

**Nippon Life India Asset Management Limited****CIN: L65910MH1995PLC220793****DISCLOSURE DOCUMENT**

This Disclosure Document has been filed with the Securities & Exchange Board of India along with the certificate in the prescribed format in terms of Regulation 22 of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020. The purpose of the Disclosure Document is to provide essential information about Portfolio Management Services in a manner to assist and enable the investors in making informed decision for engaging a Portfolio Manager. The necessary information about the Portfolio Manager required by an investor before investing is provided in the Disclosure Document and investors are also advised to retain the Disclosure Document for future reference.

**Details of the Principal Officer are as under:****Mr. Gurbir Chopra**

Nippon Life India Asset Management Limited (Portfolio Management Services)  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai - 400 013.

**Telephone:** 022 – 68087000 **Fax line:** 022-68087050**E-mail:** [gurbir.chopra@nipponindiaim.com](mailto:gurbir.chopra@nipponindiaim.com)

This Document is dated July 31, 2025 and was approved by the Board of Directors of  
Nippon Life India Asset Management Limited on August 01, 2025

**Corporate Office & Registered Office**

4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai - 400 013. Telephone: 022 – 68087000 Fax line: 022-68087050

**FORM C**

**SECURITIES AND EXCHANGE BOARD OF INDIA  
(PORTFOLIO MANAGERS) REGULATIONS, 2020 (Regulation 22)**

**Nippon Life India Asset Management Limited (NAM India)**

**CIN: L65910MH1995PLC220793**

**Portfolio Management Services**

4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg, Lower Parel (W), Mumbai - 400 013.

Telephone: +91 022 6808 7000 Fax line: 022-68087050 email - [gurbir.chopra@nipponindiaim.com](mailto:gurbir.chopra@nipponindiaim.com)

We confirm that,

- i) The Disclosure Document forwarded to Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 as amended till date and the guidelines and directives issued by the Board from time to time;
- ii) The disclosures made in the Disclosure Document are true, fair and adequate to enable the investors to make well informed decisions regarding entrusting the management of the portfolio to us / investment in the Portfolio Management Offerings/Options.
- iii) The Disclosure Document has been duly certified by an independent Chartered Accountant – Amit Ramesh Shenoy (Membership No. 124413), Proprietor, M/s. Amit Shenoy & Associates, Chartered Accountants (FRN - 146536W), A/101, Joana Park CHS Ltd., L. M. Road, Kandarpada, Dahisar - West, Mumbai - 400 068. Tel.: 022-28943034.

Sd/-

Date: July 31, 2025  
Place: Mumbai

Name: Gurbir Chopra  
Designation: Principal Officer  
  
Address: 4th Floor, Tower A,  
Peninsula Business Park,  
Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai - 400 013.

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## (1) Disclaimer Clause

This Disclosure Document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations 2020 as amended till date and it has been filed with the SEBI. This Disclosure Document has neither been approved or disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of this Disclosure Document.

