STATEMENT OF ADDITIONAL INFORMATION (SAI)

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

This SAI is dated June 30, 2026

Name of the Sponsor	Navi MF Sponsor Private Limited (Formerly known as Anmol Como Broking Private Limited)
Name of Mutual Fund	Navi Mutual Fund
Name of Asset Management Company	Navi AMC Limited
Name of Trustee Company	Navi Trustee Limited
Registered Office Address	Vaishnavi Tech Square, 7th Floor, Iballur Village, Taluk, Begur, Hobli Bengaluru, Karnataka 560102
Website	www.navimutualfund.com

I. INFORMATION ABOUT SPONSOR, AMC AND TRUSTEE COMPANIES

A. Constitution of the Mutual Fund

Navi Mutual Fund (the "Mutual Fund") has been constituted as a trust on August 04, 2009 in accordance with the provisions of the Indian Trusts Act, 1882 (2 of 1882) Navi MF Sponsor Private Limited (formerly known as Anmol Como Broking Private Limited), as the Sponsor and Navi Trustee Limited as the Trustee. The Trust Deed has been registered under the Indian Registration Act, 1908. The Mutual Fund was registered with SEBI on March 23, 2011 under SEBI vide Registration No. MF/062/09/03.

The Mutual Fund was originally sponsored by The Peerless General Finance and Investment Company Limited. Essel Finance Wealth Zone Private Limited acquired the entire shareholding held by The Peerless General Finance and Investment Company Limited in Essel Finance AMC Limited (formerly Peerless Funds Management Co. Limited) and Essel MF Trustee Limited (formerly Peerless Trust Management Co. Limited). The Board of Directors of Essel Finance AMC Limited and Essel MF Trustee Limited approved the aforesaid transfer of shares on September 21, 2017. Consequently, Essel Finance Wealth Zone Private Limited has become the sole Sponsor of Essel Mutual Fund. Pursuant to the above change in shareholding, Peerless Mutual Fund was renamed as Essel Mutual Fund, and SEBI vide its letter dated October 31, 2017 issued fresh Registration Certificate No. MF/062/09/03 dated October 31, 2017 in the name of Essel Mutual Fund and cancelled the old Registration Certificate No. MF/062/09/03 dated December 04, 2009 in the name of Peerless Mutual Fund.

Navi MF Sponsor Private Limited (formerly known as Anmol Como Broking Private Limited) acquired the majority shareholding in Essel Finance AMC Limited and Essel MF Trustee Limited. The Board of Directors of Essel Finance AMC Limited and Essel MF Trustee Limited approved the transfer of shares on February 10, 2021. Consequently, Navi MF Sponsor Private Limited (earlier known as Anmol Como Broking Private Limited) has become the sole Sponsor of Essel Mutual Fund. Pursuant to the above change in shareholding, Essel Mutual Fund was renamed as Navi Mutual Fund, and SEBI vide its letter dated March 25, 2021 issued fresh Registration Certificate No. MF/062/09/03 dated March 25, 2021 in the name of Navi Mutual Fund and cancelled the old Registration Certificate No. MF/062/09/03 dated October 31, 2017 in the name of Essel Mutual Fund.

The Registered Office of the AMC is: Vaishnavi Tech Square, 7th Floor, Iballur Village, Begur, Hobli, Bengaluru, Karnataka 560102.

B. Sponsor

Navi Mutual Fund is sponsored by Navi MF Sponsor Private Limited (formerly known as Anmol Como Broking Private Limited). The Sponsor is the Settlor of the Mutual Fund Trust. The Sponsor has entrusted a sum of Rs 1,00,000/- to the Trustee as the initial contribution towards the corpus of the Mutual Fund. The Mutual Fund was originally sponsored by The Peerless General Finance and Investment Company Limited and subsequently by Essel Finance Wealth Zone Private Limited.

Navi MF Sponsor Private Limited (formerly known as Anmol Como Broking Private Limited) and Navi Group

Navi MF Sponsor Private Limited (formerly known as Anmol Como Broking Private Limited) is a company incorporated on December 15, 2009 having CIN U67120KA2009PTC051844 and having its registered office at 09th Floor, Vaishnavi Tech Square, Iballur Village, Begur Hobli, Bengaluru, HSR Layout, Bangalore, Bangalore South, Karnataka, India, 560102. .

Navi MF Sponsor Private Limited (formerly known as Anmol Como Broking Private Limited) is a wholly-owned subsidiary of Navi Limited ("**NL**") (formerly known as Navi Technologies Private Limited). NL is an entity involved in the business of building technology and providing services through information technology-driven internet and/or mobile platforms in various sectors including banking, financial services and insurance.

Financial Performance of the Sponsor (past three years): **(Rs. in Crores)**

Particulars	2025-2026	2024-2025	2023-2024
Net Worth	213.5	213.60	167.49
Total Income	0.13	0.08	0.33
Profit after tax	-0.1	-0.39	0.17

Assets Under Management	N.A	N.A	N.A

C. The Trustee

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

Details of Trustee Directors:

Name	Age	Educational Qualifications	Brief Experience
Dr. M. Yousuf Khan (Independent Director)	82 Years	Science Graduate from University of Kashmir Doctorate of Philosophy in Business Management (PHD) from Burkes University in U.K.	Dr. M. Yousuf Khan is a Science Graduate from University of Kashmir and has also completed Doctorate of Philosophy in Business Management (PHD) from Burkes University in U. K. Dr. Khan has earlier held various senior positions including Chairman of J & K Bank, Managing Director of J & K Agro Industries Development Corporation, Managing Director of J & K Tourism Development Corporation, advisor for Berenson & Company, New York, advisor for Yes Bank, Director of Steel Authority of India, IREDA. Dr. Khan was also nominated as Member of the Chhattisgarh Economic Advisory Committee, Government of India, Member of the Banking and Financial Institutions Committee of FICCI and Member of the Managing Committee of India Banking Association, Mumbai. Dr. Khan is the recipient of several prestigious awards like (a) Udyog Rattan award, (b) Pride of India & IMM award, for excellence as top professional manager, (c) Excellence Award by Institute of Economic Studies, and (d) Star Achievers Award. Dr. Khan is presently Director in Starcom Information, Bharat Hotels, Real value Relators, Unitech Corporate Parks ISLE of Man UK, ETA Star Health Insurance Company, Chennai and Raheja Developers, New Delhi.
Mr. Arun V. Goel (Independent Director)	70 Years	B. Tech (Civil Engineering), Indian Institute of Technology (I.I.T), Kanpur	Mr. Arun Vikram Goel was former CEO of LICHFL Asset Management Co. Pvt. Ltd. He has over 45 years of varied Industry experience covering Banking, financial services, and Private Equity Investments in real estate. He has 20 years of experience in heading Profit Centers, of which 14 years at Managing Director/CEO level positions. He has also been responsible for setting up profit-centers, start-up companies, and negotiated multiple joint ventures with multi-national companies

			headquartered in the USA, UK, & SE Asia, as also local partners. After retirement he had been associated with a mentoring and funding platform for Indian SaaS start-ups. He was involved as a Mentor with two start-ups offering technology products to the real estate sector and has also served on their Board as Director. He has also served as Independent Director on the Board of four companies.
Ms. Sugandha Ghai (Associate Director)	46 years	Postgraduate – Insurance	Ms. Sugandha Ghai is Head of Sales & Business Operations at Navi Finserv Limited. Prior to this she held positions of Head of Collection and Head of Customer Experience at Navi. She is a strategist with over 23 years of experience in Banking and Insurance. She has expertise in Strategy & Leadership, Operations, Customer Service, and Digital Processes. Skilled in leading large, diverse teams across multiple locations and engaging with senior leadership, cross-functional teams, and stakeholders. She was also a Head of Retail Operations at TATA AIG. She has worked extensively in areas of Operations, setting up branches, strategic initiative in areas of Customer Experience and Customer Retention.
Sreedevi Pillai (Independent Director)	62 years	▪ M.Sc. Mathematics, St Stephens College, University of Delhi ▪ Financial Risk Manager, Global Association of Risk Professionals, (GARP)USA, ▪ Sustainability & Climate Risk Certificate, GARP, USA, ▪ Certified Associate of Indian Institute of Bankers.	Ms. Sreedevi Pillai, 62, retired as Chief General Manager – Risk Management at the State Bank of India (SBI). She began her career with SBI in 1987 as a Probationary Officer and, over a span of more than 36 years, gained extensive experience across various domains of commercial banking, including retail banking, credit, and the bank's joint venture in custodial and fund accounting services. Her assignments spanned multiple regions across India. Over the years, she developed deep expertise in financial risk management, with a strong focus on areas such as risk modeling, operational risk, fraud risk, climate risk and resilience. To nurture these interests, she has acquired Certifications of the US based Global Association of Risk Professionals (GARP). She is

			both a Financial Risk Manager (FRM) and Sustainability and Climate Risk (SCR) Certificate holder from GARP. Academically, she holds a master's degree in mathematics from St. Stephen's College, University of Delhi.

Out of 4 Directors on the Board of Navi Trustee Limited, 3 (i.e. 3/4th) Directors are independent directors.

Rights and obligations of the trustees of the Trustee under the deed of Trust and the Regulations.

1. The trustees and the asset management company shall with the prior approval of SEBI enter into an Investment Management Agreement.
2. The Investment Management Agreement shall contain such clauses as are mentioned in the Third Schedule and such other clauses as are necessary for the purpose of making investments.
3. The trustees shall have a right to obtain from the asset management company such information as is considered necessary by the trustees. A copy of the draft investment management agreement shall be enclosed with the trust deed.
4. The trustees shall ensure that the asset management company has the necessary expertise, internal control systems and risk management mechanism to invest and manage assets of the mutual fund.
5. The trustees shall ensure that the asset management company establishes systems and submits reports and information that the trustees may require in discharging their responsibility under these regulations including matters relating to: (i) prevention and oversight of mis-selling; (ii) prevention and oversight of undue influence of sponsor; (iii) ensuring adequate systems are in place to prevent misconduct including market abuse; and (iv) addressing potential conflict of interest
6. Where the trustees have reason to believe that the conduct of business of the mutual fund is not in accordance with these regulations and the scheme they shall forthwith take such remedial steps as are necessary by them and shall immediately inform SEBI of the violation and the action taken by them.
7. Termination of the assignment of the asset management company by the trustees may be under the below given circumstances and shall be subject to prior approval from SEBI: (i) Trustees own accord if they have reasons to believe that the affairs of the asset management company are being conducted in contravention to the provisions of these regulations; or (ii) Request by the asset management company.
8. The trustees shall take all necessary measures as they deem necessary to ensure that any conflict of interest involving the asset management company is effectively addressed and such measures shall include: (a) conducting a quarterly review of reports submitted by the asset management company on transactions between the mutual fund and the asset management company or its associates; (b) ensuring that the asset management company does not grant unfair advantage to its associates or engage in transactions that may prejudice the interests of unitholders; (c) ensuring that the asset management company manages each mutual fund scheme independently of its other business activities, and adopts safeguards to ensure fair and equitable treatment of investors across all schemes, without compromising the interests of one scheme for another or for its other businesses; and (d) approving broker empanelment policy of the asset management company and ensuring that brokers are empaneled after requisite due diligence, and that broker transactions are monitored to avoid undue concentration of business or unfair advantage to any associate or group entity.

9. The trustees shall have the right to request for any information from the asset management company that they deem necessary.
10. The trustees shall ensure that the asset management company complies with the obligations set out under regulation 22, adhere to the Code of Conduct applicable to asset management companies, and observe all other provisions of these regulations.
11. The transactions under the mutual fund schemes are in accordance with the provisions of these regulations and trust deed, and the asset management company makes investments only in permissible instruments, in compliance with these regulations and in alignment with the stated investment objectives of each scheme
12. The trustees shall be accountable for and be the custodian of the funds and property of the respective schemes and shall hold them in trust for the benefit of unitholders in accordance with these regulations and the provisions of trust deed.
13. The trustees shall abide by the Code of Conduct as specified in Part – A of the Fourth Schedule
14. The trustees shall obtain unitholder consent: (i) when required by SEBI for the benefit of unitholders; (ii) on the requisition of three-fourths of the unitholders of any scheme; and (iii) when the majority of trustees decide to wind up a scheme or prematurely redeem units of a closed-ended scheme.
15. The trustees shall request details of securities transactions by key personnel of the asset management company, whether made in their own name or in the name of the asset management company, and report to SEBI when required.
16. The trustees shall periodically review investor complaints and their resolution by the asset management company.
17. The trustees shall appoint auditor, who is not in any manner associated with the auditor of the asset management company, for audit of annual statement of accounts of mutual fund schemes.
18. The trustees shall submit to SEBI on a half-yearly basis (i) a report on the activities of the mutual fund; (ii) a certificate confirming there have been no instances of self-dealing or front running by trustees, directors, or key personnel of the asset management company; and (iii) a certificate confirming that the asset management company has managed the schemes independently of other activities, and any conflicts were addressed to protect unitholders' interests.
19. The independent trustees, i.e. trustees not associated with the sponsors, shall review and give their comments on the reports received from asset management company on investments in securities of group companies of the sponsor.
20. The trustees shall periodically review service contracts related to custody arrangements and ensure they serve the unitholders' interests.
21. The trustees shall review the details of securities transactions filed by directors of the asset management company on a quarterly basis.
22. The trustees shall exercise due diligence as under:

    General Due Diligence:

    (i) The trustees shall be discerning in the appointment of the directors on the Board of the asset management company.

    (ii) The trustees shall review the desirability or continuance of the asset management company if substantial irregularities are observed in any of the schemes of the mutual fund, and shall not permit the asset management company to float new schemes until such irregularities are resolved.

(iii) The trustees shall ensure that the trust property is adequately protected, held and administered by persons with necessary expertise and experience, and in a manner that ensures adequate oversight through an appropriate number of such persons.
(iv) The trustees shall ensure that all service providers engaged for mutual fund related services are holding appropriate registrations from SEBI or concerned regulatory authority.
(v) The trustees shall arrange for test checks of service contracts relating to key service providers, whose services, functions, operations and access to information or assets is critical to, or could materially influence the protection of investor interests.
(vi) The trustees shall immediately report to SEBI of any special developments in the mutual fund.

Specific due diligence:
(vii) The trustees shall obtain internal audit reports at regular intervals from independent auditors appointed by them.
(viii) The trustees shall obtain compliance certificates at regular intervals from the asset management company.
(ix) The trustees shall meet periodically to review reports and functioning of asset management company and ensure compliance with these regulations.
(x) The trustees shall maintain records of the decisions of the Trustees at their meetings and of the minutes of the meetings.
(xi) The trustees shall prescribe the Code of Ethics to be adhered to by the asset management company and its personnel.
(xii) The trustees shall communicate in writing to the asset management company of the deficiencies and review the rectification of such deficiencies.

23. The independent directors of the trustee company and asset management company shall exercise oversight over:— (i) the investment management agreement and the compensation paid under the agreement; (ii) fees and ensure that fees charged in service contracts entered with associates are not higher than those charged by outside contractors for the similar services; (iii) securities transactions involving associates to the extent such transactions are permitted; (iv) selecting and nominating individuals to fill independent directors' vacancies; (v) ensuing code of ethics designed prevents fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions; (vi) the reasonableness of fees paid to sponsors, asset management company and any others for services provided; and (vii) any service contract with the associates of the asset management company.
24. The trustees shall not be held liable for acts done in good faith if they have exercised adequate due diligence.
25. The trustees shall also exercise due diligence on such matters as may be specified by SEBI.
26. The trustees shall appoint a custodian for the mutual fund and enter into a custodian agreement and send intimation to SEBI within fifteen calendar days of such appointment.
27. The trustees shall maintain oversight of the activities of the custodian in relation to the mutual fund.

Trustee – Fees and Expenses

In accordance with the Deed of Trust constituting the Mutual Fund, the Trustee shall be entitled to receive a fee not exceeding 0.040% per annum of the daily net assets of the Fund. In addition to the aforesaid remuneration, the Trustee shall be entitled for reimbursement of all costs, charges and expenses incurred in or about the administration and execution of the Fund. Such reimbursement from and out of the Trust Funds would always be to the extent permitted under the MF Regulations.

II. Asset Management Company

Navi AMC Limited is a private limited company incorporated under the Companies Act, 1956 on April 09, 2009, having its Registered Office at Vaishnavi Tech Square, 7th Floor, Iballur Village, Taluk, Bagalur, Begur, Bengaluru, Karnataka 560102. Navi AMC Limited has been appointed as the Asset Management Company of the Navi Mutual Fund by the Trustee vide Investment Management Agreement (IMA) dated 11th August 2009, and executed between Navi AMC Limited and Navi Trustee Limited.

Details of AMC Directors:

Name	Age	Educational Qualifications	Brief Experience
Mr. Arindam Ghosh (Independent Director)	62 Years	Chartered Accountant and B. Com (University of Calcutta)	Arindam has over 2 decades of leadership experience in financial services in India and Asia-Pacific region across Asset Management, Wealth Management, NBFCs and Fintech. He has been associated with Alphaniti Fintech Pvt Ltd as Director, which is a Fintech company, engaged in building digital investment products and solutions across asset classes & geographies. He is a member in multiple Corporate Boards. Previously, Arindam was associated with Mirae

			Asset Global Investments as 'Head of Asia Pacific Business' based out of Hong Kong and subsequently as Director & CEO launched and established their Indian Mutual fund organization from inception. Prior to joining Mirae Asset, he was associated with Fidelity (AP). During his association with Fidelity he covered the key markets in Asia Pacific region comprising of Japan, Australia, Hong Kong, Korea, Taiwan and Singapore. He has also been associated with the financial services industry through his career stints across leading domestic organizations including Tata and AV Birla Group.
Mr. Ankit Agarwal (Associate Director)	43 Years	B.Tech- Computer Science- IIT Delhi	Ankit Agarwal is the Executive Director and Chief Financial Officer of Navi Technologies Limited. He holds a bachelor's degree in computer science and engineering from Indian Institute of Technology, Delhi and master's degree in management

			from Indian Institute of Management, Ahmedabad. He was previously associated with Bank of America as a director in global and markets. He was also associated with Deutsche Bank as the vice president.
Dr. Nachiket Mor (Independent Director)	62 Years	PHD in Economics, Finance from University of Pennsylvanua, PGDM-IIM Ahmedabad	Nachiket Mor is trained as an economist. His current work is principally focused on the design of national and regional health systems. He is a Visiting Scientist at The Banyan Academy of Leadership in Mental Health and a Senior Research Fellow at the Centre for Information Technology and Public Policy at IIIT Bangalore. He is also a Commissioner on the Lancet Commission on Reimagining India's Health System.
Ms. Rituparna Chakraborty (Independent Director)	50 years	Economics Graduate MBA from Goa Institute of Management, AMP from Columbia Business School	Ms. Rituparna Chakraborty is Co-Founder & Non-Executive Board Director at TeamLease Services Ltd. She has around 25 years in execution, building scale and strategy. Till recently

			she has been Chief Executive Officer of two of TeamLease' leading businesses of Staffing and Degree Apprenticeship. In her two decades with TeamLease, she successfully steered the businesses to growth including through two critical crises of the Financial Market Meltdown in 2008 and during Covid, took the company to an IPO, represented Management in Quarter Analyst calls and investor Relations, negotiated through Mergers & Acquisitions, aggressively chased growth and solved complex Business Transformation challenges. Her work also helped her develop a deep understanding of the layered and high potential talent landscape and its challenges. Over the years she has also founded and established Indian Staffing Federation in 2010, a recognized

			Industry body for staffing. She also actively advised & guided in the capacity of an Advisor, Committee Member or Board Member, various international authorities like ILO - Global Advisory Committee for ADULT, International Organisation for Employers (IOE), Human Rights Organisation Verite. In India she has worked alongside Ministry of Labour & Employment, GOI, Ministry of Skill Development and Entrepreneurship (on Drafting of Apprenticeship Amendments) GOI, CII IR and Skill Council, FICCI Skill Committee, CUTTS International, has been part of the B20 Taskforce on Future of Work, Skilling & Mobility amongst others. She is currently Advisory Board Member at IIM Udaipur, Center of Digital Enterprises and Governing Board Member at Goa Institute of Management. She has

			recently won the CII Corporate Women Leader of the Year 2022-23 for the Services Category. In addition, she has won the prestigious Businesswoman of the Year – Asia 2016, an Annual Jury based award selection hosted by Telstra. She is the first person from Asia to be included in the Global Power 100 and International 50 Woman in Staffing and has been on that list for over a decade since its inception.
Mr. Rajiv Naresh (Non-Executive Director)	36 years	Bachelor of Laws (LL.B. (University College London) Bachelor of Arts (English Honours) (St. Stephen's College, Delhi University)	Rajiv Naresh is the Non-Executive Director (NED) of our Company He holds a Bachelor of Laws (LL.B.) from University College London and a Bachelor of Arts (English Honours) from St. Stephen's College, Delhi University. Rajiv has been part of the Navi Group since 2019 and occupied multiple roles across the group. He served as the Managing Director (MD) and Chief Executive Officer (CEO) of Navi AMC Limited. Prior to

			joining Navi, Rajiv was a corporate lawyer at a full- service law firm based in Bengaluru called MD&T Partners. In this capacity, Rajiv advised companies in India and abroad on transactions (e.g., Private Equity, Venture Capital, and M&A), technology, media, and telecommunications, and general corporate matters. He represented market-leading clients in multimillion-dollar transactions in the TMT, Renewable Energy, and Security Services sectors and worked closely with leading startups in the health tech, fintech, e-commerce, and ed-tech sectors. Rajiv Naresh is the Non Executive Director (NED) of our Company He holds a Bachelor of Laws (LL.B.) from University College London and a Bachelor of Arts (English Honours) from St. Stephen's College, Delhi University. Rajiv has been part of the Navi Group since 2019 and occupied multiple roles across the group. He

			served as the the Managing Director (MD) and Chief Executive Officer (CEO) of Navi AMC Limited. Prior to joining Navi, Rajiv was a corporate lawyer at a full- service law firm based in Bengaluru called MD&T Partners. In this capacity, Rajiv advised companies in India and abroad on transactions (e.g., Private Equity, Venture Capital, and M&A), technology, media, and telecommunications, and general corporate matters. He represented market-leading clients in multimillion-dollar transactions in the TMT, Renewable Energy, and Security Services sectors and worked closely with leading startups in the health tech, fintech, e-commerce, and ed-tech sectors.
Mr. Aditya Venkatesh Mulki (Director & Chief Executive Officer)	35 years	CFA, Charter Holder	Mr. Aditya Mulki is an investment professional with close to a decade of experience in equity research and fund management. As the Head of Investments at

			Navi AMC, he currently manages an AUM of ₹7,000 crores encompassing both active and passive schemes. He also is responsible for ideating and executing new product launches. His expertise lies in mid-cap equities, emerging markets, and value investing, making him a key player in the asset management industry. Prior to his current role, Mr. Aditya was an Equity Research Analyst at Quantum Advisors India, where he specialized in mid-cap equities and identified high-potential investment opportunities. He also worked as an Equity Research Associate, conducting financial analysis for a value-style fund focused on consumer staples and media. His deep market insights and analytical expertise have contributed significantly to fund performance and investment strategy. He is a CFA Charterholder and holds a Bachelor of Commerce degree in

Obligations of asset management company and its employees as specified in the SEBI (Mutual Funds) Regulations 2026 are as under:

1. The asset management company shall ensure that all activities of the asset management company adhere to these regulations including taking all reasonable steps and exercise due diligence to ensure that the investment of funds pertaining to any mutual fund scheme is not contrary to the provisions of these regulations, circulars and guidelines issued thereunder and the trust deed.
2. The asset management company shall exercise due diligence and reasonable care in all investment decisions consistent with the standards of other entities engaged in the same business.
3. Before launching any scheme, the board of directors of the asset management company shall ensure that asset management company has: (i) established systems for its back office, dealing room and accounting; (ii) appointed all key personnel specified by SEBI, including fund managers for the scheme(s) and submitted their bio-data (including educational qualifications and securities market experience) to the trustees within 15 calendar days of their appointment; (iii) appointed auditors for audit of its accounts; (iv) appointed a compliance

officer responsible for monitoring compliance with the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by SEBI or the Central Government and for addressing investors grievances; (v) appointed a registrar to an issue and share transfer agent registered under the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 and established parameters for their supervision; (vi) prepared a compliance manual and designed internal control mechanisms including internal audit systems; (vii) specified norms for the empanelment of brokers and marketing agents; and (viii) obtained, where required by these regulations, prior in-principle approval from the recognized stock exchange(s) where units are proposed to be listed, in the manner specified by such exchange(s).

4. The asset management company shall invest such amounts in such schemes of the mutual fund, based on the risks associated with the schemes, as may be specified by SEBI.
5. The asset management company shall invest a percentage of the remuneration of employees in units of mutual fund schemes based on the designation or roles, as specified by SEBI.
6. The asset management company shall not invest in any of its scheme other than as provided in clause (a) unless full disclosure of its intention to invest has been made in the offer documents.
7. The asset management company shall not charge any fees on its own investments in a scheme of a mutual fund managed by it.
8. The Chief Executive Officer (whatever be the designation) of the asset management company shall ensure that: (i) the mutual fund complies with all the provisions of these regulations and related guidelines and circulars; (ii) investments made by the fund managers are in the interest of the unit holders; (iii) the overall risk management function of the mutual fund is comprehensively managed; and (iv) the asset management company has adequate systems in place to ensure adherence to the Code of Conduct for Fund Managers and Dealers (specified in PART - B of the Fourth Schedule of these regulations) and any breach of this Code of Conduct shall be immediately brought to the attention of SEBI of Directors of the asset management company and trustees.
9. The fund managers (whatever be the designation including chief investment officer) shall ensure: (i) that scheme funds are invested to achieve scheme objectives, in the interest of unit holders and in compliance with the provisions of these regulations and related guidelines and circulars; and (ii) adherence to the Code of Conduct for Fund Managers and Dealers (specified in PART - B of the Fourth Schedule and submit a quarterly self-certification to the trustees confirming complied or listing exceptions, if any.
10. The Dealers (whatever be the designation) shall: (i) ensure that orders are executed on the best available terms and in the best interest of all unit holders; and (ii) abide by the Code of Conduct for Fund Managers and Dealers (specified in PART - B of the Fourth Schedule and submit a quarterly self-certification to the trustees confirming complied or listing exceptions, if any.
11. The compliance officer appointed under clause (iv) of sub-regulation (2) of regulation 22 shall independently and immediately report any observed non-compliance to SEBI.
12. Employees of asset management company shall not render, directly or indirectly any investment advice about any security in the publicly accessible media, whether real-time or non-real-time, unless a disclosure of his interest including long or short position in the said security has been made, while rendering such advice: Provided that in case of rendering investment advice, he/she shall also disclose the interest of his dependent

family members and the employer including their long or short position in the said security, while rendering such advice.

13. (i) The asset management company shall ensure that the purchase or sale of securities through any stock broker that is an associate of the sponsor does not, on average, exceed five percent of the aggregate value of securities purchased or sold by the mutual fund across all its schemes.
14. (ii) The asset management company may undertake purchase or sale of securities through a stock broker which is not an associate of the sponsor in excess of five percent of the aggregate value of securities transacted by the mutual fund across all its schemes, provided that the justification for exceeding the limit is recorded in writing and reported to the trustees on a quarterly basis.
15. Where an asset management company proposes to utilise the services of the sponsor or any of its associates, employees or their relatives, for the purpose of any securities transaction, distribution and sale of securities, the proposed engagement of such persons shall be disclosed to the unitholders and the brokerage or commission paid shall be disclosed in the half-yearly and annual accounts of the mutual fund. (ii) The half-yearly and yearly annual accounts disclosure shall include: a. subscription by the schemes in the issues lead managed by associate companies; and b. subscription to any equity or debt issue on a private placement basis where the sponsor or its associate companies acted as arranger or manager. (iii) If the asset management company enters into any securities transactions with any of its associates, a report to that effect shall be placed before the trustees at their next meeting.
16. If the investment made by any company in a scheme exceeds five per cent of the net asset value of the scheme, the investment made by that scheme or by any other scheme of the same mutual fund in that company or its subsidiaries shall be brought to the notice of the trustees by the asset management company and be disclosed in the half-yearly and annual accounts of the respective schemes, with justification for such investment, where the cross investment is made within a period of one year before or after the initial investment.
17. Quarterly reports to trustees: (i) The asset management company shall submit to the trustees quarterly reports on its activities and the compliance with these regulations. (ii) The board of directors shall ensure that there has been exercise of due diligence on the reports submitted by the asset management company to the trustees.
18. Director and Key Personnel Disclosures: (i) The asset management company shall file with the trustees and the Board: a. detailed bio-data of all its directors, along with their interest in other companies, within 15 calendar days of their appointment; b. a half yearly report regarding any change in the interest of directors; and c. a quarterly report to the trustees providing details and adequate justification about the purchase and sale of securities of the group companies of the sponsor or the asset management company by the mutual fund during that quarter.
19. (ii) Each director of the asset management company shall file with the trustees the details of their securities transactions on a quarterly basis, in the manner specified by SEBI
20. The asset management company shall file with trustees the details of transactions in securities by its key personnel in their own name or in the name of the asset management company, and shall report to SEBI, as required.
21. The board of directors of the asset management company shall ensure that – a. the asset management company has been diligent in empaneling brokers, monitoring securities transactions with brokers, and avoiding

undue concentration of business with specific brokers; b. the asset management company has not given any undue or unfair advantage to any associate or dealt with any associate in any manner detrimental to the interest of unit holders; c. the transactions entered into by the asset management company align with these regulations, investment objective and asset allocation of the respective schemes; d. mutual fund transactions align with the provisions of the trust deed; e. the net worth of the asset management company is reviewed quarterly to ensure continuous compliance with the threshold provided in clause (e) of sub-regulation (1) of regulation 5; f. all service contracts, including custody arrangements for assets and transfer agency of securities, are executed in the interest of unit holders and test checks of service contracts are arranged; g. there is no conflict of interest between the deployment of the asset management company's net worth and the interest of unit holders; h. investor complaints are periodically reviewed and redressed; i. all service providers hold appropriate registrations with SEBI or relevant regulatory authority; j. any special developments in the mutual fund are immediately reported to the trustees; and k. due diligence is exercised on such matters as specified by SEBI.

