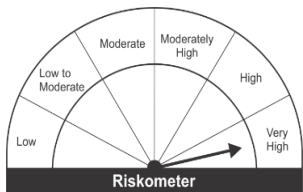
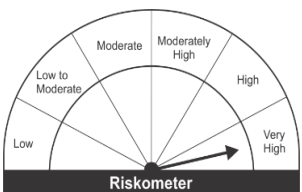


SCHEME INFORMATION DOCUMENT  
SECTION I

**JM Small Cap Fund**

**(An open ended equity scheme predominantly investing in small cap stocks)  
Continuous offer for Units at NAV based prices**

| This product is suitable for investors who are seeking*:   | Scheme Risk-o-meter   | Benchmark Risk-o-meter (as applicable)  |
|--|---|---|
| <ul style="list-style-type: none"> <li>Long term wealth creation</li> <li>An open ended equity scheme that aims for capital appreciation by investing predominantly in equity &amp; equity related securities of small cap stocks</li> </ul> |  <p><b>Investors understand that their principal will be at Very High Risk</b></p> | <p>As per AMFI, Tier I Benchmark is <b>NIFTY Smallcap 250 TRI</b></p>  <p><b>Benchmark riskometer is at Very High Risk</b></p> |

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

**Name of the Mutual Fund** : JM Financial Mutual Fund  
**Name of the Asset Management Company** : JM Financial Asset Management Limited  
**Name of the Trustee Company** : JM Financial Trustee Company Private Limited  
**Addresses, Website of the entities** : **Corporate Office of the AMC:** Office B, 8th Floor, Cnergy, Appasaheb Marathe Marg, Prabhadevi, Mumbai - 400025.  
**Tel. No.** - 022-6198 7777. **Fax Nos.** 022-6198 7704  
**Website** - <https://www.jmfinancialmf.com>

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

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

The investors are advised to refer to the Statement of Additional Information (SAI) for details of JM Financial Mutual Fund, Standard Risk Factors, Special Considerations, Tax and Legal issues and general information on [www.jmfinancialmf.com](http://www.jmfinancialmf.com).

The investors are advised to refer to the Statement of Additional Information (SAI) for details of JM Financial Mutual Fund, Standard Risk Factors, Special Considerations, Tax and Legal issues and general information on SAI is incorporated by reference (is legally a part of the Scheme Information Document). For a free copy of the current SAI, please contact your nearest Investor Service Centre or log on to our website [www.jmfinancialmf.com](http://www.jmfinancialmf.com).

SAI is incorporated by reference (is legally a part of the Scheme Information Document). For a free copy of the current SAI, please contact your nearest Investor Service Centre or log on to our website [www.jmfinancialmf.com](http://www.jmfinancialmf.com).

The Scheme Information Document (Section I and II) should be read in conjunction with the SAI and not in isolation.

This Scheme Information Document is dated **June 26, 2024**.

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## Part I. HIGHLIGHTS/SUMMARY OF THE SCHEME

| Sr. No.      | Title                                 | Description  |
|--------------|---------------------------------------|--|
| <b>I.</b>    | <b>Name of the scheme</b>             | JM Small Cap Fund  |
| <b>II.</b>   | <b>Category of the Scheme</b>         | Small Cap Fund   |
| <b>III.</b>  | <b>Scheme type</b>                    | An open ended equity scheme predominantly investing in small cap stocks.   |
| <b>IV.</b>   | <b>Scheme code</b>                    | JMFI/O/E/SCF/23/11/0016  |
| <b>V.</b>    | <b>Investment objective</b>           | The primary objective of the Scheme is to generate long-term capital appreciation by investing predominantly in equity and equity related securities of small cap companies, as defined by SEBI.<br>However, there is no assurance that the investment objective of the Scheme will be achieved. The Scheme does not guarantee/indicate any returns.   |
| <b>VI.</b>   | <b>Liquidity/listing details</b>      | Liquidity will be available through sale and repurchase of units on all business days on an ongoing basis. Unitholders can subscribe to and get their units repurchased on all business days at NAV related prices (with exit load as mandated by AMC from time to time).<br><br>As per SEBI Regulations, the Fund shall dispatch Redemption proceeds within 3 Business Days of receiving the valid Redemption request. A penal interest of 15% per annum 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 /remitted within 3 Business Days of the date of Redemption request.<br><br>However, under normal circumstances, the Fund will endeavour to dispatch the Redemption proceeds well before 3 Business Days from the acceptance of the duly completed Redemption request.  |
| <b>VII.</b>  | <b>Benchmark (Total Return Index)</b> | Nifty Smallcap 250 TRI   |
| <b>VIII.</b> | <b>NAV disclosure</b>                 | NAVs will be determined at the close of every business day and disclosed on the websites of the Fund/ AMFI.<br>The Fund shall disclose within ten days from the close of each month/half year (i.e. 31st March and 30th September), the complete statement of the Scheme's portfolio (along with ISIN) as on the last day of the month/half year for the Scheme on the websites of the Fund and AMFI in a user friendly and downloadable spreadsheet format.<br>Please refer to section 'Periodic Disclosures' hereunder for further details.  |
| <b>IX.</b>   | <b>Applicable timelines</b>           | <b>Timeline for Dispatch of redemption proceeds</b><br><br>The redemption or repurchase proceeds shall be dispatched to the unitholders within 3 business days from the date of redemption or repurchase, except for the circumstances as specified by AMFI.<br><br><b>Redemption/Switch Procedure in case of physical form:</b><br><br>The investors holding units in physical form may submit their redemption/ switch requests duly signed by all the holders (as per the mode of holding) at any of the Point of Acceptance (POA) Investor Service Centers (ISC) of Registrar & Transfer Agent viz., M/s KFin Technologies Ltd. or JM Financial Asset Management Ltd. latest by the cut off time as stipulated and revised by SEBI from time to time which is currently 3.00 p.m. on any business day. Such cases will be eligible for NAV of the business day on which the redemption requests are time- stamped upto the cut-off time at the ISC for the Scheme.<br><br><b>Redemption / Switch Procedure in case units are held in dematerialized form:</b><br><br>The investors who hold units in demat form and wish to redeem their units will have to take following steps:<br><br>1. Investors will have to approach their DP (Depository Participants) where Demat Account is being held<br>2. Investors will have to submit duly filled-in and signed Redemption/Repurchase Request Form (RRF) available with respective DPs. Normally, these RRF may be available on the websites of respective DPs e.g. Banks etc. As the format of RRF may be different with every DP, the investors are advised to use the RRF procured |

| Sr. No. | Title | Description   |
|---------|-------|---|
|         |       | <p>from their own DP to avoid rejections/delays by their own DP. The ISIN of the Scheme/plan/ sub-plan is printed on the Statement of Account issued to investors.</p> <ol style="list-style-type: none"> <li>3. The investors are required to submit 3 copies of RRF to their DPs. One copy of the RRF is used by the DP for issuing acknowledgement to investors whereas the second copy of the RRF will be forwarded by the DP to the Head Office of the RTA i.e M/s KFin Technologies Ltd. The third copy will be retained by the DP for their own records.</li> <li>4. Based on the receipt of RRF, if found in order, the DP concerned generates Electronic Redemption Request and blocks the units applied for redemption in the NSDL/CDSL system immediately. After this, the investor will not be able to transfer the blocked units to anyone (i.e. cannot transfer to anyone).</li> <li>5. The Electronic Requests generated up to the stipulated cut off time which is currently 3 pm every day by DPs shall get transmitted from NSDL / CDSL to respective Registrars of Mutual Fund by 4 - 6 pm.</li> <li>6. All such Electronic Requests transmitted by NSDL / CDSL by 4 – 6 pm everyday are updated in the system at Registrar’s end i.e. M/s KFin Technologies Ltd. for further processing.</li> <li>7. Registrar shall verify and process the requests subject to finding the same in order by             <ol style="list-style-type: none"> <li>a) Nullifying the units by confirming Electronic Repurchase Request,</li> <li>b) Applying NAV based on Date and Time of raising Electronic request by DP’s for Redemption Request,</li> <li>c) Remitting Redemption proceeds to investor’s bank account (as recorded in demat account) within 3 business days and</li> <li>d) Dispatching an SOA (Statement of Account/Consolidated Account Statement) to the registered address of investor.</li> </ol> </li> <li>8. After the above process is completed, the Registrar will update the respective Depository (i.e. NSDL/ CDSL) about the processing of redemption to enable their DPs to issue Fortnightly/ Monthly Transaction Statement.</li> </ol> <p>A Unit holder has in case of physical redemption request for redemption either in terms of Amount or in terms of the number of Units. In case, the redemption request indicates both amount in Rupees and number of Units, the lower of the two in value term will be considered. Where a Rupee amount is specified or deemed to be specified for redemption, the number of Units redeemed will be the equivalent to the amount sought redeemed plus the exit load &amp; applicable Govt levies like STT divided by the redemption price (ie additionally subject to the levy of applicable STT and exit load).</p> <p>In case of difference/ ambiguity in the amount and units mentioned in any request for Redemption/ Switch, the minimum value (of units and amount) on rupee equivalent basis on the Transaction/ applicable NAV date will be considered by the AMC, provided the investor has not furnished any clarification in writing, duly signed on the date of transaction. In the event of investor not having filled in the Amount/ Units in the Transaction Slip, the AMC will redeem/ switch out all the outstanding units in case the Scheme, Plan, Option are clearly mentioned.</p> <p>In case, the investor has not mentioned the plans/ sub-plans etc. in the redemption request specifically where he is having holdings in various plans/ sub-plans etc. of the particular scheme, AMC will summarily reject such redemption request if the investor has not furnished any clarification in writing, duly signed on the date of transaction itself, during normal office hours.</p> <p>In case, an Investor fails to mention the complete name of the Scheme upto plan/ sub - plan level while making request for redemption/ switch-out, the AMC reserves the right to redeem/ switch-out all/specified desired units/ value provided the investor is having holdings only in one scheme/plan/option and the folio number is clearly mentioned or if he maintains one folio. Otherwise, such incompletely filled requests would be summarily rejected without processing.</p> <p>Investors are requested to note that in case of redemption/switch request, if the number of units or the amount to be redeemed/switched out to any other Scheme of JM Financial Mutual Fund, exceeds the number of outstanding units or value of outstanding units, respectively, then JM Financial Asset Management Limited (the “AMC”) shall, at its discretion, redeem/switch out all the outstanding units, if no clarificatory letter is received from the respective investor on the date of the</p> |

| Sr. No. | Title  | Description   |
|---------|--|---|
|         |  | <p>transaction and if the condition of minimum investment amount of switch-in scheme is fulfilled.</p> <p>The number of Units so redeemed will be subtracted from the Unit holder's account and a monthly industry level Mutual Fund Consolidated Account Statement (CAS) containing the details will normally be dispatched / emailed to the Unitholders latest by 15th of subsequent month by NSDL/CDSL in case of Demat Units or by AMFI's appointed Agencies (currently M/s. Manipal Technologies Ltd. or M/s. Seshai Business Forms Pvt. Ltd.) for verified PAN cases and by the registrar (i.e. M/s. KFin Technologies Limited) for other cases either through email or physical copy.</p> <p><b>FIFO Method of redemption/switch-out</b></p> <p>In case, an investor has purchased Units on more than one business day, the Units purchased prior in time (i.e. those Units which have been held for the longest period of time), will be deemed to have been redeemed first, i.e. on first in first out basis. Unit holders may also request for repurchase of their entire holding and close the account by indicating the same at the appropriate place in the Transaction Slip/ Repurchase form.</p> <p><b>Uniform process for processing of redemption/switch – out for all the Schemes of the Mutual Fund.</b></p> <p>All switch funding shall be in line with redemption funding timelines adopted by the concerned scheme i.e. if a scheme follows T+2 payout for redemption, the switch out funding will also be made on T+2 and not earlier or later than T+2, where T is the day of valid transaction received before the stipulated cut off time.</p> <p><b>Dispatch of IDCW (if applicable) etc.</b></p> <p>In case the AMC delays in dispatching the Income Distribution Cum Capital Withdrawal proceeds beyond 7 working days from the Record Date, it shall pay interest to the unitholders at such rate as may be specified by SEBI for the period of such delay (presently @ 15% per annum).</p> <p><b>Delay in payment of redemption / repurchase / Income Distribution Cum Capital Withdrawal proceeds</b></p> <p>The Asset Management Company shall be liable to pay interest to the unitholders at such rate as may be specified by SEBI for the period of such delay (presently @ 15% per annum) if the delay is beyond the SEBI stipulated time which is 3 Business Days currently.</p> <p>In case the AMC delays in dispatching the Income Distribution Cum Capital Withdrawal proceeds beyond 7 working days from the Record Date, it shall pay interest to the unitholders at such rate as may be specified by SEBI for the period of such delay (presently @ 15% per annum).</p> |
| X.      | <p><b>Plans and Options</b><br/>Plans/Options and sub options under the Scheme</p> | <p>The Scheme offers two plans:</p> <ul style="list-style-type: none"> <li>- JM Small Cap Fund - Regular Plan</li> <li>- JM Small Cap Fund - Direct Plan</li> </ul> <p>Each Plan offers two options viz., Income Distribution cum Capital Withdrawal (IDCW)* &amp; Growth Option</p> <p>The Income Distribution cum Capital Withdrawal option will offer investors the facilities of: (a) Payout of Income Distribution cum Capital Withdrawal Option/IDCW (Payout), (b) Reinvestment of Income Distribution cum Capital Withdrawal Option/IDCW (Reinvestment). The options under the Scheme will have a common portfolio.</p> <p>No Income Distribution Cum Capital Withdrawal under Income Distribution Cum Capital Withdrawal option shall be distributed for those unit holders opted for payout where such Income Distribution Cum Capital Withdrawal on a single payout is less than Rs. 100/-. Consequently, such Income Distribution Cum Capital Withdrawal (less than Rs.100/-) shall be compulsorily re-invested.</p> <p>*Amounts under IDCW option can be distributed out of investors capital (equalization reserve), which is part of sale price that represents realized gains. However, investors</p>  |

| Sr. No. | Title   | Description  |
|---------|---|--|
|         |   | <p>are requested to note that amount of distribution under IDCW option is not guaranteed and subject to availability of distributable surplus.</p> <p>Under these options, the Trustees of the Fund reserve the right to declare Income Distribution cum Capital Withdrawal (income distribution) /IDCW in the respective Income Distribution cum Capital Withdrawal (income distribution) /IDCW options of the Scheme, subject to availability of distributable surplus. IDCW payout will be lower to the extent of statutory levies, as applicable.</p> <p>The Trustees to JM Financial Mutual Fund reserves the right to change/modify the above provisions at a later date. It is clarified that the minimum investment is applicable at the respective Options/ Sub-options level i.e. Growth, Income Distribution cum Capital Withdrawal and will be considered after taking into account permissible DD charges, stamp duty.</p> <p><b>ADDITIONAL PLANS</b></p> <p>The Trustees may permit introduction of one or more plans that may be envisaged at a later date under the scheme in terms of Para-no 2.3 of SEBI Master Circular depending upon the market conditions prevailing at the time of launch of the plan(s) and taking into consideration the interests of the unitholders and subject to the SEBI regulations. Investors will be suitably informed by publishing a notice in a newspaper/addendum or through any other means as the Trustee may be considered appropriate.</p> <p>For detailed disclosure on default plans and options, kindly refer SAI.</p> |
| XI.     | <b>Load Structure</b>                                 | <p><b>Exit Load:</b><br/>In respect of each purchase / switch-in of Units, an Exit Load of 1.00% is payable if Units are redeemed/ switched-out within 180 days from the date of allotment.</p> <p>No Exit Load is payable if Units are redeemed / switched-out after 180 days from the date of allotment.</p> <p>No Entry / Exit Load shall be levied on units allotted on Reinvestment of Income Distribution cum Capital Withdrawal Option</p> <p>In respect of Systematic Transactions such as SIP, STP, SWP, Exit Load, if any, prevailing on the date of registration / enrolment for SIP/STP/SWP shall be levied for all the opted Installments.</p>  |
| XII.    | <b>Minimum Application Amount/switch in</b>           | <p>Minimum amount of Rs. 1,000/- per Plan / Option / Sub-Option and in multiples of Rs. 1 thereafter in case of first time investments.</p> <p>The units will be allotted on the investment/switched-in amount after netting off the applicable Stamp Duty which is presently 0.005% of net investment amount.</p>   |
| XIII.   | <b>Minimum Additional Purchase Amount</b>             | <p>For ongoing investments in the same scheme in an existing folio, the investment would be Rs. 100/- and in multiples of Rs. 1 thereafter.<br/>However, there is no upper limit for investment.</p>   |
| XIV.    | <b>Minimum Redemption/switch amount</b>               | <p>There is no minimum and maximum limit on the amount/units which can be redeemed/switched-out. The investor is free to redeem any or all units outstanding in his/her/their folio.</p>   |
| XV.     | <b>Segregated portfolio/side pocketing disclosure</b> | <p>In case of a credit event at issuer level and to deal with liquidity risk, the AMC may create a segregated portfolio of debt and money market instruments including unrated or money market instruments of an issuer that does not have outstanding rated debt or money market instruments, under the Scheme in compliance with the Para-no 4.4 of SEBI Master Circular.</p> <p>For Details, kindly refer SAI</p>   |
| XVI.    | <b>Swing pricing disclosure</b>                       | Not Applicable   |
| XVII.   | <b>Stock lending/short selling</b>                    | The Scheme may undertake Securities Lending transactions as per para 12.11.2.1 of SEBI Master Circular. For Details, kindly refer SAI.   |
| XVIII.  | <b>How to Apply</b>                                   | <p>Application form and Key Information Memorandum may be obtained from the offices of AMC or Investor Services Centers of the Registrar or distributors or downloaded from <a href="https://www.jmfinancialmf.com">https://www.jmfinancialmf.com</a> The list of the Investor Service Centres (ISCs)/Official Points of Acceptance (OPAs) of the Mutual Fund are also provided on the website of the AMC <a href="https://www.jmfinancialmf.com">https://www.jmfinancialmf.com</a> Investors are also advised to refer to Statement of Additional Information before submitting the application form. All</p>   |

| Sr. No. | Title  | Description   |
|---------|--|---|
|         |  | <p>cheques and drafts should be crossed "Account Payee Only" and drawn in favor of the scheme viz: JM Small cap Fund or in the name of JM Financial Mutual Fund. Any application may be accepted or rejected at the sole and absolute discretion of the Trustee.</p> <p>All trading Member of Bombay Stock Exchange (BSE) and National Stock Exchange (NSE), who are registered with AMFI as Mutual Fund Advisors offering the facility of purchase and redemption of units of JM Financial Mutual Funds through stock Exchanges platforms are the official Acceptance points for fresh applications as the NFO of the scheme is offered through the stock exchange platforms.</p> <p>Further pursuant to para no.16.3 of SEBI Master Circular it has been decided to allow investors to directly access infrastructure of the recognised stock exchanges to purchase mutual fund units directly from Mutual Fund/ Asset Management Companies. SEBI circular has advised recognised stock exchanges, clearing corporations and depositories to make necessary amendment to their existing byelaws, rules and/or regulations, wherever required Ongoing price for subscription (purchase).</p> <p>Further, Investors may also apply through ASBA facility, during the NFO period of the Scheme.</p> <p>Details in section II</p> |
| XIX.    | Where can applications for subscription/redemption/ switches be submitted  | <p>Applications for purchase/redemption be submitted at any of the Designated Investor Service Centres given in the website of the AMC i.e. <a href="https://www.jmfinancialmf.com">https://www.jmfinancialmf.com</a></p> <p>Details in section II</p>  |
| XX.     | Investor services  | <p><b>Contact details for general service requests:</b><br/> Mr. Pradyumna Khare - Head of Operations<br/> Address:- The Summit Business Park, 415, 4th Floor, Off Andheri - Kurla Road, Chakala, Below Western Express Highway Metro Station, Andheri East, Mumbai - 400 093,<br/> Email:- <a href="mailto:investor@jmfl.com">investor@jmfl.com</a> and <a href="mailto:service_jmf@kfintech.com">service_jmf@kfintech.com</a></p> <p><b>Contact details for complaint resolution:</b><br/> Email - investor@jmfl.com<br/> Phone No.+91 22 61987777 / 33797777</p>   |
| XXI.    | Specific attribute of the scheme (such as lock in, duration in case of target maturity scheme/close ended schemes) (as applicable) | Not Applicable  |
| XXII.   | Special product/facility available during the NFO and on ongoing basis   | <ul style="list-style-type: none"> <li> <b>SYSTEMATIC PLANS</b><br/> Systematic Plans Are Available To The Investors Through Systematic Investment Plan ("SIP")/ Systematic Transfer Plan ("STP") and Systematic Withdrawal Plan (SWP).<br/> All the terms and conditions (including the provisions of load structure &amp; lock-in period) applicable on the date of registration i.e. date of initial investment will also be applicable for all future SIP/STP/SWP installments as well i.e. Registration concept except for special SIP where the terms and conditions (including load &amp; lock-in period) applicable on the date of first installment would be applicable for all future installments. All applicants are deemed to have accepted the terms and conditions upon submitting the valid application form with other requisites for investment under Systematic Plans.<br/> The AMC reserves the right to change the terms of this facility from time to time. </li> </ul> <p><b>1. SYSTEMATIC INVESTMENT PLAN (SIP)</b><br/> Under this facility, by investing a fixed amount at regular intervals, the Unitholders can take advantage of the benefits of Rupee Cost Averaging, at the same time</p>  |

| Sr. No.       | Title          | Description  |
|---------------|----------------|--|
|               |                | <p>investing a fixed amount regularly in a disciplined manner to build a good corpus to meet his future needs.</p> <p>An Investor has the option to hold the units in demat or physical form under SIP.</p> <p>The Scheme offers Systematic Investment Plans (SIP) to the willing investors as per the terms and conditions mentioned in the Scheme Offer Documents. The SIP Facility is subject to changes from time to time at the discretion of the AMC.</p> <p><b>2. SYSTEMATIC TRANSFER PLAN (“STP”) / SYSTEMATIC WITHDRAWAL PLAN (“SWP”)</b></p> <p>In addition to SIP Facility, the Scheme also offers STP and SWP facilities which have been explained in detail below:</p> <p>STP provides for transfer of specified amount from one Scheme/Plan/Option in which the original investment is made to any other Scheme/ Plan/Option of JM Financial Mutual Fund, on a specified date or at the end of specified periodic interval viz., either daily, weekly, fortnightly, monthly or quarterly.</p> <p><b>For further details of above special product/facilities, for details, kindly refer SAI</b></p> |
| <b>XXIII.</b> | <b>Weblink</b> | <p>To download Daily TER and last 6 months as well as scheme factsheet kindly refer the following link:<br/> <a href="https://www.jmfinancialmf.com/SIDdisclosures/Weblink">https://www.jmfinancialmf.com/SIDdisclosures/Weblink</a></p>   |



## DUE DILIGENCE BY THE ASSET MANAGEMENT COMPANY

It is confirmed that:

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

**Date:** June 26, 2024  
**Place:** Mumbai

**Name:** Diana D'sa  
**Designation:** Compliance Officer

## Part II. INFORMATION ABOUT THE SCHEME

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

The following table provides the broad classification of assets and indicative exposure level in percentage terms.

