 2013)

Investors wishing to transfer their accumulated unit balance held under discontinued plans and Regular Plan (through lumpsum / systematic investments made without Distributor code) to Direct Plan can switch their investments, without Exit Load, to Direct Plan. However, any subsequent switch / redemption of such investment shall be subject to exit load based on the original date of investment in the Regular Plan / Discontinued Plans and not from the date of switch into Direct Plan. (effective from April 01, 2013)

- (g) No Entry Load will be charged with respect to applications

for purchase/additional purchase/switch-in and applications for registration of SIP/STP, accepted by the Mutual Fund.

The Board of Trustee reserves the right to prescribe or modify the exit load structure with prospective effect, subject to a maximum as prescribed under SEBI Regulation.

Details of the modifications will be communicated in the following manner:

- Addendum detailing the changes will be attached or incorporated to the SID and Key Information Memorandum. The addendum will become an integral part of this Scheme information document.
- The change in exit load structure will be notified by a suitable display at the Corporate Office of the Sundaram Asset Management and at the Investor Service Centres of the registrar.
- A public notice shall be given in one English daily newspaper having nation-wide circulation as well as in a newspaper published in the language of region where the Head Office of the Mutual Fund is situated.

The introduction/modification of exit load will be stamped on the acknowledgement slip issued to the investors on submission of an application form and will also be disclosed in the account statement issued after the introduction of such exit load.

Investors are requested to ascertain the applicable exit load structure prior to investing.

V. Rights of Unitholders

Please refer to Statement of Additional Information for a detailed view of the rights of unit holders.

VI. Penalties & Pending Litigations

- Details of penalties awarded by SEBI under the SEBI Act or any of its Regulation against the sponsor of the Mutual Fund in the last three years: Nil
- No penalties have been awarded by SEBI under the SEBI Act or any of its Regulation against the sponsor of the Mutual Fund or any company associated with the sponsor in any capacity including the Investment Manager, Trustee

SOB
No.20

or any of the directors or any key personnel (specifically the fund managers) of the Investment Manager and Trustee. No penalties have been awarded on the Sponsor and its associates by any financial regulatory body, including stock exchanges, for defaults in respect of shareholders, debenture holders and depositors. No penalties have been awarded for any economic offence and violation of any securities laws.

- There are no pending material litigation proceedings incidental to the business of the Mutual Fund to which the sponsor of the Mutual Fund or any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any of the directors or key personnel of the Investment Manager is a party. Further, there are no pending criminal cases against the Sponsor or any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any of the directors or key personnel.
- There is no deficiency in the systems and operations of the sponsor of the Mutual Fund or any company associated with the sponsor in any capacity, including the Investment Manager which SEBI has specifically advised to be disclosed in the Scheme Information Document, or which has been notified by any other regulatory agency.
- There are no enquiries or adjudication proceedings under the SEBI Act and the Regulation, which are in progress against any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any directors or key personnel of the Investment Manager.

Jurisdiction

All disputes arising out of or in relation to the issue made under the Scheme will be subject to the exclusive jurisdiction of courts in India.