22. The asset management company shall be responsible for acts of commission or omission by its employees or persons whose services have been procured by the asset management company, where such act or omission is committed in the course of carrying out functions under these regulations, and involves negligence, breach of duty, or failure to comply with applicable law.
23. The asset management company shall abide by the Code of Conduct specified in PART-A of the Fourth Schedule
24. The asset management company shall establish, implement and maintain an institutional mechanism (as specified by SEBI), for identifying and deterring potential market abuse, including front-running and fraudulent transactions in securities.
25. The Chief Executive Officer or Managing Director (or equivalent or analogous rank) and Chief Compliance Officer of the asset management company shall be responsible and accountable for implementing institutional mechanism for deterring potential market abuse, including front-running and fraudulent securities transactions.
26. The asset management company shall establish, implement and maintain a documented whistle blower policy that: a. provides a confidential channel for employees, directors, trustees, and other stakeholders to raise concerns about suspected fraudulent, unfair or unethical practices, violations of regulatory or legal requirements or governance vulnerability; and b. establishes procedure to ensure adequate protection of whistle blowers.
27. The asset management company shall constitute a Unit Holder Protection Committee in the form and manner and with a mandate as specified by SEBI.
28. Asset management company shall ensure compliance with the Investor Charter specified by SEBI.
29. Registrars and share transfer agents appointed by the asset management company shall be registered with SEBI. If the work relating to the transfer of units is processed in-house, the charges at competitive market rates may be debited to the scheme and for rates higher than the competitive market rates, prior approval of the trustees shall be obtained and reasons for charging higher rates shall be disclosed in the annual accounts.
30. The asset management company shall compute and carry out valuation of investments made by its scheme(s) in accordance with the investment valuation norms specified in the Seventh Schedule, and shall publish the same.

31. The asset management company and the sponsor of the mutual fund shall be liable to compensate affected investors and/or the scheme for any unfair treatment to an investor resulting from inappropriate valuation
32. The asset management company shall report and disclose all transactions in debt and money market securities, including inter scheme transfers, as specified by SEBI.
33. The asset management company shall ensure that no change in the fundamental attributes of any scheme, fees and expenses payable or any other change that would modify the scheme and affect the interest of unit holders, shall be carried out unless, — a. written communication (including digital modes such as email/sms etc.) about the proposed change is sent to each unit holder; b. details, as specified by SEBI, are appropriately displayed on the website of asset management company; and c. unit holders are given an option to exit at the prevailing Net Asset Value without any exit load.
34. The asset management company shall be responsible for calculating any income due to be paid to the mutual fund and also any income received in the mutual fund for the unit holders of any scheme, in accordance with these regulations and the trust deed.
35. The asset management company shall conduct stress testing for such schemes as specified by SEBI and disclose the results in the form and manner specified by SEBI.
36. The asset management company shall not carry out its fund management operations or execution of transactions relating to mutual funds, outside the territory of India, except for execution of trades for investment in overseas securities.
37. The asset management company may request trustees for termination of the assignment of the asset management company at any time:
38. The board of directors of the trustee company and the asset management company, including their respective committees, shall hold meetings at least as often as specified by SEBI, and may hold additional meetings as necessary.

Information on Key Personnel:

Name	**Age**	**Designation**	**Educational Qualification**	**Total No. of years of Experience**	**Nature of past experience including assignments held during the last 10 years**
Mr. Aditya Mulki	35 Years	Whole Time Director & Chief Executive Officer	CFA, Charter Holder	11 years of experience	Mr. Aditya Mulki is an investment professional with close to a decade of experience in

					equity research and fund management. As the Head of Investments at Navi AMC, he currently manages an AUM of ₹7,000 crores encompassing both active and passive schemes. He also is responsible for ideating and executing new product launches. His expertise lies in mid-cap equities, emerging markets, and value investing, making him a key player in the asset management industry. Prior to his current role, Mr. Aditya was an Equity Research Analyst at Quantum Advisors India, where he

					specialized in mid-cap equities and identified high-potential investment opportunities. He also worked as an Equity Research Associate, conducting financial analysis for a value-style fund focused on consumer staples and media. His deep market insights and analytical expertise have contributed significantly to fund performance and investment strategy. He is a CFA Charter holder and holds a Bachelor of Commerce degree in Accounting & Finance from Mumbai University. His commitment to

					innovation in asset management and investor value maximization continues to drive his professional journey.
Ms. Swetha Apuri	42 years	Head of Operations and CFO	Master's in Business Administration	15 years of experience.	Swetha brings over 14 years of experience in the Banking and Financial Services industry, with strong expertise across Core Banking, Consumer Lending, and Investment Advisory. She began her career with Citi Financial, where she led one of the branches focused on disbursing personal loans. She has also been associated with institutions such as Citigroup Global

					Markets Ltd and Kotak Mahindra Bank, playing pivotal roles in delivering customer-centric financial solutions. For the past four years, Swetha has been with Navi AMC, now heading the Operations function and driving process efficiency, regulatory compliance, and operational excellence.
Mr. Tanmay Sethi	29 years	Debt Fund Manager	Chartered Accountant, B.com (Pune University).	7 years of experience	Mr. Tanmay has over 6 years of experience in the Mutual Fund industry. He had previously served in the capacity of Commodity Fund Manager and Chief Risk Officer of Navi Mutual Fund and was also associated with HDFC Mutual

					Fund in the fixed income treasury operations.
Mr. Rushabh Patel	29 years	Equity Dealer	▪ B.Tech. - Mechanical Engineering, Pandit Deendayal Petroleum University, Gandhinagar (2014- 2018) ▪ MBA in Finance , Great Lakes Institute of Management, Chennai (2018-2020)	5.5 years of experience.	Rushabh Patel brings over 4.5 years of corporate experience with a strong focus on equity research and mutual fund management. Navi AMC Limited (2.2 years). At Navi AMC, Rushabh's key contributions include: Equity Research & Analysis: Conducted in-depth research and analysis of small, mid, and large-cap companies across the IT and Capital Goods sectors, identifying key investment opportunities. Index Fund Management: Actively

					managed index funds, optimizing deployment and routing through Bloomberg for efficient execution. Mutual Fund Product Launch: Collaborated with the product team on the development and implementation of new mutual fund products. Marketing Content Support: Provided essential Navi MF data and content to the growth and marketing teams for promotional materials including mailers and push notifications. **CRISIL Limited (2.5 years)** Prior to Navi AMC, Rushabh worked at

					CRISIL, where he: Supported a Consumer Staples sector analyst by updating models and tracking sector performance. Conducted research and analysis on Thematics and ESG products for a sell-side client. Contributed to the Family Business 1000 product, comparing the performance of family businesses with non-family business universes. Developed an ESG Theme Dashboard, ranking ESG themes based on quality and momentum scores.

Ms. Sweta Shah	33 Years	Chief Compliance Officer	Company Secretary, Bachelor of Legislative Law (LLB), Bachelor of Commerce (B.com) and Master of Commerce (M.com)	8 Years of experience.	Ms. Sweta is a qualified member of Institute of Company Secretaries of India. She is also an L.L. B graduate from Mumbai University. She has more than 8 years of hands-on experience in the Mutual Fund Industry in Compliance and regulatory affairs. She also has rich experience in managing compliance and secretarial functions within the mutual fund industry, with a focus on maintaining the highest standards of integrity and ethical conduct.
Mr. Ashutosh Shirwaikar	35 Years	Head of Investments	MBA (Finance)-JBIMS, Mumbai University -B.Tech,	11 years of experience	Ashutosh Shirwaikar serves as the Head of

			Mechanical Mumbai University		Investments & Fund Manager at Navi, overseeing all equity schemes. Ashutosh has a total experience of nearly 9 years in the Equity markets. Prior to joining Navi, he spent 7 years at Quantum Advisory, where he worked as an analyst, focusing on sectors such as Auto, Media, Power, and Chemicals. Ashutosh holds an MBA in Finance from Jamunalal Bajaj Institute of Management Studies (JBIMS).
Ms. Sadiqa Banu	33 Years	Investment Relations Officer (IRO)	B.Com (Bangalore University)	6 years of experience	Ms. Sadiqa has an overall experience of 4+ years in handling investor escalations. She is the Team Leader of the

					CX Team in Navi and involved in the monitoring of individual and team performance, setting goals, conducting performance evaluations, and identifying areas for improvement. She is also handling escalations and resource management within the team.
Mr. Sanjay Pantula	40 years	Chief Risk Officer (CRO)	MS – Finance, ICFAI University, Dehradun B. Com – Accountancy, Ranchi University	16 years of experience	Mr. Sanjay Pantula holds a Master of Science (MS) in Finance from ICFAI Business School and a Bachelor of Commerce (B.Com.) in Accounting from Ranchi University. He is a seasoned risk management professional with 16 years of experience in

					Enterprise Risk Management (ERM) and Credit Risk Management (CRM). Prior to joining Navi, he was Director at EY, leading risk management strategies for financial services clients. He spent over 10 years at EY in various leadership roles, specializing in Basel IRB, IFRS 9, and credit risk frameworks. Earlier, he worked at Standard Chartered Bank as a Senior Financial Analyst – Strategic Information Management, handling credit risk calculations and risk-adjusted performance metrics. He also

					served as Assistant Manager – Risk Management at Lakshmi Vilas Bank, where he was responsible for credit risk assessment, ICAAP documentation, and regulatory disclosures. Prior to Navi Mutual Fund
Mr. Aditya Kumar	43 years	Chief Information Security Officer (CISO)	BE(EEE), MS(Cyber Security Ops & Leadership-Pursuing), CISM, CISA, CEH.	16 years of experience	Mr. Aditya Kumar holds a Master of Science (MS) in Cyber Security Operations & Leadership from the University of San Diego and a Bachelor of Engineering (BE) in Electrical and Electronics Engineering from Visvesvaraya Technological University. He is a cybersecurity professional with over 16 years of

					experience in information security, threat management, cyber fraud, forensics, and compliance. Prior to joining Navi, he was Manager – Information Security at First American (India), focusing on security frameworks and risk mitigation, and Manager – Global SOC at BT, handling security operations and incident response. He has also held key roles at IBM, TCS, Tech Mahindra, and Mphasis, specializing in network security, risk assessment, and infrastructure protection.

Ms. Reishumei Basumata	29 years	Head HR	PGP in General Management from the Indian Institute of Management Raipur (2019 2021) and a Bachelor's Degree in English Literature from Delhi University (2015–2018)	4.5 Years of experience	Prior to joining Navi AMC Limited Ms. Reishumei Basumata worked at Fashinza as an Employee Experience Specialist, focusing on engagement and organizational culture. Prior to that, she contributed to Porter in Campus Engagement, managing employer branding and developing talent acquisition strategies.

III. Service providers

1. **Custodian**
   HDFC Bank Ltd

   Empire Plaza 1,4th Floor, Chandan Nagar. L.B.S. Marg,

   Vikhroli -West, Mumbai 400083, Maharashtra, India.

   Phone: (022) 6856 5217, **Fax No.:** (022) 6856 5222

   SEBI REGISTRATION NO. IN /CUS/001

2. **Registrar and Transfer agent**
   Computer Age Management Services Limited (CAMS),

   Rayala Tower-1, 158 Anna Salai, Chennai - 600 002

   Website: https://www.camsonline.com/

   SEBI REGISTRATION No.INR000002813

   The Board of the Trustees and the AMC have ensured that the Registrar has adequate capacity to discharge responsibilities with regard to processing of applications within the time limit prescribed in the SEBI (Mutual Funds) Regulations, 2026 and also has sufficient capacity to handle investor complaints.

3. **Statutory Auditor of the Mutual Fund**
   M. P. Chitale & Co. Chartered Accountants

   1/11, 1st Floor, Prabhadevi Industrial Estate, Opp. Siddhivinayak Temple,

   Veer Savarkar Marg, Prabhadevi, Mumbai 400 025.

   Office: (022) 43474301/02/03

4. **Legal Counsel**
   There is no retained legal counsel to the Mutual Fund/AMC. However, the AMC uses the services of renowned legal counsel, if need arises.

5. **Fund Accountant**
   HDFC Bank Limited

   HDFC Bank House,Ground Floor, Kamla Mills Compound

   Senapati Bapat Marg, Lower Parel, Mumbai 400 013

6. **Collecting Bankers**
   HDFC Bank Ltd

Maneckji Wadia Bldg Nanik Motwani Marg, Fort, Mumbai – 400 001

SEBI Registration No: INB 100000063

IV. Condensed financial information (CFI)

[For all the schemes launched by MF during the last three fiscal years (excluding redeemed schemes)]

1. NAVI BSE SENSEX INDEX FUND

HISTORICAL PER UNIT STATISTICS	**Navi BSE Sensex Index Fund^^**		
Financial Year	**2023-24**	**2024-25**	**2025-2026**
NAV at the beginning of the year (as on April 01)			
Direct Plan – Growth	NA	11.2107	11.9015
Regular Plan - Growth	NA	11.1618	11.7598
Dividends			
NAV at the end of the year (as on March 31)			
Direct Plan – Growth	11.2107	11.9015	11.1604
Regular Plan – Growth	11.1618	11.7598	10.9654
Annualised returns**			
Regular Plan – Growth Option	11.63%	10.88%	3.66%
Direct Plan – Growth Option	12.11%	11.73%	4.37%
Net Assets end of period (Rs. Crs.)	8.12	16.56	18.13
Ratio of Recurring Expenses to Net Assets			
Regular Plan	0.90%	0.88%	0.90%
Direct Plan	0.14%	0.13%	0.35%

Notes:

^^The scheme was launched during the financial year 2023-24.

** *Only for growth option*

Different plans have different expense structure.

Past performance may or may not be sustained in future.

2. NAVI NIFTY IT INDEX FUND

HISTORICAL PER UNIT STATISTICS	**Navi Nifty IT Index Fund^^**		
Financial Year	**2023-24**	**2024-25**	**2025-26**
NAV at the beginning of the year (as on April 01)			
Direct Plan – Growth	NA	9.9736	10.7299
Regular Plan - Growth	NA	9.9724	10.6454
Dividends	-	-	-
NAV at the end of the year (as on March 31)			
Direct Plan – Growth	9.9736	10.7299	8.6333
Regular Plan – Growth	9.9724	10.6454	8.5081
Annualised returns**			
Regular Plan – Growth Option	-0.26%	6.40%	-7.74%
Direct Plan – Growth Option	-0.26%	7.24%	-7.07%
Net Assets end of period (Rs. Crs.)	7.63	13.19	22.19
Ratio of Recurring Expenses to Net Assets			
Regular Plan	1.00%	0.98%	1.00%
Direct Plan	0.22%	0.20%	0.34%

Notes:

^^The scheme was launched during the financial year 2023-24.

** *Only for growth option*

Different plans have different expense structure.

Past performance may or may not be sustained in future.

3. NAVI NIFTY SMALLCAP 250 MOMENTUM QUALITY 100 INDEX FUND

HISTORICAL PER UNIT STATISTICS	**Navi Nifty Smallcap250 Momentum Quality 100 Index Fund^^**		
Financial Year	**2024-25**	**2025-26**	**Year 3**
NAV at the beginning of the year (as on April 01)		-	-
Direct Plan – Growth	-	10.6471	
Regular Plan - Growth	-	10.6431	
Dividends	-	-	-
NAV at the end of the year (as on March 31)			
Direct Plan – Growth	10.6471	9.4751	-
Regular Plan – Growth	10.6431	9.4067	-
Annualised returns**			
Regular Plan – Growth Option	6.43%	3.51%	-
Direct Plan – Growth Option	6.47%	4.22%	-
Net Assets end of period (Rs. Crs.)	7.63	27.15	-
Ratio of Recurring Expenses to Net Assets			
Regular Plan	0.98%	1.00%	-
Direct Plan	0.30%	0.32%	-

Notes:

^^The scheme was launched during the financial year 2024-25.

** *Only for growth option*

** Absolute returns are provided for FY 2024-25 and 2025-26 as the scheme has not completed three years during FY 2025-26

Different plans have different expense structure.

4. NAVI NIFTY 500 MULTICAP 50-25-25 INDEX FUND

HISTORICAL PER UNIT STATISTICS	**Navi Nifty 500 Multicap 50-25-25 Index Fund^^**		
Financial Year	**2024-25**	**2025-26**	**Year 3**
NAV at the beginning of the year (as on April 01)	-		-
Direct Plan – Growth	-	9.0242	
Regular Plan - Growth	-	8.9798	
Dividends	-	-	-
NAV at the end of the year (as on March 31)		-	
Direct Plan – Growth	9.0242	8.7715	-
Regular Plan – Growth	8.9798	8.6714	-
Annualised returns**			
Regular Plan – Growth Option	-10.20%	-8.24%	-
Direct Plan – Growth Option	-9.76%	-7.60%	-
Net Assets end of period (Rs. Crs.)	22.77	23.58	-
Ratio of Recurring Expenses to Net Assets			
Regular Plan	1.00%	0.99%	-
Direct Plan	0.22%	0.34%	-

Notes:

^^The scheme was launched during the financial year 2024-25.

* *Only for growth option*

** Absolute returns are provided for FY 2024-25 and 205-26 as the scheme has not completed three years.

Different plans have different expense structure.

5. Navi Nifty MidSmallcap 400 Index Fund

HISTORICAL PER UNIT STATISTICS	**Navi Nifty MidSmallcap 400 Index Fund^^**		
Financial Year	**2025-26**	**Year 2**	**Year 3**
NAV at the beginning of the year (as on April 01)			
Direct Plan – Growth	-	-	-
Regular Plan - Growth	-	-	-
Dividends			
NAV at the end of the year (as on March 31)			
Direct Plan – Growth	8.911	-	-
Regular Plan – Growth	8.8891	-	-
Annualised returns**			
Regular Plan – Growth Option	-11.11%	-	-
Direct Plan – Growth Option	-10.89%	-	-
Net Assets end of period (Rs. Crs.)	7.77	-	-
Ratio of Recurring Expenses to Net Assets			

Regular Plan	1.00%	-	-
Direct Plan	0.15%	-	-

Notes:

^^The scheme was launched during the financial year 2025-26.

**Only for growth option*

**Absolute returns are provided for FY 2025-26 as the scheme was launched during FY 2025-26.

Different plans have different expense structure.

V. RISK FACTORS

1. Standard Risk Factors

a. Standard Risk Factors for investments in Mutual Fund

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

a) Investment in Mutual Fund Units involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.
b) As the price / value / interest rate of the securities in which the Scheme invests fluctuates, the value of your investment in the Scheme may go up or down.
c) Past performance of the Sponsor/AMC/Mutual Fund does not guarantee future performance of the Scheme.
d) The Schemes of the mutual fund does not in any manner indicate either the quality of the Scheme or its future prospects and returns.
e) The settler of the Mutual Fund is not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution of Rs. 1 lakh made by it towards setting up the Fund.
f) The present Schemes do not guarantee or assure returns.
g) The Sponsor, their affiliates, associates, subsidiaries, the Mutual Fund and the AMC may invest directly or indirectly in the Scheme, over a period of time; subject to the SEBI (Mutual Funds) Regulations. These entities may acquire a substantial portion of the Scheme's Units and collectively constitute a major investor in the Scheme. Accordingly, Redemption of Units held by such entities may have an adverse impact on the Scheme because the timing of such Redemption may impact the ability of other Unit holders to redeem their Units.
h) Different types of Securities in which the Scheme would invest as given in this Scheme Information Document carry different levels and types of risks. Accordingly, the Scheme's risk may increase or decrease depending upon its investment pattern. For example, equity and equity related securities carry a higher amount of risk than debt securities. Investment decisions made by the AMC may not always be profitable

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

Open ended debt oriented schemes shall maintain an average AUM of Rs. 20 crore on half yearly rolling basis. In case, the average AUM falls below Rs. 20 crore, the AMC shall scale up the AUM of such Scheme within a period of six months so as to maintain the average AUM of Rs. 20 crore on half yearly rolling basis, failing which the Scheme shall be wound up in accordance with the provisions Regulation 36(2)(c) of the SEBI (Mutual Funds) Regulations, 2026, as amended from time to time, as amended from time to time.

c. Risks associated with different derivative strategies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

d. Other risk factors-

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

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

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

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

In accordance with the requirement of regulation 40 of SEBI (Mutual Funds) Regulations, 2026 read with Clause 18.1 of SEBI Master Circular for Mutual Funds dated March 20, 2026, the applicable scheme(s) shall invest 25 bps of its AUM as on December 31, 2022 in the units of the Corporate Debt Market Development Fund ('CDMDF'). An incremental contribution to CDMDF shall be made every six months to ensure 25 bps of scheme AUM is invested in units of CDMDF. However, if AUM decreases there shall be no return or redemption from CDMDF. Contribution made to CDMDF, including the appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

The investments in CDMDF units shall not be considered as violation while considering maturity restriction as applicable for various purposes (including applicable Investment limits) and the calculations of Potential Risk Class (PRC) Matrix, Risk-o-meter, Stress testing and Duration for various purposes shall be done after excluding investments in units of CDMDF.

ii. Risk associated with Swing Pricing:

Swing pricing is a mechanism that allows a mutual fund to adjust the Net Asset Value (NAV) of a scheme to pass on the costs of large-scale investor subscriptions or redemptions to the transacting investors, thereby protecting the interests of remaining investors. Swing pricing may not be applied in every instance of subscriptions or redemptions and shall be implemented, wherever applicable, in accordance with Paragraph 5.8 of the SEBI Master Circular for Mutual Funds dated March 20, 2026 (as amended from time to time) and the Swing Pricing Policy approved by the Board of the AMC and the Trustees.

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

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

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

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

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

iii. Risk associated with Liquidity Risk Management (LRM):

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

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

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

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

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

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

B. Special Considerations:

- Prospective investors should study this Scheme Information Document and Statement of Additional Information carefully in its entirety and should not construe the contents hereof as advise relating to legal, taxation, financial, investment or any other matters and are advised to consult their legal, tax, financial and other professional advisors to determine possible legal, tax, financial or other considerations of subscribing to or redeeming Units, before making a decision to invest/redeem/hold Units.

- Neither this Scheme Information Document ("SID"), SAI nor the Units have been registered in any jurisdiction. The distribution of this Scheme Information Document or Statement of Additional Information in certain

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

- The AMC, Trustee or the Mutual Fund have not authorized any person to issue any advertisement or to give any information or to make any representations, either oral or written, other than that contained in this Scheme Information Document or the Statement of Additional Information or as provided by the AMC in connection with this offering. Prospective Investors are advised not to rely upon any information or representation not incorporated in the Scheme Information Document or Statement of Additional Information or as provided by the AMC as having been authorized by the Mutual Fund, the AMC or the Trustee.
- Redemption due to change in the fundamental attributes of the Scheme or due to any other reasons may entail tax consequences. The Trustee, AMC, Mutual Fund, their directors or their employees shall not be liable for any such tax consequences that may arise due to such Redemptions.
- The Trustee, AMC, Mutual Fund, their directors or their employees shall not be liable for any of the tax consequences that may arise, in the event that the Scheme is wound up for the reasons and in the manner provided in the Statement of Additional Information.
- The tax benefits described in this Scheme Information Document and Statement of Additional Information are as available under the present taxation laws and are available subject to relevant conditions. The information given is included only for general purpose and is based on advice received by the AMC regarding the law and practice currently in force in India as on the date of this Scheme Information Document and the Unit holders should be aware that the relevant fiscal rules or their interpretation may change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of an investment in the Scheme will endure indefinitely. In view of the individual nature of tax consequences, each Unit holder is advised to consult his / her own professional tax advisor.
- The Mutual Fund may disclose details of the investor's account and transactions there under to those intermediaries whose stamp appears on the application form or who have been designated as such by the investor. In addition, the Mutual Fund may disclose such details to the bankers, as may be necessary for the purpose of effecting payments to the investor. The Fund may also disclose such details to regulatory and statutory authorities/bodies as may be required or necessary.
- In case the AMC or its Sponsor or its Shareholders or their affiliates/associates or group companies make substantial investment, either directly or indirectly in the Scheme. Redemption of Units by these entities may have an adverse impact on the performance of the Scheme. This may also affect the ability of the other Unit holders to redeem their units.
- As the liquidity of the Scheme investments may sometimes be restricted by trading volumes and settlement periods, the time taken by the Fund for Redemption of Unit may be significant in the event of an inordinately large number of Redemption Requests or of a restructuring of the Scheme portfolio. In view of this, the Trustee has the right, in its sole discretion, to limit redemptions under unforeseen circumstances / unusual market conditions, may limit the total number of Units which can be redeemed on any Business Day. The same shall be in accordance with Clause 5.3 of SEBI Master Circular for Mutual Funds dated March 20, 2026 (Restriction on redemption in Mutual Funds).
- Pursuant to the provisions of Prevention of Money Laundering Act, 2002, if after due diligence, the AMC believes that any transaction is suspicious in nature as regards money laundering, on failure to provide required documentation, information, etc. by the Unit holder the AMC shall have absolute discretion to report such

suspicious transactions to FIU-IND (Financial Intelligence Unit – India) and/ or to freeze the folios of the investor(s), reject any application(s)/redemptions / allotment of Units.

- The AMC may utilise the services of the sponsor or any of its associates, for the purpose of any securities transaction and distribution and sale of securities. In such events, the brokerage or commission paid to the Sponsor or any of its associates or shall be disclosed in the half-yearly annual accounts of the mutual fund.
- The Mutual Fund/AMC and its empanelled broker(s) have not given and shall not give any indicative portfolio/ 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. Investors are requested to study the terms of the offer carefully before investing in the Scheme, and to retain this SID and the SAI for future reference.

VI. How to apply?

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

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

7. In order to protect the interest of Investors from fraudulent encashment of cheques, the current SEBI Regulations, have made it mandatory for Investors to mention in their Application / Redemption request, their bank name, branch, address, account type and account number. The Registrar/AMC may ask the investor to provide a blank cancelled cheque or its photocopy for the purpose of verifying the bank account number.
8. In terms of clause 15.16 of SEBI Master Circular for Mutual Funds dated March 20, 2026, Permanent Account Number (PAN) would be the sole identification number for all participants transacting in the securities market, irrespective of the amount of transaction, except
   (a) investors residing in the state of Sikkim;
   (b) Central Government, State Government, and the officials appointed by the courts e.g. Official liquidator, Court receiver Statement of Additional Information as on April 30, 2026 etc. (under the category of Government) and
   (c) investors participating only in micro-pension.

   SEBI pursuant to clause 15.16 of SEBI Master Circular for Mutual Funds dated March 20, 2026 has conveyed that systematic investment plans (SIP) and lumpsum investments (both put together) per mutual fund up to Rs.50,000/- per year per investor shall be exempted from the requirement of PAN. Thus, all investors (including resident and non-resident investors) have to provide PAN, along with a certified* copy of the PAN card for all transactions in Units of the Scheme irrespective of the amount of transaction. In case of investors who do not provide a certified* copy of the PAN card, the application for transaction in units of the Scheme of the Fund could be rejected.