Under normal circumstances the Investment Pattern of the Scheme will be as follows.

| Instruments  | Indicative allocations (% of total assets) |         |
|--|--|---------|
|  | Minimum                                    | Maximum |
| Equity & Equity related instruments ^ of small cap companies\$           | 65   | 100     |
| Equity and equity related instruments^ of other than small cap companies | 0  | 35      |
| Debt* & Money Market instruments^^                                       | 0  | 35      |
| Units issued by REITs and InvITs   | 0  | 10      |
| Units of Mutual Fund Scheme  | 0  | 10      |

\$Small Cap companies are those companies which are classified as small cap companies by Securities and Exchange Board of India (SEBI) or Association of Mutual Funds in India (AMFI) in terms of market capitalisation. Small Cap Companies as defined by SEBI: 251st company onwards in terms of full market capitalization.

^^Money Market instruments includes commercial papers, commercial bills, treasury bills, Government securities having an unexpired maturity up to one year, call or notice money, certificate of deposit, usance bills, and any other like instruments as specified by the Reserve Bank of India from time to time and subject to regulatory approval.

\*Debt instruments may include securitised debt upto 20% of the debt portfolio of the scheme.

^The Scheme may invest upto 50% of equity assets in equity derivatives instruments as permitted under the SEBI (Mutual Funds) Regulations, 1996 from time to time. The Scheme may use equity derivatives for such purposes as maybe permitted under the SEBI (Mutual Funds) Regulations, 1996, including but not limited for the purpose of hedging and portfolio balancing, based on the opportunities available and subject to guidelines issued by SEBI from time to time. The scheme shall not invest in debt derivative instruments.

The Scheme may enter into repos/reverse repos as may be permitted by RBI other than repo in corporate debt securities. The Scheme does not intend to invest in repo in corporate debt securities. From time to time, the Scheme may hold cash. A part of the net assets may be invested in the Tri-party repo on Government Securities or treasury bills or repo or in an alternative investment as may be provided by RBI, subject to prior approval from SEBI, if any.

The Scheme may undertake Securities Lending transactions as per para 12.11.2.1 of SEBI Master Circular within following limits:

- i. Not more than 20% of the net assets can be deployed in Stock Lending
- ii. Not more than 5% of the net assets can be deployed in Stock Lending to any single intermediary.

The Scheme shall not engage in short selling. The Scheme will not participate in Credit Default Swaps (CDS) for Corporate Bonds. The Scheme will not invest in

a. debt instruments with special features viz. subordination to equity (absorbs losses before equity capital) and /or convertible to equity upon trigger of a pre-specified event for loss absorption including Additional Tier I bonds and Tier 2 bonds issued under Basel III framework.

b. debt instruments having Structured Obligations / Credit Enhancements.

The Scheme retains the valueability to invest across all the securities in the equity, debt, money markets instruments, units issued by REITs & InvITs and mutual fund units.

As per para 12.28.1.4 of SEBI Master Circular, the cumulative gross exposure through equity, debt, derivative positions, Real Estate Investment Trusts (REITs), Infrastructure Investment Trusts (InvITs), other permitted securities /assets and such other securities/assets as may be permitted by SEBI from time to time (subject to prior approval from SEBI, if any) will not exceed 100% of the net assets of the Scheme. However, with reference to para no.12.25.3 of SEBI Master Circular cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.

Pursuant to para 12.25.3 of SEBI Master Circular and AMFI dated November 03, 2021, Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure. Cash Equivalent shall consist of the following securities having residual maturity of less than 91 days:

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

According to Para 4.5.2 of SEBI Master circular, pending deployment of funds of the Scheme in securities in terms of investment objective of the Scheme, the Mutual Fund may invest the funds of the Scheme in short term deposits of scheduled commercial banks subject to restrictions laid down under the SEBI Regulations from time to time.

It may be noted that AMC has to adhere to the asset allocation pattern indicated in the Scheme Information Document under normal circumstances.

Apart from the Investment Restrictions prescribed under the SEBI (MF) Regulations, there are internal risk parameters for limiting exposure in the interest of Unitholders. Such parameters are prescribed from time to time to respond to the dynamic market conditions and market opportunities.

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 Scheme to make their investments in the full spectrum of permitted investments in order to achieve their investment objective.

#### Indicative Table

| Sl. No. | Type of Instrument   | Percentage of exposure   | Circular/Regulatory reference  |
|---------|--|--|--|
| 1.      | Securities Lending   | The Scheme shall adhere to the following limits should it engage in Stock Lending.<br>1. Not more than 20% of the net assets of the Scheme can generally be deployed in Stock Lending.<br>2. Not more than 5% of the net assets of the Scheme can generally be deployed in Stock Lending to any single counter party (as may be applicable). | Para-no. 12.11.2.1 of SEBI Master Circular                             |
| 2.      | Equity Derivatives for non- hedging purposes                       | upto 50% of the equity portfolio of the scheme   | Para-no. 12.25 of SEBI Master Circular                                 |
| 3.      | Securitized Debt   | upto 20% of the net assets   | Para-no. 12.15 of SEBI Master Circular                                 |
| 4.      | ReITS and InVITS   | upto 10% of the net assets   | Para-no. 12.21 of SEBI Master Circular & Clause 13 of Seventh Schedule |
| 5.      | AT1 and AT2 Bonds (Instruments having special features)            | The scheme will not invest more than 10% of its NAV of the debt portfolio in such instruments and not more than 5% of its NAV of the debt portfolio in such instruments issued by a single issuer.   | Para-no. 12.2 of SEBI Master Circular                                  |
| 6.      | Debt instruments with structured obligations or credit enhancement | The investment in debt instruments with structured obligation or credit enhancement shall not exceed 10% of the debt portfolio of the scheme and the group exposure in such instruments shall not exceed 5% of the debt portfolio of the scheme.   | Para-no. 12.3 of SEBI Master Circular                                  |
| 7.      | Repo /reverse repo in corporate debt securities                    | The scheme will not invest in this instruments   | Para 12.18 of SEBI Master Circular on Mutual Funds dated May 19, 2023  |
| 8.      | Short term deposits of the Scheduled Commercial Banks              | upto 15% of the net assets   | Para 12.16 of SEBI Master Circular on Mutual Funds dated May 19, 2023  |
| 9.      | Tri Party Repo   | The corpus of the Scheme pending for deployment may be invested in Tri-Party Repos (TREPS) on Government Securities.   | -  |
| 10.     | Mutual Fund Units  | The scheme may invest in mutual fund units upto 10% of the net assets of the Scheme.   | Clause 4 of Seventh Schedule of SEBI MF Regulations, 1996              |

### **Portfolio Rebalancing in case of passive deviation from asset allocation:**

In accordance with para 2.9 of SEBI Master circular, as amended from time to time, the scheme shall rebalance the portfolio in case of any deviation to the asset allocation mentioned in the Scheme Information Document (SID) due to passive breaches. In the event of deviation from mandated asset allocation mentioned in the Scheme Information Document (SID) due to passive breaches (occurrence of instances not arising out of omission and commission of AMCs), the portfolio shall be rebalanced within a period of thirty (30) business days. In case the portfolio of scheme is not rebalanced within the above mandated timelines, justification in writing, including details of efforts taken to rebalance the portfolio shall be placed before Investment Executive Committee. The Investment Executive Committee, if so desires, can extend the timelines up to sixty (60) business days from the date of completion of mandated rebalancing period. In case the portfolio of scheme is not rebalanced within the aforementioned mandated plus extended timelines, AMCs shall:

- i. not be permitted to launch any new scheme till the time the portfolio is rebalanced.
- ii. not to levy exit load, if any, on the investors exiting such scheme(s).

### **Portfolio rebalancing in case of deviation from asset allocation under Defensive consideration:**

The scheme shall ensure adherence to the above asset allocation under normal circumstances. However, due to market conditions, the AMC may invest beyond the range set out in the asset allocation. Such deviations shall normally be for a short term and defensive considerations as per para 1.14.1.2 (b) of SEBI Master circular and the fund manager will rebalance the portfolio within 30 calendar days from the date of deviation. However, at all times the AMC shall ensure that the portfolio would adhere to the overall investment objective of the scheme.

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

The Scheme shall invest in the following securities as per the limits specified in the asset allocation table of Scheme, subject to SEBI (MF) Regulations.

The Scheme may invest its funds in the following securities:

1. Equity and equity related securities are such instruments like Convertible bonds and debentures and warrants carrying the right to obtain equity shares and derivative instruments.
2. ADRs/ GDRs issued by Indian companies, subject to guidelines issued by RBI/ SEBI.
3. Money market instruments permitted by SEBI/RBI.
4. Open-ended Liquid Schemes registered with SEBI or schemes that invest predominantly in money market instruments / securities.
5. Commercial Paper (CP), Certificate of Deposits (CD), Treasury Bills, Bills Rediscounting, Tri-party Repo on government securities or T-bills / Reverse Repo (including repo in corporate bonds).
6. Corporate Bonds include all debt instruments issued by entities such as Banks, Public Sector Undertakings, Government Agencies and other Statutory Bodies, Municipal Corporations, body corporate, companies, trusts/ Special Purpose Vehicles etc and would exclude investments in Government Securities issued by Central and State Government.
7. Investment in Government securities issued by Central and/or State Government to the extent of SEBI prescribed limits. Such securities may be:
  - (i) Supported by the ability to borrow from the Treasury or
  - (ii) Supported by Sovereign guarantee or the State Government or
  - (iii) Supported by Government of India/ State Government in some other way
8. Securities issued by any government agencies, quasi-government or statutory bodies, Public Sector Undertakings, which may or may not be guaranteed or supported by the Central Government or any state government (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills).
9. Non-convertible securities as well as nonconvertible portion of convertible securities, such as debentures, coupon bearing bonds, zero coupon bonds, deep discount bonds, Mibor-linked or other floating rate instruments, premium notes and other debt securities or obligations of public sector undertakings, banks, financial institutions, corporations, companies and other bodies corporate as may be permitted by SEBI/ RBI from time to time.
10. Securitized debt, pass through obligations, various types of securitization issuances including but not limited to Asset Backed Securitization, Mortgage Backed Securitization, single loan securitization and other domestic securitization instruments, as may be permitted by SEBI/ RBI from time to time.
11. Derivatives like Stock/ Index Futures, Stock/ Index Options (Including covered calls), and such other derivative instruments permitted by RBI/ SEBI.
12. Deposits with banks and other bodies corporate as may be permitted by SEBI from time to time.
13. Any other debt and money market instruments that may be available from time to time.
14. The Fund may also enter into "Repo" hedging or such other transactions as may be allowed to Mutual Funds from time to time. Investments in Tri-Party Repo on Government Securities or T-bills would be as per the RBI circular dated July 24, 2018. Investments in Repo in corporate debt securities would be in line with para 12.18 of SEBI Master, and shall be made basis the policy approved by the JM Financial Asset Management Limited and JM Financial Trustee Private limited. The significant features are as follows:

- i. As specified in the para 12.18 of SEBI Master Circular, the base of eligible securities for mutual funds to participate in repo in corporate debt securities is from AAA rated to AA and above rated corporate debt securities.
- ii. Category of counterparty & Credit rating of counterparty: JM Financial Mutual Fund schemes shall enter in lending via Repo only with Investment Grade counterparties.
- iii. The Gross exposure of the scheme to repo transactions in corporate debt securities shall not be more than 10% of the net asset of the scheme.

All investment restrictions stated above shall be applicable at the time of making an investment. Further, any new circular issued by RBI or SEBI on Repo would be applicable from time to time.

15. Mutual fund scheme shall not invest in unlisted debt instruments including commercial papers (CPs), other than (a) government securities, (b) other money market instruments and (c) derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. which are used by mutual funds for hedging.
16. The Scheme shall not invest in "sensitive Commodities".
17. The schemes may also enter into repurchase and reverse repurchase obligations in all securities (including Repos in corporate bonds) held by them as per the guidelines and regulations applicable to such transactions.
18. Any other instruments / securities, which in the opinion of the fund manager would suit the investment objective of the scheme subject to compliance with extant Regulations.

The securities mentioned above could be listed, unlisted, publicly offered, privately placed, secured, unsecured, rated or unrated and of varying maturity. The securities may be acquired through public offerings (IPOs), secondary market operations, private placement, rights offers or negotiated deals.

#### **DEBT MARKET IN INDIA:**

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, Triparty Repos on Government Securities or treasury bill, 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 includes 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 Mutual Funds have also started hedging their exposures through these products.

Securitized Debts Instruments – Asset securitization is a process of transfer of risk whereby commercial or consumer receivables are pooled packaged and sold in the form of financial instruments. A typical process of asset securitisation involves sale of specific Receivables to a Special Purpose Vehicle (SPV) set up in the form of a trust or a company. The SPV in turn issues financial instruments to investors, which are rated by an independent credit rating agency. Bank, Corporates, Housing and Finance companies generally issue securitized instruments.

The underlying receivables generally comprise of loans of Commercial Vehicles, Auto and Two wheeler pools, Mortgage pools (residential housing loans), Personal Loan, credit card and Corporate receivables. The instrument, which is issued, includes loans or receivables maturing only after all receivables are realized. However depending on timing of underlying receivables, the average tenure of the securitized paper gives a better indication of the maturity of the instrument.

## **C. WHAT ARE THE INVESTMENT STRATEGIES?**

### **Scheme Specific Investment Strategy**

The objective of the Scheme is to provide long term capital appreciation by investing in a diversified portfolio of small-cap companies across sectors. Companies whose Market capitalization falls below the market capitalization of Top 250 companies are classified as small cap companies as per current SEBI classification norms. These norms are subject to change from time to time. The scheme aims to invest in companies that have the potential to become Midcap & Large Cap companies over a long term horizon. These companies are in the initial phase of growth & if able to successfully scale up their business could generate significant capital appreciation.

The Scheme will invest at least 65% in small cap companies. The Scheme may also seek participation in other equity and equity related securities to achieve optimal portfolio construction.

The Scheme will focus on bottom up approach to find stocks with high growth potential. The Scheme will consider the below criteria's for company selection:

- Companies with reasonable growth outlook & ability to scale the business over multi year period
- Strong Balance Sheet & Cash Flow
- Quality Management & good corporate governance practices
- Efficient Capital Allocation
- Reasonable Valuations

**Subject to the Regulations and the applicable guidelines, the Scheme may, engage in Stock Lending activities.**

### **Risk control measures**

Investments made by the Scheme would be in accordance with the investment objective of the Scheme and the provisions of the SEBI (MF) Regulations. Since investing requires disciplined risk management, the AMC would incorporate adequate safeguards for controlling risks in the portfolio construction process. While allocating and choosing securities, the Investment Manager will aim to diversify by gaining broad exposure to different industries and companies in order to reduce risk.

### **Risk Mitigation measures for investments in equity / equity related instruments**

- The Scheme aims to maintain a well-diversified equity portfolio comprising stocks across various sectors of the economy. This shall aid in managing concentration risk and sector specific risks.
- The Scheme will maintain a portfolio diversified across a large number companies. Exposure to individual companies would be in accordance with the risk management and regulatory limits.. This diversified portfolio would aid in managing volatility and also improve liquidity of the portfolio.
- The will strive to mitigate risk through a judicious mix of Debt and Money Market Instruments and equity/ equity related instruments.

### **Risk Mitigation measures for investments in debt instruments**

The investments in debt and Money Market instruments would be undertaken after assessing the associated credit risk, interest rate risk and liquidity risk. The AMC shall undertake credit evaluation of each investment opportunity and invest in rated papers of companies having a sound background, strong fundamentals and quality of management and financial strength. In addition, the Scheme would endeavor to invest in instruments with a relatively higher liquidity, and will seek to manage the duration of the debt assets on proactive basis to manage interest rate risk and to optimize returns.

The scheme may also use various derivatives and hedging products from time to time, as would be available and permitted by SEBI/RBI for the purpose of hedging and portfolio rebalancing.

The above risk control measures shall be implemented by the AMC on best effort basis however there can be no guarantee that such measures can completely mitigate the risks involved in Scheme.

### **Inter Scheme Investments**

The Scheme may invest in other Schemes managed by the AMC or in the Schemes of any other Funds, provided it is in conformity with the investment objectives of the investor Scheme and in terms of the prevailing SEBI Regulations. As per the SEBI Regulations, no investment management fees will be charged for such investments and the aggregate inter Scheme investment made by all Schemes of JM Financial Mutual Fund or in the Schemes under the management of other asset management companies shall not exceed 5% of the net asset of the Fund as on date of investments.

### **IMPORTANT**

It must be clearly understood that the above referred portfolio strategies are not absolute, and that they can vary substantially depending upon the Fund Manager's perception as to whether the stock/debt market is in an overheated state or has fallen well below a level they consider appropriate taking into account the factors prevailing at that time, the intent being to protect the Unitholders interest, especially the NAV of the Fund.

The Fund Manager may, from time to time, at her absolute discretion review and modify the strategy, provided such modification is in accordance with SEBI Regulations.

### Trading in Derivatives

The Scheme intends to use derivatives for the purposes, which may be permitted by SEBI Mutual Fund Regulations from time to time, which will include hedging & portfolio balancing. Hedging does not mean maximisation of returns but only reduction of systematic or market risk inherent in the investment. SEBI has vide its Circular SEBI/MFD/CIR No.03/158/03 dated June 10, 2003, specified the guidelines pertaining to trading by Mutual Fund in Exchange Traded Derivatives. For detailed derivative strategies, please refer to SAI.

### Portfolio Turnover Policy

Portfolio turnover is defined as lesser of purchases and sales as a percentage of the average corpus of the Scheme during a specified period of time. Portfolio turnover would depend upon the market conditions such as volatility of the market and inflows/outflows in the scheme. The Scheme is an open ended Scheme with subscriptions and redemptions expected on a daily basis. Hence, it will be difficult to estimate the portfolio turnover with any reasonable amount of accuracy.

### Equity Derivatives

The Scheme(s) may use various equity derivatives from time to time, as would be available and permitted by SEBI, in an attempt to protect the value of the portfolio and enhance Unitholders' interest. Accordingly, the Scheme(s) may use derivative instruments like futures & options stock indices, future & options on individual securities or such other derivative instruments as may be introduced from time to time as permitted under the SEBI (Mutual Funds) Regulations, 1996. The following information provides a basic idea as to the nature of the derivative instruments proposed to be used by the Scheme(s) and the benefits and risks attached therewith. Please note that the examples have been given for illustration purposes only.