SOB
No.21

Applicability of SEBI (Mutual Fund) Regulations

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

SOB
No.22

Customer Care Centres of Sundaram Asset Management Company Limited

Agra, Shop no.9/4, Shanker Point, Sanjay Place, Near Income Tax Building, Pin code: 282002. **Ahmedabad**, 602, 6th Floor, 323 Corporate Park, Near Samudra Complex, Near Girish Cold Drink, C.G Road, Navrangpura, Ahmedabad 380009. **Ajmer**, 1st Floor, Adjoining K C Complex Opp: Daulat Bagh, Ajmer 305001. **Akola**, C-13, First Floor, Dakshata Nagar, Vyapari Complex, Sindhi Camp Chowk, Akola-444001. **Allahabad**, Vashishtha Vinayal Tower, Upper Ground Floor, 38/1 Tashkhant Marg, Allahabad-211001. **Amritsar**, C/O Sundaram Finance Ltd, 1st Floor, 27-A, Classic Plaza, Majitha Road, Amritsar 143001. **Anand**, 202 Drashit Arcade, Opp . HDFC Bank, Lambhvel Road . Anand 388001. **Aurangabad**, Office No-36 Motiwala Trade Center, Nirala Bazar Opp HDFC Bank, Aurangabad-431001. **Bangalore**, No.F18, First Floor, Lucky Paradise, 8th F Main, 22nd Cross, 3rd Block Jayanagar, Bangalore-560011. **Bangalore**, Ground Floor Sana Plaza, 21 / 14-A, M.G. Road, Near Trinity Metro Station, Bangalore-560001. **Baroda**, Office No. 109, First Floor, Siddharth Complex, R C Dutt Road, Baroda – 390007. **Bhagalpur**, ANN Tower, 1st Floor, RBSS Road, Bhikhanpur, Bhagalpur 812 001, Bihar. **Bhavnagar**, F1 Krishna Complex, Near desai nagar petrol pump, Chitra, Bhavnagar-364003. **Bhilai**, 36/5, 1st Floor, Nehru Nagar, Beside of ING Vysa Bank, Bhilai 490020. **Bhopal**, Plot no, 6 VNV Plaza 2nd Floor Bank Street, M.P Nagar Zone 2, Bhopal-462011. **Bhubaneshwar**, Office No. 16, 2nd Floor, Deen Dayal Bawan, Ashok Nagar, Bhubaneswar 751009. **Burdwan**, 43 G.T.ROAD, EAST END OFFICERS COLONY RAYMONDS BUILDING (2 nd FLOOR), SREEPALLI, BURDWAN, 713103. **Calicut**, 1st Floor, Karupalli Square, YMCA Cross Road, Calicut-673001. **Chandigarh**, S.C.O II Floor, 2475-2476, 22/C, Chandigarh 160022. **Chennai (HO)**, Sundaram Towers 1st & 2nd Floor, No.46 Whites Road, Royapettah, Chennai-600014. **Chennai (Mount Road)**, 1st Floor Metro Plaza, 221 (Old No. 162), Anna Salai, Mount Road, Opp. Spencer Plaza, Chennai-600 002. **Cochin**, Kassim Towers, 36/1899 Door No, D I Floor Sebastian Road, Off. Kaloor, Kadavanthra Road, Kaloor, Cochin-682017. **Coimbatore**, No. 100 West Periyasamy Road, R S Puram, Coimbatore – 641002. **Cuttack**, 1st Floor, Kailash Plaza, (In Front of BSNL Office), Link Road, Cuttack-753012. **Davangere**, #1953/35, "Kamakshi Nivasa", 6th cross, Siddhaveerappa badavane, Davangere-04. **Dehradun**, 2nd Floor, International Trade Tower, 1 Old Survey Road, Above Bank of Baroda, Adjacent to Cross Road Mall, Dehradun,Uttarakhand – 248001. **Delhi**, Room no. 301/314, 3rd floor, Ashoka Estate, 24 Barakhamba Road, New Delhi-110001. **Dhanbad**, Sri Ram Plaza, Room No-107, 1st Floor, Bank More, Dhanbad 826 001. **Durgapur**, A-307, Bengal Shristi Complex, II Floor, Citi Center, Durgapur-713 216. **Goa**, F 30, Alfran Plaza, Opp Don Bosco, MG Road Panjim, Goa-403001. **Gorakhpur**, Shop No. 20, 2nd Floor, Cross Road The Mall, Bank Road, Gorakhpur-273 001. **Gurugram**, Unit No 11, Vipul Agora, Agora, Mehrauli-Gurugram Road, Gurugram-122002. **Guwahati**, 4th Floor, Ganpati Enclave Above Datamation, Bora Service. G.S Road, Guwahati 781007. **Gwalior**, II Floor, 44 City Centre, Narayan Krishna, Madhav Rao Scindia Road, Gwalior -474002. **Hubli**, Shop No. UGF 4/5, Eureka Junction, T.B.Road Hubli, Karnataka – 580029. **Hyderabad**, 6-3-1085 / D /103, Dega Towers, Rajbhavan Road, Somajiguda, Hyderabad-500082. **Indore**, 205 Starlit Tower 29/1 Y N Road, Indore-452001. **Jabalpur**, Second Floor, Digamber Tower, 936, Wright Town, Pandit Bhawani Prasad Ward, Napier Town, Jabalpur-482002. **Jaipur**, No. 202, Second Floor, OK Plus Towers, Church Road, C-Scheme, Jaipur – 302001. **Jalandhar**, Shop No-11 B, 3rd Floor, City Square Mall, Civil Lines, Jalandhar 144 001. **JALGAON**, Second Floor, India Plaza Complex, Vivekanand Nagar, Swatantry Chowk, Jilha Peth, Jalgaon-425 001. **Jamnagar**, 404, Corporate House, Opp. To St. Ann'S High School, Pandit Nehru Marg, Jamnagar -361008. **Jamshedpur**, Shop No-4, 3rd Floor, Meghdeep Building, Beside Hotel South Park, Q Road, Bistupur, Jamshedpur – 