## (2) Definitions

|                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>APMI</b>                                            | Association of Portfolio Managers of India                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Client or Investor</b>                              | means any person/entity who enters into the Client Agreement with the Portfolio Manager for availing the Portfolio Management Services.                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Client Agreement</b>                                | means the agreement executed between the Client and the Portfolio Manager for providing Portfolio Management Services to that Client and stating therein the terms and conditions on which the Portfolio Manager shall provide such Portfolio Management Services to that Client.                                                                                                                                                                                                                                        |
| <b>Custodian</b>                                       | means the entity registered with SEBI as a custodian under applicable law and appointed by Portfolio Manager from time to time to provide custodial services and to act as a custodian on the terms and conditions as are agreed between the Custodian and the Portfolio Manager.                                                                                                                                                                                                                                        |
| <b>Depository</b>                                      | means depository as defined in the Depositories Act, 1996.                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Depository Account</b>                              | means any account of the Client or for the Client with an entity registered as a depository participant under applicable law in which the Securities comprising part of the Portfolio of the Client are held by the Portfolio Manager.                                                                                                                                                                                                                                                                                   |
| <b>Disclosure Document</b>                             | means this Disclosure Document for offering Portfolio Management Services as updated and amended from time to time and made available on the website of the Portfolio Manager.                                                                                                                                                                                                                                                                                                                                           |
| <b>Discretionary Portfolio Management Services</b>     | means Portfolio Management Services where the Portfolio Manager exercises or may, under a contract relating to portfolio management, exercise any degree of discretion as to the investments or management of the Portfolio of Securities or the Funds of the Client, as the case may be.                                                                                                                                                                                                                                |
| <b>Financial Year</b>                                  | means the year starting from April 1st of a year and ending on March 31st of the following year.                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Funds</b>                                           | means the money placed by the Client with the Portfolio Manager and any accretions thereto.                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Funds Managed</b>                                   | means the market value of the Portfolio of the Client as on any date.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Investment Advisory Services</b>                    | means the services, where the Portfolio Manager advises Clients on investments in general or gives specific advice required by the Clients and as agreed upon in the agreement with the Client.                                                                                                                                                                                                                                                                                                                          |
| <b>Investment Approach</b>                             | means any of the current investment offerings/options or such offerings/options that may be introduced at any time in the future by the Portfolio Manager.                                                                                                                                                                                                                                                                                                                                                               |
| <b>Money Market Instruments</b>                        | means and includes commercial paper, trade bill, treasury bills, certificate of deposit, usance bills and such other security/instrument as permissible under applicable law or as specified by SEBI from time to time.                                                                                                                                                                                                                                                                                                  |
| <b>NAM India</b>                                       | means Nippon Life India Asset Management, a company incorporated under the Companies Act, 1956 and registered with SEBI as a Portfolio Manager in terms of SEBI (Portfolio Managers) Regulations, 1993 (as repealed and superseded by Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 with effect from January 21, 2020) and having its registered and corporate office at Address: 4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg, Lower Parel (W), Mumbai - 400 013. |
| <b>Non-Discretionary Portfolio Management Services</b> | means portfolio management services under which the Portfolio Manager, subject to express prior instructions issued by the Client from time to time in writing or on recorded line or by e-mail, invests in respect of the Client's account entirely at the Client's risk.                                                                                                                                                                                                                                               |
| <b>NLI</b>                                             | Nippon Life Insurance Company                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Portfolio</b>                                       | means the total holdings of Securities and Funds belonging to any Client.                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Portfolio Entity/ies</b>                            | means companies, enterprises, bodies corporate, or any other entities in the Securities of which the monies from the Client Portfolio are invested subject to Applicable Laws.                                                                                                                                                                                                                                                                                                                                           |
| <b>Portfolio Investments</b>                           | means investments in Securities of one or more Portfolio Entity/ies made by the Portfolio Manager on behalf of the Client under the Portfolio Management Services from time to time.                                                                                                                                                                                                                                                                                                                                     |
| <b>Portfolio Management Services</b>                   | means the Discretionary Portfolio Management Services or Non-Discretionary Portfolio Management Services or Investment Advisory Services, as the context may require.                                                                                                                                                                                                                                                                                                                                                    |
| <b>Regulations</b>                                     | shall mean the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 as amended and modified from time to time and including any circulars/notifications issued pursuant thereto.                                                                                                                                                                                                                                                                                                                |

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>SEBI or Board</b> | means Securities and Exchange Board of India established under the Securities and Exchange Board of India Act, 1992.                                                                                                                                                                                                                                                                                                                                          |
| <b>Securities</b>    | means securities listed or traded on a recognized stock exchange, Money Market Instruments, units of mutual funds or other permissible securities (Provided that with respect to NRIs, the term "Securities" shall mean and include only those Securities in which an NRI is permitted to invest in terms of the extant Foreign Exchange Management Act, 1999 and other statutes, rules and regulations as may be applicable to investments by NRI in India). |

The terms that are used herein and not defined herein, except where the context otherwise so requires, shall have the same meanings as assigned to them under the extant Regulations.

### (3) Descriptions

#### (a) History, Present Business and Background of the Portfolio Manager

The Portfolio Manager i.e. Nippon Life India Asset Management Limited (NAM India) is a listed public limited company incorporated under the Companies Act, 1956.

NAM India is registered with SEBI to act as an Asset Management Company for the schemes of Nippon India Mutual Fund. NAM India is also registered with SEBI as a Portfolio Manager.

As part of its business activities NAM India also renders advisory services to its offshore Clients and an approval to manage and / or advise pooled assets including offshore funds, insurance funds & provident funds are in place.

The net worth of NAM India based on its audited accounts as on March 31, 2025 is Rs. 3039.30 Crores.