#### Index Futures

##### *Benefits*

Investment in stock index futures can give exposure to the index without directly buying the individual stocks. Appreciation in index stocks can be effectively captured through investment in Stock Index Futures. The Fund can sell futures to hedge against market movements effectively without actually selling the stocks it holds. The stock index futures are instruments designed to give exposure to the equity market indices. The Bombay Stock Exchange and the National Stock Exchange trade in index futures of 1, 2 and 3-month maturities. The pricing of an index future is the function of the underlying index and interest rates.

##### *Illustration*

Spot Index: 1790

1 month Nifty Future Price on day 1: 1800. Fund buys 100 lots. Each lot has a nominal value equivalent to 200 Units of the underlying index.

##### Situation 1:

Let us say that on the date of settlement, the future price = closing spot price = 1810

Profits for the Fund =  $(1810 - 1800) * 100 \text{ lots} * 200 = \text{Rs. } 200,000$

##### Situation 2

Let us say that on the date of settlement, the future price = Closing spot price = 1795

Loss for the Fund =  $(1795 - 1800) * 100 \text{ lots} * 200 = (\text{Rs. } 100,000)$

The net impact for the Fund will be in terms of the difference between the closing price of the index and cost price (ignoring margins for the sake of simplicity). Thus, it is clear from the example that the profit or loss for the Fund will be the difference of the closing price (which can be higher or lower than the purchase price) and the purchase price.

##### *Risk:*

- The risks associated with index futures are similar to the one with equity investments. Additional risks could be on account of illiquidity and hence mispricing of the future at the time of purchase.
- The strategy of taking a long position in index futures increases the exposure to the market. The long position is positively correlated with the market. However, there is no assurance that the stocks in the portfolio and the index behave in the same manner and thus this strategy may not provide gains perfectly aligned to the movement in the index.
- The long position will have as much loss / gain as in the underlying index. e.g. if the index appreciates by 10%, the index future value rises by 10%. However, this is true only for futures contracts held till maturity. In the event

that a futures contract is closed out before its expiry, the quoted price of the futures contract may be different from the gain/ loss due to the movement of the underlying index. This is called the basis risk.

- While futures markets are typically more liquid than the underlying cash market, there can be no assurance that ready liquidity would exist at all points in time, for the Scheme to purchase or close out a specific futures contract.

#### *Buying Options*

##### *Benefits of buying a call option*

Buying a call option on a stock or index gives the owner the right, but not the obligation, to buy the underlying stock / index at the designated strike price. Here the downside risks are limited to the premium paid to purchase the option.

##### *Illustration*

If the Fund buys a 1 month call option on Reliance at a strike price of Rs. 500, the current market price being say Rs.505. The Fund will have to pay a premium of say Rs. 25 to buy this call. If the stock price goes below Rs. 500 during the tenure of the call, the Fund avoids the loss it would have incurred had it straightaway bought the stock instead of the call option. The Fund gives up the premium of Rs. 25 that has to be paid in order to protect the Fund from this probable downside. If the stock goes above Rs. 500, it can exercise its right and own Reliance at a cost price of Rs. 500, thereby participating in the upside of the stock.

##### *Risk:*

- The strategy of taking a long position in index call option increases the exposure to the market. The long position is positively correlated with the market. However, there is no assurance that the stocks in the portfolio and the index behave in the same manner and thus this strategy may not provide gains perfectly aligned to the movement in the index.
- The risk/downside, if the market falls/remains flat is only limited to the option premium paid.

While option markets are typically less liquid than the underlying cash market, hence there can be no assurance that ready liquidity would exist at all points in time, for the Scheme to purchase or close out a specific contract.

##### *Benefits of buying a put option*

Buying a put option on a stock originally held by the buyer gives him / her right, but not the obligation, to sell the underlying stock at the designated strike price. Here the downside risks are limited to the premium paid to purchase the option.

##### *Illustration*

If the Fund owns Reliance and also buys a three-month put option on Reliance at a strike of Rs.500, the current market price being say Rs. 505. The Fund will have to pay a premium of say Rs.35 to buy this put. If the stock price goes below Rs. 500 during the tenure of the put, the Fund can still exercise the put and sell the stock at Rs. 500, avoiding therefore any downside on the stock below Rs. 500. The Fund gives up the fixed premium of Rs. 35 that has to be paid in order to protect the Fund from this probable downside. If the stock goes above Rs. 500, say to Rs. 515, it will not exercise its option. The Fund will participate in the upside of the stock, since it can now sell the stock at the prevailing market price of Rs. 515.

##### *Risk:*

- There can be no assurance that ready liquidity would exist at all points in time, for the scheme to purchase or close out a specific options contract.
- The hedging strategy using Put Options is a perfect hedge on the expiration date of the put option. On other days, there may be (temporary) imperfect correlation between the share price and the put option.

Some strategies that employ stock /index futures and their objectives

#### Arbitrage strategies

The arbitrage strategies the fund may adopt could be as under. The list is not exhaustive and the fund could use similar strategies and any other strategies as available in the markets that are permitted by regulator.

**Index / Stock spot - Index / Stock Futures:** The pricing of the futures is derived from underlying Nifty spot or the underlying stock. It is the cost of carry that binds the value of the futures to the underlying portfolio. When the two go out of sync, there are opportunities. The cost of carry binds the futures price to the price of the underlying asset. The price of the futures at any given instance should typically be more than the level of Nifty at that point. Theoretically, the fair value of the futures is equal to the price of the underlying plus the cost of carry i.e. the interest rate prevailing for an equivalent credit risk, in this case is the Clearing Corporation of the Exchange. Cash and carry trades at times provide higher than the prevailing interest rates. There is an opportunity to exploit by selling the overpriced futures and buying the underlying portfolio. It may also happen that the Index / Stock Future may be at a discount. In such cases, the Scheme may buy the future and sell the stock after



borrowing the same. The Scheme shall enter into a combination of the transactions simultaneously. If the Scheme has to unwind the positions prior to the expiry on account of redemptions or any other reason, the returns would depend on the spread between the spot and futures price at which the position is unwound. If the price differential between the spot and futures position of the subsequent month maturity is attractive near the expiry date, then the scheme may rollover the futures position and continue with the position in the spot market.

Rollover means unwinding the short position in the futures of the near month and simultaneously shorting the futures of the subsequent month. The Scheme shall endeavor to deploy its assets through transactions in the above pattern, which may involve Index Futures with Stock Futures or Futures of the same stock with different expiry months.

**Cash Future Arbitrage:** This strategy is employed when the price of the future is trading at a premium to the price of its underlying in spot market. The Scheme shall buy the stock in spot market and endeavour to simultaneously sell the future at a premium on a quantity neutral basis.

Buying the stock in spot market and selling the futures results into a hedge where the Scheme has locked in a spread and is not affected by the price movement of cash market and futures market. The arbitrage position can be continued till expiry of the future contracts. The future contracts are settled based on the last half an hour's weighted average trade of the spot Market. Thus there is a convergence between the spot price and the futures market on expiry. This convergence helps the Scheme to generate the arbitrage return locked in earlier.

On or before the date of expiry, if the price differential between the spot and futures position of the subsequent month maturity 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, and holding onto the spot position.

#### **Corporate Action / Event Driven Strategies:**

- i. Dividend Arbitrage: At the time of declaration of dividend, the stock futures / options market can provide a profitable opportunity. Generally, the stock prices decline by the dividend amount when the stock becomes ex-dividend.
- ii. Buy-Back/ Open offers Arbitrage: Companies that are targets for buy-backs/ open offers, provide opportunities depending on the difference between the traded price and the buyback open offer price. The scheme will take a long position in a stock for which the buyback/open offer price is expected to be higher than the traded price. Depending on the probability of the open offer and acceptance of shares, the scheme may take a certain short position in the future of the same stock.
- iii. Merger Arbitrage: When the Company announces any merger, amalgamation, hive off, demerger, etc, there could be opportunities due to price differential in the cash and the derivative market.
- iv. Delisting Arbitrage: When a company intends to delist from the stock exchanges, it goes for a Reverse Book Building process and offers an exit price to all existing shareholders. The scheme can take a long position in a stock in case the traded price is below the expected exit price.

#### **Arbitrage**

1. Selling spot and buying futures : In case the Scheme holds the stock of a company "A" Rs. 100 while in the futures market it trades at a discount to the spot price say at Rs. 98, then the Scheme may sell the stock and buy the futures.

On the date of expiry of the stock future, the Scheme may reverse the transactions (i.e. buying at spot & selling futures) and earn a risk-free Rs. 2 (2% absolute) on its holdings without any dilution of the view of the fund manager on the underlying stock.

Further, the Scheme can still benefit from any movement of the price in the upward direction, i.e. if on the date of expiry of the futures, the stock trades at Rs. 110 which would be the price of the futures too, the Scheme will have a benefit of Rs 10 whereby the Scheme gets the 10% upside movement together with the 2% benefit on the arbitrage and thus getting a total return of 12%. The corresponding return in case of holding the stock would have been 10%.

Note: The same strategy can be replicated with a basket of Nifty 50 stocks (Synthetic Nifty) and the Nifty future index.

2. Buying spot and Selling future : Where the stock of a company “A” is trading in the spot market at Rs. 100 while it trades at Rs. 102 in the futures market, then the Scheme may buy the stock at spot and sell in the futures market thereby earning Rs. 2.

Buying the stock in cash market and selling the futures results into a hedge where the Scheme has locked in a spread and is not affected by the price movement of cash market and futures market. The arbitrage position can be continued till expiry of the future contracts when there is a convergence between the cash market and the futures market. This convergence enables the Scheme to generate the arbitrage return locked in earlier.

Risk: On the date of expiry, when the arbitrage is to be unwound, it is not necessary for the stock price and its future contract to coincide. There could be a discrepancy in their prices even a minute before the market closes. Thus, there is a possibility that the arbitrage strategy gets unwound at different prices.

B. Buying/ Selling Stock future: When the Scheme wants to initiate a long position in a stock whose spot price is at say, Rs.100 and futures is at 98, then the Scheme may just buy the futures contract instead of the spot thereby benefiting from a lower cost.

In case the Scheme has a bearish view on a stock which is trading in the spot market at Rs.98 and the futures market at say Rs. 100, the Scheme may subject to regulations, initiate a short position in the futures contract. In case the prices align with the view and the price depreciates to say Rs. 90, the Scheme can square up the short position thereby earning a profit of Rs.10 vis a vis a fall in stock price of Rs 8.

Risk: There is risk of not being able to correctly forecast future market trends or the value of assets, indices or other financial or economic factors in establishing derivative positions for the Scheme. 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 risk of loss in trading futures contracts can be substantial, because of the low margin deposits required, the extremely high degree of leverage involved in futures pricing and the potential high volatility of the futures markets. Investments in index futures face the same risk as the investments in a portfolio of shares representing an index. The extent of loss is the same as in the underlying stocks.

(c) Hedging: The Scheme may use exchange-traded derivatives to hedge the equity portfolio. Both index and stock futures and options may be used to hedge the stocks in the portfolio.

Risk: This may involve a basis risk where the instrument used as a hedge does not match the movement in the instrument/underlying asset being hedged. The risk may be inter-related also e.g. interest rate movements can affect equity prices, which could influence specific issuer/industry assets.

(d) Alpha Strategy: The Scheme will seek to generate alpha by superior stock selection and removing market risks by selling appropriate index. For example, one can seek to generate positive alpha by buying a bank stock and selling Bank Nifty future.

Risk: Execution of these strategies depends upon the ability of the fund manager to identify and execute based on such opportunities. These involve significant uncertainties 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.

#### Writing Options

Benefits of writing an option with underlying stock holding (Covered call writing strategy). The covered call strategy can be followed by the Fund Manager in order to hedge risk thereby resulting in better risk adjusted returns of the Scheme. The strategy offers the following benefits:

a) Hedge against market risk - Since the fund manager sells a call option on a stock already owned by the mutual fund scheme, the downside from fall in the stock price would be lower to the extent of the premium earned from the call option.

b) Generating additional returns in the form of option premium in a range bound market. Thus, a covered call strategy involves gains for unit holders in case the strategy plays out in the right direction.

## Illustration

Illustration - Covered Call strategy using stock call options:

Suppose a fund manager buys equity stock of XYZ Ltd. For Rs. 1000 and simultaneously sells a call option on the same stock at a strike price of Rs. 1100. The scheme earns a premium of say, Rs. 50. Here, the fund manager does not think that the stock price will exceed Rs. 1100. Scenario 1: Stock price exceeds Rs. 1100

The call option will get exercised and the fund manager will sell the stock to settle his obligation on the call at Rs.1100 (earning Rs. 100, a return of 10% on the stock purchase price). Also, the scheme has earned a premium of Rs. 50

Net Gain - Rs. 150 (100+50)

Scenario 2: Stock prices stays below Rs. 1100

The call option will not get exercised and will expire worthless. The premium earned on call option will generate alpha for the scheme.

Net Gain - Rs. 50

Writing of call option (under the covered call strategy) can be undertaken subject to the following conditions:

1. The Scheme may write call options only under a covered call strategy for constituent stocks of NIFTY 50 and BSE SENSEX.
2. The total notional value (taking into account strike price as well as premium value) of call options written by the Scheme shall not exceed 15% of the total market value of equity shares held in the Scheme. In case of any passive breaches, the Scheme shall have 7 trading days to rebalance the portfolio. During the rebalancing period, no additional call options can be written in the Scheme.
3. The total number of shares underlying the call options written shall not exceed 30% of the unencumbered shares of a particular company held in the Scheme. The unencumbered shares in a scheme shall mean shares that are not part of Securities Lending and Borrowing Mechanism (SLBM), margin or any other kind of encumbrances.
4. In no case, the Scheme shall write a call option without holding the underlying equity shares. A call option can be written only on shares which are not hedged using other derivative contracts.
5. The premium received shall be within the requirements prescribed in terms of para 12.25.8 of SEBI Master Circular the total gross exposure related to option premium paid and received must not exceed 20% of the net assets of the Scheme.
6. The call option written shall be marked to market daily and the respective gains or losses factored into the daily NAV of the respective scheme(s) until the position is closed or expired.

The securities mentioned above and such other securities that the scheme is permitted to invest in, could be listed / unlisted, privately placed, secured / unsecured, rated / unrated of any maturity. The securities may be acquired through Initial Public of market operations, private placements, rights offers (including renunciation) or negotiated deals.

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

Benchmark index for the Scheme is Nifty Smallcap 250 TRI.

The composition of the aforesaid benchmark is such that it is most suited for comparing performance of the scheme. Also, as required under Para 1.9 of SEBI Master circular No. SEBI/HO/IMD/IMD-PoD1/P/CIR/2023/74 dated May 19, 2023, the benchmark has been selected from amongst those notified by AMFI as the first-tier benchmark to be adopted by mutual funds and which are reflective of the category of the scheme.

Further, pursuant to SEBI circular on benchmark, association of mutual funds in india (amfi), in consultation with amfi valuation committee, has published the list of benchmark as 1st tier benchmarks for mutual fund schemes and the same is also made available on its website <https://www.amfiindia.com/research-information/other-data> and <https://www.amfiindia.com/importantupdates>

The performances of the schemes of the Fund are reviewed by the Investment Advisory Committee ("IAC") as well as the Boards of the AMC and Trustee periodically. The IAC is operational at the AMC level and has majority representation from the independent Directors. Monthly reports on the performance of the schemes with appropriate benchmark indices as also with the relative performance of the schemes of other mutual funds schemes in the same category is placed before the Boards of the AMC and Trustee. The performance of the Scheme compared to its benchmark index will be reviewed at every meeting of the Boards of the AMC and Trustee and corrective action as proposed will be taken in case of unsatisfactory performance.

Pursuant to para no. 6.14 of SEBI Master Circular, benchmarking of performance of all Schemes of the Fund will be on basis of Total Return Index ("TRI").

## E. WHO MANAGES THE SCHEME?

**Primary Fund Manager:** Mr. Asit Bhandarkar, **Secondary Fund Manager:** Mr. Chaitanya Choksi and **Debt Portion:** Mr. Gurvinder Singh Wasan

The details of the Fund Managers are as mentioned below:

| Name & Designation   | Qualification & Age  | Brief Experience   | Other Schemes Managed   |
|--|--|--|---|
| Mr. Asit Bhandarkar - Senior Fund Manager - Equity   | B.Com., MMS<br>Age : 45 years  | He has 20 years of experience in equity research and fund management. His last assignment was as Fund Manager with Lotus India Asset Management Company Pvt. Ltd. Prior to that, for more than 2 years, he was with SBI Funds Management Pvt. Ltd. As a Junior Fund Manager. He started his career on the broking side as an equity analyst and has worked with firms like Jet Age Securities and Sushil Finance Consultants for almost 2 years. | <b>Primary Fund Manager:</b><br>JM Arbitrage Fund;<br>JM Equity Hybrid Fund;<br>and<br>JM Focused Fund<br><br><b>Secondary Fund Manager:</b><br>JM ELSS Tax Saver Fund;<br>JM Value Fund; and<br>JM Large Cap Fund  |
| Mr. Chaitanya Choksi - Fund Manager - Equity<br>Mr. Chaitanya Choksi (Managing this Scheme since November 2022 and hence managing this scheme more than 1 year)      | MMS(Finance), CFA<br>Age: 46 Years                                       | Mr. Chaitanya Choksi has around 23 years of work experience in the field of equity research and capital markets. Mr. Choksi is associated with JM Financial Asset Management Limited since 2008. Prior to joining the AMC, he has worked with Lotus India Asset Management Company Pvt. Ltd., Chanrai Finance Private Limited, IL &FS Investsmart and UTI Investment Advisory Services Ltd.  | <b>Primary Fund Manager</b><br>JM ELSS Tax Saver Fund<br><br><b>Secondary Fund Manager:</b><br>JM Flexicap Fund<br>JM Arbitrage Fund<br>JM Focused Fund<br>JM Midcap Fund; and<br>JM Equity Hybrid Fund   |
| Mr. Gurvinder Singh Wasan - Senior Fund Manager and Credit Analyst – Debt (Managing this Scheme since December 2022 and hence managing this scheme more than 1 year) | M.Com, Chartered Accountant (CA) and CFA Charter Holder<br>Age: 43 years | He has an experience of over 20 years in the fixed income markets. His previous assignments include working as a Fund manager and a credit analyst with a mutual fund and as a structured finance manager with a rating agency and a bank. He has worked with ICICI Bank, CRISIL, and Principal Asset Management company over this period.   | <b>Primary Fund Manager:</b><br>JM Short Duration Fund;<br>JM Dynamic Bond Fund;<br>JM Medium to Long Duration Fund;<br>JM Low Duration Fund;<br>JM Liquid Fund and;<br>JM Overnight Fund;<br><br><b>Debt portion of all the Equity Schemes of the Mutual Fund.</b> |

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

Following are the exiting open-ended Equity/Hybrid Schemes of JM Financial Mutual Fund in addition to the captioned Scheme:

|                           |                   |
|---------------------------|-------------------|
| JM ELSS Tax Saver Fund    | JM Value Fund     |
| JM Flexicap Fund          | JM Largecap Fund  |
| JM Focused Fund           | JM Arbitrage Fund |
| JM Aggressive Hybrid Fund | JM Midcap Fund    |

The AMC currently does not have any scheme in the “Small Cap” category. Thus, the scheme viz., JM Small Cap Fund is clearly differentiated from other existing Equity/Hybrid schemes of JM Financial Mutual Fund. Investors are requested to refer the following link that contains detailed comparative table between the Scheme and exiting open-ended Equity/Hybrid Schemes of JM Financial Mutual Fund:

<https://www.jmfinancialmf.com/SIDdisclosures/Scheme-Differentiation>

## G. HOW HAS THE SCHEME PERFORMED?

This Scheme is a new scheme and hence does not have any performance track record.