831004. **Jodhpur**, 116, 1st Floor, Mody Arcade, Chopasani Road, Near Bombay Motor Cycle, Jodhpur-342001. **Kanpur**, Room No. 217/218, Kan Chambers, 14/113 Civil Lines, Kanpur 208001. **Kolhapur**, Office No:12, 2nd Floor, R.D.Vichare Complex (Gemstone) Near Central Bus Stand, New Shahupuri Kolhapur 416001. **Kolkatta**, P-38 Princep Street, Ground Floor, Off Bentinck Street, (Opp Orient Cinema), Kolkatta-700072. **Kolkatta**, No. 7, Camac Street, Azimganj House III Floor, Block No. 6, Kolkatta-700017. **Kota**, Second Floor, (Above Reebok Showroom), 393, Shopping Centre, NR.Ghode Wale Baba Circle, Kota, Rajasthan-324007. **Kottayam**, CSI ascension Square, Logos Junction, Collectorate .P.O, Kottayam-686002. **Lucknow**, 104, UGF Sky Hi Chambers, 5- Park Road, Lucknow-226001. **Ludhiana**, SCO 18, Cabin No.401, 4th Floor, Feroz Gandhi Market, Ludhiana-141001. **Madurai**, No. 183 C-North Veli Street, Opp Duke Hotel, Madurai-625001. **Mangalore**, B-2, Souza Arcade, Balmatta Road, Mangalore 575001. **Moradabad**, Junaid Malik, Near Chakker Ki Milak Chauraha TV Tower Road Moradabad Pin 244001. **Mumbai (Andheri East)**, Unit No. 002, Ground floor, B (West) Wing, Satellite Gazebo, Andheri Ghatkopar Link Road, Chakala, Andheri East, Mumbai – 400093. **Mumbai (Port)**, 5th Floor, City Ice Building,Plot No.298, Perin Nariman Street,Mumbai-400001. **Mumbai (Thane West)**, Shop No 3, Ramrao Sahani Sadan, Kaka Sohoni Road, Behind P.N.Gadgil Jewellers, Off Ram Maruti Road, Thane West-400601. **Muzaffarpur**, Saroj Complex, Diwan Road, Muzaffarpur-842002. **Mysore**, 145, 2nd Floor, 5th main, 5th cross, Opposite to Syndicate Bank, Saraswathipuram, Mysore -570009, Karnataka, Phone: 97310-11115. **Nagpur**, C/O.Fortune Business Centre, Plot No.6, Vasant Vihar Complex, WHC Road, Shankar Nagar, Nagpur-440010. **Nashik**, Shop No. 1, Shrinath Apartment, Pandit Colony- Lane No. 3, Sharanpur Road, Nashik- 422 002. **Panipat**, No 75 BMK market, Sundaram finance near Hive Hotel GT above Airtel office, Panipat-132103. **Patna**, 305 & 306 Ashiana Harniwas, New Dak Bungalow Road, Patna-800001. **Pondicherry**, Jayalakshmi Complex, Door No.114 & 116, Shop No.: 7,8,9 First Floor, hiruvalluvar Salai, Pondicherry 605 013.. **Pune**, CTS No. 930 / Final, Plot No.314,1st Floor, Office No. 1, Aditya Centeeegra Apts, Condominium, F.C. Road, Shivaji Nagar, Pune – 411005. **Raipur**, Office no. S-8, 2nd floor, Raheja Towers, Near Fafadih Square, Jail Road, Near Fafadih Square, Jail Road, Raipur, PIN 492001. **Rajkot**, 301, Metro Plaza, Nr Eagle Travels, Jansata Press Road, Bhilwas Chowk, Rajkot-360001. **Ranchi**, Satya Ganga Arcade,205,2nd Floor, Lalji Hirji Road, Ranchi-834001 (Jharkhand). **Sangli**, S1-S2, Second Floor, Shiv Ratna Complex, CST No 1047B, Shiv Ratan Complex, College Corner North Shivaji Nagar, Madhav Nagar, Sangli-416416. **Silugiri**, C/O Home Land, 4th Floor, Opp. Sona Wheels Showroom, 2.5 Mile, Sevoke Road, P.S-Bhakti Nagar, Siliguri-Dist-Jalpaiguri-734008, West Bengal. **Surat**, HG-18 International Trade Centre, Majuragate, Surat-395002. **Thirunelveli**, First Floor, No 985/1-C2, 1D, Indra Complex, South Bye Pass Road, Opp To Passport Office, Tirunelveli 627005. **Thrissur**, 2nd Floor, Sri Lakshmi Building, Shornool Road, Near, Thiruvampady Temple, Thrissur-680022. **Trichy**, 60/2, Krishna Complex, I St Floor, Shastri Road, Thennur, Trichy-620017. **Trivandrum**, 1st Floor, Bava Sahib Commercial Complex, Ambujavilasam Road, Old GPO, Thiruvananthapuram-695001. **Udaipur**, C/O Sundaram Finance Ltd, 04th Floor, Plot No-32/1105 Centre Point Building, Opposite- B.N College, Udaipur, Rajasthan-313001. **Vapi**, Shop No-19 & 20, First Floor, Walden Plaza, Imran Nagar (opp to SBI), Daman-Silvassa Road, Vapi-396191. **Varanasi**, Shop no. 05, 1st Floor, Kuber Complex, Rathayatra Crossing, Varanasi-221010. State- Uttar Pradesh. **Vellore**, C/O Sundaram Finance Limited. First floor, 141/3, M P Sarathi Nagar, Vellore District Bus Owners Association Building, Chennai-Bangalore Bye Pass Road, Vellore-632012. **Vijayawada**, Rajagopala Chari Street, Mahalakshmi Towers, Ist Foor, Shop No 4. Buckinghampet Post Office Road, Vijayawada-520 002. **AP Visakhapatnam**, Shop No.2, 3 Rd Floor, Navaratna Jewel Square, Dwarakanagar, Beside Jyothi Book Depot, Visakhapatnam-530016.