#### (b) Promoters of the Portfolio Manager, directors and their background

NAM India has a promoter i.e., Nippon Life Insurance Company ("NLI")

NLI is a Japan's leading private life insurer and offers a wide range of financial products, including individual and group life and annuity policies through various distribution channels, mainly using face-to-face sales channels for its traditional insurance products. It primarily operates in Japan, North America, Europe, Asia and Oceania. NLI conducts asset management operations in Asia, through its subsidiary Nissay Asset Management Corporation, which manages assets globally. As on June 30, 2025, NLI holds 72.25% of NAM India's total issued and paid-up equity share capital.

The Directors of NAM India and their background is as follows:

| Name                   | Age/Qualification                                                                                                                             | Brief Experience                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Mr. Ashvin Parekh      | 72 Years / B. Com (Hons), FCA, AICWA, ACS, Exec MBA- INSEAD                                                                                   | Mr. Ashvin Parekh, is a qualified Chartered Accountant and has set up the advisory service company – Ashvin Parekh Advisory Services LLP (APAS) in the areas of providing services to the Boards and the management of the financial services sector companies, in June 2013. Mr. Parekh retired as a Senior Partner from Ernst & Young in June 2013 and was with EY for 8 years. Earlier Mr. Parekh was the Executive Director of Deloitte Touche Tohmatsu India Pvt. Ltd. from July 2002 till June 2005. Mr. Parekh has also held senior positions in Arthur Anderson, Price Waterhouse Coopers, KPMG India, KPMG UK, KPMG Dubai and Hindustan Lever Ltd. Mr. Parekh has worked in the United Kingdom, Dubai, Australia, Germany and the US on Partner secondment programs for about 11 years outside of India. He is registered with the World Bank and the Asian Development Bank as an expert in the financial services sector. He has worked on gamut of areas like business strategies, corporate planning, institutional strengthening and business transformation across industries including banking, insurance, pension and capital markets. He has been a member of several committees set up by the Ministry of Finance, RBI, IRDA and SEBI. He is also a member of industry bodies and associations namely CII, FICCI and ASSOCHAM. |
| Mrs. Sonu Halan Bhasin | 61 years/ B.Sc. (Hons.) Mathematics from St. Stephen's College, Delhi University and MBA from Faculty of Management Studies, Delhi University | <p>Mrs. Sonu Bhasin is one of the senior women professionals in the industry with an experience of more than 30 years and has set up and managed large businesses, and diverse teams, across financial and non-financial sectors in India and overseas.</p> <p>Mrs. Bhasin is the Founder of FAB – Families and Business. She has held senior positions across various companies such as Tata Capital Limited - Travel Forex and Cards, Yes Bank, Axis Bank &amp; ING Vysya Bank. She began her career as a TAS Officer with the Tata Group and spent 13 years with the Group before becoming a Banker.</p> <p>Mrs. Bhasin is also an award-winning business author with five published books till date and she is also a columnist with The Economic Times. She has been named as one of the Global 100 most Influential individuals for family enterprises in 2020 and was inducted into the FBU Family Business Hall of Fame in 2022. Her area of expertise includes Governance, Business Strategy, Leadership, Innovation, Wealth Management and Entrepreneurship.</p>                                                                                                                                                                                                                                                                        |