   Accordingly, investments in Navi Mutual Fund (including SIP investment where the aggregate of SIP instalments in a rolling 12 months period or in a financial year i.e. April to March) of upto Rs 50,000/- per investor per year shall be exempt from the requirement of PAN

9. Know Your Client ("KYC") compliance is mandatory for all investors in accordance with the Prevention of Money-laundering Act, 2002, the Prevention of Money-laundering (Maintenance of Records) Rules, 2005, the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011, the SEBI Master Circular for Know Your Client (KYC) norms for the securities market, and other applicable SEBI circulars, notifications and guidelines issued from time to time.

   KYC formalities are required to be completed by all Unit Holders, including guardians and Power of Attorney holders, wherever applicable, for investments in the Schemes of the Mutual Fund. The Mutual Fund/Asset Management Company shall verify the identity of investors and maintain KYC records in accordance with the applicable regulatory framework.

   Investors may complete their KYC through any SEBI-registered intermediary authorised to carry out KYC, in accordance with the applicable SEBI regulations and guidelines. Once the KYC process is successfully completed and registered with a KYC Registration Agency (KRA), the KYC shall be valid for dealings with all SEBI-registered intermediaries, subject to the applicable regulatory requirements.

In-Person Verification (IPV) shall be carried out in accordance with the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011 and the applicable SEBI circulars and guidelines. Electronic Know Your Client (e-KYC) may be completed in accordance with SEBI Circular No. CIR/MIRSD/09/2013 dated October 8, 2013, as amended from time to time, and other applicable SEBI circulars.

In accordance with the Prevention of Money-laundering Act, 2002, the Prevention of Money-laundering (Maintenance of Records) Rules, 2005, the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011, SEBI Circular Nos. CIR/MIRSD/66/2016 dated July 21, 2016 and CIR/MIRSD/120/2016 dated November 10, 2016 (as amended), the SEBI Master Circular for Know Your Client (KYC) norms for the securities market, and other applicable SEBI circulars, notifications and guidelines issued from time to time, the Mutual Fund/Asset Management Company shall capture and upload the KYC information of investors to the Central KYC Records Registry (CKYCR) in the manner prescribed under the applicable regulatory framework.

Unit Holders are advised to keep their PAN, KYC and related records updated at all times. In terms of SEBI Circular No. SEBI/HO/MIRSD/SECFATF/P/CIR/2024/79 dated June 6, 2024, and other applicable SEBI circulars issued from time to time, the Mutual Fund/Asset Management Company may require investors to update or re-submit KYC documents, where applicable. In the absence of valid PAN/KYC records or where KYC is not compliant with the applicable regulatory requirements, financial transactions may be processed, restricted or rejected in accordance with the applicable laws, SEBI regulations and circulars.

Application forms and KYC-related forms are available at the Official Points of Acceptance of the Mutual Fund, the Registrar and Transfer Agent and on the website of the Mutual Fund (**www.navimutualfund.com**).

10. The KYC requirements shall be governed by the applicable provisions of the Prevention of Money-laundering Act, 2002, the rules framed thereunder, the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011, and the applicable SEBI circulars, notifications and guidelines, as amended from time to time.
11. Applicants must satisfy the minimum Application Amount requirements mentioned in the SID of the respective schemes of the Mutual Fund.
12. Quoting of Employee Unique Identification Number ("EUIN") in the Application Form: Pursuant to SEBI Circular no. CIR/IMD/DF/21/2012 dated September 13, 2012 and various AMFI Guidelines issued in this regard, investors are requested to disclose the details of EUIN along with the AMFI Registration Number ("ARN") of the distributor and the sub-distributor while submitting the applicable transaction request (excluding redemption).

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

i) Kindly use the new application forms/transaction forms which have spaces for ARN Code, Sub broker code and the EUIN.
ii) EUIN will not be applicable to overseas distributors who comply with the requirements of AMFI guidelines
iii) Where the EUIN is left blank, the declaration by the investor should state that EUIN space has been left blank as the transaction is an "execution only" transaction.

13. Applications not complete in any respect are liable to be rejected.
14. The AMC / Trustee retains the sole and absolute discretion to reject any application.

Foreign Account Tax Compliance Act ("FATCA")

The Foreign Account Tax Compliance Act is a United States ("US") law aimed at prevention of tax evasion by US citizen and residents ("US Persons") as defined under the U.S. Securities Act of 1933 and corporations or other entities organized under the laws of US, through use of the offshore accounts. The FATCA provisions were included in the Hiring Incentive to Restore Employment (HIRE) Act of 2010, enacted by the US legislature. FATCA is designed to increase compliance by US taxpayers and is intended to bolster efforts to prevent tax evasion by the US taxpayers with offshore investments.

The Government of India and the United States of America (US) have reached an agreement in substance on the terms of an Inter- Governmental Agreement ("IGA") to implement FATCA and India is now treated as having an IGA in effect from April 11, 2014. FATCA provides for Foreign Financial Institutions to register with the US Internal Revenue Service ("IRS"), to obtain Global Intermediary Identification Number (GIIN). The AMC and/or the Fund/Trustee Co. are likely to be classified as a 'Foreign Financial Institution' (Investment Entity) under the FATCA provisions.

FATCA is globally applicable from July 1, 2014 and in order to comply with FATCA obligations, the Fund may seek additional information from investors while accepting applications, in order to ascertain their U.S. Person status. Further, with effect from September 15, 2014, the Fund will not accept applications which are Statement of Additional Information as on April 30, 2026 not accompanied with information/documentation under FATCA. Investors are therefore requested to ensure that the details required in the Form "Details Under Foreign Account Tax Compliance Act (FATCA)" of the new Application Form are complete and accurate to avoid rejection of the application (updated forms are available on Fund's website -www.miraeassetmf.co.in).

Under the FATCA regime, in respect of the existing investments from U.S. citizen as on June 30, 2014, the AMC/the Fund will be required to undertake due diligence process and identify US reportable accounts and collect such information/documentary evidences of the investors/Unit holders and disclose such information as far as may be legally permitted about the holdings/investment returns to US IRS and/or the Indian Tax Authorities as and when necessary.

FATCA due diligence will have to be directed at each investor/Unit holder (including joint investor) and on being identified as a reportable person/specified US person, all the folios will be reported. Further, in case of folio with joint investors, the entire account value of investment portfolio will be attributable under each such reportable person.

An investor/Unit holder will therefore be required to furnish such information for the AMC/Fund to comply with the reporting requirements stated in IGA and circulars issued by SEBI/AMFI in this regard.

Investors/Unitholders should consult their own tax advisors regarding FATCA requirements with respect to their own situation.

Investors can get more details on FATCA requirements at http://www.irs.gov/Businesses/CorporationS/Foreign-Account-Tax-Compliance-Act-FATCA.

- Compliance with Foreign Accounts Tax Compliance Act (FATCA) / Common Reporting Standards (CRS)
  In line with SEBI circular no. CIR/MIRSD/2/2015 dated August 26, 2015 and in terms of AMFI Best Practice guidelines no. 63/2015-16 dated September 18, 2015 with respect to uniform implementation of Foreign Accounts Tax Compliance Act (FATCA) and Common Reporting Standards (CRS), the investors may note that with effect from November 1, 2015, details as per FATCA / CRS declaration shall be mandatorily provided for all new accounts / folios opened, without which the applications shall not be accepted.

  Under the FATCA provisions of the US Hiring Incentives to Restore Employment "HIRE" Act, a withholding tax will be levied on certain US sourced income / receipt of the scheme unless it complies with various reporting requirements under FATCA. These provisions would be applicable in a phased manner as per the dates proposed by the US authorities. For complying with FATCA, the AMC/ the Fund will be required to undertake due diligence process and identify US reportable accounts and collect such information / documentary evidences of the US and / or non-US status of its investors / Unit holders and disclose such information as far as may be legally permitted about the holdings / investment. An investor / Unit holder will therefore be required to furnish such information to the AMC/ Fund to comply with the reporting requirements stated in the FATCA provisions and circulars issued by SEBI / AMFI / Income tax Authorities / such other Regulator in this regard. India has joined the Multilateral Competent Authority Agreement on Automatic Exchange of Information (AEOI) for CRS. The CRS on AEOI requires the financial institution of the "source" jurisdiction to collect and report information to their tax authorities about account holders "resident" in other countries, such information having to be transmitted "automatically" annually.

- Ultimate Beneficial Owner(s) (UBO(s)):

  Under the Prevention of Money Laundering Act, 2005 (PMLA), all intermediaries including mutual funds are required to obtain sufficient information from their clients in order to identify and verify the persons who beneficially own or control the account. SEBI circular dated January 24, 2013 on identification of Beneficial

Ownership has prescribed a uniform approach to be followed for determination of beneficial owners. All categories of investors (except individuals, company listed on a stock exchange or majority owned subsidiary of such company) are requested to provide details about beneficial ownership in the specified Section of the Fund's Application Forms, for all their investments. The Fund reserves the right to reject applications/restrict further investments or seek additional information from investors who have not provided the requisite information on beneficial ownership. In the event of change in beneficial ownership, investors are requested to immediately update the details with the Fund/Registrar.

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

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

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

- **Application through MF utility platform:**

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

  Accordingly, all financial and non-financial transactions pertaining to the schemes of Navi Mutual Fund except Exchange Traded Funds (ETFs) can be done through MFU either electronically on www.mfuonline.com as and when such a facility is made available by MFUI or physically through the authorized Points of Service ("POS") of MFUI from 19th March, 2018.

  The list of POS of MFUI is published on the website of MFUI at www.mfuindia.com as may be updated from time to time. The Online Transaction Portal of MFU i.e. www.mfuonline.com and the POS locations of MFUI will be in addition to the existing Official Points of Acceptance ("OPA") of MOMF.

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

  The uniform cut-off time as prescribed under SEBI (Mutual Funds) Regulations, 2026 and as mentioned in the Scheme Information Document (SID) / Key Information Memorandum (KIM) of respective schemes of Navi Mutual Fund shall be applicable for applications received on the portal of MFUI i.e. www.mfuonline.com However, investors should note that transactions on the MFUI portal shall be subject to the eligibility of the investors, any terms & conditions as stipulated by MFUI / Navi Mutual Fund / Navi AMC Limited from time to

time and any law for the time being in force. Investors are requested to note that, MFUI will allot a Common Account Number ("CAN"), a single reference number for all investments in the Mutual Fund industry, for transacting in eligible schemes of various Mutual Funds through MFU and to map existing folios, if any. Investors can create a CAN by submitting the CAN Registration Form (CRF) and necessary documents at the MFUI POS.

Navi AMC Limited and / or its Registrar and Transfer Agent (RTA) shall provide necessary details to MFUI as may be needed for providing the required services to investors / distributors through MFU. Investors are requested to visit the websites of MFUI i.e. www.mfuindia.com to download the relevant forms.

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

- **StAR MF facility**

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

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

Payment Mode

Payment can be made by either:

- cheque;
- draft (i.e. demand draft or bank draft); or
- a payment instrument (such as pay order, banker's cheque, etc.)
- a payment mode as may be approved by the AMC from time to time.

Resident Investors

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

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

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

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

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

- **Through NACH Facility**:

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

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

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

  Pursuant to clause 15.10 of SEBI Master Circular, the Mutual Fund dated March 20, 2026 will extend ASBA facility to NFO of the Mutual Fund.
  Investors will be provided ASBA facility for all NFOs launched on or after October 01, 2010. ASBA means "Application Supported by Blocked Amount". ASBA is an application containing an authorization to block the application money in the bank account, for applying during the NFO. An ASBA investor shall submit an ASBA physically or electronically through the internet banking system to the Self Certified Syndicate Bank (SCSB) with whom the bank account to be blocked is maintained. Self Certified Syndicate Bank has the same meaning as given to it in clause (zi) of sub-regulation (1) of regulation 2 of the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009. SCSB is a bank which is recognized as a bank capable of providing ASBA services to its customers. Names of such banks would appear on the website of SEBI.
  The AMC shall allot Units within 5 business days from the date of closure of the NFO period. Units will be allotted in whole figures.
  The SCSB shall then block the application money in the bank account specified in the ASBA, on the basis of an authorization to this effect given by the account holder. The application money shall remain blocked in the bank account till the allotment of the issue or till withdrawal/ rejection of the application, as the case may be. ASBA facility will be available to all categories of investors and will co-exist with the existing process, wherein cheques/ demand drafts are used as a mode of payment.

  As per Paragraph 15.10 of the SEBI Master Circular for Mutual Funds dated March 20, 2026 (as amended from time to time), an investor can subscribe to the New Fund Offer (NFO) of a Mutual Fund through the Applications Supported by Blocked Amount (ASBA) facility by applying for the units offered by the Scheme(s) in the ASBA application form and following the prescribed procedure.

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

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

Benefits of Applying through ASBA facility:

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

ASBA Procedure

i. An investor intending to subscribe to the units during NFO through ASBA facility shall submit a duly completed ASBA application form to a SCSB with whom such investor's bank account is maintained.
ii. The ASBA Application Form towards the subscription of units can be submitted through one of the following modes:
- submit the form physically with the Designated Branches (DBs) of SCSB ("Physical ASBA"); or
- submit the form electronically through the internet banking facility offered by the SCSB ("Electronic ASBA").

iii. An acknowledgement will be given by the SCSB in the form of the counter foil or specifying the application number for reference. Such acknowledgement does not guarantee, in any manner, that the investors will be allotted the units he has applied for.
Note: The application would be rejected by the Bank, if the bank account specified in the ASBA application form does not have sufficient credit balance to meet the application money towards the subscription of units in the NFO.

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

Grounds for Technical Rejections of ASBA application forms

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

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

Mechanism for Redressal of Investor Grievances:

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

If the SCSB has not resolved the grievance, investors should write to Computer Age Management Services Limited (CAMS), Registrar and Transfer Agent of Navi Mutual Fund.

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

Repatriation Basis

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

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

Non-repatriation Basis

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

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

- **Application under Power of Attorney**

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

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

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

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

- **Mode of Holding**

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

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

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

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

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

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

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

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

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

- **Transaction Charges**

  No Transaction Charges shall be deducted.

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

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

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

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

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

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

  Transactions through Electronic Mode

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

Subject to the investor fulfilling certain terms and conditions as stipulated by AMC from time to time, the AMC, Mutual Fund, Registrar or any other agent or representative of the AMC, Mutual Fund, the Registrar may accept transactions through any electronic mode including through fax/web/ phone transactions as permitted by SEBI or other regulatory authorities. The AMC may modify, suspend or discontinue the facility in accordance with applicable SEBI/AMFI guidelines

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

Investors **("Sender")** can send the signed valid application form / transaction slip for all the schemes of Navi Mutual Fund **('the Fund')** except Exchange Traded Funds for financial transactions viz. purchase, switch and redemption through their registered email id to contact.mf@navi.com**. ('Designated Email')**. In case the transaction request has been submitted through unregistered email id, then the AMC reserves the right to process such transactions after carrying out necessary validations provided application form / transaction slip has been signed by the unitholders as per mode of holding in the folio and transaction is otherwise valid and complete in all respect.

The AMC will accept requests for financial transactions viz purchase, switch and redemption Electronic Mail Facility **("Email Facility**") subject to the Sender fulfilling the terms and conditions as prescribed by the AMC from time to time. The following are the terms and conditions of the Email Facility:

A. For the purpose of determining the applicable NAV in accordance with SEBI (Mutual Funds) Regulations, 2026, the system generated date and time of the Email received by the Server of the AMC will be considered.
B. The Sender agrees and acknowledges and is aware that there may be delay in delivery / difference in the date and time of the email received at the server of the AMC and the date and time of the server through which investor has sent the email and also the AMC server may not receive / reject the email sent by the Sender at all.
C. To consider cut off timing and availability of funds for utilization for determining the applicable NAV the provisions of the respective Scheme Information Documents of the Scheme will be considered.

The uniform cut off timing for applicability of NAV prescribed under SEBI (Mutual Funds) Regulations, 2026 and as mentioned in Scheme Information Documents **('SIDs')**/ Key Information Memorandums **('KIMs')** of respective schemes of the Fund will be applicable for transactions received through email. The time of receipt of transaction recorded on the Designated Email and timing of receipt of funds shall be considered as final and binding for the purpose of determining applicability of NAV.

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

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

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

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

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

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

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

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

The Forms shall be available and accepted at the office of Investor Service Centre, Official Point of Acceptance of Transaction, Distributors, at the registered and corporate office of the AMC and the office of the Registrar during the business hours. The same can also be downloaded from the website of the Mutual Fund, https://navi.com/mutual-fund/downloads/scheme-documents and from website of Registrar www.camsonline.com ;and from the website of MFCentral: https://mfcentral.com/ The above shall be subject to such modifications as may be prescribed by SEBI from time to time.

How to Redeem

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

Procedure for payment of redemption:

1. **Resident Investors**

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

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

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

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

The timelines for payment of redemption proceeds shall be subject to the SEBI (Mutual Funds) Regulations, 2026 and Paragraph 15.3 of the SEBI Master Circular for Mutual Funds dated March 20, 2026 (as amended from time to time)

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

2. Non-Resident Investors

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

i. Repatriation basis

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

ii. Non-Repatriation basis

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

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

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

Effect of Redemptions

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

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

Unclaimed Redemptions

As per paragraph 15.5 of SEBI Master Circular for Mutual Funds dated March 20, 2026, the unclaimed Redemption amounts shall be deployed by the Fund in call money or money market instruments. The unclaimed Redemption and amounts shall be deployed in money market instruments and such other instruments/securities as maybe permitted from time to time. The investment management and advisory fee charged by the AMC for managing such unclaimed amounts shall not exceed 50 basis points.

Investors who claim the unclaimed amounts during a period of 3 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 an initial unclaimed amount along with the income earned on its deployment till the end of the third year. After the 3rd year, the income earned on such unclaimed amounts shall be used for the purpose of investor education.

As per Paragraph 15.5.4 of SEBI Master Circular AMCs shall adhere to the following uniform practices regarding treatment of unclaimed redemption and IDCW amounts and any income earned thereon:

- AMCs shall transfer the unclaimed redemption and IDCW amounts to Unclaimed Dividend and Redemption Scheme (UDRS) after 90 calendar days and not beyond 105 calendar days from the date of issuance of the instruments.
- AMCs shall have separate scheme/plan for Unclaimed IDCW and Unclaimed Redemption amount, pending for less than 3 years and for more than 3 years.

- On completion of first 3 years' period, AMCs shall transfer such units to UDRS plan (>3 years) within 10 business days of subsequent month.
- The amount of income accrued on daily basis on unclaimed amounts beyond three years shall be transferred on a monthly basis (i.e. on or before 10th calendar day of subsequent month) to the investor education scheme / folio.

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Unclaimed Redemption and Dividend Scheme (Under Liquid i.e 4 plans:

- o Unclaimed IDCW less than 3 years
- o Unclaimed IDCW more than 3 years
- o Unclaimed redemption amount less than 3 years
- o Unclaimed redemption amount more than 3 years

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

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

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

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

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

AMFI Best Practice Guidelines Circular No.118 /2024-25) dated January 31, 2025 on Acceptance of financial transactions through email in respect of non-individual investor.

Non-individual Investors are requested to note the following:

Risks Involved in Transacting via Email:

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

Limitation of Liability of AMC / RTA:

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

Security Measures to Ensure Safe Email Communication:

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

Retention of Transaction Records:

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

Procedure for Addition/Deletion of Authorized Signatories:

The facility to transact via email shall follow an appropriate procedure for the addition or deletion of authorized signatories. Such changes must be communicated to the AMC through a formal notification, in the form of a

signed letter or email from the authorized representative of the entity, accompanied by the requisite board resolution or authority letter. The AMC shall process these changes only upon receipt of valid documentation confirming the updated list of authorized signatories. These changes will only be effective once the AMC has acknowledged receipt and validation of the notification.

Authorization for Non-Individual Investors:

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

Security Procedures for Transaction Confirmation:

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

Electronic Time Stamping and Audit Trail for Email Transactions:

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

Change in Registered Email Address / Contact Details:

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

Changes in Bank Mandate:

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

Digital Signatures and Validity of Electronically Executed Documents:

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

MITRA (Mutual Fund Investment Tracing and Retrieval Assistant)

It is a Service platform for investors to trace inactive and unclaimed Mutual Fund folios.- MITRA. The objective of MITRA platform is as below:

a. Enable investors to identify the overlooked investments or any investments made by any other person for which he/she may be rightful legal claimant.
b. Encourage investors to do KYC as per the current norms thus reducing the number of non-KYC compliant folios.
c. Reduction in the unclaimed Mutual Fund folios.
d. Contribute towards building a transparent financial ecosystem and will be reliable medium for investors to find their inactive and unclaimed MF investments.
e. Build and incorporate mitigants against fraud risk

An inactive folio shall be defined as "*Mutual Fund Folio(s) where no investor initiated transaction/s (financial and non-financial) have taken place in the last 10 years but unit balance is available*. Thus, the inactive folios will include those folios where the investor might have remained invested in an open ended scheme and has either chosen not to redeem or simply might have lost track of the investment. There is no consequence for those folios appearing in the platform where the unitholder is aware of the investment and has chosen to remain invested. The objective of the platform is to encourage the investors to search for forgotten MF investments and update KYC as per the current norms.

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

Description for the facilities/products Available:

1. Systematic Investment Plan (SIP)

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

Particulars	Frequency	Details
Frequency and Transaction Dates	Daily	All Business Days
	Weekly	All Business Days
	Fortnightly	All Business Days
	Monthly	All Business Days
	Quarterly	All Business Days
	Half Yearly	All Business Days

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

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

Default option: Growth

Default date – 07th of every month

Default frequency – Monthly

2. SIP through Electronic Clearing System (ECS)/Direct Debit

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

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

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

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

Investors will have the right to discontinue/cancel the SIP facility at any time by sending a written request to any of the Official Point(s) of Acceptance. SIPs shall be cancelled within 10 calendar days of such request placed by the investor. On receipt of such request, the SIP facility will be terminated. It is clarified that if the Fund fails

to get the proceeds from three Installments out of a continuous series of Installments submitted at the time of initiating a SIP (Subject to a minimum under SIP i.e. 12 months), the SIP is deemed as discontinued.

Auto cancellation of SIP

Pursuant to SEBI letter dated January 03, 2024 on uniformity in cancellation of SIPs across mutual funds, investors are hereby requested to note the below mentioned changes in the schemes of Navi Mutual Fund:

Sr. No.	**SIP Interval**	**No. of failed debit attempts prior to cancellation of SIP**
1	Daily	3
2	Weekly, fortnightly	3
3	Monthly	3
4	Bi-monthly, Quarterly or Longer Interval SIP's	2

SIP pause facility

SIP Pause facility gives option to pause the SIP for a period ranging from 1month up to 6 months in a respective scheme. Basic Terms and conditions are as follows:

- The applicant will have the right to pause SIP which is directly registered with Navi Mutual Fund.
- An investor who wishes to request for SIP Pause facility shall duly fill the SIP Pause Form and submit the same at the office of Navi Mutual Fund or CAMS Service Centre or online /app of Navi Mutual Fund.
- A valid form for SIP Pause facility will be processed within 15 days from the date of receipt of the same.
- SIP Pause facility would allow existing investor to 'Pause' their SIP for a specified period of time i.e. Minimum 1 month and Maximum 6 months.
- There would be no restriction on the number of times a SIP can be paused.
- SIP Pause facility shall be available where 'SIP Facility' is available in the Schemes of Navi Mutual Fund.
- SIP Pause Facility is applicable only for AMC initiated debit instructions i.e. ECS/NACH/Direct Debit, etc.
- SIP Pause Facility is not possible for investors having Standing Instructions with banks.
- The SIP shall continue from the subsequent instalment after the completion of pause period automatically.
- If the SIP pause period is coinciding with the SIP Top Up facility, the SIP instalment amount post completion of pause period would be inclusive of SIP Top Up amount. For e.g. SIP instalment amount prior to pause period is Rs. 5,000/- and SIP Top Up amount is Rs.1,000/- . If the pause period is completed after date of SIP Top Up, then the SIP instalment amount post completion of pause period shall be Rs.6,000/-.

- Incomplete SIP Pause Form in any respect would be liable to be rejected.

The investor hereby agrees to indemnify and not hold responsible, the AMC and its employees, the R&T agent and the service providers in case his/her bank is not able to effect any of the payment instructions for whatsoever reason

In case of a request placed by the investor for cancellation of auto-debit/SIP, it shall be processed within 10 calendar days of such request placed by the investor.

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

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

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

3. <u>Systematic Transfer Plan (STP)</u>

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

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

Particulars	Frequency	Details
Frequency and Transaction Dates	Daily	All Business Days
	Weekly	All Business Days
	Fortnightly	All Business Days
	Monthly	All Business Days

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

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

Default Option : Growth

Default Date – 07th

Default Frequency – Monthly

4. Systematic Withdrawal Plan (SWP)

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

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

Particulars	**Monthly Option**	**Quarterly Option**
Minimum Value of SWP	Rs. 100/- or 10 units	Rs. 100 or 10 units
Additional amount	In multiples of Rs. 100/- or 10 units	In multiples of Rs. 100/- or 10 units
Date of SWP Request	All Business Days	All Business Days

Default Option:

Default Frequency: Monthly

5. Switch into the scheme

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

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

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

IDCW transfer facility is available in all active our schemes. If an investor wants to opt for IDCW transfer facility, he can do so by filing of the transaction slip available at our offices. There is no assurance or guarantee to the

unitholders as to rate of income distribution and regularity in declaration of income distribution. Rs.500/- will be the minimum amount.

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

The Income Distribution cum capital withdrawal will be distributed in accordance with applicable SEBI Regulations

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

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

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

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

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

Default Option: Growth

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

VII. RIGHTS OF UNITHOLDERS OF THE SCHEME

1. Unit holders of the Scheme have a proportionate right in the beneficial ownership of the assets of the Scheme.
2. When the Mutual Fund declares an Income Distribution cum Capital Withdrawal (IDCW)/dividend under a scheme, IDCW/ dividend warrants shall be dispatched to the Unit Holders within 7 working days from the record date of IDCW/dividend. Consolidated Account Statement ('CAS') at mutual fund industry level for each calendar month will be issued on or before 15th day of succeeding month to all unit holders having financial transactions and who have provided valid Permanent Account Number (PAN). For folios not included in the CAS, the AMC shall issue a monthly account statement to the unit holders, pursuant to any financial transaction done in such folios; the monthly statement shall be sent on or before 15th day of succeeding month. In case of a specific request received from the unit holders, the AMC shall provide the account statement to the unit holder within 5 business days from the receipt of such request. If a Unit holder so desires the Mutual Fund shall issue a Unit certificate (nontransferable) within 5 Business Days of the receipt of request for the certificate.
3. The Mutual Fund shall dispatch redemption or repurchase proceeds within 3 working days of accepting the valid redemption or repurchase request. For schemes investing at least 80% of total assets in such permissible overseas investments, 5 Working Days of accepting the valid redemption or repurchase request. Further, in case of exceptional scenarios as prescribed by AMFI vide its communication no. AMFI/ 35P/ MEM-COR/ 74 / 2022-23 dated January 16, 2023, read with Paragraph 15.3.3 of SEBI Master Circular for Mutual Funds dated March 20,2026, the AMC may not be able to adhere with the timelines prescribed above.
4. The Trustee is bound to make such disclosures to the Unit holders as are essential in order to keep the unitholders informed about any information known to the Trustee which may have a material adverse bearing on their investments.
5. The appointment of the AMC for the Mutual Fund can be terminated by majority of the Directors of the Trustee Board or by 75% of the Unit holders of the Scheme.
6. 75% of the Unit holders of a Scheme can pass a resolution to wind- up a Scheme.
7. The Trustee shall obtain the consent of the Unit holders:
   – whenever required to do so by SEBI, in the interest of the Unit holders.
   – whenever required to do so if a requisition is made by three- fourths of the Unit holders of the Scheme. – when the majority of the trustees decide to wind up a scheme in terms of Regulation 36(2)(a) of SEBI (Mutual Funds) Regulations, 2026 or prematurely redeem the units of a close ended scheme.
8. The trustees shall ensure that no change in the fundamental attributes of any scheme, the fees and expenses payable or any other change which would modify the scheme and affect the interest of the unit holders is carried out by the asset management company, unless it complies with Regulation 22(9)(c) of SEBI (Mutual Funds) Regulations, 2026.

9. In specific circumstances, where the approval of unitholders is sought on any matter, the same shall be obtained by way of a postal ballot or such other means as may be approved by the Board.

VIII. INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS

SEBI Regulation 22(9)(b) and the Seventh Schedule titled 'Investment Valuation Norms' under SEBI (Mutual Funds) Regulations, 2026 to introduce the overarching principles namely 'Principles of Fair Valuation'.

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

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

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

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

1. **Valuation methodologies**

   The methodology that will be followed for valuing different types of securities held by the schemes of Navi Mutual Fund is given in 'Annexure A'.