Dubai-Representative Office, Unit No. 714, Level 7, Burjuman Business Tower, Bur Dubai, Dubai UAE

Customer Care Centres of KFin Technologies Private Limited

Agartala, OLS RMS CHOWMUHANI, MANTRI BARI ROAD 1ST FLOOR NEAR Jana Sevak Saloon Building TRAFFIC POINT, TRIPURA WEST, Agartala 799001. **Agra**, House No. 17/2/4, 2nd Floor, Deepak Wasan Plaza, Behind Hotel Holiday INN, Sanjay Place, Agra 282002. **Ahmedabad**, Office No. 401, on 4th Floor, ABC-I, Off. C.G. Road, Ahmedabad 380009. **Ajmer**, 302 3rd Floor, Ajmer Auto Building, Opposite City Power House, Jaipur Road; Ajmer 305001. **Akola**, Yamuna Tarang Complex Shop No 30, Ground Floor N.H. No- 06 Murtizapur Road, Opp Radhakrishna Talkies, Akola 444004. **Aligarh**, 1st Floor Sevti Complex, Near Jain Temple, Samad Road Aligarh-202001. **Allahabad**, Meena Bazar, 2nd Floor 10 S.P. Marg Civil Lines, Subhash Chauraha, Prayagraj, Allahabad 211001. **Alwar**, Office Number 137, First Floor, Jai Complex, Road No-2, Alwar 301001. **Amaravathi**, Shop No. 21 2nd Floor, Gulshan Tower, Near Panchsheel Talkies Jaistambh Square, Amaravathi 444601. **Ambala**, 6349, 2nd Floor, Nicholson Road, Adjacent Kos Hospital Ambala Cant, Ambala 133001, **Amritsar**, SCO 5, 2nd Floor, District Shopping Complex, Ranjit Avenue, Amritsar 143001. **Anand**, B-42 Vaibhav Commercial Center, Nr Tvs Down Town Show Room, Grid Char Rasta, Anand 380001. **Ananthapur**, 13/4, Vishnupriya Complex, Beside SBI Bank, Near Tower Clock, Ananthapur-515001. **Asansol**, 112/N G. T. ROAD BHANGA PACHIL, G.T Road Asansol Pin: 713 303; Paschim Bardhaman West Bengal, Asansol 713303. **Aurangabad**, Shop no B 38, Motiwala Trade Center, Nirala Bazar, Aurangabad 431001. **Azamgarh**, House No. 290, Ground Floor, Civil lines, Near Sahara Office, Azamgarh 276001. **Balasore**, 1-B. 1st Floor, Kalinga Hotel Lane, Baleshwar, Baleshwar Sadar, Balasore 756001. **Bangalore**, No 35, Puttanna Road, Basavanagudi, Bangalore 560004, **Bankura**, Plot nos- 80/1/Anatunchati Mahalla 3rd floor, Ward no-24 Opposite P.C Chandra, Bankura town, Bankura 722101. **Bareilly**, 1st Floorrear Sidea -Square Building, 54-Civil Lines, Ayub Khan Chauraha, Bareilly 243001. **Baroda**, 1st Floor 125 Kanha Capital, Opp. Express Hotel, R C Dutt Road, Alkapuri Vadodara 390007. **Begusarai**, C/o Dr Hazari Prasad Sahu, Ward No 13, Behind Alka Cinema, Begusarai (Bihar), Begusarai 851117. **Belgaum**, Premises No.101, CTS NO.1893, Shree Guru Darshani Tower, Anandwadi, Hindwadi, Belgaum 590011. **Bellary** Ground Floor, 3rd Office, Near Womens College Road, Beside Amruth Diagnostic Shanthi Archade, Bellary 583103. **Berhampur (Or)**, Opp Divya Nandan Kalyan Mandap, 3rd Lane Dharam Nagar, Near Lohiya Motor, Berhampur (Or) 760001. **Bhagalpur**, 2Nd Floor, Chandralok Complex Ghantaghar, Radha Rani Sinha Road, Bhagalpur 812001. **Bharuch** 123 Nexus business Hub, Near Gangotri Hotel, B/s Rajeshwari Petroleum, Makampur Road, Bharuch 392001. **Bhatinda**, MCB -Z-3-01043, 2 floor, Goniana Road, Opposite Nippon India Mf Gt Road, Near Hanuman Chowk, Bhatinda 151001. **Bhavnagar**, 