## H. ADDITIONAL SCHEME RELATED

### i. Scheme's portfolio holdings:

Investors can refer the following link on our website for top 10 holdings by issuer and fund allocation towards various sectors:

Not available

*Since the captioned scheme is a newly launched scheme; the above details are not available*

### ii. Disclosure of name and exposure to Top 7 issuers, stocks, groups and sectors as a percentage of NAV of the scheme in case of debt and equity ETFs/index funds through a functional website link that contains detailed description:

Investors can refer the following link on our website for name and exposure to Top 7 issuers, stocks, groups and sectors as a percentage of NAV of the scheme:

Not available

*Since the captioned scheme is a newly launched scheme; the above details are not available*

### iii. Functional website link for Portfolio Disclosure - Fortnightly / Monthly/ Half Yearly:

Investors can refer the following link on our website for Fortnightly / Monthly/ Half Yearly portfolio:

<https://www.jmfinancialmf.com/downloads/Portfolio-Disclosure>

### iv. Portfolio Turnover Rate:

The Portfolio Turnover Ratio is: Not available

*Since the captioned scheme is a newly launched scheme; the above details are not available*

### v. Aggregate investment in the Scheme by:

| Sr. No. | Category of Persons                | Net Value |                                    | Market Value (as on June 24, 2024) |
|---------|------------------------------------|-----------|------------------------------------|------------------------------------|
|         |                                    | Units     | NAV per unit (as on June 24, 2024) |                                    |
|         | Concerned scheme's Fund Manager(s) |           |                                    |                                    |
| 1.      | Mr. Asit Bhandarkar                | 49997.50  | 10                                 | 499975.00                          |
| 2.      | Mr. Chaitanya Choksi               | 9999.50   | 10                                 | 99995.00                           |
| 3.      | Mr. Gurvinder Singh Wasan          | 9999.50   | 10                                 | 99995.00                           |

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

### vi. Investments of AMC in the Scheme:

For details on investments of AMC in the Scheme, investors can refer the following link on our website: <https://www.jmfinancialmf.com/downloads/Statutory-Disclosure/Alignment-of-interest-of-Asset-Management-Companies>

The AMC shall not invest in any of the schemes unless full disclosure of its intention to invest has been made in the Scheme Information Document and that the AMC shall not be entitled to charge any fees on such investment

The AMC and investment companies managed by the Sponsor(s), their associate companies and subsidiaries may invest either directly or indirectly in the Scheme. The associates, the Sponsor, subsidiaries of the Sponsor and/or the AMC may acquire a substantial portion of the Scheme's units and collectively constitute a major investment in the Scheme. Consequently, in the event of repurchase of units held by such associates and Sponsor, there be an adverse impact on the units of the Scheme as the timing of such repurchase may impact the ability of other unitholders to repurchase their units. The AMC reserves the right to invest its own funds in the Scheme as may be decided by the AMC from time to time.

The AMC may invest in the Scheme at any time during the NFO and continuous offer period subject to the SEBI Regulations & circulars issued by SEBI and to the extent permitted by its Board of Directors from time to time. As per the existing SEBI Regulations, the AMC will not charge investment management and advisory fee on the investment made by it in the Scheme.

Further, the AMC shall based on the risk value assigned to the scheme, shall invest minimum amount as a percentage of assets under management of the scheme, Pursuant to para-No. 6.9.2 of SEBI Master Circular.

### Part III- OTHER DETAILS

#### A. COMPUTATION OF NAV

##### NET ASSET VALUE (NAV) AND VALUATION OF INVESTMENT

Valuation of assets, computation of NAV, repurchase price and their frequency of disclosure will be in accordance with the provisions of SEBI (Mutual Funds) Regulations 1996/ Guidelines/ Directives issued by SEBI from time to time.

The NAVs of the Units of the Plans will be computed by dividing the net assets of the Scheme by the number of Units outstanding on the valuation date given as below:

$$\text{NAV(Rs.) per Unit} = \frac{\text{Market or Fair Value of the Scheme's Investments} + \text{Current Assets} - \text{Current Liabilities and Provisions}}{\text{No. of Units outstanding under Scheme/Plan}}$$

##### Notes:

1. The NAV of the Scheme will be calculated and disclosed at the close of every Business Day.
2. The NAVs will be calculated upto 4 decimals and the units will be allotted upto 3 decimal places.

##### Illustration:

Assumptions - on the day of calculation of NAV:

Market or Fair Value of the Scheme's Investments = 10600 Current Assets = 250

Current Liabilities & provisions = 150

No of units outstanding in the plan = 1000

$$10.7000 = \frac{10600+250-150}{1000}$$

The Fund shall value its investments according to the valuation norms, as specified in Schedule VIII of the Regulations, or such norms as may be prescribed by SEBI from time to time.

Account balances of Units will be calculated upto three decimal places. NAV will be calculated upto 4 decimal places.

The provisions of applicability of NAV and allotment of units in case of Direct Plan will be same as currently applicable for the Regular Plan.

##### NAV Information

The AMC shall update the NAVs on the website of Association of Mutual Funds in India -AMFI ([www.amfiindia.com](http://www.amfiindia.com)) by 11.00 p.m. or such other time as may be mandated by SEBI, on a daily basis. In case of any delay, the reasons for such delay will be explained to AMFI and, if so mandated, SEBI, by the next day. If the NAVs are not available before commencement of business hours on the following day due to any reason, the Fund shall issue a press release providing reasons and explaining when the Fund will be able to publish the NAVs.

As required under the Regulations, the fund shall ensure that the repurchase price of an open ended scheme is not lower than 95% of the Net Asset Value.

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

#### B. ANNUAL SCHEME RECURRING EXPENSES

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

The AMC has estimated that upto 2.25% of the daily net assets of the scheme will be charged to the scheme as expenses as mentioned below. For the actual current expenses being charged, the investor should refer to the website of the mutual fund (<https://www.jmfinancialmf.com/>).

| Name of the Scheme | TER Limits  |
|--------------------|---|
| JM Small Cap Fund  | (i) 2.25% on the first Rs. 500 crores of the daily net assets.    |
|                    | (ii) 2.00% on the next Rs. 250 crores of the daily net assets.    |
|                    | (iii) 1.75% on the next Rs. 1,250 crores of the daily net assets. |

|  |  |
|--|--|
|  | (iv) 1.60% on the next Rs. 3,000 crores of the daily net assets  |
|  | (v) 1.50% on the next Rs. 5,000 crores of the daily net assets.  |
|  | (vi) Total expense ratio reduction of 0.05% for every increase of Rs. 5,000 crores of daily net assets or part thereof, on the next Rs. 40,000 crores of the daily net assets. |
|  | (vii) 1.05% on balance of the assets.  |

As per the Regulations, the maximum recurring expenses excluding issue or redemption expenses, whether initially borne by the Fund or by the AMC but including investment management and advisory fee that can be charged to the Scheme shall be subject to a percentage limit of daily net assets as in the table below:

| Particulars  | % of daily Net Assets (Regular Plan) |
|--|--------------------------------------|
| Investment Management & Advisory Fee   | Upto 2.25                            |
| Audit fees/fees and expenses of trustees   |                                      |
| Custodial Fees   |                                      |
| Registrar & Transfer Agent Fees including cost of providing account statements / IDCW / redemption cheques/ warrants |                                      |
| Marketing & Selling Expenses including Agents Commission and statutory advertisement                                 |                                      |
| Costs related to investor communications   |                                      |
| Costs of fund transfer from location to location   |                                      |
| Cost towards investor education & awareness  |                                      |
| Brokerage & transaction cost pertaining to distribution of units   |                                      |
| Goods & Services Tax on expenses other than investment and advisory fees   |                                      |
| Goods & Services Tax on brokerage and transaction cost   |                                      |
| Other Expenses (to be specified as per Reg 52 of SEBI MF Regulations)  |                                      |
| Maximum Total expenses ratio (TER) permissible under Regulation 52 (6) (c)   |                                      |
| Additional expenses under Regulations 52(6A)(c)  | Upto 0.05                            |
| Additional expenses for gross new inflows from specified cities  | Upto 0.30                            |

^Any other expenses which are directly attributable to the Scheme, may be charged with the approval of the Trustee within the overall limits as specified in the Regulations except those expenses which are specifically prohibited. Further, the Direct Plan shall have a lower expense ratio excluding distribution expenses, commission etc. since no commission shall be paid from this plan. Further, all fees and expenses charged in the Direct Plan (in percentage terms) under various heads including the Investment Management and Advisory Fee shall not exceed the fees and expenses charged under such heads in the Regular Plan.

- additional expenses under Regulation 52(6A)(c) at 0.05% of daily net assets of the scheme ;  
\*\* In accordance with para 10.1.7 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD- 1/P/CIR/2023/74 dated May 19, 2023, AMC shall not charge any additional expense of upto 0.05% as per Regulation 52(6A)(c), if exit load is not being levied under the Scheme.
- Additional TER of up to 30 basis points on daily net assets of the scheme as per regulation 52 of SEBI (Mutual Funds) Regulations, 1996 if the new inflows from beyond top 30 cities\* received by JMF are at least (a) 30% of gross new inflows in the scheme or (b) 15% of the average assets under management (year to date) of the scheme, whichever is higher. In case the inflows from beyond top 30 cities is less than the higher of (a) or (b) above, then additional TER can be charged on pro rata basis.

The additional TER on account of inflows from beyond top 30 cities so charged shall be clawed back in case the same is redeemed within a period of 1 year from the date of investment. The amount so charged shall be utilised for distribution expenses incurred for bringing inflows from such cities.

\* The 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.

- The AMC may charge GST on investment management and advisory service fees ('AMC fees') which shall be borne by the Scheme in addition to the total expense ratio mentioned in table above. AMC may charge GST on expenses other than investment and advisory fees of the Scheme, if any within the maximum limit of TER as per the Regulation under 52(6) and (6A). Further, GST on brokerage and transaction costs which are incurred for the purpose of execution of trade, will be within the limit of expenses as per the Regulation 52(6) and (6A).
- @Brokerage and transaction costs which are incurred for the purpose of execution of trade up to 0.12 per cent of trade value in case of cash market transactions and 0.05 per cent of trade value in case of derivatives transactions.

It is clarified that the brokerage and transaction cost incurred for the purpose of execution of trade over and above the said 0.12 percent and 0.05 percent for cash market transactions and derivatives transactions respectively may be charged to the Scheme within the maximum limit of Total Expense Ratio (TER) as prescribed under regulation 52 of the SEBI (Mutual Funds) Regulations, 1996.

- e. The AMC shall not charge additional expenses for gross new inflows from specified cities regulation 52(6A)(b).  
 Note: Pursuant to the directions received from SEBI vide its letter no. SEBI/HO/IMD-SEC-3/P/OW/2023/5823/1 dated February 24, 2023 read along with AMFI communication dated March 02, 2023; w.e.f March 01, 2023 no additional expense shall be charged on the new inflows received on or after March 01, 2023 from specified cities as per Regulation 52 (6A) (b) till any further guidance is received from SEBI in this regard.

The total expenses charged to the scheme shall be the maximum limit of TER as prescribed under regulation 52.

Investors should note that the total recurring expenses of the scheme excluding issue or redemption expenses, whether initially borne by the Mutual Fund or by the AMC, but including the investment management and advisory fee, shall not exceed the limits as prescribed under Regulation 52 of the SEBI Regulations. The AMC will charge the Scheme such actual expenses incurred, subject to the statutory limit prescribed in the Regulations.

The AMC would update the current expense ratios on the website of the Fund at least three working days prior to the effective date of change.

Further, the Actual Expense ratio will also be disclosed by the AMC at Fund's website which can be accessed at link [www.jmfinancialmf.com](http://www.jmfinancialmf.com).

These estimates have been made in good faith as per the information available to the Investment Manager based on past experience and are subject to change inter-se. Types of expenses charged shall be as per SEBI (Mutual Funds) Regulations, 1996. The purpose of the above table is to assist the investor in understanding the various costs and expenses that an investor in the scheme will bear directly or indirectly.

#### Illustration of impact of ratio on Scheme's returns

|  | Regular Plan |       |         | Direct Plan  |       |           |
|--|--------------|-------|---------|--------------|-------|-----------|
|  | Amount (Rs.) | Units | NAV     | Amount (Rs.) | Units | NAV (Rs.) |
| Amount Invested on August 31, 2022 (A)   | 10,000.00    | 1000  | 10.0000 | 10,000.00    | 1000  | 10.0000   |
| Value of above investment as on December 31, 2021 (before all expenses charged) ( B )              | 10,800.00    | 1000  | 10.8000 | 10,800.00    | 1000  | 10.8000   |
| Expenses charged during the year (other than Distribution Expenses/Commission) ( C )               | 50           |       |         | 50           |       |           |
| Distribution Expenses/Commission charged during the year (D)                                       | 50           |       |         | -            |       |           |
| Value of above investment as on December 31, 2022 (post all applicable expenses) E = ( B - C - D ) | 10,700.00    | 1000  | 10.7000 | 10,750.00    | 1000  | 10.7500   |
| Returns (%) (post all applicable expenses) (F) [F= (E-A)/A]  |              | 7.00  |         |              | 7.50  |           |
| Returns (%) (without considering any expenses) (G) [G=(B-A)/A]                                     |              | 8.00  |         |              | 8.00  |           |

Please note that the above illustration is based on certain assumptions.

#### Notes:

- The purpose of the above illustration is to purely explain the impact of expense ratio charged to the Scheme and should not be construed as providing any kind of investment advice or guarantee of returns on investments.
- It is assumed that the expenses charged are evenly distributed throughout the year.
- The expenses of the Direct Plan under the Scheme will be lower to the extent of distribution expenses / commission
- Calculations are based on assumed NAVs, and actual returns on your investment may be more, or less.
- Any tax impact has not been considered in the above example. In view of the individual nature of the tax implications, each investor is advised to consult his or her own financial advisor and tax consultant.



### C. LOAD STRUCTURE

Exit Load is an amount which is paid by the investor to redeem the units from the scheme. Load amounts are variable and are subject to change from time to time. For the current applicable structure, please refer to the website of the AMC ([www.jmfinancialmf.com](http://www.jmfinancialmf.com)) or may call at (toll free no. 1800-1038-345) or your distributor.

| Type of Load | Load chargeable (as %age of NAV)  |
|--------------|---|
| Exit         | <p>In respect of each purchase/ switch-in of Units, an Exit Load of 1.00% is payable if Units are redeemed/ switched-out within 180 days from the date of allotment</p> <p>No Exit Load is payable if Units are redeemed / switched-out after 180 days from the date of allotment</p> |

No Entry / Exit Load shall be levied on units allotted on Reinvestment of Income Distribution cum Capital Withdrawal Option.

In respect of Systematic Transactions such as SIP, STP, SWP, Exit Load, if any, prevailing on the date of registration / enrolment for SIP/STP/SWP shall be levied for all the opted Installments.

As required under the Regulations, the fund shall ensure that the repurchase price of an open ended scheme is not lower than 95% of the Net Asset Value.

## **Section II**

### **I. Introduction**

#### **A. Definitions/Interpretation**

For detailed description on Definitions/Interpretation, investors are requested to refer the following link on our website:  
<https://www.jmfinancialmf.com/SIDdisclosures/Definitions-interpretation>

#### **B. Risk Factors**

##### **- 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 invest fluctuates, the value of your investment in the Scheme may go up or down. In addition to the factors that affect the value of individual investments in the Scheme, the NAV of the Scheme can be expected to fluctuate with movements in the broader equity and bond markets and may be influenced by factors affecting capital and money markets in general, such as, but not limited to, changes in interest rates, currency exchange rates, changes in Governmental policies, taxation, political, economic or other developments and increased volatility in the stock and bond markets.
- Past performance of the Sponsor/AMC/Mutual Fund does not guarantee future performance of the Scheme.
- The name of the Scheme does not in any manner indicate either the quality of the Scheme or its future prospects and returns.
- The Sponsor is not responsible or liable for any loss resulting from the operation of the scheme beyond the initial contribution of 1 Lac made by it towards setting up the Fund.
- The present Scheme is not a guaranteed or assured return Scheme.

##### **• General Risk Factors**

- Trading volumes, settlement periods and transfer procedures may restrict the liquidity of the investments made by the Scheme. Different segments of the Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances leading to delays in receipt of proceeds from sale of securities. The NAV of the Units of the Scheme can go up or down because of various factors that affect the capital markets in general.
- As the liquidity of the investments made by the Scheme could, at times, be restricted by trading volumes and settlement periods, the time taken by the Fund for redemption of Units may be significant in the event of an inordinately large number of redemption requests or restructuring of the Scheme. In view of the above, the Trustee has the right, in its sole discretion, to limit redemptions (including suspending redemptions) under certain circumstances.
- At times, due to the forces and factors affecting the capital market, the Scheme may not be able to invest in securities falling within its investment objective resulting in holding the monies collected by it in cash or cash equivalent or invest the same in other permissible securities / investments amounting to substantial reduction in the earning capability of the Scheme. The Scheme may retain certain investments in cash or cash equivalents for its day-to-day liquidity requirements.
- Securities, which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges or offer other exit options to the investor, including a put option. The AMC may choose to invest in unlisted securities that offer attractive returns. This may increase the risk of the portfolio.
- Investment strategy to be adopted by the Scheme may carry the risk of significant variance between the portfolio allocation of the Scheme and the Benchmark particularly over a short to medium term period.
- Performance of the Scheme may be affected by political, social, and economic developments, which may include changes in government policies, diplomatic conditions and taxation policies.

##### **- SCHEME SPECIFIC RISK FACTORS**

#### **A. Risk factors associated with investing in equities and equity related instruments**

- Equity shares and equity related instruments are volatile and prone to price fluctuations on a daily basis. Investments in equity shares and equity related instruments involve a degree of risk and investors should not invest in the Scheme unless they can afford to take the risks.

- Securities, which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges. Investment in such securities may lead to increase in the scheme portfolio risk.
- While securities that are listed on the stock exchange carry lower liquidity risk, the ability to sell these investments is limited by the overall trading volume on the stock exchanges and may lead to the Scheme incurring losses till the security is finally sold.

#### **B. Risk factors associated with investing in fixed income securities**

- The Net Asset Value (NAV) of the Scheme, to the extent invested in Debt and Money Market instruments, will be affected by changes in the general level of interest rates. The NAV of the Scheme is expected to increase from a fall in interest rates while it would be adversely affected by an increase in the level of interest rates.
- Money market instruments, while fairly liquid, lack a well developed secondary market, which may restrict the selling ability of the Scheme and may lead to the Scheme incurring losses till the security is finally sold.
- Investments in money market instruments involve credit risk commensurate with short term rating of the issuers.
- Investment in Debt instruments are subject to varying degree of credit risk or default (i.e. the risk of an issuer's inability to meet interest or principal payments on its obligations) or any other issues, which may have their credit ratings downgraded. Changes in financial conditions of an issuer, changes in economic and political conditions in general, or changes in economic or and political conditions specific to an issuer, all of which are factors that may have an adverse impact on an issuer's credit quality and security values. The Investment Manager will endeavour to manage credit risk through in-house credit analysis. This may increase the risk of the portfolio. The Investment Manager will endeavour to manage credit risk through in-house credit analysis.
- Government securities where a fixed return is offered run price-risk like any other fixed income security. Generally, when interest rates rise, prices of fixed income securities fall and when interest rates drop, the prices increase. The extent of fall or rise in the prices is a function of the existing coupon, days to maturity and the increase or decrease in the level of interest rates. The new level of interest rate is determined by the rates at which government raises new money and/or the price levels at which the market is already dealing in existing securities. The price-risk is not unique to Government Securities. It exists for all fixed income securities. However, Government Securities are unique in the sense that their credit risk generally remains zero. Therefore, their prices are influenced only by movement in interest rates in the financial system.
- Different types of fixed income securities in which the Scheme would invest as given in the Scheme Information Document carry different levels and types of risk. Accordingly, the Scheme risk may increase or decrease depending upon its investment pattern. e.g. corporate bonds carry a higher level of risk than Government securities. Further even among corporate bonds, AAA rated bonds are comparatively less risky than AA rated bonds.
- The AMC may, considering the overall level of risk of the portfolio, invest in lower rated / unrated securities offering higher yields as well as zero coupon securities that offer attractive yields. This may increase the absolute level of risk of the portfolio.
- As zero coupon securities do not provide periodic interest payments to the holder of the security, these securities are more sensitive to changes in interest rates and are subject to issuer default risk. Therefore, the interest rate risk of zero coupon securities is higher. The AMC may choose to invest in zero coupon securities that offer attractive yields. This may increase the risk of the portfolio. Zero coupon or deep discount bonds are debt obligations that do not entitle the holder to any periodic payment of interest prior to maturity or a specified date when the securities begin paying current interest and therefore, are generally issued and traded at a discount to their face values. The discount depends on the time remaining until maturity or the date when securities begin paying current interest. It also varies depending on the prevailing interest rates, liquidity of the security and the perceived credit risk of the Issuer. The market prices of zero coupon securities are generally more volatile than the market prices of securities that pay interest periodically.
- Scheme's performance may differ from the benchmark index to the extent of the investments held in the debt segment, as per the investment pattern indicated under normal circumstances.
- **Prepayment Risk: Certain** fixed income securities give an issuer the right to call back its securities before their maturity date, in periods of declining interest rates. The possibility of such prepayment may force the Scheme to reinvest the proceeds of such investments in securities offering lower yields, resulting in lower interest income for the Scheme.
- **Reinvestment Risk:** This risk refers to the interest rate levels at which cash flows received from the securities in the Scheme are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk is that the rate at which interim cash flows can be reinvested may be lower than that originally assumed.
- **Settlement risk:** Different segments of Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances. Delays or other problems in settlement of transactions could result in temporary periods when the assets of the Scheme are uninvested and no return is earned thereon. The inability

of the Scheme to make intended securities purchases, due to settlement problems, could cause the Scheme to miss certain investment opportunities. Similarly, the inability to sell securities held in the Scheme's portfolio, due to the absence of a well developed and liquid secondary market for debt securities, may result at times in potential losses to the Scheme in the event of a subsequent decline in the value of securities held in the Scheme's portfolio.