   In case of any new security not covered by the present universe in Annexure A, the valuation methodology for the same will be laid down with the approval of the board of the AMC.

2. **Inter-scheme transfers**

   All the Inter-scheme transfers shall be done in line with regulatory requirements and as per current internal policy viz. at prevailing market price.

   Annexure A describes the methodology that is followed in arriving at the fair valuation of securities which are intended to be transferred from one scheme to another.

3. **Valuation Committee**

   A. Valuation committee comprises of the following personnel:

   a) Chief Executive Officer (CEO)
   b) Chief Investment Officer (CIO) and in their absence, Head of Investments
   c) Head - Fixed Income and in their absence, Fund Manager- Fixed Income
   d) Head- Equities and in their absence, Fund Manager-Equity
   e) Fund Manager - Commodity
   f) Head - Operations & Customer Service

g) Head - Compliance and in their absence, Chief Compliance Officer
h) Company Secretary

The CEO can reconstitute or nominate additional members of the valuation committee.

B. Scope of the Valuation Committee:

a) Define valuation procedure and methodology for different types of securities
b) Review, approve and recommend the valuation policy/ procedures to the AMC & Trustee Board for their approval and noting.
c) Review the accuracy and appropriateness of methods used in arriving at the fair value of securities and recommend changes, if any.
d) Review and approve valuation methodologies at least annually or more frequently based on market condition
e) Review the policy and procedures on a periodic basis, at least once annually.
f) Review and approve the spread adjustment in the value of asset based on liquidity and issuer risk consideration.
g) Act as escalation body for pricing/ valuation issues, addressing areas of potential conflicts of interest
h) Lay down procedures to prevent incorrect valuation.
i) Recommend valuation method during exceptional events.
j) Recommend valuation methodology for a new type of security.
k) Report to the AMC / Trustee Board regarding any deviations or incorrect valuations and disclosures to the investors.

4. Handling conflict of Interest

The valuation committee shall be responsible for ongoing review of areas of conflict and should recommend to the AMC Board the procedures to mitigate it and therein recommend changes, if any, in policy/methodology.

The same shall be ratified with the Board of the AMC and Trustee.

5. Exceptional Events

Following are the some of the events that can broadly be classified as exceptional events:

a) Major policy announcements by the Reserve Bank of India, Central Bank, the Government or any Regulatory body (SEBI/IRDA/PFRDA).
b) Natural disasters or public disturbances that force the markets to close unexpectedly.
c) Absence of trading in a specific security or similar securities
d) Significant volatility in the capital markets
e) Severe liquidity issue in the market
f) Any other events where realizable value may be substantially different from benchmark based prices obtained.

Any change/modification to the above list of exceptional events shall be updated from time to time. The Valuation Committee shall be responsible for monitoring exceptional events and recommending appropriate valuation methods under the circumstances.

Further, the Valuation Committee shall seek the guidance of the AMC board in deciding the appropriate methodology for valuation of affected securities.

6. Deviation:

Deviation in the valuation policy and procedures shall be allowed only with the prior approval of the Valuation Committee followed by reporting to the Board of the AMC and Trustee. Deviations from the valuation policy and principles, if any, will be communicated to the unit holders' through suitable disclosures on the fund website.

7. Record keeping

This policy document will be updated in SID / SAI, AMC website and other documents as prescribed by the SEBI regulations and guidelines.

All the documents which form the basis of valuation including inter-scheme transfers (the approval notes & supporting documents) shall be maintained in electronic form or physical papers.

Above valuation records shall be maintained and preserved for a period of 8 years and in accordance with the norms prescribed by the SEBI from time to time.

8. Review

The policy shall be reviewed by the Board of Directors of Navi AMC Limited and Navi Trustee Limited annually on or need basis whichever is earlier.

9. Disclosure

In order to ensure transparency of valuation norms adopted by the AMC, the valuation policy and procedures is disclosed on the website, viz. www.navimutualfund.com.

ANNEXURE A

Following is the broad valuation methodology for each type of securities:

1. EQUITY AND RELATED SECURITIES

Equity Shares, Preference Share, Equity Warrants, InvIT's / ReIT's

Traded	At the last quoted closing price on the Bombay Stock Exchange (BSE)/ National Stock Exchange (NSE) or other stock exchange, where such security is listed. NSE will be the primary stock exchange. If not traded on the primary stock exchange, the closing price on the other stock exchange will be considered. For valuation of securities held by Exchange Traded Funds (ETFs) and Index funds which are benchmarked to indices relating to a particular stock exchange, the primary stock exchange will be that exchange, e.g. For a Nifty Index Fund, the primary stock exchange will be NSE, for a Sensex Index Fund, the primary stock exchange will be the BSE.
Non Traded	**APPLICATION MONEY FOR PRIMARY MARKET ISSUE** Application money should be valued at cost up to 60 days from the closure of the issue. If the security is not allotted within 60 days from the closure of the issue, application money is to be valued as per the directives of valuation committee. Rationale of valuing such application money should also be recorded. Equity securities allotted and proposed to be listed, but not listed, are to be valued at cost till two months from the date of allotment and after two months, are to be valued as unlisted securities. Method of valuing unlisted equity is stated below.

	VALUATION OF NON-TRADED / THINLY TRADED SECURITIES When a security is not traded on any stock exchange, on the date of valuation, then the previous closing price on NSE / any other Stock Exchange will be used, provided such closing price is not earlier than a period of 30 calendar days. If the equity securities are not traded on any stock exchange for a period of thirty days prior to the valuation date, the scrip must be treated as `non-traded' scrip. Thinly traded equity/ equity related security is defined in SEBI (Mutual Fund) Regulations as follows: *When trading in an equity/equity related security (such as convertible debentures, equity warrants, etc.) in a month is both less than Rs. 5 lacs and the total volume is less than 50,000 shares, it shall be considered as thinly traded security and valued accordingly.* In line with these guidelines issued by SEBI, **non-traded / thinly traded** securities should be valued as follows: Net worth per share is computed as follows: i.Net worth of the company = Paid up share capital + Reserves (other than Revaluation reserve) - Miscellaneous expenditure & debit balance in Profit and Loss account Net worth per share = (Net worth of the company / Number of paid up shares). **Computation of capitalized value of earning per share (EPS):**

	a) Determination of the Industry Price Earning Ratio (P/E) to which the company belongs. ● Classification of industries provided by AMFI should be adopted. ● Presently Industry P/E Ratio used is provided by NSE on a monthly basis. However, the P/E ratio data if not available from BSE/NSE, P/E provided by the Capital Market, Prowess (CMIE), Reuters etc. should be taken. ii. Compute EPS from the latest audited annual accounts. In case the EPS is negative, EPS value shall be considered as zero. iii. Compute capitalized value of EPS at 75% discount(P/E*0.25) * EPS Computation of fair value per share to be considered for valuation at 10 % discount for illiquidity. [(Net worth per share + Capitalized value of EPS) / 2] * 0.90 In case the latest balance sheet i.e. balance sheet prepared within nine months from the close of the accounting year of the company, is not available (unless the accounting year is changed) the shares should be valued as zero. In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalized earning. (f) In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero. In case an individual non traded / thinly traded security as valued aforesaid, accounts for more than 5% of the total asset of the scheme, AMC

	should appoint an independent valuer. The security shall be valued on the basis of the valuation report of the valuer. To determine if a security accounts for more than 5% of the total assets of the scheme, it should be valued by the procedure above and the proportion which it bears to the total net assets of the scheme to which it belongs would be compared on the date of valuation. **<u>VALUATION OF UNLISTED SECURITIES</u>** As per Paragraph 10.8 of SEBI Master Circular for Mutual Funds dated March 20, 2026 has prescribed the method of valuation for unlisted equity securities. These guidelines are similar to the guidelines issued by SEBI for non-traded / thinly traded securities mentioned above only except the following: Computation of Net worth per share *as lower of (a) and (b)*: a) i) Net worth of the company = Paid up share capital + Reserves other than Revaluation reserve - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses. a. ii) Net worth per share = (Net worth of the company / Number of paid up shares). b) Net worth of the company = Paid up capital + Consideration on exercise of Option/Warrants received/receivable by the company + free reserves other than Revaluation reserve – Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses. Net worth per share = (Net worth of the company/{Number of paid-up shares + number of

	shares that would be obtained on conversion/exercise of outstanding warrants and options}). If the net worth of the company is negative, the share should be marked down to Zero. Computation of fair value per share to be considered for valuation at 15 % discount for illiquidity. [(Net worth per share + Capitalized value of EPS) / 2] * 0.85 In case the latest balance sheet i.e. balance sheet prepared within nine months from the close of the accounting year of the company, is not available (unless the accounting year is changed) the shares should be valued as zero. At the discretion of the AMC and with the approval of the trustees, unlisted equity scrip may be valued at a price lower than the value derived using the aforesaid methodology. **VALUATION OF NON-TRADED WARRANTS** In respect of warrants to subscribe for shares attached to instruments, the warrants can be valued similarly to the valuation of the convertible portion of debentures, as reduced by the amount which would be payable on exercise of the warrant. If the amount payable on exercise of the warrants is higher than the value of the share, the value of the warrants should be taken as zero. Value of Warrant = [Value of share computed as stated in the paragraph above - exercise price] **VALUATION OF PREFERENCE SHARES** Non traded preference shares should be valued in good faith depending upon the type of the preference Share and after considering illiquidity discount if any.

	VALUATION OF ILLIQUID SECURITY IN EXCESS OF 15% OF TOTAL ASSETS OF THE SCHEME As per Paragraph 10.7 of SEBI Master Circular dated March 20, 2026, Illiquid security means securities defined as non-traded, thinly traded and unlisted equity shares. As per the SEBI Regulations aggregate value of Illiquid securities should not exceed 15% of the total assets of the scheme and any illiquid securities held above 15% of the total assets shall be assigned zero value. **VALUATION OF CONVERTIBLE DEBENTURES** i. As per Seventh Schedule of SEBI (Mutual Fund) Regulations, 2026 method of valuation of convertible debentures is prescribed. Non-convertible and convertible components are valued separately. A. The non-convertible component shall be valued on the same basis as would be applicable to a non-convertible debt instrument mentioned at clause 2 above. B. The convertible component to be valued as follows: Ascertain ● The number of shares to be received after conversion. ● Whether the shares would be pari passu for dividend on conversion. ● The rate of last declared dividend. ● Whether the shares are presently traded or non-traded/thinly traded. Market rate of shares on the date of valuation. ii. In case the shares to be received are, on the date of valuation, are thinly traded /

	non-traded, these shares to be received on conversion are to be valued as thinly traded / non-traded shares as stated at para 1.2 above. iii. In case the shares to be received on conversion are not non-traded or thinly traded on the date of valuation and would be traded pari passu for dividend on conversion: a) Number of shares to be received on conversion, per convertible debenture, multiplied by the present market rate b) Determine the discount for non-tradability of the shares on the date of valuation. - (This discount should be determined in advance and to be used uniformly for all the convertible securities. Rate of discount should be documented and approved by the Board of AMC) Value = (a)*market rate [1-(b)] iv. In case the shares to be received on conversion are not non-traded or thinly traded on the date of valuation but would not be traded pari passu for dividend on conversion: a) Number of shares to be received on conversion, per convertible debenture, multiplied by the present market rate. b) Arrive at the market value of the shares on the date of valuation by reducing the amount of last paid dividend. c) Determine the discount for non-tradability of the shares on the date of valuation. (This discount should be determined in advance and to be used uniformly for all the convertible

	securities. Rate of discount should be documented and approved by the Board of AMC) Value = (a)*{b- [1- (c)]} v. In case of optionally convertible debentures, two values must be determined assuming both, exercising the option and not exercising the option. o If the option rests with the issuer, the lower of the two values shall be taken as the valuation of the optionally convertible portion, and; o If the option rests with the investor, the higher of the two values shall be taken. **VALUATION OF RIGHTS ENTITLEMENTS - AS PER SCHEDULE VII OF SEBI (MUTUAL FUND) REGULATIONS, 2026.** When Company announces rights to the existing equity shareholders, under its Listing Agreement with Stock Exchange; it has to declare ex-right date for the purpose of trading on the Stock Exchange. Ex-right date is a date from which the underlying shares, which are traded on the Stock Exchange, will not be entitled to the rights. These rights entitlements can also be renounced in favour of a willing buyer. These renunciations are in some cases traded on the Stock Exchange. In such case these should be valued as traded equity related securities as detailed hereinabove. Till the rights are subscribed, the entitlements as per Regulations have to be valued as under: Valuation of non-traded rights entitlement is principally the difference between the right price and ex-right price. SEBI Regulations have explained this with the help of following formula:

	Vr= n / m x (Pex – Pof) Where Vr = Value of Rights n = Number of rights offered m = Number of original shares held Pex = Ex-right price Pof = Rights offer price The following issues while valuing the rights entitlements have to be addressed: **i.** In case original shares on which the right entitlement accrues are not traded on the Stock Exchange on an ex-right basis, right entitlement should be valued as zero**.** ii. When rights are not treated pari passu with the existing shares such as, restrictions with regard to dividend etc., suitable adjustment should be made by way of a discount to the value of rights at the last dividend announced rate. iii. Where right entitlements are not subscribed to but are to be renounced, and where renouncements are being traded, the right entitlements have to be valued at traded renunciation value. iv. Where right entitlements are not traded and it was decided not to subscribe the rights, the right entitlements have to be valued at zero v. In case the Rights Offer Price is greater than the ex-rights price, the value of the rights share is to be taken as zero. **VALUATION OF SHARES ON DE-MERGER** On de-merger following possibilities arise which influence valuation these are:

	i. Both the shares are traded immediately on de-merger: In this case both the shares are valued at respective traded prices. ii. Shares of only one company continued to be traded on de-merger: Valuation price will be worked out by using cum-price, before demerger reduced for quoted price of the listed resultant company(s). iii. Both the shares are not traded on de-merger: Shares of de-merged companies are to be valued equal to the pre de merger value up to a period of 30 days from the date of de merger. The market price of the shares of the de-merged company one day prior to ex-date can be bifurcated over the de-merged shares. The market value of the shares can be bifurcated in the ratio of cost of shares. **VALUATION OF SUSPENDED SECURITY** In case trading in an equity security is suspended for trading on the stock exchange up to 30 days, then the last traded price would be considered for valuation of that security. If an equity security is suspended for trading on the stock exchange for more than 30 days, then it would be considered as non-traded and valued accordingly. In case shares of both the companies are not traded for more than 30 days, these are to be valued as unlisted security.
Non Traded	**APPLICATION MONEY FOR PRIMARY MARKET ISSUE** Application money should be valued at cost up to 60 days from the closure of the issue. If the security is not allotted within 60 days from the closure of the issue, application money is to be

	valued as per the directives of valuation committee. Rationale of valuing such application money should also be recorded. InvIT / ReIT securities allotted and proposed to be listed, but not listed, are to be valued at cost till two months from the date of allotment and after two months, are to be valued as unlisted securities. Method of valuing unlisted InvIT / ReIT is stated below. **VALUATION OF NON TRADED/UNLISTED InvIT / ReIT** When a security is not traded on any stock exchange, on the date of valuation, then the previous closing price on NSE / any other Stock Exchange will be used, provided such closing price is not earlier than a period of 30 calendar days. If the InvIT / ReIT security is not traded on any stock exchange for a period of thirty days prior to the valuation date, the scrip must be treated as `non-traded' scrip. For Non-traded scrip, valuation would be as per NAV disclosed in the valuation report issued by valuer in the latest half yearly report or latest annual report. For private / unlisted InvIT/ReIT, valuation would be as per NAV disclosed in the valuation report issued by valuer in the latest half yearly report or latest annual report.
Thinly Traded	Valuation will be computed in accordance with the method prescribed under SEBI (MF) Regulations. i.e. on the basis of average of book value and the price computed on the basis of the PE ratio (after appropriate discount to Industry PE), further discounted for illiquidity.)

	Definition of thinly traded equity/ equity related security: When trading in an equity/equity related security in a calendar month is both less than INR 5 lacs and the total volume is less than 50,000 shares, it shall be considered as a thinly traded security
Futures and Options	
Traded	On the valuation day, at the settlement price provided by the respective stock exchanges.
Non Traded	When a security is not traded on the respective stock exchange on the date of valuation, then the settlement price / any other derived price provided by the respective stock exchange.

2. FIXED INCOME, SOVEREIGN AND RELATED SECURITIES

Money market and debt securities including bill rediscounting

- **For Instruments maturing within or equal to 30 days**
- **Traded Instruments**

In case of multiple platforms reporting trades on the same day, the order of preference will be CCIL F-Trac/NSEOTC, NSE WDM, BSE WDM,

The traded yield / price reported on the Public Platforms will be used only if the following criterion is met:

Residual Maturity	**Criteria for Trades reported on Public Platform**
For Instruments maturing in 30 days	CD/CPs- At least 8 trades, aggregating to Rs. 400 crores or more. NCDs/Bonds - Atleast 8 trades aggregating to 200 crores or more

For CPs/CDs/ZCBs the weighted average yield will be considered as the traded yield. In case of forward settlement dates traded yield shall be considered for valuation. For Bonds/NCDs the weighted average price will be considered as the traded price. In case of forward settlement dates traded price shall be considered for valuation.

- Non Traded Instruments

Money market and debt securities including bill rediscounting:

All Fixed Income and related securities which are not traded or traded but do not qualify as traded (not falling in the above criteria) will be valued as under:

Securities will be amortized from purchase price/ last traded price on straight line amortization as long as their valuation remains within ±0.025% band of the price derived from the reference price (computed based on CRISIL/ICRA matrices plus applicable spreads) for each bucket. The reference price shall be obtained from the Bond Valuer. The Valuation Committee would ensure that the difference between valuation price and reference price is within ±0.025%.

The existing methodology of using amortization will be continued till the availability of reference price from the Bond Valuer.

Note: With effect from 1st April 2020, amortization based valuation shall be dispensed with and all money market and debt securities shall be valued at average of security level prices obtained from valuation agencies.

Principles of Fair Valuation will always prevail over the above methods used for valuation of security/s.

- For Instruments maturing above 30 days

Money market and debt securities including bill rediscounting:

All securities will be valued at the average of the scrip level prices provided by the Agency/s nominated by AMFI - currently CRISIL and ICRA.

In case of price being available from only one agency, the same will be considered for valuation.

In case of price not being available from either of the agency/s nominated by AMFI then trades available on multiple platforms on the same day will be used for valuation in the below mentioned order of preference

- **FIMMDA F-Trac/NSEOTC**
- NSE WDM
- BSE WDM

The traded yield / price reported on the Public Platforms will be used only if the following criterion is met:

Residual Maturity	Criteria for Trades reported on Public Platform
For Instruments with residual maturity of more than 30 days	CD/CPs- At least 5 trades, aggregating to Rs. 250 crores or more. NCDs/Bonds - Atleast 5 trades aggregating to 100 crores or more

For CPs/CDs/ZCBs the weighted average yield will be considered as the traded yield. In case of forward settlement dates traded yield shall be considered for valuation.

For Bonds/NCDs the weighted average price will be considered as the traded price. In case of forward settlement dates traded price shall be considered for valuation.

Where no price available for a particular security then the previous day EOD yield will be maintained for CPs/CDs/ZCBs and previous day EOD price for Bonds/NCDs.

The Valuation Committee will on a quarterly basis review the prices provided by the agency/s.

The Fund Manager can override the security prices provided by agency/s if the same is not representing the current market level for that security by valuing the security with a mark up/mark down +/- 25 bps from the day's closing SLV prices/yield irrespective of the tenor and rating.

For this purpose, a justification note will be prepared by the Fund Manager and approved by the MD & CEO or the Valuation Committee. The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued vis-a-vis the price as per the valuation agencies and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.

2.1 Sovereign Securities including Government Securities, State Government Securities, Treasury Bills and Cash Management Bills:

Irrespective of the residual maturity, sovereign securities would be valued at scrip-level price provided by the valuation agencies.

Principles of Fair Valuation will always prevail over the above methods used for valuation of security/s.

3. Other types of securities

Following methodology shall be adopted for valuation of other types of securities:

A. Units of Mutual Funds will be valued at the last available NAV
B. Exchange Traded Funds shall be valued at closing prices available on the stock exchanges (NSE / BSE)
C. Investments in short-term deposits with banks (pending deployment) and repurchase (repo) transactions (including tri-party repo i.e. TREPS) with tenor of upto 30 days, shall be valued on cost plus accrual basis.
D. Valuation of securities lent under Securities Lending Scheme: Securities shall be valued according to this policy, The lending fees received for the Securities lent out would be accrued in a proportionate manner till maturity of the contract.
E. Any investment in "To be Listed" Companies, for Initial 30 days valuation would be done at a purchase price or book cost. After 30 days, security would be valued on a book value provided by the research analyst or Portfolio manager.
F. Physical Gold held by the Scheme shall be valued in accordance with the provisions of Chapter 10 (Valuation), Paragraphs 10.9.1 and 10.9.2 of the SEBI Master Circular for Mutual Funds dated March 20, 2026, as amended from time to time.

   The physical Gold held by the Scheme shall be valued using the polled spot prices published by the recognised stock exchanges, which are used for settlement of physically delivered Gold derivatives contracts. The spot polling mechanism shall comply with the spot polling guidelines specified by SEBI from time to time.

   The valuation of physical Gold shall be carried out in accordance with the uniform valuation policy prescribed by AMFI in consultation with SEBI, as amended from time to time.

   The principles of fair valuation shall be followed while valuing physical Gold and any deviation from the prescribed valuation methodology, if warranted due to exceptional circumstances, shall be dealt with in accordance with the valuation framework approved by the Board of the AMC and the Trustees and the applicable SEBI regulations, circulars and guidelines issued from time to time.

Physical Silver held by the Scheme shall be valued in accordance with the provisions of Chapter 10 (Valuation), Paragraphs 10.9.1 and 10.9.2 of the SEBI Master Circular for Mutual Funds dated March 20, 2026, as amended from time to time.

The physical Silver held by the Scheme shall be valued using the polled spot prices published by the recognised stock exchanges, which are used for settlement of physically delivered Silver derivatives contracts. The spot polling mechanism shall comply with the spot polling guidelines specified by SEBI from time to time.

The valuation of physical Silver shall be carried out in accordance with the uniform valuation policy prescribed by AMFI in consultation with SEBI, as amended from time to time.

The principles of fair valuation shall be followed while valuing physical Silver and any deviation from the prescribed valuation methodology, if warranted due to exceptional circumstances, shall be dealt with in accordance with the valuation framework approved by the Board of the AMC and the Trustees and the applicable SEBI regulations, circulars and guidelines issued from time to time.

G. Valuation of Exchange Traded Commodity Derivative
Commodities intended to be traded : Gold/Gold Mini (Exchange: MCX/NSE/BSE), Silver (Exchange: MCX/NSE/BSE)
Valuation will be done at end of day closing /settlement price published on the MCX/NCDEX/NSE/BSE and value the commodity on the exchange on which it got transacted.

There might be variants of commodities based on the lot size which may be launched going ahead by different exchanges such as Gold, Gold Mini etc., for such cases we will be taking the closing/settlement price on which it gets transacted.

In case the ETCDs gets converted into physical commodities then upon the receipt of physical commodity at the exchange accredited warehouse in the allocated location the commodity can be valued daily.

H. Valuation of Foreign Securities & ADR/GDR:

For the purpose of valuation of foreign securities and ADRs/GDRs, the principal stock exchange to be considered for determining the market price shall be approved by the Board of the AMC. SEBI has not prescribed the method of valuation of foreign securities and ADR/GDR. Process of valuation to be followed by NAVI Mutual Fund would be as follows:

- Receiving last quoted price:

  If the security is listed in a time zone ahead of ours than the same day closing price on appropriate stock exchange as provided by Reuters would be used for valuation. If the security is listed in a time zone behind ours then the previous day's closing price provided by Reuters would be considered for valuation.

  In case the security is not traded on the above mentioned days, price of previous day should be used provided the price is not more than 30 days old.

- Converting the price in Indian Rupees (INR):

  Since these prices are in foreign currency these are to be converted in Indian Rupees by applying the exchange rate. Bloomberg also provide closing conversion rate, which can be used for converting the foreign currency prices in INR. This closing price in INR should also be used for valuation of foreign securities and ADR/GDR.

  In case Bloomberg has not provided the conversion rate, the closing price of the security should be converted to INR at RBI reference rate.

Valuation of securities with Put / Call options:

The valuation of securities with Put / Call options would be in accordance with Paragraph 10.3 of SEBI Master Circular dated March 20, 2026 as amended from time to time.

Inter Scheme Policy (IST):-

1. Market Price of same or similar security available on F-Trac/CBRICS at the time of IST would be considered provided the security traded is in a marketable lot (which is Rs. 25 crs).
2. If market price is not available, previous day valuation price will be considered.

Criterion for determining similar securities:

The determination of 'similar securities' should be arrived at by considering industry, parentage, tenor and rating of the issuer.

Inter-scheme transfers (IST)

In accordance with Paragraph 10.13 of SEBI Master Circular dated March 20, 2026,

The price at which IST of any money market or debt security (irrespective of maturity) is to be done will be taken from the valuation agencies

1. IST prices will be given by the agencies within a turn-around-time (TAT) decided

2. If prices from the valuation agencies are received within the pre-agreed TAT, an average of the prices so received will be used for IST pricing
3. If price from only one valuation agency is received within the agreed TAT, that price will be used for IST pricing
4. If prices are not received from any of the valuation agencies within the agreed TAT, the IST pricing will be based on market price of same or similar security available on F-Trac/CBRICS at the time of doing IST provided the security traded is in a marketable lot (which is Rs. 25cr)
5. If market price is not available, previous day valuation price will be considered.

Waterfall approach for valuation of money market and debt securities

In terms of Paragraph 10.2.3(b)(i) of the SEBI Master Circular for Mutual Funds dated March 20, 2026, AMFI shall ensure that valuation agencies have a documented waterfall approach for valuation of money market and debt securities. The detailed waterfall methodology shall be as prescribed by AMFI from time to time. Accordingly, the valuation agencies (currently CRISIL and ICRA) shall follow the waterfall approach prescribed under AMFI Best Practices Circular No. 135/BP/83/2019-20 dated November 18, 2019 (as amended from time to time), including the following broad principles::

The valuation agencies (CRISIL & ICRA) will follow a waterfall approach for the valuation of money market and debt securities as follows:

- All traded securities will be valued on the basis of traded yields, subject to identification of outlier trades.
- Volume Weighted Average Yield (VWAY) for trades in the last one hour of trading will be used as the basis for valuation of Government Securities and Treasury Bills.
- Valuation of all other money market and debt securities including Government Securities not traded in the last one hour will be done on the basis of VWAY of all trades during the day.
- In case of any exceptional event on a day, only VWAY of trades post such an event will be considered for valuation.
- All trades on stock exchanges and trades reported on trade reporting platforms till end of the trade reporting time (excluding inter-scheme transfers) will be considered for arriving at the valuation every day.
- CRISIL & ICRA will follow a polling process as part of the waterfall approach and will identify Mutual Funds who will participate in the polling process on a particular day.
    - Polling process policy, approved by the Board of AMC and Trustees, will be documented detailing the governance of the polling process.

Valuation of money market and debt securities which are rated below investment grade & Default:

The valuation of money market and debt securities which are rated below investment grade would be in accordance with Paragraph 10.2.3.d of SEBI Master Circular dated March 20, 2026 as amended from time to time.

Changes in terms of investment:

Any changes to the term of investment would follow guidelines as mentioned in Paragraph 10.14 of SEBI Master Circular dated March 20, 2026 as amended from time to time.

COMPUTATION OF NAV

A. Policy of Computation of NAV

The AMC will calculate the NAVs for all the Business Days. The Net Asset Value of the scheme shall be calculated on daily basis and disclosed in the manner specified by SEBI. The Asset Management Company ("AMC") shall update the NAVs on its website (https://navi.com/mutual-fund) and of the Association of Mutual Funds in India ("AMFI") (www.amfiindia.com) before 11.00 p.m. every Business Day and for overseas fund on next Business day by 10.00 a.m. In case of any delay, the reasons for such delay would be explained to AMFI in writing and reported in the quarterly CTR. In case the NAVs are not disclosed e before the commencement of Business Hours of the following business day of the next business day due to any reason, the Mutual Fund shall issue a press release giving reasons and explaining when the Mutual Fund would be able to publish the NAV.

The Net Asset Value (NAV) per Unit of the Scheme will be computed by dividing the net assets of the Scheme by the number of Units outstanding on the valuation day. The Mutual Fund will value its investments according to the valuation norms, as specified in Seventh Schedule of the SEBI (MF) Regulations, or such norms as may be specified by SEBI from time to time. In case of any conflict between the Principles of Fair Valuation and valuation guidelines specified by SEBI, the Principles of Fair Valuation shall prevail.