303 Sterling Point, Waghawadi Road, Bhavnagar 364001. **Bhilai**, Office No.2, 1st Floor, Plot No. 9/6, Nehru Nagar [East], Bhilai 490020. **Bhilwara** Office No. 14 B, Prem Bhawan, Pur Road, Gandhi Nagar, Near Canara Bank, Bhilwara 311001. **Bhopal**, SF-13 Gurukripa Plaza, Plot No. 48A, Opposite City Hospital, zone-2, M P nagar, Bhopal 462011. **Bhubaneswar**, A/181 Back Side Of Shivam Honda Show Room, Saheed Nagar, Bhubaneswar 751007. **Bikaner**, 70-71 2Nd Floor | Dr.Chahar Building, Panchsati Circle, Sadul Ganj, Bikaner 334003. **Bilaspur**, Shop.No.306, 3rd Floor, Anandam Plaza, Vyapar Vihar Main Road, Bilaspur 495001. **Bokaro**, City Centre, Plot No. He-07, Sector-Iv, Bokaro Steel City, Bokaro 827004. **Burdwan**, Saluja Complex; 846, Laxmipur, G T Road, Burdwan; PS: Burdwan & Dist: Burdwan-East, PIN: 713101. **Calicut**, Second Floor, Manimuriyil Centre, Bank Road,, Kasaba Village, Calicut 673001. **Chandigarh**, First floor, SCO 2469-70, Sec. 22-C, Chandigarh 160022. **Chennai**, 9th Floor, Capital Towers, 180, Kodambakkam High Road, Nungambakkam | Chennai – 600 034. **Chinsura**, No : 96, PO: Chinsurah, Doctors Lane, Chinsurah 712101. **Cochin**, Ali Arcade 1St Floor Kizhavana Road, Panampilly Nagar, Near Atlantis Junction, Ernakulam 682036. **Coimbatore**, 3rd Floor Jaya Enclave, 1057 Avinashi Road, Coimbatore 641018. **Cuttack**, Shop No-45, 2nd Floor,, Netaji Subas Bose Arcade,, (Big Bazar Building) Adjacent To Reliance Trends, Dargha Bazar, Cuttack 753001. **Darbhanga**, 2nd Floor Raj Complex, Near Poor Home, Darbhanga-846004. **Davangere**, D.No 162/6, 1st Floor, 3rd Main, P J Extension, Davangere taluk, Davangere Manda, Davangere 577002. **Dehradun**, Shop No-809/799, Street No-2 A, Rajendra Nagar, Near Sheesha Lounge, Kaulagarh Road, Dehradun-248001. **Deoria**, K. K. Plaza, Above Apurwa Sweets, Civil Lines Road, Deoria 274001. **Dhanbad**, 208 New Market 2Nd Floor, Bank More, Dhanbad 826001. **Dhule**, Ground Floor Ideal Laundry Lane No 4, Khol Galli Near Muthoot Finance, Opp Bhavasar General Store, Dhule 424001. **Durgapur**, MWAV-16 Bengal Ambuja, 2nd Floor City Centre, Distt. Burdwan Durgapur-16, Durgapur 713216. **Eluru**, DNO-23A-7-72/73K K S Plaza Munukutla Vari Street, Opp Andhra Hospitals, R R Peta, Eluru 534002. **Erode**, Address No 38/1 Ground Floor, Sathy Road, (VCTV Main Road), Sorna Krishna Complex, Erode 638003. **Faridabad**, A-2B 2nd Floor, Neelam Bata Road Peer ki Mazar, Nehru Groundnit, Faridabad 121001. **Ferozpur**, The Mall Road Chawla Bulding Ist Floor, Opp. Centrail Jail, Near Hanuman Mandir, Ferozepur 152002. **Gandhidham**, Shop # 12 Shree Ambica Arcade Plot # 300, Ward 12. Opp. CG High School, Near HDFC Bank, Gandhidham 370201. **Gandhinagar**, 123 First Floor, Megh Malhar Complex, Opp. Vijay Petrol Pump Sector-11, Gandhinagar 382011. **Gaya**, Property No. 711045129, Ground FloorHotel Skylark, Swaraipuri Road, Gaya 823001. **Ghaziabad**, FF-31, Konark Building, Rajnagar, Ghaziabad 201001. **Ghazipur**, House No. 148/19, Mahua Bagh, Raini Katra-, Ghazipur 233001. **Gonda**, H No 782, Shiv Sadan, ITI