- The Scheme at times may receive large number of redemption requests, leading to an asset-liability mismatch and therefore, requiring the investment manager to make a distress sale of the securities leading to realignment of the portfolio and consequently resulting in investment in lower yield instruments.

### **C. Risk factors associated with investment in Tri-Party Repo:**

The Fund is a member of securities segment and Triparty Repo trade settlement of the Clearing Corporation of India (CCIL). All transactions of the Fund in government securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL; thus reducing the settlement and counterparty risks considerably for transactions in the said segments. The members are required to contribute an amount as communicated by CCIL from time to time to the default fund maintained by CCIL as a part of the default waterfall (a loss mitigating measure of CCIL in case of default by any member in settling transactions routed through CCIL).

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). CCIL shall maintain two separate Default Funds in respect of its Securities Segment, one with a view to meet losses arising out of any default by its members from outright and repo trades and the other for meeting losses arising out of any default by its members from Triparty Repo trades. The Fund is exposed to the extent of its contribution to the default fund of CCIL, in the event that the contribution of the Fund is called upon to absorb settlement/default losses of another member by CCIL, as a result the scheme may lose an amount equivalent to its contribution to the default fund.

### **D. RISK FACTORS ASSOCIATED WITH INVESTING IN NON- CONVERTIBLE PREFERENCE SHARES**

- **Credit Risk** - Credit risk is the risk that an issuer will be unable to meet its obligation of payment of Income Distribution Cum Withdrawal and/ or redemption of principal amount on the due date. Further, for non-cumulative preference shares, issuer also has an option to not pay Income Distribution Cum Withdrawal on preference shares in case of inadequate profits in any year.
- **Liquidity Risk** - The preference shares generally have limited secondary market liquidity and thus we may be forced to hold the instrument till maturity.
- **Unsecured in nature** - Preference shares are unsecured in nature and rank lower than secured and unsecured debt in hierarchy of payments in case of liquidation. Thus, there is significant risk of capital erosion in case the company goes into liquidation.

### **E. RELATED TO JM SMALL CAP FUND**

While small/micro/mid-cap stocks gives one an opportunity to go beyond the usual large blue chip stocks and present possible higher capital appreciation, it is important to note that small/micro/mid-cap stocks can be riskier and more volatile on a relative basis. Therefore, the risk levels of investing in small/micro/mid-cap stocks are more than investing in stocks of large well established companies. It should be noted that over a period of time, Micro, Small, Mid and Large cap stocks have demonstrated different levels of volatility and investment returns and it is important to note that generally, no one class consistently outperforms the others

### **F. Risk related to investing in debt / bonds / money market instruments / units of liquid / money market / debt mutual fund schemes:**

#### **a) Interest Rate Risk:**

As with all debt securities, changes in interest rates will affect the NAVs of the Scheme as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of long term securities generally fluctuate more in response to interest rate changes than of shorter-term securities. Interest rate movements in the Indian debt markets can be volatile leading to the possibility of large price movements up or down in debt and money market securities and thereby to possibly large movements in the NAV.

#### **b) Liquidity or Marketability Risk:**

This refers to the ease at which a security can be sold at or near its true value. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. Liquidity risk is characteristic of the Indian

fixed income market. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of some of these investments. Different segments of the Indian financial markets have different settlement periods, and such periods may be extended significantly by unforeseen circumstances.

The length of time for settlement may affect the Scheme in the event it has to meet an inordinately large number of redemption or of restructuring of the Scheme's investment portfolio.

**c) Credit Risk:**

Credit risk or default risk refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). Because of this risk, debentures are sold at a yield spread above those offered on treasury securities which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default.

**d) Reinvestment Risk:**

This risk refers to the interest rate levels at which cash flows received from the securities in the Scheme or from maturities in the Scheme are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk is that the rate at which interim cash flows can be reinvested will fall.

**e) Rating Migration Risk:**

Fixed income securities are exposed to rating migration risk, which could impact the price on account of change in the credit rating. For example: One notch downgrade of a AAA rated issuer to AA+ will have an adverse impact on the price of the security and vice-versa for an upgrade of a AA+ issuer

**f) Basis Risk (Interest - rate movement):**

During the life of a floating rate security or a swap, the underlying benchmark index may become less active and may not capture the actual movement in interest rates or at times the benchmark may cease to exist. These types of events may result in loss of value in the portfolio.

**g) Pre-payment Risk:**

Certain fixed income securities give an issuer the right to call back its securities before their maturity date, in periods of declining interest rates. The possibility of such prepayment may force the fund to reinvest the proceeds of such investments in securities offering lower yields, resulting in lower interest income for the fund.

**h) Spread Risk:**

In a floating rate security the coupon is expressed in terms of a spread or mark up over the benchmark rate. In the life of the security this spread may move adversely leading to loss in value of the portfolio. The yield of the underlying benchmark might not change, but the spread of the security over the underlying benchmark might increase leading to loss in value of the security.

i) Different types of securities in which the scheme would invest as given in the SID carry different levels and types of risk. Accordingly the scheme's risk may increase or decrease depending upon its investment pattern. E.g. corporate bonds carry a higher amount of risk than Government securities. Further even among corporate bonds, bonds, which are AA rated, are comparatively more risky than bonds, which are AAA rated.

**G. Some of the other risks of investing in debt and money market securities are:**

- a. Securities, which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges or offer other exit options to the investor, including a put option. The AMC may choose to invest in unlisted securities that offer attractive yields. This may increase the risk of the portfolio.
- b. The Scheme at times may receive large number of redemption requests, leading to an asset- liability mismatch and therefore, requiring the investment manager to make a distress sale of the securities leading to realignment of the portfolio and consequently resulting in investment in lower yield instruments
- c. Investment in unrated instruments may involve a risk of default or decline in market value higher than rated instruments due to adverse economic and issuer-specific developments. Such investments display increased price sensitivity to changing interest rates and to a deteriorating economic environment. The market values for unrated investments tends to be more volatile and such securities tend to be less liquid than rated debt securities.
- d. Changes in government policy in general and changes in tax benefits applicable to Mutual Funds may impact the returns to investors in the Schemes.

## H. Risks Associated with investing IN Tri Party Repo Through CCIL (TREPS)

The Fund is a member of securities segment and Tri-party Repo trade settlement of the Clearing Corporation of India (CCIL). All transactions of the Fund in government securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL; thus reducing the settlement and counterparty risks considerably for transactions in the said segments.

CCIL maintains prefunded resources in all the clearing segments to cover potential losses arising from the default member. In the event of a clearing member failing to honour his settlement obligations, the default Fund is utilized 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).

However, it may be noted that a member shall have the right to submit resignation from the membership of the Security segment if it has taken a loss through replenishment of its contribution to the default fund for the segments and a loss threshold as notified have been reached. The maximum contribution of a member towards replenishment of its contribution to the default fund in the 7 days (30 days in case of securities segment) period immediately after the afore-mentioned loss threshold having been reached shall not exceed 5 times of its contribution to the Default Fund based on the last re-computation of the Default Fund or specified amount, whichever is lower.

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

## I. Redemption Risk

As the liquidity of the investments made by the Scheme could, at times, be restricted by trading volumes and settlement periods, the time taken by the Fund for redemption of Units may be significant in the event of an inordinately large number of redemption requests or a restructuring of the Scheme.

## J. Risk relating to Derivatives

- i. The Scheme may use various derivative products as permitted by the Regulations. In the derivative markets there are risk factors and issues concerning the use of derivatives that investors should understand. 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 manage the risks as a result of the failure of the counterparty to comply with the terms of the derivative contract. Other risks in using derivatives include the risk of mispricing or improper valuation of derivatives, credit risk where the danger is that of a counterparty failing to honour its commitment, liquidity risk where the danger is that the derivatives cannot be sold at prices that reflect the underlying assets, rates and indices and price risk where the market price may move in adverse fashion.
  - ii. The AMC, on behalf of the Scheme may use various derivative products, from time to time, in an attempt to protect the value of the portfolio and enhance Unit holders' interest. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but of the derivative itself. Other risks include, the risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.
  - iii. 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.
- **Credit Risk:** The credit risk in 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:** Market movements may adversely affect the pricing and settlement derivatives.
  - **Illiquidity Risk:** This is the risk that a derivative cannot be sold or purchased quickly enough at a fair price, due to lack of liquidity in the market.

#### K. Risks associated with Securities Lending:

Securities Lending is lending of securities through an approved intermediary to a borrower under an agreement for a specified period with the condition that the borrower will return equivalent securities of the same type or class at the end of the specified period along with the corporate benefits accruing on the securities borrowed. The risks in lending portfolio securities, as with other extensions of credit, consist of the failure of another party, in this case the approved intermediary, to comply with the terms of agreement entered into between the lender of securities i.e. the Scheme and the approved intermediary. Such failure to comply can result in a possible loss of rights to the collateral put up by the borrower of the securities, the inability of the approved intermediary to return the securities deposited by the lender and the possible loss of corporate benefits accruing to the lender from the securities deposited with the approved intermediary. The Mutual Fund may not be able to sell such lent securities, and this can lead to temporary illiquidity.

#### L. Risks for writing covered call options for equity shares:

- Writing call options are highly specialized activities and entail higher than ordinary investment risks. In such investment strategy, the profits from call option writing are capped at the option premium, however the downside depends upon the increase in value of the underlying equity shares. Being a covered call, the downside risk is not unlimited, but limited to the extent of change in the price of underlying security held by the Fund.
- The Scheme may write covered call option only in case it has adequate number of underlying equity shares as per regulatory requirement. This would lead to setting aside a portion of investment in underlying equity shares. If covered call options are sold to the maximum extent allowed by regulatory authority, the scheme may not be able to sell the underlying equity shares immediately if the view changes to sell and exit the stock. The covered call options need to be unwound before the stock positions can be liquidated. This may lead to a loss of opportunity or can cause exit issues if the strike price at which the call option contracts have been written become illiquid. Hence, the scheme may not be able to sell the underlying equity shares, which can lead to temporary illiquidity of the underlying equity shares and result in loss of opportunity.
- The writing of covered call option would lead to loss of opportunity due to appreciation in value of the underlying equity shares. Hence, when the appreciation in equity share price is more than the option premium received the scheme would be at a loss.
- The total gross exposure related to option premium paid and received shall not exceed the regulatory limits of the net assets of the scheme.

#### M. Risk factors associated with Reits and Invits

- **Price Risk:** Securities/Instruments of REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. The extent of fall or rise in the prices is a fluctuation in general market conditions, factors and forces affecting capital market, Real Estate and Infrastructure sectors, level of interest rates, trading volumes, settlement periods and transfer procedures.
- **Interest Rate Risk:** Securities/Instruments of REITs and InvITs run interest rate risk. Generally, when interest rates rise, prices of units fall and when interest rates drop, such prices increase.
- **Credit Risk:** Credit risk means that the issuer of a REIT/InvIT security/ instrument may default on interest payment or even on paying back the principal amount on maturity. Securities/ Instruments of REITs and InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be pre scheduled.
- **Liquidity Risk:** This refers to the ease with which securities/instruments of REITs/InvITs 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/instruments for which a liquid market exists. As these products are new to the market they are likely to be exposed to liquidity risk.
- **Reinvestment Risk:** Investments in securities/instruments of REITs and InvITs may carry reinvestment risk as there could be repatriation of funds by the Trusts in form of buyback of units or Income Distribution Cum Withdrawal pay-outs, etc. Consequently, the proceeds may get invested in assets providing lower returns.
- **Legal and Regulatory Risk:** The regulatory framework governing investments in securities/instruments of REITs and InvITs comprises a relatively new set of regulations and is therefore untested, interpretation and enforcement by regulators and courts involves uncertainties. Presently, it is difficult to forecast as to how any new laws, regulations or standards or future amendments will affect the issuers of REITs/InvITs and the sector as a whole. Furthermore, no assurance can be given that the regulatory system will not change in a way that will impair the ability of the Issuers to comply with the regulations, conduct the business, and compete effectively or make distributions.

## N. Risks associated with investing in securitised debt:

The scheme may invest in domestic securitized debt such as asset backed securities (ABS) or mortgage backed securities (MBS). ABS means securitized debts wherein the underlying assets are receivables arising from personal loans, automobile loans, etc. MBS means securitized debts

wherein the underlying assets are receivables arising from loans backed by mortgage of properties which can be residential or commercial in nature. ABS / MBS instruments reflect the undivided interest in the underlying of assets and do not represent the obligation of the issuer of ABS / MBS or the originator of the underlying receivables. The ABS / MBS holders have a limited recourse to the extent of credit enhancement provided. Securitized debt may suffer credit losses in the event of the delinquencies and credit losses in the underlying pool exceeding the credit enhancement provided. As compared to the normal corporate or sovereign debt, securitized debt is normally exposed to a higher level of reinvestment risk.

Pass through Certificate (PTC) (Pay through or other Participation Certificates) represents beneficial interest in an underlying pool of cash flows. These cash flows represent dues against single or multiple loans originated by the sellers of these loans. These loans are given by banks or financial institutions to corporates. PTCs may be backed, but not exclusively, by receivables of personal loans, car loans, two wheeler loans and other assets subject to applicable regulations.

How the risk profile of securitized debt fits into the risk appetite of the scheme

Securitized debt is a form of conversion of normally non-tradable loans to transferable securities. This is done by assigning the loans to a special purpose vehicle (a trust), which in turn issues Pass-Through-Certificates (PTCs). These PTCs are transferable securities with fixed income like characteristics. The risk of investing in securitized debt is similar to investing in debt securities. In addition, securitized debt may also carry prepayment risk and has a relatively higher liquidity risk (the same are explained in the sections that follow). However, if the fund manager evaluates that the additional risks are suitably compensated by the higher returns, he may invest in securitized debt up to the limits specified in the asset allocation table. The investment shall be in securitized instruments that are top rated (AAA/ A1+) or its equivalent, by a recognised credit rating agency for the retail pool, and for single loan securitization, limits will be assigned as per the internal credit policy of the Fund.

Policy relating to originators The originator is the person who has initially given the loan. The originator is also usually responsible for servicing the loan (i.e. collecting the interest and principal payments). An analysis of the originator is especially important in case of retail loans as this affects the credit quality and servicing of the PTC. Originators may be : Banks, Non Banking Finance Companies etc. The fund manager's evaluation will be based on the track record of the originator, delinquencies in the pool and the seasoning of the pool. Other factors that will be considered are loan type, size of the loan, average original maturity of the pool, Loan to Value Ratio, geographical distribution, liquid facility, default rate distribution, credit enhancement facility and structure of the pool.

Risk associated with each kind of originator :

- (a) Prepayment risk : MBS and ABS are subject to prepayment risk. When the underlying loans are paid off by the borrower prior to their respective due dates, this is known as a prepayment. It could be triggered on account of various factors particularly in periods of declining interest rates. The possibility of such prepayment may require the scheme to reinvest the proceeds of such investments in securities offering lower yields, thereby
- (b) Interest rate risk : MBS carry interest rate risk. Home loan borrowers are provided the facility of refinancing their loans at the prevailing interest rates. A lowering of interest rates could induce a borrower to pay his loan off earlier than the scheduled tenure, whereas if the interest rates move upward, the borrower would tend to hold on to his loan for a longer period, thus increasing the maturity of the bond. The maturity of the bond could therefore shorten or lengthen, depending on the prevailing interest rates.
- (c) Credit risk / default risk : MBS and ABS also carry credit or default risk. MBS and structures carry built in credit enhancement in different forms. However, any delinquencies would result in reduction of the principal amount if the amount available in the credit enhancement facility is not enough to cover the shortfall. Historically, housing loans have had lower default rates than other forms of credit.
- (d) Price risk / liquidity risk : MBS and ABS are subject to prepayment risk. Limited volumes of trading in securitized paper in secondary market could restrict or affect the ability of the scheme to re-sell them. Thus these trades may take place at a discount, depending on the prevailing interest rates.

In case of securitization involving single loans or a small pool of loans, the credit risk of the underlying borrower is analyzed. In case of diversified pools of loans, the overall characteristic of the loans is analyzed to assess the credit risk. Securitization transactions may include some risk mitigants (to reduce credit risk). These may include interest subvention (difference in interest rates on the underlying loans and the PTC serving as margin against defaults), overcollateralization (issue of PTCs of lesser value than the underlying loans, thus even if some loans default, the PTC continues to remain protected), presence of an equity / subordinate tranche (issue of PTCs



of differing seniority when it comes to repayment - the senior tranches get paid before the junior tranche) and / or guarantees.

Level of diversification with respect to the underlying assets and risk mitigation measures for less diversified investments: Currently, the following parameters are used while evaluating investment decision relating to a pool securitization transaction. These parameters may be revised the from time to time.

| Characteristics/<br>Type<br>Of Pool   | Mortgage<br>Loan | Commercial<br>Vehicle and<br>Construction<br>Equipment | Car            | Two<br>Wheelers | Micro<br>Finance<br>Pools | Personal<br>Loans | Single<br>Sell<br>Downs | Others                |
|---|------------------|--|----------------|-----------------|---------------------------|-------------------|-------------------------|-----------------------|
| Approximate<br>Average<br>maturity (in Months)  | Up to 10<br>Yrs  | Up to 3 yrs  | Up to<br>3 yrs | Up to 3<br>yrs  | NA                        | NA                | Refer<br>to Note<br>a   | Refer<br>to Note<br>b |
| Collateral margin<br>(including cash,<br>guarantees, excess<br>interest spread,<br>subordinate tranche) | >10%             | >10%   | >10%           | >10%            | NA                        | NA                |                         |                       |
| Average Loan to<br>Value<br>Ratio   | <90%             | <80%   | <80%           | <80%            | NA                        | NA                |                         |                       |
| Average seasoning<br>of<br>the Pool   | >3 mths          | >3 mths  | >3 mths        | >3 mths         | NA                        | NA                |                         |                       |
| Maximum single<br>exposure range  | <1%              | <1%  | <1%            | <1%             | NA                        | NA                |                         |                       |
| Average single<br>exposure range %  | <1%              | <1%  | <1%            | <1%             | NA                        | NA                |                         |                       |

#### Notes

- In case of securitization involving single loans or a small pool of loans, the credit risk of the borrower is analyzed. The investment limits applicable to the underlying borrower are applied to the single loan sell-down.
- Other investments will be decided on a case-to-case basis.

Minimum retention period of the debt by originator prior to securitization Issuance of securitized debt is governed by the Reserve Bank of India. RBI norms cover the "true sale" criteria including credit enhancement and liquidity enhancements. In addition, RBI has proposed minimum holding period of between nine and twelve months for assets before they can be securitized. The minimum holding period depends on the tenure of the securitization transaction. The Scheme will invest in securitized debt that is in compliance with the regulations.

Minimum retention percentage by originator of debts to be securitized RBI norms cover the "true sale" criteria including credit enhancement and liquidity enhancements, including maximum exposure by the originator in the PTCs. In addition, RBI has proposed minimum retention requirement of between five and ten percent of the book value of the loans by the originator. In the PTCs. In addition, RBI has proposed minimum retention requirement of between five and ten percent of the book value of the loans by the originator. The minimum retention requirement depends on the tenure and structure of the securitization transaction. The Scheme will invest in securitized debt that is in compliance with the regulations.

Mechanism to tackle conflict of interest when the mutual fund invests in securitised debt of an originator and the originator in turn invests makes investments in that particular scheme of the fund The key risk in securitized debt relates to the underlying borrowers and not the originator. In a securitization transaction, the originator is the seller of the debt(s) and the scheme is the buyer. However, the originator is also usually responsible for servicing the loan (i.e. collecting the interest and principal payments). As the originators may also invest in the scheme, the fund manager shall ensure that the investment decision is based on parameters as set by the Investment Committee (IC) of the AMC and IC shall review the same at regular interval.