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

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

The NAV shall be calculated up to four decimal places. However the AMC reserves the right to declare the NAVs up to additional decimal places as it deems appropriate. Separate NAV will be calculated and disclosed for each Option. The NAVs of the Growth Option and the Dividend Option will be different after the declaration of the first Dividend.

The NAVs will be calculated for all the Business days.

Pursuant to Regulation 44(4) the repurchase Price of the units of an open ended scheme will not be lower than 97% of the NAV. Any imposition or enhancement of Load in future shall be applicable on prospective investments only.

Illustration on Computation of NAV:

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

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

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

The investor is requested to check the prevailing load structure of the Scheme before investing. Subject to the Regulations, the Trustee reserves the right to modify/alter the load structure on the Units subscribed/redeemed on any Business Day.

At the time of changing the load structure, the AMC/Mutual Fund shall follow the applicable regulatory requirements, including issuance of an addendum, disclosure on its website, communication to distributors/intermediaries and such other measures as may be prescribed under the applicable SEBI Regulations and circulars.

Any change in the load structure shall be applicable only on a prospective basis, i.e., such changes shall apply only to redemptions from prospective purchases (applying the First In First Out (FIFO) basis).

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

Let's assume that the NAV of a Mutual Fund Scheme on April 01, 2026 is Rs. 10/-.

Purchase of mutual fund units:

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

Purchase Price = Applicable NAV

In the above example, purchase is done on April 01, 2026, when the Applicable NAV = Rs. 10/-

Therefore, Purchase Price = Rs. 10/-

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

Redemption/Re-purchase of mutual fund units

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

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

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

For exit on or before 30 days from the date of allotment – 1.00%

For exit after 30 days from the date of allotment – Nil.

Scenario 1: Redemption is done during applicability of exit load

In case the investor requests for redemption on or before 30 days i.e. on or before March 31, 2026; say December 01, 2025, when the NAV of the scheme is Rs. 12/- and the exit load applicable is 1%, so the Redemption amount payable to investor shall be calculated as follows:

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

= Rs. 12 * (1-1%) = Rs. 11.88/-

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

In case the investor requests for redemption after 30 days i.e. after March 31, 2026; say April 01, 2026, when the NAV of the scheme is Rs. 12/- and the exit load applicable is NIL, so the Redemption amount payable to investor shall be calculated as follows:

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

= Rs. 12 * (1-0) = Rs. 12/-

The aforesaid example does not take into consideration any applicable statutory levies or taxes. Accordingly, the redemption amount payable to investor shall further reduce to the extent of applicable statutory levies or taxes.

B. Policy for Computation of NAV in foreign securities

The AMC will calculate and disclose the NAVs for all the Business Days. The Net Asset Value of the scheme shall be calculated on daily basis and disclosed in the manner specified by SEBI. The Asset Management Company ("AMC") shall calculated and update the NAVs of the Scheme on its website (https://navi.com/mutual-fund) and of the Association of Mutual Funds in India ("AMFI") (www.amfiindia.com) on next Business day by 10.00 a.m. In case of any delay, the reasons for such delay

would be explained to AMFI in writing and reported in the quarterly CTR. In case the NAVs are not disclosed e before the commencement of Business Hours of the following business day of the next business day due to any reason, the Mutual Fund shall issue a press release giving reasons and explaining when the Mutual Fund would be able to publish the NAV.

The Net Asset Value (NAV) per Unit of the Scheme will be computed by dividing the net assets of the Scheme by the number of Units outstanding on the valuation day. The Mutual Fund will value its investments according to the valuation norms, as specified in Seventh Schedule of the SEBI (MF) Regulations, 2026 or such norms as may be specified by SEBI from time to time.

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

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

The NAV shall be calculated up to four decimal places. However the AMC reserves the right to declare the NAVs up to additional decimal places as it deems appropriate. Separate NAV will be calculated and disclosed for each Option. The NAVs of the Growth Option and the Dividend Option will be different after the declaration of the first Dividend.

The NAVs will be calculated for all the Business days.

Pursuant to Regulation 44(4) the repurchase Price of the units of an open ended scheme will not be lower than 975% of the NAV. Any imposition or enhancement of Load in future shall be applicable on prospective investments only.

Illustration on Computation of NAV:

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

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

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

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

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

The exit load of an open-ended mutual fund scheme shall not exceed three per cent of the Net Asset Value of the scheme.Any imposition or enhancement of Load in future shall be applicable on prospective investments only.

IX. TAX & LEGAL & GENERAL INFORMATION

A. Taxation on investing in Mutual Funds

Prospective Unit holders should inform themselves of and take their own advice on the taxes applicable to the subscription, holding and redemption of units, and any distribution (each, a "Relevant Event") under the laws of the place of their operations, domicile, residence, citizenship and/or incorporation. Neither the Fund nor any of the parties listed in the Section I of this Statement of Additional Information gives or makes any warranty and/or representation as to the tax consequences in relation to any Relevant Event (or combination of Relevant Events), takes any responsibility for any tax consequences in relation to any Relevant Event (or combination of Relevant Events) and each of the Fund and such parties expressly disclaims any liability whatsoever for any tax consequences in relation to any Relevant Event (or combination of Relevant Events) and/or for any loss howsoever arising (whether directly or indirectly) from any Relevant Event (or combination of Relevant Events). Dividends, interest income, gains on the disposal of investments and other income received by the Fund on its investments in some jurisdictions may be liable to the imposition of income tax, irrecoverable withholding tax or other tax.

The following paragraphs are based on Law and practice currently in force as well as known future changes at the date of this Statement of Additional information and are subject to changes in content and interpretation. They are intended as a general guide only and not necessarily describe the tax

consequences for all types of investors in the Fund and no reliance, therefore, should be placed up on them.

INCOME-TAX

The income-tax rates indicated below are as per the Finance Act, 2025 (FA 2025).

A. FOR UNIT HOLDERS

i. Securities Transaction Tax ('STT')

At the time of sale of units of an equity oriented fund to the Mutual Fund (i.e. redemption/ repurchase of units by the Fund), the Unit holder is required to pay STT of 0.001 percent on the value of the transfer, which will be collected by the Mutual Fund and deposited into Government treasury. Where such units are purchased or sold on a recognised stock exchange in India, Unit holders would be required to pay STT at the rates mentioned in Table H below.

STT is not applicable to sale of units of funds which do not qualify as 'equity oriented funds'[1].

[1]An equity oriented fund has been defined as:

a) In case where the fund invests a minimum of 90 per cent of the total proceeds in units of another fund, which is traded on recognized stock exchange, and such other fund also invests a minimum of 90 per cent of its total proceeds in the equity shares of domestic companies listed on a recognized stock exchange; and
b) In any other case, a minimum of 65 per cent of the total proceeds of such fund is invested in the equity shares of domestic companies listed on a recognized stock exchange.

ii. Tax on Capital Gains

1. On units of Equity Oriented Funds:

– **Long-term Capital Gains**

Under section 2(29AA) read with section 2(42A) of the Income-tax Act, 1961 (Act), units of an equity oriented mutual fund held as capital assets are treated as long-term capital assets if they are held for a period of more than twelve months preceding the date of transfer. The additional (bonus) units issued under any option under the Scheme and held as capital assets would be treated as a long-term capital assets if held for a period of more than 12 months from the date when such additional units were allotted.

Finance Act 2018 has, with effect from 1st April 2018, withdrawn the exemption under section 10(38) of the Act on long-term capital gains on sale of units of equity oriented fund on which STT is chargeable and has introduced section 112A of the Act.

Under the provisions of section 112A of the Act, in respect of transfer of a unit of an equity oriented fund on or after 1 April 2018 but before 23 July 2024, tax at the rate of 10 per cent

(plus applicable surcharge and cess), and in respect of transfer of a unit of an equity oriented fund on or after 23 July 2024, tax at the rate of 12.5 per cent (plus applicable surcharge and cess) shall be levied on long-term capital gains, exceeding Rs 1,25,000, where STT has been paid on transfer of such unit of an equity oriented fund.

The long term capital gains are required to be computed without giving effect to the first and second provisos to section 48 of the Act, i.e. benefit of computation of capital gains in foreign currency and indexation in respect of cost of acquisition and improvement.

Further, for the purpose of computing capital gains in relation to a long-term capital asset, being a unit of an equity oriented fund, acquired before 1 February 2018, the cost of acquisition is deemed to be the higher of:

- The cost of acquisition of such unit; and
- The lower of –

(a) the fair market value of the unit; and

(b) the full value of consideration received or accruing as a result of the transfer of the unit.

Fair market value has been defined to mean –

a) in a case where the unit is listed on any recognized stock exchange, the highest price of the unit quoted on such exchange on 31 January 2018. However, where there is no trading in such unit on such exchange on 31 January 2018, the highest price of such unit on such exchange on a date immediately preceding the 31 January 2018 when such unit was traded on such exchange shall be the fair market value.
b) in a case where the capital asset is a unit and is not listed on recognized stock exchange, the net asset value of such asset as on 31 January 2018.

Tax rate for long-term capital gains on units of an equity oriented fund

Table A

Particulars	**Rate of tax**
Resident unit holders	12.5 per cent without indexation benefit
Non-resident unit holders	12.5 per cent without foreign currency and indexation benefit

In case of resident individuals and HUF, where the total income as reduced by the long-term capital gains, is below the basic exemption limit (Rs 500,000 in case of resident individuals of age 80 years or more, Rs 300,000 in case of resident individuals of age 60 years or more but less than 80 years, and Rs 250,000 in case of resident in India below 60 years of age) or (Rs 400,000 wherever section 115BAC has been opted), the

long-term capital gains will be reduced to the extent of the shortfall and only the balance long-term capital gains will be subjected to

a) 20 per cent tax or the 10 per cent tax as applicable, where the transfer of the units takes place before 23 July 2024
b) 12.5 per cent tax, where the transfer of the units takes place on or after 23 July 2024.

The aforementioned tax rates would be increased by applicable surcharge and cess **(Refer Note 1)**.

For the purpose of computing the eligible deduction under section 80C of the Act, the total income of the assessee shall be reduced by the income earned in the nature of long-term capital gains.

Further, under section 87A of the Act, a tax rebate up to Rs 12,500 per annum would be available for resident individuals with total income up to Rs 500,000 per annum and where section 115BAC has been opted, a tax rebate up to Rs 60,000 per annum would be available for resident individual with total income up to Rs 12,00,000. However, the rebate shall be allowed from the income tax on the total income as reduced by tax payable on such capital gains.

In case of non-resident Unit Holders eligible for availing tax treaty benefits, please refer to paragraph (viii) below.

– **Short-term Capital Gains**

Under section 2(42A) of the Act, units of an equity oriented mutual fund held as capital assets for a period of 12 months or less preceding the date of their transfer are regarded as short-term capital assets.

As per section 111A of the Act, short-term capital gains arising from the transfer of a unit of an equity oriented fund, where such transaction is chargeable to STT, is taxable at the rate of:

a) 15 per cent , where the transfer of the units takes place before 23 July 2024 **.**
b) 20 per cent, where the transfer of the units takes place on or after 23 July 2024.

The aforementioned tax rates would be increased by applicable surcharge and cess **(Refer Note 1)**.

Tax rate for short-term capital gains on units of an equity oriented fund

Table B

Particulars	Rate of tax
Resident unit holders	20 per cent
Non-resident unit holders - Foreign Portfolio Investors (FPI)	20per cent (without foreign currency benefit)

Non-resident unit holders – other than FPIs	20per cent (with foreign currency benefit)

However, in case of resident individuals and HUFs, where the total income as reduced by the short term capital gains, is below the basic exemption limit (Rs 500,000 in case of resident individuals of age 80 years or more, Rs 300,000 in case of resident individuals of age 60 years or more but less than 80 years, and Rs 250,000 in case of resident in India below 60 years of age) or (Rs 400,000 wherever section 115BAC has been opted), the short-term capital gains will be reduced to the extent of the shortfall and only the balance short-term capital gains will be subjected to

a) 15 per cent tax, where the transfer of the units takes place before 23 July 2024.
b) 20 per cent tax, where the transfer of the units takes place on or after 23 July 2024.

The aforementioned tax rates would be increased by applicable surcharge and cess **(Refer Note 1)**.

For the purpose of computing the eligible deduction under section 80C of the Act, the total income of the assessee shall be reduced by the income earned in the nature of short-term capital gains.

Further, under section 87A of the Act, a tax rebate up to Rs 12,500 per annum would be available for resident individuals with total income of Rs 500,000 per annum and where section 115BAC has been opted, a tax rebate up to Rs 60,000 per annum would be available for resident individual with total income up to Rs 12,00,000.

In case of non-resident Unit holders eligible for availing tax treaty benefits, please refer to para (viii) below.

2. On units of funds other than Equity Oriented Funds:

– Long-term Capital Gains

As per section 2(42A) of the Act, units of a Mutual Fund (other than an equity oriented fund and specified Mutual Fund[2]) shall be considered as a Long-term capital asset where the same are held for a period of more than 24 months immediately preceding their date of transfer.

Tax rate for long-term capital gains on units* of a mutual fund (other than an equity oriented fund)

Table C

Particulars	**Rate of tax**
Resident unit holders	
Listed units (Having Holding Period of more than 12 months)	12.5 per cent without indexation benefit
Unlisted units	12.5 per cent without indexation benefit

Non-resident unit holders	
FPI (for listed or unlisted units)	10 per cent without foreign currency and indexation benefit under section 115AD of the Act.
Others – Listed units (Having Holding Period of more than 12 months)	12.5 per cent without indexation benefit
Others – Unlisted units	12.50 per cent with foreign currency benefit but without indexation benefit

*According to the Finance Act, 2023, capital gain on units (acquired on or after 1st day of April 2023) of other than equity oriented fund having less than or equal to 35 percent of its total proceeds invested in equity shares of domestic companies will be deemed as short-term capital gains irrespective of period of holding and shall be taxed at the investors' income tax slab without indexation benefit.

In case of resident individuals and HUF, where the total income as reduced by the long-term capital gains, is below the basic exemption limit (Rs 500,000 in case of resident individuals of age 80 years or more, Rs 300,000 in case of resident individuals of age 60 years or more but less than 80 years, and Rs 250,000 in case of resident in India below 60 years of age) or (Rs 400,000 wherever section 115BAC has been opted), the long-term capital gains will be reduced to the extent of the shortfall and only the balance long-term capital gains will be subjected to the 12.5 per cent tax or the 10 per cent tax as applicable.

The aforementioned tax rates would be increased by applicable surcharge and cess. **(Refer Note 1)**

For the purpose of computing the eligible deduction under section 80C of the Act, the total income of the assessee shall be reduced by the income earned in the nature of long-term capital gains.

Further, under section 87A of the Act, a tax rebate up to Rs 12,500 per annum would be available for resident individuals with total income of Rs 500,000 per annum and where section 115BAC has been opted, a tax rebate up to Rs 60,000 per annum would be available for resident individual with total income up to Rs 12,00,000.

In case of non-resident Unit Holders eligible for availing tax treaty benefits, please refer to paragraph (viii) below.

- **Short-term Capital Gains**

  As per section 2(42A) of the Act, units of a Mutual Fund (other than an equity oriented fund) shall be considered as a short-term capital asset where the same are held for a period of 24 months or less immediately preceding their date of transfer.

  Short-term capital gains earned on the transfer of units of funds other than equity oriented funds is added to the total income of the investor.

As per section 50AA of the Act introduced by the Finance Act 2023, capital gains on transfer / redemption /maturity of specified mutual funds acquired on or after 01 April 2023 shall be deemed to be short term capital gains (irrespective of the period of holding).

[2]"Specified Mutual Fund" means a mutual fund by whatever name called, where not more than 35% of its total proceeds is invested in the equity shares of domestic companies provided that the percentage of equity shareholding held in respect of the Specified Mutual Fund shall be computed with reference to the annual average of the daily closing figures

The tax rates shall be as below for short term capital gains:

Table D

Status of Assessee	**Income slab**	**Tax Rates**
Individual/ HUF/ AOP/ BOI*(Other than FPI)	Where total income for a tax year (April to March) is less than or equal to Rs 250,000* (the basic exemption limit)	Nil
	Where such total income is more than Rs 250,000* but is less than or equal to Rs 500,000	5 per cent of the amount by which the total income exceeds Rs 250,000*
	Where such total income is more than Rs 500,000* but is less than or equal to Rs 1,000,000	Rs 12,500 plus 20 per cent of the amount by which the total income exceeds Rs 500,000*
	Where such total income is more than Rs 1,000,000	Rs 112,500 plus 30 per cent of the amount by which the total income exceeds Rs 1,000,000
Co-operative society	Where total income for a tax year (April to March) is less than or equal to Rs 10,000	10 per cent of the total income
	Where such total income is more than Rs 10,000 but is less than or equal to Rs 20,000	Rs 1,000 plus 20 per cent of the amount by which the total income exceeds Rs 10,000
	Where the total income exceeds Rs 20,000	Rs 3,000 plus 30 per cent of the amount by which the total income exceeds Rs 20,000

FPI UnitHolders	30 per cent
Domestic Corporate (where the total turnover or gross receipts of such company for financial year 2018-19 exceeds Rs 400 crores)/ Partnership firm/ LLP/Local authority/ FPIs	30 per cent
Domestic company, where the total turnover or gross receipts of such company for financial year 2018-19 does not exceed Rs 400 crores	25 percent
Domestic Companies which opted to pay tax under section 115BAA of the act	22 %
Domestic Companies which opted to pay tax under section 115BAB of the act.	22 %
AOP/ BOI	30 per cent or such higher rate of tax applicable to the individual members of the AOP/ BOI
Foreign Corporates	40 per cent

* In case of resident individuals of age 60 years or more, but less than 80 years, the basic exemption limit is Rs 300,000. Income between Rs 300,000 and Rs 500,000 will be taxable at the rate of 5 per cent.

In case of resident individuals of age 80 years or more, the basic exemption limit is Rs 500,000. Income exceeding Rs 500,000 but less than or equal to Rs 1,000,000 will be taxable at the rate of 20 per cent.

Further, a tax rebate up to Rs 12,500 per annum would be available for resident individuals with total income of Rs 5,00,000 per annum.

 # Section 115BAC in the Act provides individuals and HUFs for new tax regime in respect of their total income at the following rates w.e.f 1 April 2025:

Table E

Status of Assessee	**Income slab**	**Tax Rates**

Individual/ HUF	Where total income for a tax year (April to March) is less than or equal to Rs 400,000	Nil
	Where such total income is more than Rs 400,000 but is less than or equal to Rs 800,000	5 per cent of the amount by which the total income exceeds Rs 400,000
	Where such total income is more than Rs 800,000 but is less than or equal to Rs 12,00,000	Rs 20,000 plus 10 per cent of the amount by which the total income exceeds Rs 800,000
	Where such total income is more than Rs 1200,000 but is less than or equal to Rs 16,00,000	Rs 60,000 plus 15% of the amount by which the total income exceeds Rs 12,00,000
	Where such total income is more than Rs 16,00,000 but is less than or equal to Rs 20,00,000	Rs 120,000 plus 20% of the amount by which the total income exceeds Rs 16,00,000
	Where such total income is more than Rs 20,00,000 but is less than or equal to Rs 24,00,000	Rs 200,000 plus 25 per cent of the amount by which the total income exceeds Rs 20,00,000
	Where such total income is more than Rs 24,00,000	Rs 300,000 plus 30 per cent of the amount by which the total income exceeds Rs. 24,00,000

The above new tax regime shall be subject to conditions and other provisos laid down under the section 115BAC of the Act.

The aforementioned tax rates would be increased by applicable surcharge and cess **(Refer Note 1)**

In case of non-resident Unit holders eligible for availing tax treaty benefits, please refer to para (viii) below.

Note 1: Surcharge rate & Cess

Individual/ HUF/ AOP/ BOI

Income	**Individual*, HUF, AOP, BOI**	**Cess**
Rs.50 lakh to 1 crore (including income under section 111A and 112A of the Act)	10%	4% on tax plus Surcharge, applicable in all cases

Above Rs 1 crores upto Rs 2 crores (including income under section 111A,112 and 112A of the Act or dividend income from domestic companies)	15%	
Above Rs 2 crores up to Rs 5 crores (excluding income earned under section 111A,112 and 112A of the Act or dividend income from domestic companies)	25% (Refer Note 1)	
Above Rs 5 crores (excluding income earned under section 111A,112 and 112A of the Act or dividend income from domestic companies)	37% (Refer Note 1& 2)	

Note 1: For income earned under provisions of section 111A,112 and section 112A of the Act or dividend income from domestic companies, surcharge rate shall be 15% where income exceeds Rs. 2 crores.

Note 2: Under the default tax regime i.e. as per Section 115BAC of the Act, maximum surcharge applicable to an individual, HUF, AOP, BOI shall be restricted to 25%. If the assessee opts not to be governed by the default tax regime, then the surcharge rate of 37% shall apply for income exceeding INR 5 crore.

Non-corporate/ Non-firm FPIs:

Income	**Surcharge rate for capital gains**	**Surcharge rate for other than capital gains**	**Cess**
Rs.50 lakh to 1 crore	10%	10%	4% on tax plus Surcharge, applicable in all cases
Above Rs 1crores upto Rs 2 crores	15%	15%	
Above Rs 2 crores upto Rs 5 crores	15%	25%	

Companies:

Income	**Resident companies***	**Foreign Company/ Corporate FPIs**	**Cess**

Above Rs 1 crores upto Rs 10 crores	7%	2%	4% on tax Plus Surcharge, applicable in all cases
Above Rs 10 crores	12%	5%	

*Surcharge rate shall be 10% in case resident companies opting taxation under section 115BAA and section 115BAB on any income earned.

In case of a firm with total income exceeding Rs.1 crore, surcharge rate shall be 12%.

Consolidation of mutual fund schemes

Section 47 of the Act deals with transactions not regarded as transfer for the purpose of computing capital gains chargeable to tax under the provisions of the Act.

Section 47(xviii) of the Act provides that transfer by a unit holder of units held by him on consolidation of schemes of a mutual fund shall not be treated as a transfer provided they are allotted units in the consolidated scheme of the mutual fund. The aforesaid exemption is provided only where the consolidation is of two or more schemes of an equity oriented fund or two or more schemes of a non-equity oriented fund.

Further, the period of holding of the units of the consolidated scheme shall include the period for which the units in the consolidating scheme were held by the assessee. Also, the cost of acquisition of the units of the consolidated scheme shall be deemed to be the cost of acquisition of the units in the consolidating scheme.

Additionally, transfer by a unit holder of units held on consolidation of plans of a mutual fund schemes shall not be treated as transfer provided they are allotted units in the consolidated plan of that scheme of the mutual fund. The cost of acquisition of the units in the consolidated plan of mutual fund scheme shall be the cost of units in the consolidating plan of a mutual fund scheme and period of holding of the units of the consolidated plan of a mutual fund scheme shall include the period for which the units in the consolidating plan of a mutual fund scheme were held by the assessee.

(i) Tax on business income

Under section 28 of the Act, profit arising on transfer of units of a mutual fund which are held as stock in trade or trading asset, is taxed under the head 'Profits and gains of business or profession'. Such profit is added to the total income of the assessee and taxed at applicable rates. In case of non-resident Unit holders eligible for availing tax treaty benefits, please refer to paragraph (viii)below.

(ii) Deduction from business income

No deduction would be allowed for STT while calculating capital gains. However, where the units are treated as stock in trade and the profits arising from the sale of units are taxed under the head 'Profits and gains of business or profession', the STT paid by the Unit holder can be claimed as a deduction from such business profits.

(iii) Tax on income from other sources

Section 56(2)(x) in the Act (which replaces section 56(2)(viia) with effect from 1 April 2017) provides that any property (includes mutual fund units) received without consideration or for consideration less than the FMV is taxable in the hands of the recipient, being any person instead of limiting it to individuals and HUFs. Certain exceptions such as property received from prescribed persons like relatives, etc. or on prescribed occasions like marriage, etc.) have been excluded from the purview of section 56(2)(x) of the Act. The following amounts would be taxable under the head 'Income from other sources' at the rates mentioned in Table B above:

Table E

Sr. no.	Taxable situation	Taxable amount
a	Units received without any consideration where the aggregate fair market value of such units exceed Rs 50,000	The aggregate FMV of the units received
b	Units received for a consideration where the aggregate FMV of the units received exceeds the consideration by more than Rs 50,000	The difference between the aggregate FMV of the units and the consideration

For this purpose, the FMV means the value to be determined in accordance with the methods prescribed.

For the purpose of computing capital gains on transfer of such units received without consideration or for consideration less than the FMV, the cost of acquisition is deemed to be the value determined under (a) or (b) above, as the case may be.

(iv) Deduction from total income

In terms of the provisions of section 80C of the Act, an individual or a HUF is entitled to claim a deduction in respect of the amount of subscription made to any units of any Mutual Fund referred to in section 10(23D), being a fund formulated in accordance with the Equity Linked Savings Scheme, 2005 notified by the Central Government in the Official Gazette vide notification no. SO 1563(E) dated 3 November 2005. The aggregate amount deductible under section 80C in respect of subscription to the units of the Mutual Fund (including

the amount of dividend reinvested), being an equity linked savings scheme and other prescribed investments is restricted to Rs 150,000.

(v) Tax Deduction at Source on capital gain

Table F

Particulars		**TDS Rates under the Act**	
		Residents	**Non Residents**
Short-term capital gains	Non-equity oriented fund	NIL	a) 30 per cent for foreign non-corporates b) 40 per cent for foreign corporate entities
	Equity oriented Fund	NIL	20 per cent
Long-term capital gains	Non-equity oriented fund	NIL	10 per cent or 12.5 per cent, as may be applicable.
	Equity oriented Fund	NIL	12.5 per cent
Business income	Non-equity and equity oriented mutual fund	NIL	30 per cent for foreign non-corporates 40 per cent for foreign corporate entities

The aforementioned TDS rates would be increased by applicable surcharge and cess **(Refer Note 1)** In case of non-resident Unit holders eligible for availing tax treaty benefits, please refer to paragraph (vi) below.

(vi) Tax treaty

In the case of a non-resident Unit Holder who is resident of a country with which India has signed a Double Taxation Avoidance Agreement (DTAA), which is in force, income-tax is payable at the rate provided in the Act or at the rate provided in the such agreement, whichever is more beneficial to such non-resident Unit Holder.

Further, where the rate of tax prescribed under the relevant DTAA is lower than that prescribed under the Act, tax would be withheld at such lower rate.

Section 90(4) of the Act, provides that a taxpayer, not being a resident, to whom a DTAA applies, shall not be entitled to claim any relief under such DTAA unless a certificate of it being a resident in any country outside India is obtained by it from the Government of that country.

Further, section 90(5), provides that the assessee referred to in section 90(4) of the Act, shall also provide such other documents and information, as may be prescribed. The Central Board of Direct Taxes (CBDT) has issued a Notification substituting Rule 21AB of the Income-tax Rules, 1962 (Rules) and prescribing the format of information to be provided under section 90(5) of the Act, i.e. in Form No 10F. An assessee would be required to furnish Form No 10F, where the required information is not explicitly mentioned in the aforementioned certificate of residency; in which case, the Notification additionally requires the assessee to keep and maintain such documents as are necessary to substantiate the information provided.

If the non-resident unit holder produces a nil or lower withholding certificate from the income tax authorities, then tax shall be deducted at such rates mentioned in the certificate during the validity of the certificate. Section 195(7) of the Act provides that the CBDT may specify a class of persons or cases, where a person responsible for making any payment to a non-resident (other than a company) or a foreign company, shall make an application to the Assessing Officer to determine the appropriate proportion of sum chargeable to tax and upon such determination, tax shall be deducted under section 195(1) of the Act on such chargeable proportion. However, CBDT has not specified any class of persons or cases as on the date.

Tax on Income distributed by the Mutual Fund

Particulars	Tax Implications in IDCW received by unit holders	Withholding of Taxes by Mutual Fund
Resident (Individuals / Non-corporates / Corporates)	Taxed in the hands of unitholders at applicable rate under the provisions of the Act.	10% under section 194K of the Act
Non-residents (Individuals / Non-corporates / Corporates) **	Taxed in the hands of unitholders at the rate of 20% u/s 115A/115AD of the Act. (plus applicable surcharge and cess)	20% (plus applicable surcharge and cess) u/s 196A/196D^ of the Act

Currently, the IDCW (Income Distribution Cum Capital Withdrawal) is taxable in the hands of the unitholders at the applicable tax slab rates (Refer Note 2 for tax rates) and also, subject to withholding of taxes at source by Mutual Fund:

* As per provision of section 194K of the Act, where the amount of income credited or paid in a financial year, in aggregate, does not exceed INR 10,000, no withholding is required to be carried out.