Road, Near Raghukul Vidyapeeth, Civil lines, Gonda 271001. **Gorakhpur**, Shop No 8 & 9, 4th Floor, Cross Road The Mall, Bank Road, Gorakhpur-273001. **Gulbarga**, H NO 2-231, Krishna Complex, 2nd Floor Opp., Opp. Municipal corporation Office, Jagat, Station Main Road, Kalaburagi, Gulbarga 585105. **Guntur**, 2nd Shatter, 1st Floor, Hno. 6-14-48, 14/2 Lane,, Arundal Pet, Guntur 522002. **Gurgaon**, No: 212A, 2nd Floor, Vipul Agora, M. G. Road, Gurgaon 122001. **Guwahati**, Ganapati Enclave, 4th Floor, Opposite Bora service, Ullubari, Guwahati, Assam 781007. **Gwalior**, City Centre, Near Axis Bank, Gwalior 474011. **Haldwani**, Shoop No 5, KMVN Shopping Complex, Haldwani 263139. **Haridwar**, Shop No.-17, Bhatia Complex, Near Jamuna Palace, Haridwar 249410. **Hassan**, SAS NO: 490, Hemadri Arcade, 2nd Main Road, Salgame Road Near Brahmins Boys Hostel, Hassan 573201. **Hissar**, Shop No. 20, Ground Floor, R D City Centre, Railway Road, Hissar 125001. **Hoshiarpur**, Unit # SF-6, The Mall Complex, 2nd Floor, Opposite Kapila Hospital, Sutheri Road, Hoshiarpur 146001. **Hubli**, R R Mahalaxmi Mansion, Above Indusind Bank, 2nd Floor, Desai Cross, Pinto Road, Hubballi 580029. **Hyderabad**, No: 303, Vamsee Estates, Opp: Bigbazaar, Ameerpet, Hyderabad 500016. **Indore**, 101, Diamond Trade Center, 3-4 Diamond Colony, New Palasia, Above khurana Bakery, Indore. **Jabalpur**, 2nd Floor, 290/1 (615-New), Near Bhavartal Garden, Jabalpur-482001. **Jaipur**, Office no 101, 1st Floor, Okay Plus Tower, Next to Kalyan Jewellers, Government Hostel Circle, Ajmer Road, Jaipur 302001. **Jalandhar**, Office No 7, 3rd Floor, City Square building, E-H197 Civil Line, Next to Kalyan Jewellers, Jalandhar 144001. **Jalgaon**, 3rd floor, 269 JAE Plaza, Baliram Peth near Kishore Agencies, Jalgaon 425001. **Jalpaiguri**, D B C Road Opp Nirala Hotel, Opp Nirala Hotel, Opp Nirala Hotel, Jalpaiguri 735101. **Jammu**, 1D/D Extension 2, Valmiki Chowk, Gandhi Nagar, Jammu 180004, State-J&K. **Jamnagar**, 131 Madhav Piazza,, Opp Sbi Bank, Nr Lal Bungalow, Jamnagar 361008. **Jamshedpur**, Madhukunj, 3rd Floor, Q Road, Sakchi, Bistupur, East Singhbhum, Jamshedpur 831001. **Jhansi**, 1st Floor, Puja Tower, Near 48 Chambers, ELITE Crossing, Jhansi 284001. **Jodhpur**, Shop No. 6, Gang Tower, G Floor, Opposite Arora Moter Service Centre, Near Bombay Moter Circle, Jodhpur 342003. **Junagadh**, Shop No. 201, 2nd Floor, V-ARCADE Complex, Near vanzari chowk, M.G. Road, Junagadh, 362001. **Kannur**, 2ND FLOOR, GLOBAL VILLAGE, BANK ROAD, Kannur 670001. **Kanpur**, 15/46 B Ground Floor, Opp : Muir Mills, Civil Lines, Kanpur 208001. **Karimnagar**, 2nd Shutter H No. 7-2-607 Sri Matha, Complex Mankammathota, Karimnagar 505001. **Karnal**, 3 Randhir Colony, Near Doctor J.C.Bathla Hospital, Karnal, (Haryana) 132001. **Karur**, No 88/11, BB plaza, NRMP street, K S Mess Back side, Karur 639002. **Khammam**, 11-4-3/3 Shop No. S-9, 1st floor, Srivenkata Sairam Arcade, Old CPI Office Near PriyaDarshini CollegeNehru Nagar, KHAMMAM 507002. **Kharagpur**, Holding No 254/220, SBI BUILDING, Malancha