The resources and mechanism of individual risk assessment with the AMC for monitoring investments in securitised debt The fund management team including the credit analyst has the experience to analyze securitized debt. In addition, credit research agencies provide analysis of individual instruments and pools. On an on-going basis (typically monthly) the servicer provides reports regarding the performance of the pool. These reports would form the base for ongoing evaluation where applicable. In addition, rating reports indicating rating changes would be monitored for changes in rating agency opinion of the credit risk

#### O. Risk factors associated with Segregated Portfolio

- Unit holders holding units of segregated portfolio may not be able to liquidate their holdings till recovery of money from the issuer.

- Security in the segregated portfolio may not realize any value.
- Listing of any units of segregated portfolio in recognized stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units in the stock market. Further, trading price of units on the stock market may be significantly lower than the prevailing NAV.
- The trading price of units on the stock exchange may be significantly lower than the prevailing Net Asset Value (NAV) of the segregated portfolio.

### C. RISK MITIGATION MEASURES FOLLOWED:

Risk management is an integral part of the investment process. The AMC incorporates adequate safeguards for controlling risks in the portfolio construction process, which would be periodically evaluated. Online monitoring of various exposure limits are done by the Front Office System. The system incorporates all the investment restrictions as per SEBI guidelines and 'soft' warning alerts at appropriate levels for preemptive monitoring. The system also enables identifying & measuring the risk through various risk measurement tools and analyzes the same so as to act in a preventive manner. In addition to minimize the major risks for equity & debt schemes, the following steps are taken

#### **Credit Risk – Risk of investing in unsustainable / weak companies**

- In depth credit evaluation of the money market and debt instruments (other than GSecs) proposed to be invested in.
- Issuer wise and Industry wise exposure limits.
- Independent rating of scheme portfolio by recognized rating agency.
- Defining the minimum rating grades at portfolio level.

#### **Interest Rate Risk**

- Risk of bond prices falling as a result of rise in interest rates.
- Active duration management.
- Cap on Average Portfolio maturity depending upon the scheme objective and Strategy.
- Portfolio exposure spread over various maturities depending on the mandates of the respective schemes.

#### **Liquidity Risk**

- High impact cost at the time of buying/selling
- Focus on good quality paper having good liquidity in the market at the time of portfolio construction.
- Asset-Liability management

## II. Information about the scheme:

### A. Where will the scheme invest?

Detailed description of the instruments (including overview of debt markets in India) mentioned in Section I

### B. What are the investment restrictions?

The investment policies of the mutual fund comply with the rules, regulations and guidelines laid out in the SEBI Regulations. As per the Regulations, specifically the Seventh Schedule, the following investment limitations will be applicable to the Scheme.

1. The scheme shall not invest more than 10 per cent of its NAV in the equity shares or equity related instruments of any company.
2. The Mutual Fund under all its schemes should not own more than 10 per cent of any company's paid-up capital carrying voting rights. Provided that investment in an asset management company or the trustee company of a mutual fund shall be governed by clause (a) of sub-regulation (1) of regulation 7B of the Regulations.
3. 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.
4. A mutual fund scheme shall not invest more than
  - a. 10% of its NAV in debt and money market securities rated AAA; or
  - b. 8% of its NAV in debt and money market securities rated AA; or
  - c. 6% of its NAV in debt and money market securities rated A and below issued by a single issuer.

The above investment limits may be extended by upto 2% of the NAV of the Scheme with prior approval of the Board of Trustees and Board of Directors of the AMC, subject to compliance with the overall 12% limit specified in clause 1 of Seventh Schedule of Mutual Fund Regulation.

Provided further that investment within such limit can be made in mortgaged backed securitised debt which are rated not below investment grade by a credit rating agency registered with the SEBI. As per para 12.15.1 of SEBI Master Circular with respect to investment in securitized debt (mortgage backed securities / asset backed securities), restrictions at the originator level will not be applicable.

5. The Scheme shall not invest in unlisted debt instruments including commercial papers, except Government Securities and other money market instruments:
6. Provided that Mutual Fund Schemes may invest in unlisted non-convertible debentures up to a maximum of 10% of the debt portfolio of the scheme subject to such conditions as may be specified by SEBI vide Para 12.1.1 of SEBI Master circular as amended from time to time. Provided further that for investments by mutual fund schemes in unrated debt instruments maybe made subject to such conditions as may be specified by SEBI vide para 12.1.5. SEBI Master circular as amended from time to time. Investment in unrated debt and money market instruments, other than government securities, treasury bills, derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. by mutual fund schemes shall be subject to the following:
  - a. Investments should only be made in such instruments, including bills re-discounting, usance bills, etc., that are generally not rated and for which separate investment norms or limits are not provided in SEBI Regulations and various circulars issued thereunder.
  - b. Exposure of mutual fund schemes in such instruments, shall not exceed 5% of the net assets of the schemes.
  - c. All such investments shall be made with the prior approval of the Board of AMC and the Board of Trustees.
7. The Scheme will not invest in fixed income instruments having structured obligations / credit enhancements or debt instruments with special features viz. subordination to equity (absorbs losses before equity capital) and /or convertible to equity upon trigger of a prespecified event for loss absorption including Additional Tier I bonds and Tier 2 bonds issued under Basel III framework.
8. The Scheme shall not invest in unrated debt and money market instruments. For this purpose, unrated debt securities shall exclude instruments such as tri-party repo on government securities or treasury bills, Reverse Repo, short term deposit, treasury bills, government securities and such instruments to which rating is not applicable.
9. Transfers of investments from one scheme to another scheme in the same mutual fund shall be allowed only if,-
  - a. such transfers are done at the prevailing market price for quoted instruments on spot basis.  
Explanation - "Spot basis" shall have same meaning as specified by stock exchange for spot transactions;
  - b. the securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.
10. A scheme may invest in another scheme under the same asset management company or any other mutual fund without charging any fees, provided that aggregate inter scheme investment made by all schemes under the same management or in schemes under the management of any other asset management company shall not exceed 5% of the net asset value of the mutual fund

Provided that this clause shall not apply to any fund of funds scheme.

11. Every mutual fund shall buy and sell securities on the basis of deliveries and shall in all cases of purchases, take delivery of relevant securities and in all cases of sale, deliver the securities:

Provided that a mutual fund may engage in short selling of securities in accordance with the framework relating to short selling and securities lending and borrowing specified by the Board:

Provided further that a mutual fund may enter into derivatives transactions in a recognized stock exchange, subject to the framework specified by the Board.

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

12. The Mutual Fund will buy and sell securities on the basis of deliveries and shall in all cases of purchase, take delivery of relevant securities and in all cases of sale, deliver the securities. Provided that a mutual fund may enter into derivatives transactions in a recognised stock exchange, subject to the framework specified by SEBI. Provided further that sale of government security already contracted for purchase shall be permitted in accordance with the guidelines issued by RBI in this regard.

13. The Mutual Fund shall get the securities purchased or transferred in the name of the Mutual Fund on account of the concerned scheme, wherever investments are intended to be of a long term nature.
14. In terms of Para 12.16 of SEBI Master circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023, pending deployment of funds of the Scheme in securities in terms of the investment objective of the Scheme, the Mutual Fund may invest the funds of the Scheme in short term deposits of scheduled commercial banks subject to restrictions laid down under the SEBI Regulations from time to time. The following provisions shall be complied with:
  - a) Short Term for parking of funds by Mutual Fund shall be treated as period not exceeding 91 days
  - b) Such short term deposits shall be held in the name of the concerned scheme.
  - c) No mutual fund scheme shall park more than 15% of the net assets in Short term deposit(s) of all the scheduled commercial banks put together. However, it 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 total deployment by the mutual fund in short term deposits.
  - d) No mutual fund scheme shall park more than 10% of the net assets in short term deposit(s), with any one scheduled commercial bank including its subsidiaries.
  - e) Trustee/AMC shall ensure that no funds of a scheme may be parked in short term deposit of a bank which has invested in that scheme. Trustee/AMC shall also ensure that the bank in which a scheme has short term deposit do not invest in the said scheme until the scheme has short term deposit with such bank.
  - f) AMC shall not charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks.
15. A scheme shall not 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 the net assets.
16. The Mutual Fund/AMC shall make investment out of the NFO proceeds only on or after the closure of the NFO period. However, in terms of Para 1.10.3 of SEBI Master circular SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023, the Mutual Fund/ AMC can however deploy the NFO proceeds in tri-party repo on government securities or treasury bills before the closure of NFO period. However, AMC shall not charge any investment management and advisory fees on funds deployed in tri-party repo on government securities or treasury bills during the NFO period. The appreciation received from investment in triparty repo on government securities or treasury bills shall be passed on to investors. Further, in case the minimum subscription amount is not garnered by the Scheme during the NFO period, the interest earned upon investment of NFO proceeds in tri-party repo on government securities or treasury bills shall be returned to investors, in proportion of their investments, along-with the refund of the subscription amount.
17. The scheme shall not make any investment in any fund of funds scheme.
18. A mutual fund may invest in the units of REITs and InvITs subject to the following:
  - (i) No mutual fund under all its schemes shall own more than 10% of units issued by a single issuer of REIT and InvIT; and
  - (ii) (A mutual fund scheme shall not invest –
    - (a) more than 10% of its NAV in the units of REIT and InvIT; and
    - (b) more than 5% of its NAV in the units of REIT and InvIT issued by a single issuer.

Provided that the limits mentioned in sub-clauses (a) and (b) above shall not be applicable for investments in case of index fund or sector or industry specific scheme pertaining to REIT and InvIT.
19. The Scheme will not participate in debt derivatives, Credit Default Swaps (CDS) for corporate bonds and repo in corporate debt securities.
20. Save as otherwise expressly provided under SEBI Regulations, the mutual fund shall not advance any loans for any purpose.
21. The Mutual Fund having an aggregate of securities which are worth Rs.10 crores or more, as on the latest balance sheet date, shall subject to such instructions as may be issued from time to time by SEBI, settle their transactions entered on or after January 15, 1998 only through dematerialised securities. Further, all transactions in government securities shall be in dematerialised form.
22. The mutual fund shall not borrow except to meet temporary liquidity needs of the mutual fund for the purpose of repurchase, redemption of units or payment of interest or distribution of amounts to the unit holders. Provided that the mutual fund shall not borrow more than 20% of the net asset of the scheme and the duration of such a borrowing shall not exceed a period of six months.

23. SEBI has permitted Mutual Funds to participate in derivatives trading subject to observance of guidelines issued by it in this behalf. Accordingly, Mutual Funds may use various derivative products from time to time, as would be available and permitted by SEBI. The Mutual Fund would comply with para no. 7.5 of SEBI Master Circular. The position limits for Mutual Funds and its schemes shall be under:

(i) Position limit for Mutual Funds in index options contracts:

- The Mutual Fund position limit in all index options contracts on a particular underlying index shall be Rs. 500 crore or 15% of the total open interest of the market in index options, whichever is higher, per Stock Exchange.
- This limit would be applicable on open positions in all options contracts on a particular underlying index.

(ii) Position limit for Mutual Funds in index futures contracts:

- The Mutual Fund position limit in all index futures contracts on a particular underlying index shall be Rs.500 crore or 15% of the total open interest of the market in index futures, whichever is higher, per Stock Exchange.
- This limit would be applicable on open positions in all futures contracts on a particular underlying index.

(iii) Additional position limit for hedging:

In addition to the position limits at point (i) and (ii) above, Mutual Funds may take exposure in equity index derivatives subject to the following limits:

- Short positions in index derivatives (short futures, short calls and long puts) shall not exceed (in notional value) the Mutual Fund's holding of stocks.
- Long positions in index derivatives (long futures, long calls and short puts) shall not exceed (in notional value) the Mutual Fund's holding of cash, government securities, T-Bills and similar instruments.

(iv) Position limit for Mutual Funds for stock based derivative contracts:

- The combined futures and options position limit shall be 20% of the applicable Market Wide Position Limit (MWPL)
- The MWPL and client level position limits however, would remain the same as prescribed.

(v) Position limit for each scheme of a Mutual Fund:

The scheme-wise position limit requirements shall be:

- For stock option and stock futures contracts, the gross open position across all derivative contracts on a particular underlying stock of a scheme of a mutual fund shall not exceed the higher of:
  - 1% of the free float market capitalization (in terms of number of shares). Or
  - 5% of the open interest in the derivative contracts on a particular underlying stock (in terms of number of contracts).
- This position limits shall be applicable on the combined position in all derivative contracts on an underlying stock at a Stock Exchange.
- For index based contracts, Mutual Funds shall disclose the total open interest held by its scheme or all schemes put together in a particular underlying index, if such open interest equals to or exceeds 15% of the open interest of all derivative contracts on that underlying index

### Investments in Derivatives

Pursuant to para-no. 12.25 of SEBI Master Circular, investments in derivatives shall be as per the existing guidelines. For complete details on investments in derivatives, kindly refer SAI.

### C. Fundamental Attributes

Following are the Fundamental Attributes of the scheme, in terms of Clause 1.14 of SEBI Master Circular for Mutual Funds dated May 19, 2023:

#### (i) Type of a scheme

An open ended equity scheme predominantly investing in small cap stocks

#### (ii) Investment Objective

- o **Main Objective** - The primary objective of the Scheme is to generate long-term capital appreciation by investing predominantly in equity and equity related securities of small cap companies, as defined by SEBI. However, there can be no assurance that the investment objectives of the Scheme will be realized. The Scheme does not guarantee/indicate any returns.

- o **Investment pattern** - Kindly refer section I Part II “How will the Scheme Allocate its Assets”

**(iii) Terms of Issue**

- o Liquidity provisions such as listing, repurchase, redemption – Kindly refer “Other Scheme Specific Disclosure”
- o Aggregate fees and expenses charged to the scheme – Kindly refer “Annual Scheme Recurring Expense”
- o Any safety net or guarantee provided - No guarantee has been provided

In accordance with Regulation 18(15A) of the SEBI (MF) Regulations and Clause 1.14.1.4 of SEBI Master Circular for Mutual Funds dated May 19, 2023 the Trustees shall ensure that no change in the fundamental attributes of the Scheme(s) and the Plan(s) / Option(s) thereunder or the trust or fee and expenses payable or any other change which would modify the Scheme(s) and the Plan(s) / Option(s) thereunder and affect the interests of Unitholders is carried out unless:

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

**D. Other Scheme Specific Disclosures:**

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| <b>Listing and transfer of units</b>   | At present, the Units of the Scheme are not proposed to be listed on any stock exchange.<br><br>However, the AMC / Trustee may at their sole discretion list the Units under the Scheme on one or more stock exchanges at a later date.   |
| <b>Dematerialization of units</b>  | The existing units held in physical form can also be dematerialized by the Unitholders. In such a case, the investor is required to approach his DP and make a request in DRF (Dematerialization Request Form) in triplicate along with the Statement of Account for the units. The DP will acknowledge the DRF by returning one copy and will forward the other one to the RTA for dematerialization of units.   |
| <b>Minimum Target amount</b><br>(This is the minimum amount required to operate the scheme and if this is not collected during the NFO period, then all the investors would be refunded the amount invested without any return.) | Not Applicable.   |
| <b>Maximum Amount to be raised (if any)</b>  | Not Applicable. The AMC reserves the right to specify maximum amount to be raised, at the time of New Fund Offer.   |
| <b>Dividend Policy (IDCW)</b>  | The Income Distribution Cum Capital Withdrawal warrants shall be dispatched to the unitholders within 7 Working days of the Record Date.<br><br>The IDCW will be paid to only those Unitholders whose names appear on the register of Unitholders of the Scheme / Option at the close of the business hours on the record date. Pursuant to 11.4 of SEBI Master Circular, The Fund is required to dispatch IDCW payments within seven working days from the record date. In case the AMC fails to dispatch the IDCW payments within the stipulated time of seven working days, it shall be liable to pay interest to the unit holders at 15% p.a. or such other rate as may be prescribed by SEBI from time to time.<br><br>On payment of Income Distribution Cum Capital Withdrawal, the NAV will stand reduced by the amount of Income Distribution Cum Capital Withdrawal and statutory levies paid if any.<br><br>Investors may like to note that the amounts can be distributed as Income Distribution Cum Capital Withdrawal out of investors capital (Equalization Reserve), which is part of the sale price that represents realized gains. |

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|  | <p><b>Exchange Platforms:</b></p> <p>If the sub - option of Payout of Income Distribution cum Capital Withdrawal Option is chosen and the Income Distribution Cum Capital Withdrawal amount is less than Rs. 100, then the Income Distribution Cum Capital Withdrawal shall not be reinvested but will be paid out to the respective investors.</p>   |
| <p><b>Allotment procedure) (Detailed</b></p>   | <p>An investor who purchases Units through a broker/ clearing member will receive Units in his/her/its account through his/her/its broker / clearing member's pool account. The AMC will credit the Units to the broker / clearing member's pool account, and they in turn will credit the Units to the investor's account. Credit of Units to the broker / clearing member's pool account by the AMC/its RTA shall discharge the AMC/its RTA of their obligation of allotment of Units to the investor.</p> <p>In case of purchase transactions, where there is a mismatch in the amounts on the Transaction Slip / Application Form and the payment instrument / credit received, the AMC may at its discretion allot the units for the lesser of the two amounts and refund / utilize the excess, if any, for any other transaction submitted by the same investor, subject to the fulfillment of other regulatory requirements for the fresh transaction.</p> <p>Pursuant to Association of Mutual Funds in India (AMFI) Best Practice Guidelines Circular No. 48/2014-15 dated June 24, 2014, the investors are hereby informed that in case of fresh/additional purchases, if the name of the Scheme on the application form/transaction slip differs from the name on the Cheque/Demand Draft (payment instrument), then JM Financial Asset Management Limited (the "AMC") shall process the application and allot units at the applicable Net Asset Value of the Scheme mentioned in the application form/transaction slip duly signed by the investor, given that the same constitutes a valid legal document between the investor and the AMC.</p> <p>The AMC reserves the right to call for other additional documents as may be required, for processing such transactions. The AMC also reserves the right to reject such transactions.</p> <p>The AMC, thereafter, shall not be responsible for any loss suffered by the investor due to the discrepancy in the Scheme name mentioned in the application form/transaction slip and Cheque / Demand Draft.</p> |
| <p><b>Who can invest</b><br/> <b>This is an indicative list and investors shall consult their financial advisor to ascertain whether the scheme is suitable to their risk profile.</b></p> | <p>The following persons (subject to, wherever relevant, purchase of units of funds being permitted under respective constitutions, and relevant statutory regulations) are eligible and may apply for subscription to the Units of the Scheme.</p> <ul style="list-style-type: none"> <li>• Resident adult individuals, either singly or jointly (not exceeding three).</li> <li>• Parents/Lawful Guardian on behalf of Minors.</li> <li>• Hindu Undivided Family (HUF), in the name of Karta.</li> <li>• Companies/Bodies Corporate/Public Sector Undertakings, association of persons or bodies of individuals whether incorporated or not and societies registered under the Societies Registration Act, 1860 (so long as the purchase of units is permitted under the respective constitutions), Co- Operative Societies registered under the Co-Operative Societies Act, 1912, One Person Company.</li> <li>• Religious and Charitable Trusts, Wakfs or endowments of private trusts (subject to receipt of necessary approvals as required) under the provisions of 11(5) of Income Tax Act, 1961 read with 17C of the Income Tax Rules, 1962 (subject to receipt of necessary approvals as "Public Securities", where required).</li> <li>• Trustee of private trusts authorized to invest in mutual fund scheme under the Trust Deed.</li> <li>• Partnership Firms &amp; Limited Liability Partnerships (LLPs) in the name of the Firm or in the name of the partner authorised to invest as per the partnership deed or as per the consent letter signed by remaining partners of the Firm.</li> <li>• Proprietorship firm in the name of the proprietor.</li> <li>• Banks (including Co-operative Banks and Regional Rural Banks) and Financial Institutions and Investment Institutions.</li> </ul>   |