| Name                              | Age/Qualification                                                                                                                                                                                                                                                                                                                                                                                                                                 | Brief Experience                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| General Ved Prakash Malik (Retd.) | 85 years / M. Sc. (Defence Studies), Madras University                                                                                                                                                                                                                                                                                                                                                                                            | General Ved Prakash Malik (Retd.) has worked in the Indian Army as Chief of the Army Staff from October 1, 1997 to September 30, 2000. He had dual responsibility of being an advisor to the Government as well as commander of 1.2 million strong Indian Army to fulfil its national role and assigned missions. During the service at Indian Army, General Malik was bestowed with prestigious awards like Ati Vishishta Seva Medal (1986) and Param Vishita Seva Medal (1996). He has also received 'Excellence in Leadership Award' by Atur Foundation, 'Pride of Nation Award' by Doon Citizens Council and 'Distinguished Fellowship' by the Institute of Directors, New Delhi (1999).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Mr. B. Sriram                     | 66 years / M.Sc Physics, St Stephen's College, Delhi University, B.Sc. (Hons) Physics, St Stephen's College, Delhi University, AIMA Diploma in Management, All India Management Association, New Delhi, Diploma in International Law & Diplomacy, The Indian Academy of International Law & Diplomacy, New Delhi, Certificated Associate of the Indian Institute of Banking & Finance (formerly known as The Indian Institute of Bankers), Mumbai | <p>Mr. B. Sriram has over 37 years of experience in all areas of Banking and Finance. He joined State Bank of India as a Probationary Officer in December 1981 and has held various key assignments within the Bank and the Group in Credit and Risk, Retail, Operations, IT, Treasury, Investment Banking, International Operations, Payment and Settlement Systems and Small Scale Industry.</p> <p>Experience Overview:</p> <ul style="list-style-type: none"> <li>• Managing Director &amp; CEO, IDBI Bank Ltd. from June 30, 2018 to September 29, 2018.</li> <li>• Managing Director, State Bank of India from July 2014 to June 2018.</li> <li>• Managing Director, State Bank of Bikaner &amp; Jaipur from March 2013 to July 2014.</li> </ul> <p>Mr. Sriram is an External Investment Committee member of British International Investment, UK and serves as an Independent Director on the board of several companies. In addition, he has also taken on a few advisory positions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Mr. Upendra Kumar Sinha           | 73 years / M.Sc., LLB                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>Mr. Sinha, a 1976 batch IAS officer of Bihar cadre, during his 3 decades plus of experience has held several responsible government positions in India, including as Joint Secretary (Banking) and Joint Secretary (Capital Markets) in the Ministry of Finance; Chairman of the Working Group on Foreign Investment in India &amp; Chairman of SEBI, to name a few. He has also been the Chairman &amp; Managing Director of UTI Asset Management Company Limited and Chairman of the Association of Mutual Funds in India.</p> <p>He has actively contributed to the financial sector reforms in the country and is credited with starting the micro pension movement in India. Under his leadership, SEBI introduced significant developmental changes in the areas of FPIs, AIFs, REITs, InvITs and Corporate Governance.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Mr. Sundeep Sikka*                | 53 years / MBA - Finance, Pune University                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Mr Sundeep Sikka is the Executive Director &amp; Chief Executive Officer of Nippon Life India Asset Management Limited, with over 29 years of rich experience in the financial services industry and core expertise in the asset management business. Sundeep joined the Company in 2003, holding various leadership positions before being elevated in 2009, when he became one of the youngest CEOs of India. Under his leadership, the Company witnessed significant growth in assets and emerged as one of the most trusted mutual fund houses in the country, with 1 out of 3 mutual fund investors in India investing with the Company. He has not only been responsible for the growth of the Company but also forging a relationship with NLI, acquisition of Goldman Sachs Asset Management (India), and listing of the Company on stock exchange.</p> <p>Sundeep is an alumnus of Harvard Business School. He closely works with Regulatory Bodies i.e. RBI, SEBI and Ministry of Finance on matters related to asset management.</p> <p>Mr. Sikka has been an active industry participant in the financial services' industry and has held both Vice-Chairman and Chairman positions of the industrial body AMFI (Association of Mutual Funds in India), apart from positions held in various capacities at RBI, CII, NSDL, FICCI. He has been actively contributing as a keynote speaker at various domestic and international forums and conferences.</p> <p>Representation (past as well as present) across: • Chair: CII Mutual Fund Summit (2024-25), CII WR Indo Japan Business Dialogue, CII Alternatives Fund Summit (2023-24), CII WR Taskforce on Banking &amp; Finance (2023-24) • Member: CII National Committee on Financial</p> |