** As per the provisions of section 196A of the Act which is specifically applicable in case of non-resident unitholders, the Mutual Fund shall have to deduct TDS at the rate of 20% (plus applicable surcharge and cess) or the rates provided in the relevant DTAA, whichever is lower, on IDCW credited or paid. However, the unitholder has to furnish a tax residency certificate and such other information and documents as may be prescribed to avail the benefits of DTAA.

^ Section 196D of the Act provides for deduction of tax on income of FPI from securities as referred to in section 115AD(1)(a) of the Act (other than interest referred in section 194LD of the Act) at the rate of 20 percent.

The FA 2021 amended section 196D of the Act to provide that tax shall be deducted on the above income, at the rate of 20 percent or the rates provided in the relevant DTAA, whichever is lower, provided the payee furnishes a tax residency certificate and such other information and documents as may be prescribed.

(vii) Dividend stripping

Under the provisions of section 94(7) of the Act, where a person buys any units within a period of three months before the record date, sells such units within nine months after such date and the income distributed on such units is exempt from tax, the loss on such sale to the extent of the income distributed on units shall be ignored while computing the income chargeable to tax.

With effect from 1 April 2020, any dividend or income distributed in respect of units are not subject to Dividend Distribution Tax and hence, such income is now taxable in the hands of shareholder/unit holder. Therefore, the provisions of dividend stripping shall not apply on such dividend or income from units.

(viii) Bonus stripping

Under the provisions of section 94(8) of the Act, where a person buys units (original units) within a period of three months before the record date, receives bonus units on such original units, and then sells (all or part of) the original units within a period of nine months from the record date and continues to hold the bonus units, then the loss incurred on the original units shall be ignored while computing the income chargeable to tax but shall be deemed to be the cost of acquisition of the bonus units.

(ix) Switching between options

Switching from one option to another option of a Scheme will be effected by way of redemption of units of the relevant option and reinvestment of the redemption proceeds in the other option selected by the Unit holder. Hence switching will attract the same implications as applicable on transfer of such units.

(x) Set-off and carry forward of losses

According to the provisions of the Act, the capital loss resulting from sale of units would be available for set off against other capital gains made by the investor and would reduce the tax liability of the investor to that extent. However, losses on transfer of units held as long-term capital assets would be allowed to be set-off only against gains from transfer of long-term capital assets. Further, losses on transfer of units held as Short-term capital assets would be allowed to be set-off against gains from transfer of Short term capital assets as well as long-term capital assets. Where such losses arising from sale of units held as capital asset cannot be wholly set-off, the amount of losses not set-off can be carried forward for a period of eight years.

Under the Act, a loss resulting from the transfer of units held as stock in trade or trading asset would be available for set off against income under any other head other than income under the head 'Salaries'. Where such loss cannot be wholly set-off in accordance with the provisions of the Act, the amount remaining to be set-off can be carried forward for a period of eight years and setoff against income under the head 'Profits and gains of business or profession'.

(xi) Minimum Alternate Tax (MAT)

Section 115JB(1) of the Act provides that, if the tax payable by a company on the total income computed as per the provisions of the Act is less than 15 % per cent of its 'book profit', then notwithstanding anything contained in any other provision of the Act, the 'book profit' shall be deemed to be the total income of the tax payer, and the amount of tax payable shall be the amount of income-tax at the rate of 15% per cent (plus applicable surcharge and health and education cess) on such total income. This tax prescribed on book profits under section 115JB is commonly referred to as MAT.

Section 115JB(2) of the Act further provides that, every company shall, for the purposes of section 115JB of the Act, prepare its profit and loss account in accordance with Schedule III of the Indian Companies Act, 2013.

Further, Explanation 1 to section 115JB(2) of the Act prescribes certain additions to/ deductions from the net profit/ loss to determine the 'book profit' within the meaning of section 115JB of the Act.

The amount of income accruing or arising to a foreign company from capital gains arising on transactions in securities or interest, royalty, or fees for technical services chargeable to tax at the rates specified in Chapter XII of the Act, shall be excluded from the purview of MAT, if such income is credited to the Profit and Loss Account and the income-tax payable thereon in accordance with the provisions of the Act (other than the MAT provisions), is at a rate less than the MAT rate of 15 per cent. Also, corresponding expenses shall be excluded while computing MAT. Further, MAT shall not be applicable to resident companies opting taxation under section 115BAA and secion115BAB.

Further, the MAT provisions are not applicable to a foreign company:

i. If such company is a taxpayer of a country with which India has a DTAA and the taxpayer does not have a Permanent Establishment in India in accordance with the provisions of such DTAA.
ii. If such company is a resident of a country with which India does not have a DTAA and the taxpayer is not required to seek registration under any law in force relating to companies. As per the provisions of section 115JAA of the Act, a company paying tax under section 115JB of the Act is eligible to claim tax credit. The tax credit is the difference between the tax payable under section 115JB of the Act and the tax payable under the normal provisions of the Act. Such tax credit shall be carried forward and set-off upto 15 succeeding AYs. Foreign Tax Credit (FTC) claimed against MAT liability which exceeds the FTC that would have been allowable while computing income under normal provisions, would be ignored while computing tax credit under MAT.

(xii) General Anti Avoidance Rules (GAAR)

The General Anti Avoidance Rule (GAAR), effective from 1 April 2017, allows the Indian Revenue authorities to declare an arrangement entered into by an assessee as an impermissible avoidance arrangement, subject to specified terms and conditions therein and determine tax consequences as appropriate. Further, investments made up to 31 March 2017 would be protected from the applicability of GAAR.

Tax Implications for the Mutual Fund:

Navi Mutual Fund is a Mutual Fund registered with the Securities and Exchange Board of India and its entire income is exempt from tax under the provisions of section 10(23D) of the Act. The Mutual Fund will receive all Indian sourced income without any deduction of tax at source under the provisions of section 196(iv) of the Act.

Where the Fund receives any income from investments made in overseas jurisdictions, the same may be subject to withholding tax (or any other tax) in the relevant jurisdiction from which the income is

received. As the Fund is exempted from its entire income (including foreign income) in India, credit/ refund in respect of such foreign taxes withheld/ paid by the fund will not be available.

(ii) STT

Under the Act, as and when the Mutual Fund purchases and sells equity shares/ units/ derivatives, it would be required to pay the STT applicable on such purchases/ sales to the concerned Recognised Stock Exchange. The rates of STT have been listed below.

Table H

Nature of Transaction	Payable by	Value on which tax shall be levied	Rates applicable (per cent)
Delivery based purchase transaction in units of equity oriented fund entered into in a recognized stock exchange	Purchaser	Value at which units are bought	Nil
Delivery based purchase transaction in equity shares or units of a business trust entered in a recognized stock exchange	Purchaser	Value at which shares/ units are bought	0.1
Delivery based sale transaction in equity shares or units of a business trust entered in a recognized stock exchange	Seller	Value at which shares/ units are bought	0.1
Delivery based sale transaction in units of equity oriented fund entered into in a recognized stock exchange	Seller	Value at which units are sold	0.001

Non-delivery based sale transaction in equity shares or units of equity oriented fund or units of a business trust entered in a recognised stock exchange	Seller	Value at which shares/ units are sold	0.025
Transaction for sale of futures in securities	Seller	Value at which futures are traded	0.02
Transaction for sale of an option in securities	Seller	The option premium	0.1
Transaction for sale of an option in securities, where the option is exercised	Purchaser	The settlement price	0.125
Sale of units of an equity oriented fund to the mutual fund	Seller	Value at which units are sold	0.001
Sale of unlisted equity shares by any holder of such shares under an offer for sale to the public included in an IPO and where such shares are subsequently listed on a recognised stock exchange	Seller	Value at which shares are sold	0.2
Sale of unlisted units of a business trust under an offer for sale	Seller	Value at which shares are sold	0.2

Other Considerations:

a) **Wealth-tax:** FA 2015 has abolished the levy of wealth-tax under the Wealth-tax Act, 1957 with effect from the financial year 2015- 16.

b) **Gift-tax:** The Gift-tax Act, 1958 has ceased to apply to gifts made on or after 1 October 1998. Gifts of units purchased in a scheme of the Mutual Fund would therefore, be exempt from gift-tax.

c) **Investments in Units of the Mutual Fund** will rank as an eligible form of investment under section 11(5) of the Act read with Rule 17C of the Income-tax Rules, 1962, for religious and charitable trusts.

Please note: The Information provided here is general in nature. EACH INVESTOR IS ADVISED TO CONSULT HIS OR HER OWN TAX CONSULTANT WITH RESPECT TO THE SPECIFIC TAX IMPLICATIONS ARISING OUT OF HIS OR HER PARTICIPATION IN THE SCHEME

B. Legal Information

1. <u>Nomination Facility</u>

- Pursuant to **Regulation 27** of the SEBI (Mutual Funds) Regulations, 2026, the AMC provides an option to the Unit holder to nominate (in the manner prescribed under the SEBI (Mutual Funds) Regulations, 2026 and applicable SEBI circulars/guidelines, as amended from time to time) a person(s) in whom the Units held by him/her shall vest in the event of his/her death. Where the Units are held by more than one person jointly, the joint Unit holders may together nominate a person(s) in whom all the rights in the Units shall vest in the event of the death of all the joint Unit holders. By providing this facility, the AMC is not in any way attempting to grant any rights other than those granted by law to the nominee(s).

- A nomination in respect of the Units does not create any beneficial interest in the property after the death of the Unit holder. The nominee(s) shall receive the Units only as an agent and trustee for the legal heirs or legatees, as the case may be. It is hereby clarified that the nominee(s) under the nomination facility provided herein shall not necessarily acquire any title or beneficial interest in the property by virtue of such nomination.

- Nomination can be made only by individuals on their own behalf, either singly or jointly. Non-individuals including a society, trust (other than a religious or charitable trust where permitted), body corporate, partnership firm, Karta of a Hindu Undivided Family and holders of Power of Attorney cannot make a nomination.

- The following persons may be nominated in accordance with the applicable laws and SEBI requirements:

  (a) Individuals

  (b) Minors through their parent/legal guardian;

  (c) Religious or charitable trusts; and

(d) The Central Government, State Government, a local authority or any person designated by virtue of his/her office.

- The nominee shall not be a society, body corporate, partnership firm, Karta of a Hindu Undivided Family or a Power of Attorney holder. A trust, other than a religious or charitable trust where permitted under applicable law, cannot be nominated.

- A non-resident Indian can be a Nominee subject to the exchange controls in force from time to time.

- Minor(s) may be nominated and, in such event, the name and address of the guardian of the minor nominee shall be provided by the Unit holder. Nomination may also be made in favour of the Central Government, State Government, a local authority, any person designated by virtue of his/her office or a religious or charitable trust.

- Nomination may be made in favour of a maximum of three nominees. In case of multiple nominees, the percentage allocation/share in favour of each nominee shall be indicated against their respective names. Such allocation shall be in whole numbers aggregating to 100%. Where the Unit holder does not specify the percentage allocation/share, the Mutual Fund/AMC shall treat the allocation as equal amongst all the nominees, in accordance with the applicable SEBI framework.

- Nomination in respect of the Units shall stand rescinded upon redemption of all the Units.

- Cancellation of nomination can be made only by the individual Unit holder(s) who made the original nomination. Upon cancellation, the nomination shall stand rescinded and the Mutual Fund/AMC shall not be under any obligation to transfer the Units in favour of the nominee(s).

- The nomination facility shall be subject to the applicable laws, the SEBI (Mutual Funds) Regulations, 2026 and applicable SEBI circulars/guidelines issued from time to time. The AMC shall, subject to production of such documentary evidence as may be considered sufficient, effect the transmission/payment in favour of the nominee(s). Such transmission/payment shall constitute a valid discharge of the Mutual Fund, the AMC and the Trustee against all claims in respect of the Units.

- Legal heir(s) of nominee shall not be eligible to inherit the assets of the investor, if the nominee predeceases the investor.

- The Fund, the AMC and the Trustee are entitled to be indemnified from the deceased Unit Holder's estate against any liabilities whatsoever that any of them may suffer or incur in connection with a nomination.

- Nomination shall be mandatory for new folios/accounts opened by individual investors holding Units singly or jointly, subject to the exemptions and opt-out facility permitted under the applicable SEBI circulars/guidelines issued from time to time.

- Investors who do not wish to nominate shall submit a declaration for opting out of nomination in the manner prescribed by SEBI from time to time. In case the declaration is submitted in physical mode, it shall be signed by all the Unit holder(s). Where the declaration is submitted electronically, it shall be authenticated using the e-Sign facility recognised under the Information Technology Act, 2000 or through Two-Factor Authentication (2FA), in accordance with the applicable SEBI requirements.

- In case of joint holdings in a folio, all joint holders shall be required to sign the request for nomination or cancellation of nomination, irrespective of the mode of holding. The nomination facility shall not be available in a folio held on behalf of a minor. Nomination/opt-out forms shall not be signed by a Power of Attorney (PoA) holder. In accordance with SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/81 dated June 10, 2024 and the applicable provisions of the SEBI Master Circular for Mutual Funds dated March 20, 2026, nomination shall be optional for jointly held Mutual Fund folios.

- The facility to nominate will not be available in a folio held on behalf of a minor.

- Nomination shall be maintained at the folio or account level and shall be applicable for investments in all schemes in the folio or account.

- Every new nomination in a folio will over write the existing nomination.

- Investors may note that where the Units are transferred in favor of the nominee, the "Know Your Customer" norms, where applicable will have to be fulfilled by the nominee.

Additional Operational Guidelines relating to Nomination

- Nomination may be made in favour of a maximum of three nominees. The Unit holder may specify the percentage share in favour of each nominee. In case no percentage share is specified, the Mutual Fund/AMC shall settle the claim equally amongst all the nominees.

- Nomination/Opt-out forms shall not be signed by a Power of Attorney (PoA) holder.

- In the event of the death of one or more joint Unit holder(s), the Units shall be transmitted in favour of the surviving Unit holder(s) in accordance with the SEBI (Mutual Funds) Regulations, 2026, the SEBI Master Circular for Mutual Funds dated March 20, 2026 and the transmission process prescribed by the Mutual Fund from time to time.

- The nominee(s) shall receive the Units as a trustee for the legal heirs or legatees of the deceased Unit holder, in accordance with the applicable law.

Nominee to act on behalf of incapacitated investors:

The investors having single holding / account / folio, the option to:

(a) empower, any one of the nominees (excluding minor nominee) to operate the investor's account / folio, if the investor is physical incapacitated, but still has the capacity to contract,
(b) specify either the percentage or absolute value of assets in the account/ folio that can be encashed by such nominee,
(c) change such mandate any number of times without any restriction.

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

As per Paragraph 15.13 of SEBI Master Circular for Mutual Funds dated March 20, 2026 with respect to investment made in the name of minor through a guardian:

a) Payment for investment by any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian. For existing folios, the AMCs shall insist upon a change of Pay-out bank mandate before redemption is processed382.
b)
c) 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 parent/legal guardian after completing all KYC formalities.
d) Upon the minor attaining the status of major, the minor in whose name the investment was made, shall be required to provide all KYC details, updated bank account details including cancelled original cheque leaf of the new account. No further transactions shall be allowed till the status of the minor is changed to major.
e) AMC has build a system control at the account set up stage of SIP, STP and SWP on the basis of which, the standing instruction is suspended when the minor attains majority, till the status is changed to major.

2. **KYC Requirements**

Know Your Client (KYC) requirements shall be governed by the Prevention of Money-laundering Act, 2002 and the Rules made thereunder, the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011, the SEBI Master Circular for Know Your Client (KYC) norms for the securities market, and the applicable SEBI circulars, notifications and guidelines issued from time to time.

In-Person Verification (IPV) shall be carried out in accordance with the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011 and the applicable SEBI circulars and guidelines. IPV carried out by an authorised intermediary shall be relied upon by other SEBI registered intermediaries in accordance with the applicable regulatory framework.

Know Your Client (KYC) requirements shall be governed by the Prevention of Money-laundering Act, 2002 and the Rules made thereunder, the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011, the SEBI Master Circular for Know Your Client (KYC) norms for the securities market, and the applicable SEBI circulars, notifications and guidelines issued from time to time.

In-Person Verification (IPV) shall be carried out in accordance with the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011 and the applicable SEBI circulars and guidelines. IPV carried out by an authorised intermediary shall be relied upon by other SEBI registered intermediaries in accordance with the applicable regulatory framework.

Operationalisation of Central KYC Records Registry (CKYCR)

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

In accordance with the Prevention of Money-laundering Act, 2002, the Prevention of Money-laundering (Maintenance of Records) Rules, 2005, the SEBI (KYC (Know Your Client) Registration Agency) Regulations, 2011, SEBI Circular Nos. CIR/MIRSD/66/2016 dated July 21, 2016 and CIR/MIRSD/120/2016 dated November 10, 2016 (as amended), the SEBI Master Circular for Know Your Client (KYC) norms for the securities market and other applicable SEBI circulars, notifications and guidelines issued from time to time, the Mutual Fund/AMC shall capture and upload the KYC information of investors to the Central KYC Records Registry (CKYCR) in the manner prescribed under the applicable regulatory framework.

In accordance with the aforesaid SEBI circulars and AMFI best practice guidelines for implementation of CKYC norms investors who have never done KYC process under KRA regime i.e. a new investor who is new to KRA system and whose KYC is not registered or verified in the KRA system shall be required to provide KYC details in the CKYC Form to the Mutual Fund/ AMC.

a) investor who fills old KRA KYC Form, should provide additional / missing information using Supplementary KYC Form or fill CKYC Form. The said form is available on Navi Mutual Fund website (https://navi.com/mutual-fund).
b) Details of investors shall be uploaded on the system of CKYCR and a 14-digit unique KYC identifier ('KIN') will be generated for such customer.
c) new investors, who have completed CKYC process & have obtained KIN may quote their KIN in the application form instead of submitting CKYC Form/ Supplementary KYC Form.

d) AMC/ Mutual Fund shall use the KIN of the investor to download the KYC information from CKYCR system and update its records.

e) If the PAN of investor is not updated on CKYCR system, the investor should submit self-certified copy of PAN card to the Mutual Fund/ AMC.

The AMC reserves the right to reject transaction application in case the investor(s) fails to submit information and/or documentation as mentioned above. In the event of non-compliance of KYC requirements, the Trustee / AMC reserves the right to freeze the folio of the investor(s).

3. <u>Prevention of Money Laundering Act Requirements (PMLA Requirements)</u>

In terms of the PML Requirements, all intermediaries, including Mutual Funds, have to formulate and implement a Client Identification Process, commonly referred to as KYC Process, verify and maintain the record of identity and address (es) of investors. The AMC recognizes the value and importance of creating a business environment that strongly discourages money launderers from using Navi Mutual Fund.

The investor(s) / unitholder(s) including guardian(s) where investor / unitholder is a minor, must ensure that the amount invested in the Scheme is derived only through legitimate sources and does not involve and is not designed for the purpose of any contravention or evasion of the provisions of all the applicable laws, rules and regulations, directions issued by the appropriate authority (the applicable laws) in force from time to time including the Prevention of Money Laundering Act, the Income Tax Act, 1961, or the Prevention of Corruption Act, 1988, etc.

Pursuant to the above and SEBI in terms of paragraph 17.2 of SEBI Master Circular for Mutual Funds dated March 20, 2026, the AMC has adopted certain policies to ensure KYC, PML and SEBI Requirements, considered appropriate for its line of business, being committed to prevent money launderers using NMF as a vehicle for any such illegal activity. Accordingly, the AMC may seek information or obtain and retain documentation used to establish Customers' identity. It may re-verify identity and obtain any missing or additional information for this purpose.

The AMC / The Trustees reserve the right to take all steps and actions, including recording investor(s) / unitholder(s) telephonic calls, and / or obtain and retain documentation for establishing the identity of the investor, proof of residence, source of funds etc. in accordance with the applicable laws, from the investor(s) / unitholder(s), as may be required, to ensure the appropriate identification / verification / re-verification of the investor(s) / unitholder(s), the source of funds etc. under its KYC Policy.

The AMC, under powers delegated by the Trustees, shall have absolute discretion to reject any application, prevent further transactions by a Unit Holder, delay processing redemption as per applicable laws or regulations if:

(i) after due diligence, the investor / Unit Holder / a person making the payment on behalf of the investor does not fulfill the requirements of the KYC as determined by the AMC or the AMC believes that the transaction is suspicious in nature as regards money laundering.

(ii) the AMC determines in its sole discretion that the application does not or will not comply with any applicable laws or regulations.

In this regard the AMC reserves the right to reject any application and affect a mandatory Redemption of Units allotted at any time prior to the expiry of 30 days from the date of the allotment.

If the payment for Purchase of Units are made by a third party (e.g. a power of attorney holder, a financing agency, a relative, etc.), the investor / applicant may be required to give such details of such transaction so as to satisfy the AMC of the source and / or consideration underlying the transaction.

4. <u>Transfer and Transmission of Units</u>

a) Transfer Facility

- Units of the schemes shall be non-transferable. However, if a person becomes a holder of the units consequent to operation of law, or upon enforcement of a pledge, the Mutual Fund will, subject to production of satisfactory evidence, effect the transfer, if the transferee is otherwise eligible to hold the units.
- In case units are held in a single name by a unit holder, units shall be transmitted in favour of the nominee, where the unit holder has appointed a nominee, upon production of death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- If the unit holder has not appointed a nominee, the units shall be transmitted in favour of the unit holder's executor /administrator of estate / legal heir(s), as the case may be, on production of death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- In case units are held by more than one registered unit holder, then upon death of first unitholder, units shall be transmitted in favour of the second named holder on production of a death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- The rights in the units will vest in the nominee upon the death of all joint unit holders upon the nominee producing a death certificate or any other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.

As per the AMFI Best Practices Guidelines Circular No.116 /2024-25 dated August 14, 2024, on 'Standard Process for Transfer of Units held in Non-Demat (SoA) mode', units held by individual unitholders in Non- Demat ('SoA') mode can be transferred only in following cases-

(a) Surviving joint unitholder, who wants to add new joint holder(s) in the folio upon demise of one or more joint unitholder(s).

(b) A nominee of a deceased unitholder, who wants to transfer the units to the legal heirs of the deceased unitholder, post the transmission of units in the name of the nominee.

(c) A minor unitholder who has turned a major and has changed his/her status from minor to major, wants to add the name of the parent / guardian, sibling, spouse etc. in the folio as joint holder(s).

Partial transfer of units held in a folio shall be allowed.

If the request for transfer of units is lodged on the record date, the IDCW payout/ reinvestment shall be made to the transferor.

Redemption of the transferred units shall not be allowed for 10 days from the date of transfer. This will enable the investor to revert in case the transfer is initiated fraudulently.

Mode of submitting/accepting the Transfer Request Non-Demat (SOA) mode:

The facility for transfer of units held in SoA mode shall be available only through online mode via the transaction portals of the RTAs and the MF Central, i.e., the transfer of units held in SoA mode shall not be allowed through physical/ paper-based mode or via the stock exchange platforms, MFU, channel partners and EOPs etc.

b) Transmission Facility

(i) In case of transmission of Units, the transferee will have to comply with the applicable " Know Your Customer" Norms.
The AMC has implemented image based processing wherever the claimant is a nominee or a joint holder in the investor folio.

(ii) In case of transmission of Units, the claimant(s) of Units will be required to submit the common Transmission Request Form (common fields) and NOC form and the prescribed documents as listed in SEBI Circular Reference No. SEBI/HO/OIAE/OIAE_IAD-3/P/ON/2025/01650 dated January 10, 2025 and amendments issued vide SEBI circular dated February 28, 2025 a) Self-attested copy of Death Certificate of the deceased investor, (b) due completion, updating or reaffirming of the KYC of nominee/s) due discharge from the creditors if there are subsisting credit facilities secured by a duly created pledge and as may be applicable. The transferee may refer to our website (www.navimutualfund.com) or contact any of our investor service centers for the various documents required under different transmission scenarios.

(iii) (No claims in respect of such transmission shall subsist against the AMC and any claim or contestation shall be only amongst the nominee(s) and the claimants without reference to the AMC.

5. Duration of the Scheme and Winding Up

A. Duration of the Scheme

a) Close - ended Scheme(s)

- Each closed-ended Scheme/ Plan will have a Maturity Date / Final Redemption Date and will be compulsorily and without any act by the unit holder(s) redeemed on Maturity Date / Final Redemption Date. On Maturity /Final Redemption Date of the Scheme/ Plan, the units will be redeemed at the Applicable NAV.

- The Mutual Fund may convert the Scheme/ Plans under the Scheme after the Maturity Date / Final Redemption Date into an open-end Scheme/ Plan and this shall be in accordance with the SEBI Regulations.
- The Units of close-ended Scheme/ Plan may be converted into open-ended scheme,
    (a) If the SID of such scheme discloses the option and the period of such conversion; or
    (b) The Unit holders are provided with an option to redeem their units in full before such conversion.
- A close-ended scheme shall be fully redeemed at the end of the maturity period. Provided that a close ended scheme may be allowed to be rolled over if the purpose, period and other terms of the roll over and all other material details of the scheme including the likely composition of assets immediately before the roll over, the net assets and net asset value of the scheme, are disclosed to the Unitholders and a copy of the same has been filed with SEBI. Provided further, that such roll over will be permitted only in case of those Unit holders who express their consent in writing and the Unit holders who do not opt for the roll over or have not given written consent shall be allowed to redeem their holdings in full at net asset value based price. A closed-ended Scheme/ Plan shall be wound up on the expiry of duration fixed in the Scheme/ Plan on the redemption of the Units unless it is rolled-over for a further period under regulation 36.
- In terms of SEBI (MF) regulations, the Scheme may be wound up as provided in (B) below.

b) **Open - ended / Interval Scheme(s) :-** An Open-ended / Interval Scheme has a perpetual life. However in terms of SEBI (MF) regulations, the Scheme(s) may be wound up as provided in (B) below.

c) **Close - ended Scheme(s)** with automatic conversion into Open-ended Scheme upon Maturity - Such Scheme(s) will remain close-ended for the period mentioned in the SID and subsequently the Scheme will automatically be converted into an open ended scheme without any further reference from the Mutual Fund/ Trustee/ AMC/ Unitholders. Thereafter, the duration of the Scheme would be perpetual. However in terms of SEBI (MF) regulations, the Scheme may be wound up as provided in (B) below.

B. Procedure of winding up

A close-ended scheme shall be wound up upon the expiry of the duration specified in the Scheme Information Document, unless the scheme is rolled over in accordance with the SEBI (Mutual Funds) Regulations, 2026.

A scheme may be wound up under any of the following circumstances:

(a) where the Trustees are of the opinion that an event has occurred which requires the scheme to be wound up;

(b) where seventy-five per cent of the unit holders of the scheme pass a resolution that the scheme be wound up; or

(c) where SEBI so directs in the interest of the unit holders.

Where a scheme is proposed to be wound up under clause (a) above, the Trustees shall, within **one day**, give notice disclosing the circumstances leading to the winding up of the scheme:

(a) to SEBI; and

(b) in two daily newspapers having nationwide circulation and one vernacular newspaper circulating at the place where the Mutual Fund is formed.

The Trustees shall obtain the consent of the unit holders by simple majority of the unit holders participating in the voting, on the basis of one vote per unit, and shall publish the results of such voting within forty-five calendar days from the date of publication of the notice. Where the Trustees fail to obtain the requisite consent of the unit holders, the scheme shall be reopened for business activities with effect from the second business day following the publication of the voting results.

Effect of Winding Up

As per Regulation 37 of SEBI (Mutual Fund) Regulations, 2026 , on and from the date of the publication of the notice as stated above, the Trustees or the AMC as the case maybe, shall

(a) cease to carry on any business activities in respect of the Scheme(s) so wound up;

(b) cease to create and/or cancel Units in the Scheme(s);

(c) cease to issue and/or redeem Units in the Scheme(s).

(d) list the units of mutual fund scheme under winding up on a recognised stock exchange.

6. Procedure and Manner of Winding Up

As per Regulation 38 of SEBI (Mutual Fund) Regulations, 2026 In the event of the Scheme being wound up as above-mentioned, the AMC shall proceed as follows:

- The Trustee shall call a meeting of the Unit holders of the Scheme to consider and pass necessary resolutions by simple majority of Unit holders present and voting at the meeting for authorising the AMC or any other person /agency to take the steps for winding up of the Scheme.
- Provided that a meeting shall not be necessary if the Scheme is wound up at the end of the maturity period.
- The Trustee or the person authorised as above, shall dispose the assets of the Scheme concerned in the best interests of the Unit holders of the Scheme.
- The proceeds of the sale made in pursuance of the above, shall in the first instance be utilised towards discharge of such liabilities as are properly due under the Scheme and after making appropriate provision for meeting the expenses connected with such winding up, the balance shall be paid to the Unit holders

in proportion to their respective interests in the assets of the Scheme as on the date when the decision for the winding up was taken.