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|                                 | <ul style="list-style-type: none"> <li>• NRIs/ persons of Indian origin residing abroad on full repatriation basis (subject to RBI approval, if any) or non-repatriation basis. Presently OCBs are not permitted to invest in mutual funds pursuant to RBI A.P.(DIR Series) Circular No. 14 dated September 16,2003.</li> <li>• Army/Air Force/Navy and other Para Military units and other eligible institutions.</li> <li>• Scientific and/or industrial research organisations.</li> <li>• International Multilateral Agencies approved by Government of India.</li> <li>• Non- Government Provident/Pension/Gratuity funds as and when permitted to invest.</li> <li>• Others who are permitted to invest in the Scheme as per their respective constitutions.</li> <li>• Mutual Funds/Alternative Investment Funds registered with SEBI.</li> <li>• Overseas Citizen of India (OCI) on repatriation basis or on non-repatriation basis.</li> <li>• Foreign Portfolio Investors (FPI) registered with SEBI on repatriation basis.</li> <li>• Multilateral Financial Institutions/Bilateral Development Corporation Agencies/Bodies Corporate incorporated outside India with the permission of Government of India/ Reserve Bank of India.</li> <li>• Such other category of investors as may be decided by the AMC from time to time in conformity with the applicable laws and SEBI (MF) Regulations.</li> </ul> <p>Note:</p> <ol style="list-style-type: none"> <li>1. The AMC may reject any application received in case the application is found invalid/ incomplete or for any other reason in the AMC's sole discretion, subject to the Regulations.</li> <li>2. Any scheme of JM Financial Mutual Fund or of any other Mutual Fund managed by any other AMC, including a Fund of Fund (subject to the conditions and limits prescribed in Regulations and/or by the Trustee, AMC or Sponsor) may subscribe to the units under the Scheme. The AMC/Trustee/Fund /Sponsor may subject to the limits prescribed by SEBI subscribe to units of this Scheme.</li> <li>3. The AMC will not be entitled to charge any fees on investments made by the AMC.</li> <li>4. The AMC may accept an application from an unincorporated body of persons/ trusts. The AMC may also periodically add and review the persons eligible for making application for purchase of units under the Scheme. If a person who is a resident Indian at the time of subscription becomes a resident outside India subsequently, he/she shall have the option to either be paid repurchase value of Units, or continue into the Scheme if he/she so desires and is otherwise eligible.</li> <li>5. Notwithstanding the aforesaid, the AMC reserves the right to close the unitholder account and to pay the repurchase value of Units, subsequent to his becoming a person resident outside India, should the reasons of cost, interest of other unitholders and any other circumstances make it necessary for the Fund to do so. Unitholders in whose case there has been a change of status from Resident to Non Resident will not have a right to claim growth in capital and/or income distribution.</li> <li>6. Investment in units of Mutual Funds in the name of minor through guardian will be in line with the SEBI Circular SEBI/HO/IMD/POD-II/CIR/P/2023/0069 dated May 12, 2023.</li> </ol> |
| <p><b>Who cannot invest</b></p> | <ol style="list-style-type: none"> <li>a) Any individual who is a foreign national or any other entity that is not an Indian resident under the Foreign Exchange Management Act, 1999, except where registered with SEBI as a FPI or FPI sub-account or except for NRIs or PIOs (who are not residents of the United States of America and Canada), unless such foreign national or other entity that is not an Indian resident has procured the relevant regulatory approvals from the Foreign Investment Promotion Board and / or the RBI, as applicable in the sole discretion and to the sole satisfaction of the AMC.</li> <li>b) Overseas Corporate Bodies (“OCBs”), i.e. firms and societies which are held</li> </ol>  |



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|  | <p>directly or indirectly but ultimately to the extent of at least 60% by NRIs and trusts in which at least 60% of the beneficial interest is similarly held irrevocably by such persons without the prior approval of the RBI.</p> <p>c) NRIs and PIOs who are resident of the United States of America and Canada.</p> <p>d) NRIs residing in Non-Compliant Countries and Territories (“NCCTs”) as determined by the Financial Action Task Force (“FATF”), from time to time.</p> <p>e) Any individual or entity subject to U.S. sanctions (OFAC) or other sanctions or persons resident in countries which are subject to U.S. sanctions (OFAC) or other sanctions.</p> <p>f) Any other person determined by the AMC or the Trustee as not being eligible to invest in the Scheme.</p> <p>The AMC reserves the right to include/exclude new/existing categories of investors to invest in the Scheme from time to time, subject to SEBI Regulations &amp; other prevailing statutory regulations, if any.</p>   |
| <p><b>How to Apply (and other details)</b></p>   | <p>Details regarding availability of application form from either the Investor Service Centers (ISCs)/Official Points of Acceptance(OPAs) of AMC or may be downloaded from the website of AMC (i.e <a href="https://www.jmfinancialmf.com/Reach-Us">https://www.jmfinancialmf.com/Reach-Us</a>)</p> <p>Please refer to the SAI and Application form for the instructions.</p> <p><b>Where can you submit the filled up applications</b></p> <p>Offices of JM Financial Asset Management Ltd. or designated ISCs (Investor Service Centers) of RTA (Registrar and Transfer Agent) i.e. M/s. KFin Technologies Limited.</p> <p><b>Registrar &amp; Transfer Agent</b></p> <p>M/s. KFin Technologies Limited, Karvy Selenium Tower B, Plot No 31 &amp; 32, First Floor, Gachibowli, Financial District, Nanakramguda, Serilingampally, Hyderabad – 500 032.</p> <p>Tele :- 040 - 67161500-Email :- <a href="mailto:service_jmf@kfintech.com">service_jmf@kfintech.com</a>, Website:- <a href="http://www.kfintech.com">www.kfintech.com</a></p> <p>The duly completed application form can also be submitted at the official points of acceptance of the Registrar/branches of AMC. The details of the official points of acceptance and branches of AMC are available on website of the AMC i.e. <a href="https://www.jmfinancialmf.com/Reach-Us">https://www.jmfinancialmf.com/Reach-Us</a></p> <p>As per the directives issued by SEBI it is mandatory for an investor to declare his/her bank account number. To safeguard the interest of Unitholders from loss or theft of their refund orders/redemption cheques, investors are requested to provide their bank details in the Application Form. The Bank Account details as mentioned with the Depository should be mentioned. If depository account details furnished in the application form are invalid or not confirmed in the depository system, the application may be rejected.</p> |
| <p><b>The policy regarding reissue of repurchased units, including the maximum extent, the manner of reissue, the entity (the scheme or the AMC) involved in the same.</b></p> | <p>Not Applicable</p>  |
| <p><b>Restrictions, if any, on the right to freely retain or dispose of units being offered.</b></p>   | <p><b>A. Non – acceptance of subscriptions:</b></p> <p>The U.S. Securities and Exchange Commission (SEC) requires that a person falling under the definition of the term ‘US Person’ under the Securities Act of 1933 of U.S.A (an ‘Act’) and corporations or other entities organized under the U.S. laws shall not be permitted to make investments in securities not registered under the Act.</p> <p>Also, the Canadian Securities Administrator (CSA) mandates prior registration of the fund with CSA before marketing or selling to the residents of Canada.</p> <p>The investors are hereby informed that none of the Scheme of JM Financial Mutual Fund (the “Fund”) is presently registered under the relevant laws, as applicable in the territorial jurisdiction of U.S. or in any provincial or territorial jurisdiction of Canada.</p>   |

Hence, the units made available under the SAI or SID of all the Scheme may not be directly or indirectly be offered for sale in any of the provincial or territorial jurisdiction in U.S. and/or Canada or to/ or for the benefits of the residents thereof. Accordingly, the persons, corporations and other entities organized under the applicable laws of the U.S. including Qualified Foreign Investors (QFI) registered in USA and Canada and residents of Canada as defined under the applicable laws of Canada will not be permitted to make any fresh purchases/ additional purchases/ switches in the Scheme in any manner whatsoever.

The above classes of investors are requested to note the following:

No fresh purchases (including Systematic Investment Plans and Systematic Transfer Plans)/ additional purchases/switches in any Scheme of the Fund would be allowed. However, existing Unit Holder(s) will be allowed to redeem their units from the Schemes of the Fund. If an existing Unit Holder(s) subsequently becomes a U.S. Person or Resident of Canada, then such Unit Holder(s) will not be able to purchase any additional Units in any of the Scheme of the Fund.

For transaction on Stock Exchange platform, while transferring units from the broker account to investor account, if the investor has U.S./Canadian address then the transactions would be rejected.

In case JMF AMC/JM Financial Mutual Fund subsequently identifies that the subscription amount is received from U.S. Person(s) or Resident(s) of Canada, the AMC/Fund at its discretion shall redeem all the units held by such person from the Scheme of the Fund at applicable Net Asset Value.

**B. Restriction on redemption in Mutual Funds:**

Pursuant to para-No. 1.2 of SEBI Master Circular, provision of restriction on redemption under any scheme of the mutual fund could be made only after the approval from the Board of Directors of the Asset Management Company (AMC) and the Trustees.

Pursuant to para-No 1.12 of Master Circular, has laid down the criteria and the conditions in case AMC wishes to impose restrictions on redemptions.

Vide the said circular, SEBI has advised that:

- 1) 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
  - ii. Market failures, exchange closures and/or iii Operational issues
- 2) Restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period.

If restriction on redemption is imposed by JM Financial Asset Management Limited (JMF AMC) anytime in future, JMF AMC, in addition to the above requirements, will ensure the following:

Redemption requests upto Rs. 2 lakh shall not be subject to such restriction.

Where redemption requests are above Rs. 2 lakh, JMF AMC shall redeem the first Rs. 2 lakh without such restriction and remaining part over and above Rs. 2 lakh, shall be subject to restriction, as may be imposed.

**C. Transfer of Units**

Units shall be freely transferable. In case, the units are with the depository held in Demat mode, such units will be transferable in accordance with the provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996. Pursuant to para no 14.4.4 of SEBI Master Circular dated August 18, 2010, units under the Scheme are freely transferable from one demat account to another demat account. In case, a person becomes a holder of Units by operation of law or upon enforcement/invoke of pledge, the AMC shall, subject to production of such satisfactory evidence and submission of such documents by the transferee, proceed to effect the transfer, if the intended transferee is otherwise eligible to hold the Units of the Scheme concerned. In case of physical mode of holding, the asset management company shall, on production of instrument of transfer

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|   | <p>together with relevant statement of accounts, register the transfer and return the statement of accounts to the transferee within thirty days from the date of such production.</p> <p><b>D. Pledge or Hypothecation of Units</b></p> <p>Units under the Scheme may be offered as security by way of a pledge / charge in favour of scheduled banks, financial institutions, non-banking finance companies (NBFCs) or at the discretion of the AMC. The AMC and / or the Registrar will note and record the pledge of Units. The AMC shall mark a lien only upon receiving the duly completed form and documents, as it may require. Disbursement of the loans will be at the entire discretion of the bank / financial institution / NBFC etc and the Fund/AMC assumes no responsibility for that. The Pledgor will not be able to redeem Units that are pledged until the entity to which the Units are pledged provides a written authorization to the Mutual Fund that the pledge / lien charge may be removed. As long as the Units are pledged, the Pledgee will have complete authority to redeem such Units with or without Income Distribution Cum Capital Withdrawal /reinvested units thereon as per the arrangements between the pledger and pledgee.</p>  |
| <p><b>Cut off timing for subscriptions/ redemptions/ switches</b><br/> <b>This is the time before which your application (complete in all respects) should reach the official points of acceptance.</b></p> | <p>Applicable Net Asset Value (NAV) for Purchase/ Switch-in, Installments under Systematic Investment Plan (SIP), and Systematic Transfer Plan (STP) irrespective of application amount across all the schemes of JM Financial Mutual Fund, the following provisions are effective:</p> <p>Where the application is received and time stamped upto the cut-off time of 3.00 p.m. on a business day at the official point of acceptance and funds for the entire amount of subscription/purchase/SIP/ STP installments are available for utilization upto 3.00 p.m. on the same Business Day, NAV of the same Business Day shall be applicable.</p> <p>Where the application is received and time stamped upto the cut-off time of 3.00 p.m. on a business day at the official point of acceptance and funds for the entire amount of subscription/purchase/ SIP/STP are available for utilization after 3.00 p.m. on the same Business Day or on any subsequent Business day, NAV of such subsequent Business Day on which the Funds are available for utilization prior to 3.00 p.m. shall be applicable.</p> <p>Where the application is received and time stamped after the cut off time of 3.00 p.m. on a business day at the official point of acceptance and funds for the entire amount of subscription/purchase/SIP/STP installments are available for utilization upto 3.00 p.m. on the same Business Day, NAV of the subsequent Business Day shall be applicable.</p> <p>Redemption/ Switch out request can be submitted to the official point of acceptance on any business day till the cut off time as stipulated and revised by the SEBI from time to time which is currently 3.00 p.m. (IST). In respect of valid applications received up to 3.00 p.m. (IST) by the Fund, same day's closing NAV shall be applicable. In respect of valid applications received after 3.00 p.m. (IST) by the Fund, the closing NAV of the next business day shall be applicable.</p> <p><b>SIP/STP/Switch-in Transactions</b></p> <p>The NAV for SIP &amp; STP instalments will be allotted based on the credit of funds into the Scheme's account for the respective instalments before the cut off time i.e. 3.00 p.m. irrespective of the SIP/ STP instalments' due dates opted by the investors as the same will only be meant for the purpose of initiating the SIP/STP transactions.</p> <p>The NAVs for Switch-in transactions will be based on transfer of funds into the Bank Account of the target Scheme as per the redemption pay-out service standards of the switch-out scheme subject to the time stamping of the switch transactions upto the cut-off timings of 3.00 p.m.</p> <p>For faster realisation of the funds, the investors are requested to use electronic modes of payments.</p> <p>It is clarified that the cut off timings will also be applicable to investments made through "sweep" mode.</p> <p><b>Transactions through online facilities / electronic modes:</b></p> <p>The time of transaction done through various online facilities / electronic modes offered by the Online Channel Partners of the AMC, for the purpose of determining</p> |

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|  | <p>the applicability of NAV, would be the time when the request for purchase / sale / switch of units is received in the servers of AMC/RTA.</p> <p>In case of transactions through Online facilities / electronic modes, there may be a time lag of few days between the amount of subscription being debited to investor's bank account and the subsequent credit into the respective Scheme's bank account. This lag may impact the applicability of NAV for transactions where NAV is to be applied, based on actual realization/receipt of funds by the Scheme. Under no circumstances will JMF AMC or its bankers or its service providers be liable for any lag / delay in realization of funds and consequent pricing of units.</p> <p>The AMC has the right to amend cut off timings of transactions received through online channels within the cut off time stipulated by SEBI (MF) Regulations for the smooth and efficient functioning of the Scheme.</p> <p><b>Exchange Platforms &amp; MFU:</b></p> <p>The cut – off timing and applicability of Net Asset Value (NAV) shall be subject to the guidelines issued by SEBI in this regard from time to time. With respect to investors who transact through Stock Exchange Platforms (i.e. BSE/NSE or MFU), the applicable NAV shall be reckoned on the basis of the time stamping as evidenced by confirmation slip given by Stock Exchange/MFU mechanism, and subject to receipt of funds by the AMC/ Fund before the cut – off time of the Scheme for purchase transactions. These platforms are authorized Point of Acceptance for the limited purpose of time-stamping the transactions.</p> |
| <p><b>Where can the application for purchase/redemption switches be submitted?</b></p>   | <p>Please refer the AMC website at the following link for the list of official points of acceptance, collecting banker details etc.<br/> <a href="https://www.jmfinancialmf.com/Reach-Us">https://www.jmfinancialmf.com/Reach-Us</a></p> <p>As per the directives issued by SEBI it is mandatory for an investor to declare his/her bank account number. To safeguard the interest of Unitholders from loss or theft of their refund orders/redemption cheques, investors are requested to provide their bank details in the Application Form. The Bank Account details as mentioned with the Depository should be mentioned. If depository account details furnished in the application form are invalid or not confirmed in the depository system, the application may be rejected</p>   |
| <p><b>Minimum amount for purchase/redemption/switches (mention the provisions for ETFs, as may be applicable, for direct subscription/redemption with AMC.</b></p> | <p>The table on minimum investment amounts for the Scheme under this Scheme Information Document is set out elsewhere in the document.</p> <p>Minimum amount of Rs. 1,000/- per Plan / Option / Sub-Option and in multiples of Rs. 1 thereafter. in case of first time investments. For ongoing investments in the same scheme in an existing folio, the investment would be Rs. 100/- and in multiples of Rs. 1 thereafter. However, there is no upper limit for investment. The minimum investment is applicable at the respective Plans /Options/ Sub-options level i.e. Growth, Income Distribution Cum Capital Withdrawal (i.e. Income/Distribution) etc. and will be considered at gross level taking into account permissible DD charges, stamp duty etc. as per the current practice.</p> <p>There is no minimum and maximum limit on the amount/units which can be redeemed/switched-out. The investor is free to redeem any or all units outstanding in his/her/their folio.</p> <p>However, in case of switch transaction, during post NFO period, the minimum investment provisions of the switch-in Scheme/Plan i.e. for fresh/additional purchase, shall continue to be applicable. In the event of failure to meet the requirement of switch-in Scheme/Plan, such switch requests will be treated as cancelled/ rejected.</p>   |
| <p><b>Minimum balance to be maintained and consequences of non-maintenance</b></p>   | <p>There is no minimum balance requirement.</p>  |
| <p><b>Accounts Statements/ Common Account Statement (“CAS”)/ Half Yearly Account Statement</b></p>   | <p>The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 working days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or mobile number (whether units are held in demat mode or in account statement form).</p> <p>A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 15th of the succeeding month.</p>  |

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|   | <p>Half-yearly CAS shall be issued at the end of every six months (i.e. September/ March) on or before 21st day of succeeding month, to all investors providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form across demat accounts, if applicable</p> <p>For further details, refer SAI.</p>   |
| <b>Dividend/ IDCW</b>   | The payment of dividend/IDCW to the unitholders shall be made within seven working days from the record date.  |
| <b>Redemption / Repurchase</b>  | <p>The redemption or repurchase proceeds shall be dispatched to the unitholders within three working days from the date of redemption or repurchase.</p> <p>For list of exceptional circumstances refer para 14.1.3 of SEBI Master Circular for Mutual Funds dated May 19, 2023</p>  |
| <b>Bank Mandate</b>   | <p>All cheques and bank drafts accompanying the application form should contain the application form number on its reverse.</p> <p>Pursuant to para-No.14.11 and 14.12 of Master Circular it is mandatory for applicants to mention their bank account numbers in their PAN and applications for purchase or redemption of Units. This is to prevent fraudulent encashment of Income Distribution Cum Capital Withdrawal /redemption / refund cheques.</p> <p>The verification procedures for registration of bank mandates will henceforth be applicable at the time of fresh subscription/new folio creation with the Fund i.e. in case the fresh subscription cheque does not belong to the bank mandate mentioned in the application form, the AMC shall seek the additional documents and follow the procedures set out in the above mentioned addendum, before registering the bank mandate in the new folio.</p>  |
| <b>Delay in payment of redemption/repurchase proceeds/dividend</b>                | The Asset Management Company shall be liable to pay interest to the unitholders at rate as specified vide clause 14.2 of SEBI Master Circular for Mutual Funds dated May 19, 2023 by SEBI for the period of such delay.  |
| <b>Unclaimed Redemption and Income Distribution cum Capital Withdrawal Amount</b> | <p>Pursuant to para no 14.3 of SEBI Master Circular, the unclaimed redemption amount and Income Distribution Cum Capital Withdrawal amounts (the funds) may be deployed by the Fund in money market instruments and separate plan of Liquid Scheme / Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts only.</p> <p>Investors who claim the unclaimed amounts during a period of three years from the due date shall be paid initial unclaimed amount along-with the income earned on its deployment. Investors, who claim these amounts after 3 years, shall be paid initial unclaimed amount along-with the income earned on its deployment till the end of the third year. After the third year, the income earned on such unclaimed amounts shall be used for the purpose of investor education.</p> <p>JMF AMC will make a continuous effort to remind the investors through letters/ emails/ other modes to take their unclaimed amounts. The details of such unclaimed redemption/Income Distribution Cum Capital Withdrawal amounts are made available to investors upon them providing proper credentials, on the website of Fund and AMFI along with the information on the process of claim-ing the unclaimed amount and the necessary forms / documents required for the same. Further, the information on unclaimed amount along-with its prevailing value (based on income earned on deployment of such unclaimed amount), will be separately disclosed to investors through the periodic statement of accounts / Consolidated Account Statement sent to the investors. Further, the investment management fee charged by the AMC for managing the said unclaimed amounts shall not exceed 50 basis points.</p> |
| <b>Disclosure w.r.t investment by minors</b>                                      | <p>Payment for investment by minor in any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor, i.e. the account the minor may hold with the parent/ legal guardian after completing all KYC formalities.</p> <p>The above provisions are in line with the SEBI circular no. SEBI/HO/IMD/POD - II/CIR/P/2023/0069 dated May 12, 2023).</p> <p>Mutual Fund will send an intimation to Unit holders advising the minor (on attaining majority) to submit an application form along with prescribed documents to change the status of the account from 'minor' to 'major'.</p>   |

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|  | <p>All transactions / standing instructions / systematic transactions etc. will be suspended i.e. the Folio will be frozen for operation by the guardian from the date of beneficiary child completing 18 years of age, till the status of the minor is changed to major. Upon the minor attaining the status of major, the minor whose name the investment was made, shall be required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new bank account.</p> <p>No investments (lumpsum/SIP/ switch in/ STP in etc.) in the scheme would be allowed once the minor attains majority i.e. 18 years of age.</p> <p><b>Email ID &amp; Mobile Number</b></p> <p>Investors should provide their own email address and mobile number to enable AMC for speed and ease of communication in a convenient and cost-effective manner, and to help prevent fraudulent transactions.</p> |
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**E. Requirement of minimum investors/ investment in the Scheme (Applicability for an open-ended scheme):**

The Scheme/ plan (at portfolio level) shall have a minimum of 20 investors and no single investor shall account for more than 25% of the corpus of the Scheme/ Plan(s). In case the Scheme / Plan(s) 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 / Plan(s) shall be wound up and the units would be redeemed at applicable NAV. For details, kindly refer SAI.