Road, Ward No.16, PO: Kharagpur, PS: Kharagpur, Dist: Paschim Medinipur, Kharagpur 721304. **Kolhapur**, 605/1/4 E Ward Shahupuri 2Nd Lane, Laxmi Niwas, Near Sultane Chambers, Kolhapur 416001. **Kolkata**, 2/1, Russel Street, 4th Floor, Kankaria, Centre, Kolkata, 70001, WB. **Kollam**, Sree Vigneswara Bhavan, Shastri Junction, Kollam-691001. **Kota**, D-8, Shri Ram Complex, Opposite Multi Purpose School, Gumanpur, Kota 324007. **Kottayam**, 1st Floor Csiascension Square, Railway Station Road, Collectorate P O, Kottayam 686002. **Kurnool**, Shop No:47, 2nd Floor, S komda Shopping mall, Kurnool 518001. **Lucknow**, 1st Floor, A. A. Complex, 5 Park Road Hazratganj Thaper House, Lucknow 226001. **Ludhiana**, SCO 122, Second floor, Above Hdfc Mutual fund,, Feroze Gandhi Market, Ludhiana 141001. **Madurai**, No. G-16/17, AR Plaza, 1st floor, North Veli Street, Madurai 625001. **Malda**, Ram Krishna Pally; Ground Floor, English Bazar, Malda 732101. **Mandi**, House No. 99/11, 3rd Floor, Opposite GSS Boy School, School Bazar, Mandi 175001. **Mangalore**, Shop No - 305, Marian Paradise Plaza, 3rd Floor, Bunts Hostel Road, Mangalore 575003, Dakshina Kannada, Karnataka. **Margao**, Shop No 21, Osia Mall, 1st Floor, Near Ktc Bus Stand, Sgdpa Market Complex, Margao-403601. **Mathura**, Shop No. 9, Ground Floor, Vihari Lal Plaza, Opposite Brijwasi Centrum, Near New Bus Stand, Mathura 281001. **Meerut**, H No 5, Purva Eran, Opp Syndicate Bank, Hapur Road, Meerut 250002. **Mehsana**, FF-21 Someshwar Shopping Mall, Modhera Char Rasta, Mehsana 384002. **Mirzapur**, Triveni Campus, Near SBI Life Ratanganj Mirzapur 231001. **Moga**, 1st Floor Dutt Road, Mandir Wali Gali, Civil Lines Barat Ghar, Moga 142001. **Moradabad**, Chadha Complex, G. M. D. Road, Near Tadi Khana Chowk, Moradabad 244001. **Morena**, House No. HIG 959, Near Court, Front of Dr. Lal Lab, Old Housing Board Colony, Morena 476001. **Mumbai**, 24/B Raja Bahadur Compound, Ambalal Doshi Marg, Behind Bse Bldg, Fort 400001. **Muzaffarpur**, First Floor Saroj Complex, Diwar Road, Near Kalyani Chowk, Muzaffarpur 842001. **Mysore**, NO 2924, 2nd Floor, 1st Main, 5th Cross, Saraswathi Puram, Mysore 570009. **Nadiad**, 311-3rd Floor City Center, Near Paras Circle, Nadiad 387001. **Nagercoil**, HNO 45, 1st Floor, East Car Street, Nagercoil 629001. **Nagpur**, Plot No. 2, Block No. B / 1 & 2, Shree Apratment, Khare Town, Mata Mandir Road, Dharampeth, Nagpur 440010. **Nanded**, Shop No.4, Santakripa Market G G Road, Opp.Bank Of India, Nanded 431601. **Nasik**, S-9 Second Floor, Suyojit Sankul, Sharanpur Road, Nasik 422002. **Navsari**, 103 1st Floor Landmark Mall, Near Sayaji Library, Navsari Gujarat, Navsari 396445. **New Delhi**, 305 New Delhi House, 27 Barakhamba Road, New Delhi 110001. **Noida**, F-21, 2nd Floor, Near Kalyan Jewelers, Sector-18, Noida 201301. **Palghat**, No: 20 & 21, Metro Complex H.P.O.Road Palakkad, H.P.O.Road, Palakkad 678001. **Panipat**, Shop No. 20, 1st Floor BMK, Market, Behind HIVE Hotel, G.T.Road, Panipat-132103, Haryana. **Panjim**, H. No: T-9, T-10, Affran plaza, 3rd Floor, Near Don Bosco High School, Panjim 403001. **Pathankot**, 2nd Floor, Sahni Arcade Complex Adjoining Indra Colony Gate, Railway Road, Pathankot Punjab-145001. **Patiala**, B- 17/423, Lower Mall Patiala, Opp Modi College, Patiala 147001. **Patna**, 3A 3Rd Floor Anand Tower, Exhibition Road, Opp Icici Bank, Patna 800001. **Pondicherry**, No 122(10b), Muthumariamman koil street, Pondicherry 605001. **Pune**, Office # 207-210, second floor, Kamla Arcade, JM Road. Opposite Balgandharva, Shivaji Nagar, Pune 411005. **Raipur**, Office No S-13 Second Floor Reheja Tower, Fafadih Chowk, Jail Road, Raipur 492001. **Rajahmundry** No. 46-23-10/A, Tirumala Arcade, 2nd floor, Ganuga Veedhi, Danavaipeta, Rajahmundry, East Godavari Dist, AP-533103. **Rajkot**, 302 Metro Plaza, Near Moti Tanki Chowk, Rajkot, Rajkot Gujarat 360001. **Ranchi**, Room No 307 3Rd Floor, Commerce Tower, Beside Mahabir Tower, Ranchi 834001. **Renukoot**, C/o Mallick Medical Store, Bangali Katra Main Road, Dist. Sonebhadra (U.P.), Renukoot 231217. **Rewa**, Shop No. 2, Shree Sai Anmol Complex, Ground Floor, Opp Teerth Memorial Hospital, Rewa 486001. **Rohtak**, Office No:- 61, First Floor, Ashoka Plaza, Delhi Road, Rohtak 