- On the completion of the winding up, the Trustee shall forward to SEBI and the Unit holders, a report on the winding up containing particulars such as circumstances leading to the winding up, the steps taken for disposal of assets of the Scheme before winding up, expenses of the Scheme for winding up, net assets available for distribution to the Unit holders and a certificate from the Auditors of the Mutual Fund.
- Notwithstanding anything contained herein, the application of the provisions of SEBI Regulations in respect of disclosures of half-yearly reports and annual reports shall continue to be applicable until the winding up is completed or the Scheme ceases to exist.
- After the receipt of report referred to the above under "Procedure and Manner of Winding up" if SEBI is satisfied that all measures for winding up of the Scheme have been complied with, the Scheme shall cease to exist.
- The aforesaid provisions pertaining to "Procedure and Manner of Winding Up" shall apply in respect of each individual scheme and to the extent possible shall apply mutatis mutandis to each Investment Plan.
- The units of a mutual fund scheme shall be delisted from a recognised stock exchange in accordance with the guidelines as may be specified by SEBI.

Listing of Mutual Fund schemes that are in the process of winding up is as per paragraph 8.2 of SEBI Master Circular for Mutual Funds dated March 20, 2026.

In terms of Regulation 29 of the SEBI (Mutual Funds) Regulations, 2026 ("MF Regulations") and Paragraph 8.2 of the SEBI Master Circular for Mutual Funds dated March 20, 2026, units of Mutual Fund schemes which are under the process of winding up shall be listed on a recognised stock exchange, subject to compliance with the listing formalities stipulated by the recognised stock exchange. Every close-ended scheme and units of segregated portfolio shall also be listed on a recognised stock exchange in accordance with Regulation 29 of the MF Regulations and Paragraph 5.5.4(b)(vi) of the SEBI Master Circular.

As per the MF Regulations, there are several steps envisaged with respect to winding up of Mutual Fund schemes before the scheme ceases to exist. During this process, such units shall be listed and may be traded on a recognised stock exchange, thereby providing an optional exit avenue to investors.

In terms of Regulation 29 of the MF Regulations read with Paragraph 8.2 of the SEBI Master Circular, the units of Mutual Fund schemes which are under the process of winding up shall be listed on a recognised stock exchange, subject to compliance with the listing formalities stipulated by the recognised stock exchange.

However, pursuant to such listing, trading on the recognised stock exchange shall not be mandatory for investors. Investors may, at their option, avail the stock exchange mechanism as an exit avenue during the winding-up process.

Initially, trading in units of a listed scheme under the process of winding up shall be permitted only in dematerialised form.

The AMC shall enable transfer of units held in the form of Statement of Account (SoA) / Unit Certificates in accordance with the operational framework prescribed by the recognised stock exchange(s).

The detailed operational modalities for trading and settlement of units of Mutual Fund schemes under the process of winding up shall be finalised by the recognised stock exchange(s), in consultation with SEBI. The operational modalities may, inter alia, include:

- Mechanism for order placement, execution, payment and settlement;
- Enabling bulk orders to be placed for trading in units;
- Suspension of trading, determination of record dates and other operational matters relating to payments to Unit holders during the winding-up process;
- Disclosures to be made by the AMC, including disclosure of NAV and scheme portfolio in accordance with the applicable regulatory requirements.

The recognised stock exchange shall develop an appropriate mechanism, in consultation with the Registrar and Transfer Agent (RTA), for trading and settlement of units held in the form of Statement of Account (SoA) / Unit Certificates.

The AMC, its Sponsor, employees of the AMC and the Trustee shall not buy or sell units of schemes which are under the process of winding up. Compliance with this requirement shall be monitored by the Board of the AMC and the Trustee.

7. <u>Consolidation of Folios</u>

In case an investor has multiple folios, the AMC reserves the right to consolidate all the folios into one folio, based on such criteria as may be determined by the AMC from time to time. In case of additional purchases in same scheme / fresh purchase in new scheme, if the investor fails to provide the folio number, the AMC reserves the right to allot the units in the existing folio, based on such integrity checks as may be determined by the AMC from time to time.

8. <u>Miscellaneous</u>

Investors may note that in case of fresh/additional purchases, if the name of the Scheme on the application form/transaction slip differs with the name on the Cheque/Demand Draft/payment instrument/transfer letter, then the AMC will allot units under the Scheme mentioned on the application form. In case of fresh/additional purchases, if the Scheme name is not mentioned on the application form/transaction slip, then the units will be allotted under the Scheme mentioned on the Cheque/Demand Draft/payment instrument/transfer letter. The Plan/Option that will be considered in such cases if not specified by the customer will be the default option of the Scheme as per the SID. However, in case additional purchase is

under the same scheme as fresh purchase, then the AMC reserves the right to allot units in the option under which units were allotted at the time of fresh purchase.

9. Bank Mandate Requirement

a) For all fresh purchase transactions made by means of a cheque, where the account on which the cheque is drawn for purchase of units differs from the bank mandate account provided in the application, a copy of blank/cancelled cheque of bank mandate account is required to be provided. This condition is also applicable to all purchase transactions made by means of a Demand Draft.

b) For Change of Bank mandate requests a copy of cheque of new bank mandate account is required to be provided. All Change of Bank Mandate requests submitted without copy of cheque are liable to be rejected.

c) In case the application is not accompanied by the cheque copy, the AMC reserves the right to reject the application also the AMC will not be liable in case the redemption/dividend proceeds are credited to wrong account in absence of above cheque copy.

d) In case of Change of Bank Mandate requests along with redemptions requests, where copy of cheque as mandated above is not submitted, redemption proceeds will be issued / credited to existing bank mandate account.

10. Application with/without broker

Investors may note and follow the below-mentioned directions while applying for the units of the schemes of the Mutual Fund:

1) In case where the Broker code is already printed in Application form / Transaction form / Purchase request form by the AMC / Registrar / Distributor:
Where the Investor wishes to apply directly (i.e. not through existing broker / distributor), then the investor should strike off the broker code (printed) and should write "Direct Applications" or "Not Applicable (N.A.)" and countersign the same.

2) In case where the Broker code is not printed in Application form / Transaction form / Purchase request form:
In case of direct applications, the Investor should write in the space provided for the broker code "Direct Application" or "Not Applicable (N.A.)".

3) In case of change in broker, the investor will be required to strike off the old broker code and countersign near the new broker code, before submitting the application form / transaction form / purchase form to the designated ISC's/ OPA (Official points of Acceptance).

4) The Registrar and the AMC shall affect the application for changes in the broker code within the reasonable period of time from the time of receipt of written request from the investor at the designated ISC's / OPA. Decision of the Registrar/AMC in this regard shall be final and acceptable to all.

5) All Unitholders who have invested/may invest through channel distributors and intend to make their future investments through the direct route, are advised to complete the procedural formalities prescribed by AMC from time to time.

C. General Information

1. Inter-Scheme Transfer of Investments

Transfers of investments from one scheme to another scheme in the Mutual Fund shall be allowed only if such transfers are done at the prevailing market price for quoted instruments on spot basis.spot basis shall have same meaning as specified by stock exchange for spot transactions) and the securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.

2. Aggregate investment in the Scheme under the following categories:

Please find below the aggregate investment in the respective Scheme(s) by Board of Directors of Navi AMC Limited and key personnel as on May 31, 2026:

	Aggregate amount invested in the Scheme as on May 31, 2026 (market value in Rs.)		
Scheme Name	**AMC Board of Directors**	**Key Personnel (Excluding Fund Manager)**	**Fund Manager**
Navi Aggressive Hybrid Fund	616,424.17	1,329,769.27	364,940.17
Navi ELSS Tax Saver Nifty 50 Index Fund	0.00	25,433.12	33,019.99
Navi Flexi Cap Fund	1,253,267.60	4,310,364.92	330,866.86
Navi Large & Midcap Fund	1,418,255.40	3,193,391.87	367,112.88
Navi Liquid Fund	0.00	560,454.74	484,761.44
Navi Nifty 50 Index Fund	2,770,981.68	5,141.43	131,483.89
Navi Nifty 500 Multicap 50:25:25 Index Fund	493,165.34	0.00	0.00
Navi Nifty Bank Index Fund	0.00	186,306.92	0.00
NAVI NIFTY IT INDEX FUND	0.00	147,082.37	0.00
Navi Nifty Midcap 150 Index Fund	406,133.97	25,464.08	279,917.68
Navi Nifty Midsmallcap 400 Index Fund	0.00	5,199.74	0.00
Navi Nifty Next 50 Index Fund	0.00	32,369.72	468,505.87

Navi Nifty Smallcap250 Momentum Quality 100 Index Fund	0.00	681,720.55	0.00
Navi US Nasdaq 100 Fund of Fund	3,295,334.14	1,625,275.00	584,274.05
Navi US Total Stock Market Fund of Fund	3,520,983.78	1,503,690.36	409,465.92

3. Dematerialisation and Rematerialisation procedures

Option to hold units in Dematerialized (Demat) Form

As per Paragraph 15.7.2 of SEBI Master Circular dated March 20, 2026, Navi Mutual Fund provides an option to the investors of the Fund to mention demat account details in the subscription form, in case they desire to hold units in the dematerialized mode. The option to subscribe to the units in the dematerialized mode is available for all the schemes of the Fund, except for plans / options, where dividend distribution frequency is less than one month.

4. ASBA disclosures

ASBA disclosures are provided under **Section VI – How to apply - Mode of Payment**

5. Portfolio Turnover Details

For open-ended Schemes, it is expected that there would be a number of Subscriptions and Redemptions on a daily basis. The fund manager depending upon the view and subject to trading opportunities, may trade in securities, which will lead to increase in Portfolio Turnover. There may be an increase in transaction cost such as brokerage paid, if trading is done frequently. However, the cost would be negligible as compared to the total expenses of the Schemes. Frequent trading may increase the profits which will offset the increase in costs. The fund manager will endeavor to optimize portfolio turnover to maximize gains and minimize risks keeping in mind the cost associated with it. However, it is difficult to estimate with reasonable measure of accuracy, the likely turnover in the portfolio of the Schemes. The Schemes have no specific target relating to portfolio turnover.

Portfolio Turnover as on May 31,2026

Scheme Name	Portfolio Turnover Ratio
Navi Aggressive Hybrid Fund	0.54
Navi Flexi Cap Fund	0.51
Navi Large & Midcap Fund	0.62

Navi Nifty 50 Index Fund	0.07
Navi Nifty Next 50 Index Fund	0.26
Navi Nifty Bank Index Fund	0.36
Navi Nifty Midcap 150 Index fund	0.27
Navi Nifty India Manufacturing Index Fund	0.35
Navi ELSS Tax Saver Nifty 50 Index Fund	0.04
Navi S&P BSE Sensex Index Fund	0.18
Navi Nifty IT Index Fund	0.36
Navi Nifty 500 Multicap 50:25:25 IndexFund	0.33
Navi Nifty SmallCap250 Momentum Qlty 100 Index Fund	0.83
Nifty MidSmallcap 400 Index Fund	0.45

Latest monthly portfolio holding can be obtained on website of Navi Mutual Fund .(https://navi.com/mutual-fund/downloads/portfolio)

D. Associate Transactions

The Mutual Fund was registered on September 04, 2009 with SEBI and has not had any transactions with the Sponsor or any of the Sponsor's associates from the date of registration until the date of this SAI.

The AMC may however, for the purposes of providing certain services utilize the services of the Sponsor, group companies and any other subsidiary or associate company of the Sponsor established or to be established at a later date, who is in a position to provide the requisite services to the AMC.

The scheme till date has not invested in group companies of the sponsor or the sponsor in accordance with the provisions of the MF Regulations.

No scheme of the Mutual Fund has invested more than 25% of its net assets in group companies.

The AMC, on behalf of the Fund, shall conduct its business with the aforesaid companies (Including their employees or relatives) on commercial terms and on arms-length basis and at mutually agreed terms and conditions to the extent permitted under the Regulations.

The Mutual Fund does not propose to have dealings, transactions and any services used for marketing and distributing the scheme and the commissions paid to them to the associates of the Sponsor or the Asset Management Company

Details of brokerage / commission paid to associates / related parties / group companies of Sponsor for the past 3 financial years is given below:

Name of associates / related parties / group companies of Sponsor / AMC	Nature of association / nature of relation	Period covered	Value of transaction		Brokerage Paid	
			Rs. Cr.	% of total value of transaction of fund	Rs. Cr.	% of total brokerage paid by the fund
NA	NA	**Apr'25-Mar'26**	NIL	NIL	NIL	NIL
NA	NA	**Apr'24-Mar'25**	NIL	NIL	NIL	NIL
NA	NA	**Apr'23-Mar'24**	NIL	NIL	NIL	NIL

Details of Commission paid to associates / related parties / group companies of Sponsor / AMC for the past 3 financial years is given below:

Name of associates / related parties / group companies of Sponsor / AMC	Nature of association / nature of relation	Period covered	Value of transaction		Brokerage Paid	
			Rs. Cr.	% of total value of transaction of fund	Rs. Cr.	% of total brokerage paid by the fund

NA	NA	**Apr'25-Mar'26**	NIL	NIL	NIL	NIL
NA	NA	**Apr'24-Mar'25**	NIL	NIL	NIL	NIL
NA	NA	**Apr'23-Mar'24**	NIL	NIL	NIL	NIL

-Dealing with Associates

No such Transactions (aggregate purchase and sale) in securities were carried out with associates during the past 3 financial years.

E. **Documents Available for Inspection**

The following documents will be available for inspection at the office of the Mutual Fund at Vaishnavi Tech Square, 7th Floor, Iballur Village, Begur Hobli, Bengaluru, Karnataka 560102 during business hours on any day (excluding Saturdays, Sundays and public holidays):

- Memorandum and Articles of Association of the AMC
- Investment Management Agreement
- Trust Deed and amendments thereto, if any
- Mutual Fund Registration Certificate
- Agreement between the Mutual Fund and the Custodian
- Agreement with Registrar and Share Transfer Agents
- Consent of Auditors to act in the said capacity
- Consent of Legal Advisors to act in the said capacity
- Securities and Exchange Board of India (Mutual Funds) Regulations, 2026 and amendments from time to time thereto.
- Indian Trusts Act, 1882.

F. **Investor Grievances Redressal Mechanism**

Investors may address their complaints to **Ms. Sadiqa Banu,** Investor Relations Officer of the Company, between 09:00 a.m. and 06:00 p.m., at

Toll Free / Tel No.: 18002032131 / +91 95359 99572
Email: mf@navi.comv
Chatbot: https://m.Navi.com/d1TRK4WScNb

Registered Office Address:
Vaishnavi Tech Square, 7th Floor,
Iballur Village, Begur,
Bengaluru, Karnataka – 560102

Investors may also contact or visit any of the Investor Service Centres (ISCs) of the AMC for assistance and grievance redressal.

Details of investors complaints received and redressed during the period April 1, 2023 to March 31, 2024 are as under:-

Redressal of Complaints received during		2023-2024										
Name of the Mutual Fund		Navi Mutual Fund										
Total Number of Folios		2737910										
Complaint code	Type of complaint	(a) No. of complaints pending at the beginning of the year	Action on (a) and (b)									
			(b) No of complaints received during the year	Resolved				Non Actionable	Pending			
				With in 30 days	30-60 days	60-180 days	Beyond 180 days		0-3 months	3-6 months	6-9 months	9-12 months
IA	Non receipt of Dividend on Units	0	6	6	0	0	0	0	0	0	0	0

IB	Interest on delayed payment of Dividend	0	0	0	0	0	0	0	0	0	0	0
IC	Non receipt of Redemption Proceeds	0	88	87	1	0	0	0	0	0	0	0
ID	Interest on delayed payment of Redemption	0	0	0	0	0	0	0	0	0	0	0
IIA	Non receipt of Statement of Account/Unit Certificate	0	6	6	0	0	0	0	0	0	0	0
IIB	Discrepancy in Statement of Account	0	1	1	0	0	0	0	0	0	0	0
IIC	Data corrections in Investor details	0	2	2	0	0	0	0	0	0	0	0
IID	Non receipt of Annual Report/Abridged Summary	0	0	0	0	0	0	0	0	0	0	0
IIIA	Wrong switch between Schemes	0	2	2	0	0	0	0	0	0	0	0
IIIB	Unauthorized switch between Schemes	0	1	1	0	0	0	0	0	0	0	0

IIIC	Deviation from Scheme attributes	0	0	0	0	0	0	0	0	0	0	0
IIID	Wrong or excess charges/load	0	1	0	1	0	0	0	0	0	0	0
IIIE	Non updation of changes viz. address, PAN, bank details, nomination, etc	0	5	4	1	0	0	0	0	0	0	0
IIIF	Delay in allotment of Units	0	130	123	7	0	0	0	0	0	0	0
IV	Others	0	126	122	4	0	0	0	0	0	0	0

-Details of investors complaints received and redressed during the period April 1, 2024 to March 31, 2025 are as under:-

Redressal of Complaints received during		2024-2025				
Name of the Mutual Fund		Navi Mutual Fund				
Total Number of Folios		2865784				
Compl aint code	Type of complaint	(a) No. of complaints pending at the	Action on (a) and (b)			
			(b) No of complaints received	Resolved	Non Actiona ble	Pending

		beginning of the year	during the year	With in 30 days	30-60 days	60-180 days	Beyond 180 days		0-3 months	3-6 months	6-9 months	9-12 months
IA	Non receipt of Dividend on Units	0	0	0	0	0	0	0	0	0	0	0
IB	Interest on delayed payment of Dividend	0	0	0	0	0	0	0	0	0	0	0
IC	Non receipt of Redemption Proceeds	0	67	67	0	0	0	0	0	0	0	0
ID	Interest on delayed payment of Redemption	0	0	0	0	0	0	0	0	0	0	0
IIA	Non receipt of Statement of Account/Unit Certificate	0	0	0	0	0	0	0	0	0	0	0
IIB	Discrepancy in Statement of Account	0	1	1	0	0	0	0	0	0	0	0
IIC	Data corrections in Investor details	0	0	0	0	0	0	0	0	0	0	0

IID	Non receipt of Annual Report/Abridged Summary	0	0	0	0	0	0	0	0	0	0	0
IIIA	Wrong switch between Schemes	0	0	0	0	0	0	0	0	0	0	0
IIIB	Unauthorized switch between Schemes	0	0	0	0	0	0	0	0	0	0	0
IIIC	Deviation from Scheme attributes	0	0	0	0	0	0	0	0	0	0	0
IIID	Wrong or excess charges/load	0	0	0	0	0	0	0	0	0	0	0
IIIE	Non updation of changes viz. address, PAN, bank details, nomination, etc	0	2	2	0	0	0	0	0	0	0	0
IIIF	Delay in allotment of Units	0	265	265	0	0	0	0	0	0	0	0
IV	Others	0	129	129	0	0	0	0	0	0	0	0

-Details of investors complaints received and redressed during the period April 1, 2025 to March 31, 2026 are as under:-

Redressal of Complaints received during		April 1, 2025, to March 31, 2026										
Name of the Mutual Fund		Navi Mutual Fund										
Total Number of Folios		27,03,445										
Complaint code	Type of complaint	(a) No. of complaints pending at the beginning of the year	Action on (a) and (b)									
			(b) No of complaints received during the year	Resolved				Non Actionable	Pending			
				Within 30 days	30-60 days	60-180 days	Beyond 180 days		0-3 months	3-6 months	6-9 months	9-12 months
IA	Non receipt of Dividend on Units	0	0	0	0	0	0	0	0	0	0	0
IB	Interest on delayed payment of Dividend	0	0	0	0	0	0	0	0	0	0	0
IC	Non receipt of Redemption Proceeds	0	29	29	0	0	0	0	0	0	0	0
ID	Interest on delayed payment of Redemption	0	0	0	0	0	0	0	0	0	0	0

IIA	Non receipt of Statement of Account/Unit Certificate	0	0	0	0	0	0	0	0	0	0	0
IIB	Discrepancy in Statement of Account	0	0	0	0	0	0	0	0	0	0	0
IIC	Data corrections in Investor details	0	1	1	0	0	0	0	0	0	0	0
IID	Non receipt of Annual Report/Abridged Summary	0	0	0	0	0	0	0	0	0	0	0
IIIA	Wrong switch between Schemes	0	0	0	0	0	0	0	0	0	0	0
IIIB	Unauthorized switch between Schemes	0	0	0	0	0	0	0	0	0	0	0
IIIC	Deviation from Scheme attributes	0	0	0	0	0	0	0	0	0	0	0
IIID	Wrong or excess charges/load	0	0	0	0	0	0	0	0	0	0	0

IIIE	Non updation of changes viz. address, PAN, bank details, nomination, etc	0	0	0	0	0	0	0	0	0	0	0
IIIF	Delay in allotment of Units	0	128	127	1	0	0	0	0	0	0	0
IV	Others	0	25	25	0	0	0	0	0	0	0	0

G. **Information pertaining to Investments by the Schemes of the Fund**

1. Derivative strategies

Derivative Strategies: As allowed under the SEBI guidelines on derivatives, the fund manager will employ various other stock and index derivative strategies by buying or selling stock/index futures and/or options.

Objective of the Strategy

The objective of the strategy is to earn low volatility consistent returns.

Risk Associated with this Strategy

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

Execution Risk: The prices which are seen on the screen need not be the same at which execution will take place.

Equity Derivative Instruments:

Equity derivative instrument include but are not limited to futures (both stock and index) and options (stock and index).

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

Derivatives can be either exchange traded or can be over the counter (OTC). Exchange traded derivatives are listed and traded on stock exchanges whereas OTC derivative transactions are generally structured

between two counterparties. The risks associated with derivatives are similar to those associated with equity investments. The additional risks could be on account of:

1. Illiquidity
2. Potential mis - pricing of the Futures / Options
3. Inability of derivatives to correlate perfectly with the underlying (Indices, Assets, Exchange Rates)
4. Cost of hedge can be higher than adverse impact of market movements.
5. An exposure to derivatives in excess of the hedging requirements can lead to losses.
   An exposure to derivatives can also limit the profits from a genuine investment transaction.

   Exchange traded derivative contracts in stocks and indices in India are currently cash settled at the time of maturity/ expiry.

Concepts and Examples

Futures

Futures (Index & Stocks) are forward contracts traded on the exchanges & have been introduced both by BSE and NSE. Generally, futures of 1 month (*near month*), 2 months (*next month*) and 3 months (*far month*) are presently traded on these exchanges. These futures expire on the last Business Thursday of the respective months.

Illustration with Index Futures

In case the Nifty near month future contract is trading at say, Rs. 3,500, and the fund manager has a view that it will depreciate going forward; the Scheme can initiate a sale transaction of Nifty futures at Rs. 3,510 without holding a portfolio of equity stocks or any other underlying long equity position. Once the price falls to Rs. 3,400 after say, 20 days, the Scheme can initiate a square-up transaction by buying the said futures and book a profit of Rs. 110.

Correspondingly, if the fund manager has a positive view he can initiate a long position in the index / stock futures without an underlying cash/ cash equivalent subject to the extant regulations.

There are futures based on stock indices as mentioned above as also futures based on individual stocks. The profitability of index / stock future as compared to an individual security will inter-alia depends upon:

1. The carrying cost.
2. The interest available on surplus funds, and
3. The transaction cost.

Example of a future trade and the associated costs

Particulars	**Index Future**	**Actual Purchase of Stocks**

Index at the beginning of the month	3500	3500
Price of 1 month future	3510	
A Execution Cost: Carry and other index future costs	10.00	
B. Brokerage Costs: Assumed at 0.20% of Index Future and 0.25% for Spot Stocks	7.02	8.75
C. Gains on surplus Funds:	19.56	0
(assumed 8% p.a. return on 85% of the money left after paying 15% margin)		
(8%*3500*85%*30 days/365)		
Total Cost (A+B+C)	**-2.54**	**8.75**

Few strategies that employ stock / index futures and their objectives:

(a) Arbitrage

i. Selling spot and buying future: In case the Scheme holds the stock of a company "A" at say 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.

ii. 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.

iii. 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.

iv. 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.

v. 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.

vi. 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.

(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-à-vis a fall in stock price of Rs 8.

(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.

(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 associated with these strategies:

a) Lack of opportunities
b) Inability of derivatives to correlate perfectly with the underlying security; and
c) Execution risk, whereby ultimate execution takes place at a different rate than those devised by the strategy.

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.

Option Contracts (Stock and Index)

An Option gives the buyer the right, but not the obligation, to buy (call) or sell (put) a stock at an agreed upon price during a certain period of time or on a specific date.

Options are used to manage risk or as an investment to generate income. The price at which underlying security is contracted to be purchased or sold is called the Strike Price.

Options that can be exercised on or before the expiration date are called American Options while, Options that can be exercised only on the expiration date are called European Options.

Options Risk / Return Pay-off Table

INDEX/STOCK OPTIONS	**CALL**		**PUT**	
	BUY	**SELL**	**BUY**	**SELL**
View on Underlying	Positive	Negative	Negative	Positive
Premium	Pay	Receive	Pay	Receive
Risk Potential	Limited to premium paid	Unlimited	Limited to premium paid	Unlimited
Return Potential	Unlimited	Premium Received	Unlimited	Premium Received

Option contracts are of two types - Call and Put.

Call Option: A call option gives the buyer; the right to buy specified quantity of the underlying asset at the set strike price on or before expiration date and the seller (writer) of call option however, has the obligation to sell the underlying asset if the buyer of the call option decides to exercise the option to buy.

Put Option: A put option gives the buyer the right to sell specified quantity of the underlying asset at the set strike price on or before expiration date and the seller (writer) of put option however, has the obligation to buy the underlying asset if the buyer of the put option decides to exercise his option to sell.

Index Options / Stock Options

Index options / Stock options are termed to be an efficient way of buying / selling an index/stock compared to buying / selling a portfolio of physical shares representing an index for ease of execution and settlement.

The participation can be done by buying / selling either Index futures or by buying a call/put option.

The risk are also different when index / stock futures are bought/sold visa- a- vie index/ stocks options as in case of an index future there is a mark to market variation and the risk is much higher as compared to buying an option, where the risk is limited to the extent of premium paid.

The illustration below explains how one can gain using Index call / put option. These same principals of profit / loss in an Index option apply in Toto to that for a stock option.

Call Option

Suppose an investor buys a Call option on 1 lot of Nifty 50 (Lot Size: 50 units)

- Nifty index (European option).
- Nifty 1 Lot Size: 50 units
- Spot Price (S): 3500
- Strike Price (x): 3550 (Out-of-Money Call Option)
- Premium: 100

Total Amount paid by the investor as premium [50*100] =5000

There are two possibilities i.e. either the index moves up over the strike price or remains below the strike price.

Case 1- The index goes up

An investor sells the Nifty Option described above before expiry:

Suppose the Nifty index moves up to 3600 in the spot market and the premium has moved to Rs 200 and there are **15 days more left for the expiry.** The investor decides to reverse his position in the market by **selling** his 1 Nifty call option as the option now is in the Money.

His gains are as follows:

- Nifty Spot: 3600
- Current Premium: Rs.200
- Premium paid: Rs.100
- Net Gain: Rs.200- Rs.100 = Rs.100 per unit
- Total gain on 1 lot of Nifty (50 units) = Rs.5000 (50*100)

In this case the premium of Rs.200 has an intrinsic value of Rs.50 per unit and the remaining Rs.150 is the time value of the option.

An investor exercises the Nifty Option at expiry

Suppose the Nifty index moves up to 3700 in the spot market on the expiry day and the investor decides to reverse his position in the market by exercising the Nifty call option as the option now is in The Money.

His gains are as follows:

- Nifty Spot: 3700
- Premium paid: Rs.100
- Exercise Price: 3550
- Receivable on exercise: 3700-3550 = 150
- Total Gain: Rs.2500 {(150-100) *50}

In this case the realized gain is only the intrinsic value, which is Rs.50, and there is no time value.

Case 2 - The Nifty index moves to any level below 3550.

Then the investor does not gain anything but on the other hand his loss is limited to the premium paid:

Net Loss is Rs.5000 (Loss is capped to the extent of Premium Paid) (Rs 100 Premium paid*Lot Size: 50 units).

Put Option

Suppose an investor buys a Put option on 1 lot of Nifty 50.

- Nifty 1 Lot Size: 50 units
- Spot Price (S): 3500
- Strike Price (x): 3450 (Out-of-Money Put Option)
- Premium: 30
- Total Amount paid by the investor as premium [50*30] =1500

There are two possibilities i.e. either the index moves over the strike price or moves below the strike price.