| Name                 | Age/Qualification                                        | Brief Experience                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                      |                                                          | Markets (2024-25), B20 Task Force (2023-24) • Chair: The Task Force Banking & Finance of CII Western Region (2021-22) • Member: Expert Committee on Investment Funds. – International Financial Services Centres Authority (IFSCA) (2021) • Member: CII National Committee on Financial Markets (2020) • Chair: CII Mutual Fund Summit (2020) • Association of Mutual Funds in India – Vice Chairman (2011, 2012, 2013) and Chairman (2014, 2015) • Reserve Bank of India – Technical Advisory Committee on Money, Foreign Exchange & Govt. Securities Markets (2015) • National Securities Depository Limited – Member of Executive Committee (2015) • Member: FICCI Capital Markets Committee (2015) & Others.                                                                                 |
| Mr. Minoru Kimura*   | 58 years/<br>B.A. in Laws, Kyoto University, Kyoto       | Mr. Minoru Kimura currently serves as Director and Managing Executive Officer, Head of Global Business at Nippon Life Insurance Company (NLI). In his over 30-year professional career with NLI, Mr. Kimura has engaged in corporate planning for more than 10 years. Also, Mr. Kimura has worked for Nissay Asset Management Corporation in investment planning for 4 years from 2010 to 2014. Other than above, Mr. Kimura has also spent his professional career with Nippon Deutsche Asset Management Europe Limited and NLI Investments Europe Limited, where he carried the position of Chief Executive Officer for 4 years (2003 to 2007). He has engaged in Head of Asia Pacific at Nippon for 2 years (2018-2020) and Regional CEO for the Americas and Europe for 2 years (2020-2022). |
| Mr. Kosuke Kuroishi* | 49 years / B.A. in Economics from the Waseda University  | Mr. Kuroishi serves as General Manager, Global Asset Management Business Unit, Global Business Headquarters at Nippon Life Insurance Company (NLI). In his over 25-year professional career, he has performed various roles, including corporate planning and investment planning. Besides the above, he was involved in risk management at Enterprise Risk Management (ERM) Project Office. In the most recent role, he was in charge of management of Nissay Asset Management, Nippon Life's asset management subsidiary, as General Manager & Head of Corporate Planning for 4 years (2021-2024).                                                                                                                                                                                             |
| Mr. Hiroki Yamauchi* | 50 years / B.A. (Economics) from the University of Tokyo | Mr. Hiroki Yamauchi serves as General Manager, Global Asset Management Business Department at Nippon Life Insurance Company (NLI). In his over 20-year professional career with NLI, he has performed various roles, including corporate planning, marketing planning, and group annuity business. Also, he has worked for Nissay Asset Management in corporate / investment planning for 4 years. Besides the above, he has also spent his professional career with Nissay Deutsche Asset Management (Europe), where he held the position of Fund Manager for 3 years. In the most recent role, he has engaged in NLI's Indian life insurance and asset management business as Head of Indian Business for 2 years (2020-2022).                                                                 |

\* Associate Director

**(c) Top 10 Group Companies / firms of Portfolio Manager as on March 31, 2025:**

|    |                                              |
|----|----------------------------------------------|
| 1  | Nippon Life Insurance Company                |
| 2  | Nippon Life India Asset Management Limited   |
| 3  | Nissay Asset Management Corporation          |
| 4  | Nippon Wealth Life Insurance Company Limited |
| 5  | TAIJU LIFE INSURANCE COMPANY LIMITED         |
| 6  | Nissay Information Technology Co., Ltd.      |
| 7  | NICHII HOLDINGS CO.,LTD.                     |
| 8  | Nippon Life Insurance Company of America     |
| 9  | Nissay Leasing Co., Ltd.                     |
| 10 | Nissay Capital Co., Ltd.                     |

As NLI is an insurance company and has various type of subsidiaries, the top 10 group companies are disclosed based on profit after tax.

**(d) Details of services being offered**

Portfolio Manager offers Discretionary Portfolio Management Services, Non – Discretionary Portfolio Management Services and Advisory Services. For more details refer section (5) "Services offered".

(4) **Penalties, pending litigation or proceedings, findings of inspection or investigations for which action may have been taken or initiated by any regulatory authority**

|                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made thereunder.                                                                                                                                                                                     | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| The nature of the penalty/direction.                                                                                                                                                                                                                                                                                         | Not Applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Penalties/Fines imposed for any economic offence and/or for violation of any securities laws.                                                                                                                                                                                                                                | None                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.                                                                                                                                                             | There are no criminal cases, material litigations are pending against the Portfolio manager/ key personnel. For details of pending legal proceedings, pls refer Annexure 1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory agency.                                                                                                                                                                                                        | Please refer Annexure 2 for details.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Any enquiry/ adjudication proceedings initiated by the Board against the Portfolio Manager or its directors, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its directors, principal officer or employee, under the Act or Rules or Regulations made thereunder. | <p>No enquiry/ adjudication proceedings have been initiated by the Board against the Portfolio Manager or its directors, principal officer or employee for Portfolio Management Services.</p> <p>Kindly note that Nippon Life India Asset Management Limited (NAM India) is also registered as an Asset Management Company of Nippon India Mutual Fund, and in their capacity as such:</p> <p>a) SEBI vide its Adjudication Order dated August 08, 2024 has imposed a penalty to the extent of Rs. 2 Lacs on the NAM India &amp; Rs. 1 Lac on the Nippon Life India Trustee company Limited wrt charging of expenses/ TER in respect of certain ETF schemes from AMC books.</p> <p>b) In August 2024, NAM India and certain other Key Personnels have received a notice under Rule 4 (1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 wrt certain investment made in AT-1 Bonds of Yes Bank Limited by then Reliance Mutual Fund. The SCN alleges non-compliances with certain provisions of SEBI (Mutual Fund Regulations) 1996, and SEBI (Prohibition of Fraudulent and Unfair trade Practices relating to Securities Market) Regulations 2003.</p> |