124001. **Roorkee**, Shree Ashadeep Complex 16, Civil Lines, Near Income Tax Office, Roorkee 247667. **Rourkela**, 2nd Floor, Main Road, UDIT NAGAR, SUNDARGARH, Rourekla 769012. **Sagar**, II floor Above shiva kanch mandir,, 5 civil lines, Sagar, Sagar 470002. **Salem**, No.6 NS Complex, Omalur main road, Salem 636009. **Sambalpur**, First Floor; Shop No. 219, Sahej Plaza, Golebazar; Sambalpur, Sambalpur 768001. **Satna**, 1st Floor Gopal Complex, Near Bus Stand Rewa Roa, Satna, 485001. **Shillong**, Annex Mani Bhawan, Lower Thana Road, Near R K M Lp School, Shillong 793001. **Shimla**, 1st Floor, Hills View Complex, Near Tara Hall, Shimla 171001. **Shimoga**, Jayarama Nilaya, 2nd Corss, Mission Compound, Shimoga 577201. **Shivpuri**, A. B. Road, In Front of Sawarkar Park, Near Hotel Vanasthali, Shivpuri 473551. **Sikar**, First Floor Super Tower, Behind Ram Mandir Near Taparya Bagichi, Sikar 332001. **Silchar**, N.N. Dutta Road, Chowchakra Complex, Premtala, Silchar 788001. **Siliguri**, Nanak Complex, 2nd Floor, Sevoke Road, Siliguri 734001. **Sitapur**, 12/12 Surya Complex, Station Road, Uttar Pradesh, Sitapur 261001. **Solan**, Disha Complex, 1st Floor, Above Axis Bank, Rajgarh Road, Solan 173212. **Solapur**, Shop No 106, Krishna complex 477, Dakshin Kasaba, Datta Chowk, Solapur-413007. **Sonepat**, Shop no. 205 PP Tower, Opp income tax office, Subhash chowk Sonepat. 131001. **Sri Ganganagar**, Address Shop No. 5, Opposite Bihani Petrol Pump, NH-15, near Baba Ramdev Mandir, Sri Ganganagar 335001. **Srikakulam**, D No 4-4-97 First Floor Behind Sri Vijayaganapathi Temple, Pedda relli veechi, Palakonda Road, Srikakulam 532001. **Sultanpur**, 1st Floor, Ramashanker Market, Civil Line, Sultanpur 228001. **Surat**, Ground Floor Empire State building, Near Udhna Darwaja, Ring Road, Surat 395002. **Tirunelveli**, 55/18 Jeney Building, 2nd Floor, S N Road, Near Aravind Eye Hospital, Tirunelveli 627001. **Tirupathi**, Shop No:18-1-421/f1, CITY Center, K.T.Road, Airtel Backside office, Tirupathi-517501. **Tiruvalla**, 2Nd Floor Erinjery Complex, Ramanchira, Opp Axis Bank, Tiruvalla 689107. **Trichur**, 4TH FLOOR, CROWN TOWER, SHAKTHAN NAGAR, OPP. HEAD POST OFFICE, Thrissur 680001. **Trichy**, No 23C/1 E V R road, Near Vekkaliyaman Kalyana Mandapam, Putthur, Trichy 620017. **Trivandrum**, 1st FLOOR, MARVEL BUILDING OPP, SL ELECTRICALS, UPPALAM ROAD, STATUE PO, TRIVANDRUM 695001. **Tuticorin**, 4-B A34-A37, Mangalmal Mani Nagar, Opp. Rajaji Park Palayamkottai Road, Tuticorin 628003. **Udaipur**, Shop No. 202, 2nd Floor business centre, 1C Madhuvan, Opp G P O Chetak Circle, Udaipur 313001. **Ujjain**, Heritage Shop No. 227, 87 Vishvavidhyalaya Marg, Station Road, Near ICICI bank Above Vishal Megha Mart, Ujjain 456001. **Valsad**, 406 Dreamland Arcade, Opp Jade Blue, Tithal Road, Valsad 396001. **Vapi**, A-8 Second Floor Solitaire Business Centre, Opp Dcb Bank Gidc Char Rasta, SILVASSA ROAD, Vapi 396191. **Varanasi**, D-64/132 KA, 2nd Floor, Anant Complex, Sagra, Varanasi 221010. **Vellore**, No 2/19, 1st floor, Vellore city centre, Anna salai, Vellore 632001. **Vijayawada**, H No26-23, 1st Floor, Sundarammastreet, GandhiNagar, Krishna, Vijayawada 520010. **Visakhapatnam**, DNO : 48-10-40, Ground Floor, Surya Ratna Arcade, Srinagar, Opp Roadto Lalitha Jeweller Showroom, Beside Taj Hotel Ladage, Visakhapatnam 530016. **Warangal**, Shop No22,, Ground Floor Warangal City Center, 15-1-237, Mulugu Road Junction, Warangal 506002. **Yamuna Nagar**, B-V, 185/A, 2nd Floor, Jagadri Road,, Near DAV Girls College, (UCO Bank Building) Pyara Chowk, Yamuna Nagar 135001.

Collection centres of KFin Technologies Limited.

Hyderabad(Gachibowli), Selenium Plot No: 31 & 32, Tower B Survey No.115/22 115/24 115/25, Financial District Gachibowli Nanakramguda Serilingampally Mandal, Hyderabad, 500032. **Vashi**, Vashi Plaza, Shop no. 324, C Wing, 1ST Floor, Sector 17, Vashi Mumbai, 400705. **Vile Parle**, Shop No.1 Ground Floor,, Dipti Jyothi Co-operative Housing Society, Near MTNL office P M Road, Vile Parle East, 400057. **Borivali**, Gomati Smuti Ground Floor, Jambli Gully, Near Railway Station, Borivali Mumbai, 400 092. **Thane**, Room No. 302 3rd Floor Ganga Prasad, Near RBL Bank Ltd, Ram Maruti Cross Road, Naupada Thane West, Mumbai, 400602.