Let us analyze these scenarios.

Case 1 - The index goes down

An investor sells the Nifty Option before expiry:

Suppose the Nifty index moves down to 3400 in the spot market and the premium has moved to Rs. 80 and there are 15 days more left for the expiry. The investor decides to reverse his position in the market by selling his 1 Nifty Put Options as the option now is in the money. His gains are as follows:

- Nifty Spot: 3400
- Premium paid: Rs.30
- Net Gain: Rs.80 - Rs.30 = Rs.50 per unit
- Total gain on 1 lot of Nifty (50 units) = Rs.2500 (50*50)

In this case the premium of Rs.80 has an intrinsic value of Rs.50 per unit and the remaining Rs.30 is the time value of the option.

An investor exercises the Nifty Option at expiry (It is an European Option)

Suppose the Nifty index moves down to 3400 in the spot market on the expiry day and the investor decides to reverse his position in the market by exercising the Nifty Put Option as the option now is **In the Money**.

His gains are as follows:

- Nifty Spot: 3400
- Premium paid: Rs.30
- Exercise Price: 3450
- Gain on exercise: 3450-3400 = 50
- Total Gain: Rs.1000 {(50-30) *50}

In this case the realized amount is only the intrinsic value, which is Rs.50, and there is no time value in this case.

Case 2 - If the Nifty index stays over the strike price which is 3450, in the spot market then the investor does not gain anything but on the other hand his loss is limited to the premium paid.

- Nifty Spot: >3450
- Net Loss Rs.1500 (Loss is caped to the extent of Premium Paid) (Rs 30 Premium paid*Lot Size: 50 units).

Debt Derivatives Strategy:

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

The Fund will be allowed to take exposure in interest rate swaps only on a non-leveraged basis. A swap will be undertaken only if there is an underlying asset in the portfolio. In terms of Paragraph 8.5.2 of SEBI Master circular on Mutual Funds dated March 20, 2026 and guidelines issued by RBI permitting participation by Mutual Funds in interest rate swaps and forward rate agreements, the Fund will use Derivative instruments for the purpose of hedging and portfolio balancing.

The Fund may also use derivatives for such purposes as maybe permitted from time to time. Further, the guidelines issued by RBI from time to time for forward rate agreements and interest rate swaps and other derivative products would be adhered to by the Mutual Fund.

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

Investments in Derivatives will be in accordance with the extant Regulations / guidelines. Presently Derivatives shall be used for hedging and / or portfolio balancing purposes, as permitted under the Regulations. The circumstances under which such transactions would be entered into would be when, for example using the IRS route it is possible to generate better returns / meet the objective of the Scheme at a lower cost. e.g. if buying a 2 Yr Mibor based instrument and receiving the 2 Yr swap rate yields better return than the 2 Yr AAA corporate, the Scheme would endeavor to do that. Alternatively, the Scheme would also look to hedge existing fixed rate positions if the view on interest rates is that it would likely rise in the future.

The following information provides a basic idea as to the nature of the Derivative instruments proposed to be used by the Fund and the benefits and risks attached therewith.

2. Swing Pricing

- The Swing Framework shall apply in case of scenarios related to net outflows from the schemes.
- SEBI will determine 'market dislocation' either based on AMFI's recommendation or suo moto.
- Once market dislocation is declared, SEBI will notify that swing pricing will be applicable for a specified period.

- Thereafter, mandatory swing pricing will apply for applicable Schemes which:
  - o have 'High' or 'Very High' risk on the risk-o-meter (as of the most recent period at the time of declaration of market dislocation); and
  - o classify themselves in cells A-III, B-II, B-III, C-I, C-II and C-III of Potential Risk Class (PRC) Matrix.
- Swing factor as per below matrix shall be made applicable to the above-mentioned schemes and the NAV will be adjusted for the swing factor

Swing factor			
Max Credit Risk of scheme → **Max Interest Rate Risk (CRV* ↓**	**Class A (CRV* >=12)**	**Class B (CRV* >=10)**	**Class C (CRV* <10)**
Class I: (Macaulay duration <=1 year)	Optional	Optional	1.5%
Class II: (Macaulay duration <=3 years)	Optional	1.25%	1.75%
Class III: Any Macaulay duration	1%	1.5%	2%
*CRV - Credit Risk Value			

- **Impact on investors:**
  - When the Swing Framework is triggered and swing factor is made applicable, both the incoming (unit holders who submit purchase/switch-in requests) and outgoing investors (unit holders who submit redemption/switch out requests) shall get NAV adjusted downwards for swing factor.
  - Swing pricing shall be made applicable to all unitholders at PAN level with an exemption for redemptions up to Rs. 2 lacs for each mutual fund scheme for both normal times and market dislocation.
  -
- **Periodic Disclosures:**
  Disclosures pertaining to NAV adjusted for swing factor shall be made by the AMC in SIDs and in the prescribed format in the SAI and in scheme wise Annual Reports and Abridged summary thereof and on the website in case swing pricing framework has been made applicable for a scheme of the Fund.
- **Scheme performance shall be calculated as per unswung NAV.**

A. Threshold for Trigger Swing Pricing during Normal Times for all open-ended debt scheme

(Except overnight funds, Gilt Funds and Gilt with 10-year maturity funds)

The indicative range of Swing Factor during normal times shall be:

a. 10% net flow from any debt scheme other than liquid scheme.
b. 15% net flow from Liquid Scheme.

These are floor figures, and the AMC reserves the right to set limits higher, depending on the dynamics of the scheme both on liability side and on the asset side.

Indicative range of Swing Threshold:

The indicative range amount of Swing factor based on PRC Matrix is as follows:

Sr. No.	a	B	C
1	0.00 %	0.05 %	0.20%
2	0.05 %	0.10%	0.40%
3	0.10%	0.20%	0.60%

These are floor figures amounts, and the AMC reserves the right to set limits higher, depending on the dynamics of the scheme both on liability side and on the asset side.

B. Triggering Swing-Pricing on re-opening of Scheme after announcement of winding-up.

For instances where Navi AMC /Navi Mutual Fund decides to roll back the decision to wind up the scheme, it shall mandatorily invoke the swing -pricing upon re-opening a scheme for subscriptions and redemptions post such announcement.

The indicative range of swing pricing for the parameter of "re-opening of Scheme after announcement of winding-up" shall be the same as applicable for normal times.

The indicative range of swing pricing shall be applied for a higher of swing period as decided by the Board of Navi AMC Limited or for a minimum of 7 working days, upon re-opening a scheme for subscriptions and redemptions.

3. <u>Provisions on creation of Segregated portfolio</u>

Conditions for creation of Segregated Portfolio:

Creation of segregated portfolio shall be subject to guidelines specified by SEBI from time to time and includes the following:

1) Segregated portfolio may be created, in case of a credit event at issuer level i.e. downgrade in credit rating by a SEBI registered Credit Rating Agency (CRA), as under:

a) Downgrade of a debt or money market instrument to 'below investment grade', or
b) Subsequent downgrades of the said instruments from 'below investment grade', or
c) Similar such downgrades of a loan rating.

2) In case of difference in rating by multiple CRAs, the most conservative rating shall be considered. Creation of segregated portfolio shall be based on issuer level credit events as detailed above and implemented at the ISIN level.
3) Creation of segregated portfolio is optional and is at the discretion of the Navi AMC Limited (AMC).
4) AMC has a written down policy on Creation of segregated portfolio which is approved by the Trustees.

Definitions

1. The term 'segregated portfolio' shall mean a portfolio, comprising of debt or money market instrument affected by a credit event, that has been segregated in a mutual fund scheme.
2. The term 'main portfolio' shall mean the scheme portfolio excluding the segregated portfolio.
3. The term 'total portfolio' shall mean the scheme portfolio including the securities affected by the credit event.

Process for Creation of Segregated Portfolio

1) On the date of credit event, AMC should decide on creation of segregated portfolio. Once AMC decides to segregate portfolio, it should:
   a) seek approval of trustees prior to creation of the segregated portfolio.
   b) immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors. Navi Mutual Fund will also disclose that the segregation shall be subject to Trustee approval. Additionally, the said press release will be prominently disclosed on the website of the AMC.
   c) ensure that till the time the trustee approval is received, which in no case shall exceed 1 business day from the day of credit event, the subscription and redemption in the scheme will be suspended for processing with respect to creation of units and payment on redemptions.
2) Once Trustee approval is received by the AMC:
   a. Segregated portfolio will be effective from the day of credit event
   b. AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information will also be submitted to SEBI.
   c. An e-mail or SMS will be sent to all unit holders of the concerned scheme.
   d. The NAV of both segregated and main portfolios will be disclosed from the day of the credit event.
   e. All existing investors in the scheme as on the day of the credit event will be allotted equal number of units in the segregated portfolio as held in the main portfolio.No redemption/subscription will be allowed in the segregated portfolio. However, in order to facilitate exit to unit holders in segregated portfolio, AMC shall enable listing of units of segregated portfolio on the recognized stock exchange within 10 business days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests
   f.
   g.
3) If the trustees do not approve the proposal to segregate portfolio, AMC will issue a press release immediately informing investors of the same.

Valuation and Processing of Subscription and Redemption Proceeds

Notwithstanding the decision to segregate the debt and money market instrument, the valuation process shall take into account the credit event and the portfolio shall be valued based on the principles of fair valuation (i.e. realizable value of the assets) in terms of the relevant provisions of SEBI (Mutual Funds) Regulations, 2026 and Circular(s) issued thereunder.

All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as under:

(i) Upon trustees' approval to create a segregated portfolio –
   - Investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio.
   - Investors subscribing to the scheme will be allotted units only in the main portfolio based on its NAV.

(ii) In case trustees do not approve the proposal of segregated portfolio, subscription and redemption applications will be processed based on the NAV of total portfolio.

Disclosures

1. A statement of holding indicating the units held by the investors in the segregated portfolio along with the NAV of both segregated portfolio and main portfolio as on the day of the credit event shall be communicated to the investors within 5 Business days of creation of the segregated portfolio.
2. Adequate disclosure of the segregated portfolio shall appear in all scheme related documents, in monthly and half yearly portfolio disclosures and in the annual report of the mutual fund and the scheme.
3. The Net Asset Value (NAV) of the segregated portfolio shall be declared on daily basis.
4. The information regarding number of segregated portfolios created in the Scheme shall appear prominently under the name of the Scheme at all relevant places such as SID, KIM-cum-Application Form, advertisement, AMC and AMFI websites, etc.
5. The performance of the Scheme required to be disclosed at various places shall include the impact of creation of segregated portfolio and shall clearly reflect the fall in NAV to the extent of the portfolio segregated due to the credit event and the said fall in NAV along with recovery(ies), if any, shall be disclosed as a footnote to the scheme performance.
6. The disclosures at paragraph (4) and () above regarding the segregated portfolio shall be carried out for a period of at least 3 years after the investments in segregated portfolio are fully recovered/written-off.
7. The investors of the segregated portfolio shall be duly informed of the recovery proceedings of the investments of the segregated portfolio. Status update may be provided to the investors at the time of recovery and also at the time of writing-off of the segregated securities.

Monitoring by Trustees

Trustees shall ensure that:

1. The AMC puts in sincere efforts to recover the investments of the segregated portfolio.

2. Upon recovery of money, whether partial or full, it shall be immediately distributed to the investors in proportion to their holding in the segregated portfolio. Any recovery of amount of the security in the segregated portfolio even after the write off shall be distributed to the investors of the segregated portfolio.
3. An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated portfolio is placed in every meeting of the Trustees till the investments are fully recovered/ written-off.
4. The Trustees shall monitor the compliance of the SEBI circular in respect of creation of the segregated portfolio and disclose in the half-yearly trustee reports filed with SEBI, the compliance in respect of every segregated portfolio created.

In order to avoid mis-use of segregated portfolio, Trustees shall ensure to have put in place a mechanism to negatively impact the performance incentives of Fund Managers, Chief Investment Officers (CIOs) etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of Navi AMC Ltd. , including claw back of such amount to the segregated portfolio of the scheme.

The existence of the provisions for segregated portfolio shall not encourage the AMCs to take undue credit risk in the scheme portfolio. Any misuse of the provisions of segregated portfolio, shall be considered serious and stringent action shall be taken.

BER for the Segregated Portfolio

1) AMC will not charge investment and advisory fees on the segregated portfolio. However, BER (excluding the investment and advisory fees) can be charged, on a pro-rata basis only upon recovery of the investments in segregated portfolio.

2) The BER so levied shall not exceed the simple average of such expenses (excluding the investment and advisory fees) charged on daily basis on the main portfolio (in % terms) during the period for which the segregated portfolio was in existence The legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio in proportion to the amount of recovery. However, the same shallbe within the maximum TER limit as applicable to the main portfolio. The legal charges in excess of the TER limits, if any, shall be borne by the AMC.

3) The costs related to segregated portfolio shall in no case be charged to the main portfolio.

Risks associated with segregated portfolio

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

1. Investor holding units of segregated portfolio may not able to liquidate their holding till the time recovery of money from the issuer.
2. Security comprises of segregated portfolio may not realise any value.
3. Listing of units of segregated portfolio in recognised stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units in the stock market. Further trading price of units on the stock market may be significantly lower than the prevailing NAV. The trading price of units on the stock exchange may be significantly lower than the prevailing Net Assets Value (NAV) of the segregated portfolio.

4. <u>Illustration of Segregated Portfolio:</u>

Portfolio Date	31-Mar-25
Downgrade Event Date	31-Mar-25
Downgrade Security	7.65% C Ltd from AA+ to B
Valuation Marked Down	25%

Mr. X is holding 1000 Units of the Scheme, amounting to (1000*15.0573) Rs.15,057.3/-.

Portfolio Before Downgrade Event

Security Price	Rating	Type of the Security	Qty	Per Unit(Rs)	Market Value (Rs. in Lacs)	% of Net Assets
7.80%A FINANCE LTD	CRISIL AAA	NCD	3,200,000	102.812	3289.98	21.850
7.70 % B LTD	CRISIL AAA	NCD	3,200,000	98.5139	3182.00	21.133
7.65 % C Ltd	**CRISIL B***	**NCD**	**3,200,000**	**73.843**	**2362.97**	**15.693**
D Ltd (15/May/2025)	ICRA A1+	CP	3,200,000	98.3641	3147.65	20.904
7.65 % E LTD	CRISIL AA	NCD	3,200,000	98.6757	2960.27	19.660
Cash / Cash Equivalents					114.47	0.760
Net Assets						**15057.34**
Unit Capital (no of units)						**1000.00**
NAV (Rs)						**15.0573**

* Marked down by 25% on the date of credit event. Before Marked down the security was valued at Rs.98.4570 per unit on the date of credit event i.e on 31st March 2025, NCD of C Ltd (7.65%) will be segregated as separate portfolio.

Main Portfolio as on 31st March 2026

Security Price	Rating	Type of the Security	Qty	Per Unit(Rs)	Market Value (Rs. in Lacs)	% of Net Assets
7.80% A FINANCE LTD	CRISIL AAA	NCD	3,200,000	102.812	3289.98	21.850
7.70 % B LTD	CRISIL AAA	NCD	3,200,000	98.5139	3182.00	21.133
D Ltd (15/May/2020)	ICRA A1+	CP	3,200,000	98.3641	3147.65	20.904
7.65 % E LTD	CRISIL AA	NCD	3,200,000	98.6757	2960.27	19.660
Cash / Cash Equivalents					114.47	0.760
Net Assets						**12694.37**
Unit Capital (no of units)						**1000.00**
NAV (Rs)						**12.6944**

Segregated Portfolio as on 31st March 2026

Security Price	Rating	Type of the Security	Qty	Per Unit (Rs)	Market Value (Rs. in Lacs)	% of Net Assets
7.65 % C Ltd	**CRISIL B***	**NCD**	**3,200,000**	**73.843**	**2362.97**	**15.693**
Unit Capital (no of units)						**1000.00**
NAV (Rs)						**2.3630**

Value of Holding of Mr. X after creation of Segregated Portfolio

	Segregated Portfolio	Main Portfolio	Total Value (Rs.)

No of units	1000	1000	
NAV(Rs)	2.3630	12.6944	
Total value	2362.97	12694.33	15057.30

Investors may note the essential difference between a segregated portfolio and non-segregated portfolio as follows:

Where the portfolio is not segregated, the transactions will continue to be processed at NAV based prices. There will be no change in the number of units remaining outstanding.

- Where the portfolio is segregated, equal number of units are created and allotted to reflect the holding for the portion of portfolio that is segregated.
- Once the portfolio is segregated, the transactions will be processed at NAV based prices of main portfolio.
- Since the portfolio is segregated for distressed security, the additional units that are allotted cannot be redeemed. The units will be listed on the recognised stock exchange to facilitate exit to unit holders.
- Upon realisation of proceeds under the distressed security either in part or full, the proceeds will be paid accordingly. Based on the circumstances and developments, the AMC may decide to write off the residual value of the segregated portfolio.
- Unitholders may also note that the process followed by the AMC/Trustees regarding creation of segregated portfolios shall be in accordance with the provisions laid down by SEBI in this regard, from time to time.

4. Short selling / stock lending

Subject to the SEBI Regulations as applicable from time to time, the Mutual Fund may, engage in Stock Lending. Stock Lending means the lending of stock to another person or entity for a fixed period of time, at a negotiated compensation. The securities lent will be returned by the borrower on the expiry of the stipulated period.

The AMC shall adhere to the following limits should it engage in Stock Lending:

Not more than 20% of the net assets of a Scheme can generally be deployed in Stock Lending.

Not more than 5% of the net assets of a Scheme can generally be deployed in Stock Lending to any single approved intermediary / counterparty.

Risks associated with Short Selling & Securities Lending:

Securities Lending is a 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. There are risks inherent in securities lending, including the risk of failure of the other party, in this case the approved intermediary to comply with the terms of the agreement. Such failure can

result in a possible loss of rights to the collateral, the inability of the approved intermediary to return the securities deposited by the lender and the possible loss of corporate benefits accruing thereon.

Short-selling is the sale of shares or securities that the seller does not own at the time of trading. Instead, he borrows it from someone who already owns it. Later, the short seller buys back the stock/security he shorted and returns the stock/security to the lender to close out the loan. The inherent risks are Counterparty risk and liquidity risk of the stock/security being borrowed. The security being short sold might be illiquid or become illiquid and covering of the security might occur at a much higher price level than anticipated, leading to losses.

For details, investors are requested to refer to the Scheme Information Document of the respective schemes.

H. <u>Transaction Charges and Stamp Duty</u>

Transaction Charges- Not Applicable

Stamp Duty- A stamp duty @0.005% of the transaction value would be levied on applicable mutual fund transactions, with effect from July 01, 2020. Pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including dividend reinvestment) to the unitholders would be reduced to that extent.

X. DISCLOSURES AND REPORTS BY THE FUND

1. Account Statement/Consolidated Account Statement

The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 Business Days of receipt of valid application/transaction to the Unit holders registered e-mail address and/or mobile number (whether units are held in demat mode or in account statement form).

The Unit holder without any charges may request for a physical account statement by writing to/calling the AMC/ISC/RTA. The Mutual Fund/ AMC shall dispatch an account statement within 5 Business Days from the date of the receipt of request from the Unit holder. On receipt of request from the unit holder, the AMC shall issue units in dematerialized form to a unit holder in a scheme within 2 working days.

A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds 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 within 12 days from the end of the month for the unitholders who have opted for delivery via electronic mode and within 15 days from the end of the month for unitholders who have opted for delivery via physical mode.

Half-yearly CAS shall be issued at the end of every six months (i.e. September/March) on or before 18th day of April and September for investors who have opted for delivery via electronic mode and on or before 21st day of April and October for investors who have opted delivery via physical mode, providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form across demat accounts, if applicable.

2. Portfolio Disclosures:

Fortnightly Disclosures:

The AMC will disclose the portfolio of the Debt schemes (along with ISIN) on fortnightly basis on the website https://navi.com/mutual-fund/downloads/portfolio and AMFI website www.amfiindia.com within 5 calendar days of every fortnight in a user-friendly and downloadable spreadsheet format.

Monthly Disclosures:

Paragraph 6.1 of SEBI Master Circular for Mutual Funds dated March 20, 2026, Mutual Funds/ AMCs shall disclose portfolio (along with ISIN) as on the last day of the month for all their schemes on their respective website and on the website of AMFI within 10 calendar days from the close of each month in a user-friendly and downloadable spreadsheet format.

In case of unit holders whose e-mail addresses are registered, AMCs shall send such monthly/fortnightly statements of scheme portfolio to such unitholders via email within the timelines prescribed above. AMCs shall provide a feature wherein a link is provided to investors to their registered email to enable the investor to directly view/download only the portfolio of schemes subscribed by the said investor, along with the scheme risk-o-meter, name of benchmark and risk-o-meter of benchmark

AMCs shall declare on their website the hosting of the monthly/fortnightly statement of its schemes portfolio on their respective website and on the website of AMFI and the modes such as SMS, telephone, email or written request (letter) through which a unit holder can submit a request for a physical or electronic copy of the statement of scheme portfolio.

AMCs shall provide a physical copy of the statement of its scheme portfolio, without charging any cost, on specific request received from a unit holder.

AMCs may disclose additional information (such as ratios, etc.) subject to compliance with the Advertisement Code.

3. Half Yearly Results

The Mutual Fund shall within one month from the close of each half year, (i.e.31st March and 30th September), host a soft copy of its unaudited financial results on its website of Navi Mutual Fund on https://navi.com/mutual-fund/downloads/statutory-disclosure and on the website of AMFI (https://www.amfiindia.com/) in a user-friendly, downloadable and machine-readable format.

Written communication (including digital modes such as email/SMS etc.) shall be sent to unitholders by the asset management company about the availability of financial results.

4. Annual Report

The Scheme wise annual report or an abridged summary thereof shall be provided to all Unit holders not later than four months (or such other period as may be specified by SEBI from time to time) from the date of closure of the relevant accounting year (i.e. 31stMarch each year) in the manner specified by SEBI. The mutual fund shall provide a physical copy of the abridged summary of the Annual Report without any cost, if a request through any mode is received from a unitholder. The full annual report shall be available for inspection at the Head Office of the Mutual Fund, and a copy shall be made available to the Unit holders on request on payment of nominal fees, if any.

Scheme wise annual report shall also be displayed on the website of the AMC https://Navi.com/mutual-fund and Association of Mutual Funds in India (www.amfiindia.com).

A link of the scheme annual report or abridged summary shall be displayed prominently on the website of the Fund and shall also be displayed on the website of AMFI.

XI. DISCLOSURES RELATED TO INDEX FUNDs

Pursuant to Chapter 20 of SEBI Master Circular for Mutual Funds dated March 20, 2026w.r.t. Mutual Funds Lite (MF Lite) framework for passively managed schemes of Mutual Funds, investors/ unitholders are requested to take note of following additional disclosures in relation to current passive schemes of Navi Mutual Fund:

I. Portfolio rebalancing:

- **Applicable for Equity oriented Index Funds:**

  Pursuant to clause 4.5.5.(a) of Master Circular for Mutual Funds dated March 20, 2026, in case of change in constituents of the index due to periodic review, the portfolio of the scheme will be rebalanced within 7 calendar days, or such other timeline as may be prescribed by SEBI from time to time.

  Further, any transactions undertaken in the portfolio of Index Schemes in order to meet the redemption and subscription obligations shall be done ensuring that post such transactions replication of the portfolio with the index is maintained at all points of time.

- **Applicable for Debt oriented Index Funds:**

  Pursuant to clause 4.4.5 of Master circular for Mutual Funds dated March 20,2026, for rebalancing the portfolio of the Debt oriented ETF/ Index Fund, the following norms shall apply:

a. In case of change in constituents of the index due to periodic review, the portfolio of ETF/ Index Funds be rebalanced within 7 calendar days.
b. In case the rating of any security is downgraded to below the rating mandated in the index methodology (including downgrade to below investment grade), the portfolio be rebalanced within 30 calendar days.
c. In case the rating of any security is downgraded to below investment grade, the said security may be segregated in accordance with Paragraph 5.5.3 and 5.5.4 of Master circular for Mutual Funds dated March 20, 2026, on "Segregated portfolio in mutual fund schemes.

II. Investments of AMC in the schemes of Navi Mutual Fund:

Pursuant to Regulation 22(a) of SEBI (MF) Regulations, 2026 read along with para 7.13.16 of SEBI Master Circular for Mutual Funds dated March 20, 2026, AMC has disclosed its scheme wise mandatory investment in the schemes of the Mutual Fund on its website (https://navi.com/mutual-fund)

III. Annual Scheme Recurring Expenses

All the expenditures pertaining to launch of new fund offer till the date of allotment of mutual fund units to investors shall be borne by the asset management company or trustees or sponsor.

All expenses of the scheme shall be clearly identified and shall be paid from the scheme. The expenses shall be subject to the base expense limits, brokerage limits, transaction cost and statutory levy permissible under these regulations.

The base expense ratio ("BER") of the scheme shall be sum of expenses mentioned at sub-regulation (4), sub-regulation (5) and sub-regulation (6) but excluded statutory levy applicable, if any, on the said expenses and transaction cost specified under sub-regulation (10) of Regulation 66 of MF Regulations.

The maximum base expense ratio as percentage of daily net assets shall be upto 0.90% per annum.

Total expense ratio ("TER") shall be total of expense charged within the base limit, brokerage cost permitted, transaction cost incurred for the purpose of execution of trade and statutory levies charged to the investors, as may be permitted under the SEBI (Mutual Funds) Regulations and circulars issued thereunder from time to time.

Expense Head	**% p.a. of daily Net Assets* (Estimated p.a.)**
Investment Management and Advisory fees	
Audit fees/fees and expenses of trustees	

Custodial Fees	Upto 0.90 %
Registrar & Transfer Agent Fees including cost of providing account statements / IDCW / redemption cheques/ warrants	
Marketing & Selling Expenses including fees, commission and charges towards distribution of mutual fund schemes	
Costs related to investor communications	
Costs of fund transfer from location to location	
Cost towards investor education, awareness and financial inclusion	
Brokerage & transaction cost pertaining execution of trade	
Costs of statutory advertisements;	
Such other expenses as may be specified in the Regulations*	
Maximum Base expenses ratio (BER) permissible under Regulation 66	**Upto 0.90%**
Statutory levies (including GST) on all expenses excluding brokerage and transaction cost	GST of 18% or any other rate as may be levied from time to time on the Taxable/Invoice/ Contract amount. Additionally, levies such as Stamp Duty, STT etc.
Statutory levies (including GST) on brokerage and transaction cost	GST of 18% or any other rate as may be levied from time to time on the Taxable/Invoice/ Contract amount. Additionally, levies such as

	Stamp Duty, STT etc.

*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.

The base expenses of the scheme including the investment management and advisory fee shall not exceed the limit as specified in the Regulations and amendments thereto.

The total of all expenses i.e. Total Expense Ratio (TER) charged to the investors of the scheme shall be total of expense charged within the base limit specified above, brokerage cost, transaction cost incurred for the purpose of execution of trade and statutory levies charged to the investors, as specified in the Regulations.

The expenses towards Investment Management and Advisory Fees under Regulation 66 (4) and the various sub-heads of recurring expenses mentioned under Regulation 66 (5) of SEBI (MF) Regulations, 2026 can be apportioned under various expense heads/ sub heads without any sub limit, as permitted under the applicable regulations. Thus, there shall be no internal sub-limits within the expense ratio for expense heads mentioned under Regulation 66 (4) and (5) respectively.

In addition to the limits as specified in Regulation 66(7) of SEBI (MF) Regulations, 2026 or the Base Recurring Expenses (Base Expense Limit) as specified above, the following costs or expenses may be charged to the Scheme namely-

▪ The Scheme may charge expense incurred towards brokerage, for the purpose of execution of trade, over and above the base expense ratio subject to a maximum of 0.06 per cent of trade value in case of cash market transactions and 0.02 per cent of trade value in case of derivatives transactions. Expense charged towards brokerage, over and above the specified limit, shall be part of the base expense ratio limit specified in the Regulations.

▪ Transaction cost incurred for the purpose of execution of a trade shall mean regulatory levies and any other expenses charged by the stock exchanges, clearing corporation, and clearing house, as applicable. Such transaction costs shall not form part of the base expense ratio.

All Scheme related expenses shall necessarily be paid from the Scheme only within the regulatory limits and not from the books of the AMC, its associates, Sponsor, Trustee or any other entity through any route.

Notwithstanding anything contained in this Statement of Additional Information, the provisions of the SEBI (Mutual Funds) Regulations, 2026 and the guidelines thereunder shall be applicable.