**F. Special Considerations, if any**

- I. Prospective investors in this Scheme should educate themselves or seek professional advice on:
  - Legal requirements or restrictions relating to the acquisition, holding, disposal, or redemption of Units within their jurisdiction of nationality, residence, ordinary residence and domicile or under the laws of any jurisdiction to which they are subject; and
  - Treatment of capital gains, and other tax consequences relevant to their acquisition, holding or disposal, whether by way of sale or redemption of Units
- II. Prospective investors should study this Scheme Information Document carefully in its entirety and consult their legal, tax and investment advisors to determine possible legal, tax, financial or other considerations of subscribing for, purchasing or holding Units before making a subscription for Units.
- III. Prospective investors should note that all financial investments carry inherent risks and no assurance or guarantee can be given that the objective of the Fund will be fully met. The NAV of the Units issued under this Scheme and the income from them can go up or down depending on the factors and forces affecting the capital markets, debt markets and money markets and the value of the underlying securities/ stocks within India/ abroad.
- IV. Entities managed or sponsored by the associates of the Sponsors may either directly or indirectly invest in a substantial portion of the Scheme. If these entities decide to offer a substantial portion of such investment for repurchase, it may have an adverse impact on the NAV of Units.
- V. Neither this Scheme Information Document nor the Units have been registered in any jurisdiction. 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 are required to keep themselves abreast of, and to observe, any such restrictions, as may be applicable. This Scheme Information Document does not constitute an offer or solicitation to any person within such jurisdiction. The Fund may compulsorily redeem any units held directly or beneficially in contraventions of these prohibitions. It is the responsibility of the person in possession of this Scheme Information Document and of the person wishing to apply for Units pursuant to this Scheme Information Document to be aware of and to observe, all applicable laws and Regulations of such relevant jurisdiction. Any changes in SEBI/RBI regulations and other applicable laws/regulations could have an effect on such investments and valuation thereof from time to time.
- VI. No person has been authorized to issue any advertisement or to give any information or to make any representations other than that contained in this Scheme Information Document. Circulars in connection with this offering not authorized by JM Financial Mutual Fund and any information or representations not contained herein must not be relied upon as having been authorized by JM Financial Mutual Fund. Prospective investors should not construe the contents hereof as advice relating to legal, taxation or investment matters and are advised to consult their own professional advisors concerning the purchase, holding or disposal of Units under the Scheme.
- VII. Past performance of other Schemes of JM Financial Mutual Fund are not necessarily indicative of the future performance of the Scheme. The Sponsor is not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution made by it of an aggregate amount of Rupees One lac towards setting up of the Fund which has been invested in JM Large Cap Fund (earlier known as JM Equity Fund) and such other accretions and additions to the initial corpus made by the Sponsor.
- VIII. The Trustee, AMC, Fund, their directors or their employees shall not be liable for any of the tax consequences that may arise, in the event that the Scheme is wound up for the reasons and in the manner provided in SAI.
- IX. Redemption by the Unit holder either due to change in the fundamental attributes of the Scheme or due to any other reasons may entail tax consequences. The Trustee, AMC, Fund, their directors or their employees shall not be liable for any such tax consequences that may arise.
- X. Any dispute arising out of the Scheme shall be subject to the non-exclusive jurisdiction of the Courts in India. Statements in this SID are, except where otherwise stated, based on the law, practice currently in force in India and are subject to changes therein.

- XI. Investors are advised to rely upon only such information and/or representations as contained in this SID. Any subscription or redemption made by any person on the basis of statements or representations which are not contained in this SID or which are inconsistent with the information contained herein shall be solely at the risk of the Investor. The Investor is required to confirm the credentials of the individual/ firm he/she is entrusting his/her application form alongwith payment instructions for any transaction in the Scheme. The Fund/Trustee/ AMC shall not be responsible for any acts done by the intermediaries representing or purportedly representing such Investor. If the units are held by any person in breach of the Regulations, law or requirements of any governmental, statutory authority including, without limitation, Exchange Control Regulations, the Fund may mandatorily redeem all the units of any Unit holder where the units are held by a Unit holder in breach of the same. The Trustee may further mandatorily redeem units of any Unit holder in the event it is found that the Unit holder has submitted information either in the application or otherwise that is false, misleading or incomplete.
- XII. The AMC and/or its Registrars & Transfer Agent (RTA) reserve the right to disclose/share Unit holder's details of folio(s) and transaction details thereunder with the following third parties:
- RTA, Banks and/or authorised external third parties who are involved in transaction processing, dispatching etc., of the Unitholder's investment in the Scheme;
  - Distributor/s or sub-broker/s through whom the applications are received for the Scheme;
  - Any other organizations for compliance with any legal or regulatory requirements or to verify the identity of the Unitholders for complying with anti-money laundering requirements.
- XIII. If after due diligence the Trustee/AMC has reason to believe that any transaction is suspicious in nature as regards money laundering, the AMC shall report such transactions to competent authorities under PMLA and rules/guidelines issued thereunder by SEBI/RBI, furnish any such information in connection therewith to such authorities and take any other actions as may be required for the purposes of fulfilling its obligations under PMLA and rules/guidelines issued thereunder without obtaining prior approval of the Unitholder/any other person or information to the unitholder. In this connection the Trustee/ AMC reserves the right to reject any such application at its discretion.
- XIV. **Non – acceptance of subscriptions:**  
The U.S. Securities and Exchange Commission (SEC) requires that a person falling under the definition of the term 'US Person' under the Securities Act of 1933 of U.S.A (an 'Act') and corporations or other entities organized under the U.S. laws shall not be permitted to make investments in securities not registered under the Act. Also, the Canadian Securities Administrator (CSA) mandates prior registration of the fund with CSA before marketing or selling to the residents of Canada.  
The investors are hereby informed that none of the schemes of JM Financial Mutual Fund (the "Fund") are presently registered under the relevant laws, as applicable in the territorial jurisdiction of U.S. or in any provincial or territorial jurisdiction of Canada. Hence, the units made available under the SAI or SID of the scheme may not be directly or indirectly be offered for sale in any of the provincial or territorial jurisdiction in U.S. and/or Canada or to/or for the benefits of the residents thereof. Accordingly, the persons, corporations and other entities organized under the applicable laws of the U.S. including Qualified Foreign Investors (QFI) registered in USA and Canada and residents of Canada as defined under the applicable laws of Canada will not be permitted to make any fresh purchases/additional purchases/switches in the Scheme of the Fund, in any manner whatsoever. The above classes of investors are requested to note the following:
- No fresh purchases (including Systematic Investment Plans and Systematic Transfer Plans)/ additional purchases/switches in the Scheme of the Fund would be allowed. However, existing Unit Holder(s) will be allowed to redeem their units from the Scheme of the Fund. If an existing Unit Holder(s) subsequently becomes a U.S. Person or Resident of Canada, then such Unit Holder(s) will not be able to purchase any additional Units in the Scheme of the Fund.
  - For transaction on Stock Exchange platform, while transferring units from the broker account to investor account, if the investor has U.S./ Canadian address then the transactions would be rejected.
  - In case JM Financial Asset Management Ltd. (the "AMC")/JM Financial Mutual Fund subsequently identifies that the subscription amount is received from U.S. Person(s) or Resident(s) of Canada, the AMC/Fund at its discretion shall redeem all the units held by such person from the Scheme of the Fund at applicable Net Asset Value.
- XV. **Identification of Beneficial Ownership:**  
In terms of SEBI Master Circular on Guidelines on Anti Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) dated February 03, 2023 and guidelines issued by SEBI from time to time, all the registered intermediaries are required to undertake Client Due Diligence ('CDD') measures wherein intermediaries are required to obtain sufficient information from their clients in order to verify the identity of their clients and identify the identity of the persons who beneficially own or control the securities account.

In terms of the said SEBI Master Circular, beneficial owner is the individual who ultimately owns or controls the client and/ or the person on whose behalf a transaction is being conducted. Also, the Prevention of Money Laundering Rules, 2005 (PMLR 2005) requires each intermediary to identify the beneficial owner and take all reasonable steps to verify his/her identity.

In compliance with the aforesaid regulatory requirements, the following CDD shall be applicable to all the investors of the Scheme of JM Financial Mutual Fund (the 'Fund'):

**1. Applicability:**

- a. Details of beneficial ownership will have to be provided by all the categories of investors except the following:
  - 1) Individuals
  - 2) Company listed on a stock exchange
  - 3) Majority owned subsidiary of the aforesaid company.
- b. Information about the Beneficial Owner shall be provided by the investors to JMF AMC/ its Registrar i.e. M/s. KFin Technologies Limited.
- c. Proof of Identity of the Beneficial Owner such as Name/s, Address & PAN/Passport together with self attested copy\* are required to be submitted to the AMC/its Registrar.

(\*Original to be shown for verification and immediate return)

- d. In case of any change in the beneficial ownership, the investor is required to immediately intimate JMF AMC/its Registrar/KRA, as may be applicable, about such changes.

## 2. Identification Process:

As provided by SEBI in its Circular No. CIR/MIRSD/2/2013 dated January 24, 2013, read with SEBI circular no SEBI/HO/MIRSD/MIRSDSECFATF/P/ CIR/2023/091 dated July 16, 2023 the following process shall be adopted by the Fund:

### a) For investors other than Individuals or Trusts:

1. In the case of Company, Partnership or unincorporated association/body of individuals, the beneficial owners are the natural person/s, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest.  
For the aforesaid clause, Controlling ownership interest means ownership of/entitlement of:
  - a. More than 10% of shares or capital or profits of the juridical person, where the juridical person is a company;
  - b. More than 15% of the capital or profits of the juridical person, where the juridical person is a partnership; or
  - c. More than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.
2. In case of doubt under clause (1) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests; the identity of the natural person exercising control over the juridical person through other means. Control through other means can be exercised through voting rights, agreement, arrangements or in any other manner.
3. Where no natural person is identified under clauses (1) and (2) above, the natural person who holds the position of senior managing official shall be considered as the beneficial owner.

### b) For investor which is a Trust:

Where the client is a Trust, the beneficial owners of the client shall be identified and reasonable measures taken to verify the identity of such persons, through the identity of the Settlor of the trust, the trustee, the protector, the beneficiaries with 10% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.

### c) For Foreign investors:

Where the client is a Foreign Portfolio Investor, it shall adopt the Know Your Client (KYC) requirements specified by SEBI in its Circular No. CIR/MIRSD/11/2012 dated September 5, 2012 and CIR/ MIRSD/07/2013 dated September 12, 2013.

- XVI. The AMC may add to or otherwise amend either all or any of the terms of the Scheme, by duly complying with the guidelines of and notifications issued by SEBI/Government of India/any other regulatory body that may be issued from time to time subject to the prior approval of SEBI, if required. The SID shall be updated once every year. In case of change in fundamental attributes in terms of the Regulation 18(15A), SID shall be revised and updated immediately after completion of duration of exit option. The addendum shall be circulated to all the distributors/brokers/Investor Service Centre (ISC) so that the same can be attached to all KIM and SID already in stock till it is updated.
- XVII. **Indicative yield/ portfolio**  
The Fund/ AMC and its empanelled brokers /distributors have not given and shall not give any indicative portfolio and indicative yield in any communication, in any manner whatsoever. Investors are advised not to rely on any communication regarding indicative yield/ portfolio with regard to the Scheme.

## III. Other Details

- A. Since this is not a Fund of Funds Scheme, relevant disclosures pertaining to the underlying fund in this section are not applicable.**
- B. Periodic Disclosures such as Half yearly disclosures, half yearly results, annual report**
- **Monthly/Half yearly Disclosures\*** (Portfolio This is a list of securities where the corpus of the scheme is currently invested. The market value of these investments is also stated in portfolio disclosures.)

The Fund shall disclose within ten days from the close of each month/half year (i.e. 31st March and 30th September), the complete statement of the Scheme's portfolio (alongwith ISIN) as on the last day of the month/half year for all its schemes on the websites of the Fund and AMFI AMFI in a user friendly and downloadable spreadsheet format.

The link of Fund website for Monthly/Half yearly portfolio is <https://www.jmfinancialmf.com/downloads/Portfolio-Disclosure>.

The Link of AMFI website is <https://www.amfiindia.com/investor-corner/online-center/portfoliodisclosure>

The Fund shall send email regarding the monthly and half-yearly portfolio within 10 days from the close of each month/half year (i.e. March 31st & September 30th) to the unitholders whose email addresses are registered with the Fund.

The Fund will publish an advertisement in the all India edition of at least two daily newspapers, one each in English and Hindi, regarding the hosting of the half yearly statement of the Scheme's portfolio on the websites of the Fund and AMFI and also the



modes through which unitholders can submit a re-quest for a physical or electronic copy of the Scheme portfolio. The Fund shall provide a physical copy of the portfolio, without charging any cost, upon specific request from a unitholder

- **Monthly Average Asset under Management (Monthly AAUM) Disclosure**

The Fund shall disclose the Monthly AAUM under different categories of Schemes as specified by SEBI in the prescribed format on a monthly basis on its website and forward to AMFI within 7 working days from the end of the month.

The link of Fund website for Monthly AAUM is [https://www.jmfinancialmf.com/downloads/Statutory-Disclosure/Assets-Under-Management-\(AUM\)-disclosure](https://www.jmfinancialmf.com/downloads/Statutory-Disclosure/Assets-Under-Management-(AUM)-disclosure).

- **Half-Yearly Results**

The Fund and asset management company shall within one month from the close of each half year, that is on 31st March and on 30th September, host a soft copy of its unaudited / audited financial results on its website.

The Fund shall give an advertisement disclosing the hosting of the financial results on the website and in atleast one English daily newspaper having nationwide circulation and in a newspaper having wide circulation published in the regional language where the Corporate Office of the Fund is situated.

The link of Fund website for Half Yearly Result is <https://www.jmfinancialmf.com/downloads/Scheme-Financials/Half-Yearly-Unaudited-Financial>

- **Annual Report**

The Scheme wise annual report or Abridged Summary, in the format prescribed by SEBI, shall be host- ed on the websites of the Fund) and the AMFI. A link of the scheme wise annual report or abridged summary shall be displayed prominently on the website of the Fund. Annual report or Abridged Sum- mary will also be sent by way of e-mail to the investor's registered email address.

Investors who have not registered their email id, will have an option of receiving a physical copy of the Annual report or Abridged Summary thereof, without charging any cost, upon receipt of a specific request.

The physical copy of the scheme wise annual report or abridged summary shall be made available to the investors at the registered office of the AMC.

The Fund will publish an advertisement in the all India edition of atleast two daily newspapers, one each in English and Hindi, regarding the hosting of the scheme wise annual report on the websites of the Fund and AMFI and also the modes through which unitholders can submit a request for a physical or electronic copy of the scheme wise annual report or abridged summary thereof.

The new subscribers to the units of the Fund can tick the 'opt-in' facility in the application form to receive the physical copy of the scheme – wise annual report or abridged summary thereof.

For existing investors, an Option Form for opting-in to receive the physical copy of Annual Report/ Abridged Summary is available on the website under 'Downloads' section.

However, in case the investor does not opt-in, it will be presumed that he/she has opted out from receiving the physical copy of the Annual Report or Abridged Summary.

The link for Annual Report is <https://www.jmfinancialmf.com/downloads/Scheme-Financials/Scheme-Annual-Report>

- **Risk-o-meters**

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 the unitholders.

The AMC will evaluate the Risk-o-meter of all its schemes on a monthly basis and disclose the Risk-o-meter along with portfolio disclosure on <https://www.jmfinancialmf.com/downloads/Notice-and-Addendums> (website) and on AMFI's website, within 10 days from the close of each month.

The Fund shall disclose the risk level of schemes as on March 31 every year , along with number of times the risk level has changed over the year, in scheme wise Annual Reports and abridged summary, on the website of the Fund as well as that of AMFI.

The risk-o-meter of the primary benchmark will also be disclosed in the disclosures as stipulated by SEBI.

- **Scheme Summary Document**

The AMC will provide on its website a standalone scheme document for all the Schemes which contains all the details of the Scheme including but not limited to Scheme features, Fund Manager details, investment details, investment objective, expense ratios, portfolio details, etc. Scheme summary document will be uploaded on the websites of AMC, AMFI and stock exchanges in 3 data formats i.e. PDF, Spreadsheet and a machine-readable format)

The link for Scheme Summary Document is [https://www.jmfinancialmf.com/downloads/Scheme-related-documents/Scheme-Summary-Document-\(SSD\)](https://www.jmfinancialmf.com/downloads/Scheme-related-documents/Scheme-Summary-Document-(SSD))

- **Investment by the Designated Employees of AMC in the Scheme:**

Pursuant to para 6.10 of SEBI Master circular SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023 pertaining to 'Alignment of interest of Designated Employees of AMC's with the Unitholders of the Mutual Fund Schemes', investors are requested to note that a part of compensation of the Designated Employees of AMC, as defined by SEBI, shall be mandatorily invested in units of the schemes in which they have a role/oversight effective October 01, 2021. Further, investors are requested to note that such mandatory investment in units of the scheme shall be made on the day of payment of salary and in proportion to the AUM of the schemes in which such Designated Employee has a role/oversight. AMC shall ensure compliance with the provisions of the said circular and further, the disclosure of such investment shall be made at monthly aggregate level showing the total investment across all relevant employees in scheme on website of AMC (<https://www.jmfinancialmf.com/downloads/Statutory-Disclosure/Disclosure-of-investment-by-Designated-Employees>). Further, in accordance with the said regulatory requirement, the minimum application amount and minimum redemption amount as specified for the scheme will not be applicable for investment made in scheme in compliance with the aforesaid guidelines.

- C. Transparency/NAV Disclosure (Details with reference to information given in Section I)
- D. Transaction charges and stamp duty- Indicate only the amount of transaction charges and stamp duty applicable. Details to be provided in SAI.
- E. Associate Transactions- Please refer to Statement of Additional Information (SAI)
- F. Taxation- For details on taxation please refer to the clause on Taxation in the SAI apart from the following:

|  | <b>Resident Investors</b>   | <b>Mutual Fund</b>  |
|--|---|---|
| Tax on dividend  | Income would be taxable at the slab rates of the resident investors and at the rate of 20% for non residents. | <p><b>Resident investor:</b><br/>Tax is to be withheld at rate of 10% if amount of dividend distributed in the year exceeds Rs 5,000.</p> <p><b>Non-Resident investor:</b><br/>Tax is to be withheld at rate of 20% plus applicable surcharge and cess.</p> |
| Capital gain   | Income exceeding Rs 10,00,000 would be taxable at a rate of 10%   | <p><b>Resident investor:</b><br/>No tax is required to be withheld.</p> <p><b>Non-Resident investor:</b><br/>Tax is to be withheld at rate of 10% plus applicable surcharge and cess.</p>   |
| Long Term Capital Gains for Equity Shares and Equity Oriented Mutual Fund  |   |   |
| Short Term Capital Gains for Equity Shares and Equity Oriented Mutual Fund | Income would be taxable at a rate of 15%  | <p><b>Resident investor:</b><br/>No tax is required to be withheld.</p> <p><b>Non-Resident investor:</b><br/>Tax is to be withheld at rate of 15% plus applicable surcharge and cess.</p>   |

**G. Rights of Unitholders** - Please refer to SAI for details.

**H. List of official points of acceptance: Details to be uploaded and updated on the AMC website:**

The Link of the AMC website for List of official point of acceptance is <https://www.jmfinancialmf.com/Reach-Us>

**I. Penalties, Pending Litigation or Proceedings, Findings of Inspections or Investigations For Which Action May Have Been Taken Or Is In The Process Of Being Taken By Any Regulatory Authority**

The Penalties, Pending Litigation or Proceedings, Findings of Inspections or Investigations For Which Action May Have Been Taken Or Is In The Process Of Being Taken By Any Regulatory Authority available on our website on the following link:

<https://www.jmfinancialmf.com/SIDdisclosures/Penaltiesndpending>

**NOTWITHSTANDING ANYTHING CONTAINED IN THIS SCHEME INFORMATION DOCUMENT, THE PROVISIONS OF THE SEBI (MUTUAL FUNDS) REGULATIONS, 1996 AND THE GUIDELINES/CIRCULARS THERE UNDER SHALL BE APPLICABLE.**