**Annexure 1**

**List of litigations for Nippon Life India Asset Management Limited ("NAM India") as on June 30, 2025**

| Sr. No. | Parties Involved                                                                                                     | Nature of Dispute | Pending Before                                           |
|---------|----------------------------------------------------------------------------------------------------------------------|-------------------|----------------------------------------------------------|
| 1.      | M. Sudhakar V. S. Charumathi & 14 Ors. (NIMF being Defendant no. 5)                                                  | Civil             | Court of Subordinate Judge, Vellore                      |
| 2.      | Pramila Lodha v. Edelweiss Securities Limited & Ors.                                                                 | Civil             | Bombay High Court                                        |
| 3.      | Nippon Life India Asset Management Limited (Formerly Reliance Nippon Life Asset Management Limited) v/s Deepak Chury | Civil             | High Court Of Judicature At Bombay                       |
| 4.      | Nippon Life India Asset Management Limited (Formerly Reliance Nippon Life Asset Management Limited) v/s Bipin Chury  | Civil             | High Court Of Judicature At Bombay                       |
| 5.      | MGD Electronics & Mr. Rajesh Rathie v/s Nippon India Mutual Fund (Formerly Reliance Mutual Fund) & Others            | Civil             | Senior Civil Judge, Gandhinagar                          |
| 6.      | Malti Narendrakumar Jain & Ors. V. Mr. Louis James & Ors.                                                            | Civil             | Court of the Prl. City Civil & Sessions Judge, Bangalore |
| 7.      | Lopamudra Harshadray Desai & Ors. V. NAM India & Ors.                                                                | Civil             | Court of Principal Senior Civil Judge, Anand, Gujarat    |
| 8.      | Ramesh Singh v/s. NAM India & Ors.                                                                                   | Civil             | Court of Civil Judge (Junior Division) Garvi, Allahabad  |
| 9.      | Smt. Bharti Beohar v. Nippon India Mutual Fund (Formerly Reliance Mutual Fund) & Ors.                                | Civil             | Hon'ble V Civil Judge Class – I, District Court, Bhopal  |

|     |                                                                                                                                |          |                                                                              |
|-----|--------------------------------------------------------------------------------------------------------------------------------|----------|------------------------------------------------------------------------------|
| 10. | Madhusudhan D Amre & Ors. v/s. Urmila Laxman Ambre & Ors.                                                                      | Civil    | Bombay High Court                                                            |
| 11. | Ajay Uberoi v/s. Reliance & Ors.                                                                                               | Civil    | Court of Civil Judge (Senior Division), Kanpur Nagar                         |
| 12. | Neelam Sachdeva & Ors. v/s. Nippon Life India Asset Management Limited (Formerly Reliance Nippon Life Asset Management Limited | Consumer | Uttar Pradesh State Consumer Disputes Redressal Commission, Lucknow          |
| 13. | Rakhi Shailendra Katiyar & Ors. v/s. Chandrababha Karansingh Katiyar & Ors. [NIMF being Defendant No. 11]                      | Civil    | Court of Principal Senior Civil Judge, Vadodara, Gujarat                     |
| 14. | Neelam Kathuria & Anr v/s. Ramneek Bajaj & Ors.                                                                                | Civil    | High Court of Delhi, New Delhi                                               |
| 15. | Smt. Pragyaben v/s. Shantilal Ratanjibhai Umrao & Ors.                                                                         | Civil    | Court of Principal Senior Civil Judge, Surat                                 |
| 16. | Pankaj Roy & Ors. v/s. Bhanu Roy & Ors.                                                                                        | Civil    | Court of VI Civil Judge – Class 1, Raipur                                    |
| 17. | Nitin Jayant Patel v/s. State of Gujarat & Ors.                                                                                | Criminal | Court of District & Sessions Judge, Anand, Gujarat                           |
| 18. | Rina Kumari Sinha v/s. Bank of India & Ors.                                                                                    | Civil    | Court of Sub Judge 1st cum ACJM, Muzaffarpur                                 |
| 19. | Satyanarayan Tripathy v/s. Nippon India Top 200 & Ors.                                                                         | Consumer | District Consumer Disputes Redressal Forum, Puri, Odisha                     |
| 20. | Nipun Sharma v/s. General Public & Ors.                                                                                        | Civil    | Court of Additional Civil Judge (Senior Division), Faridabad                 |
| 21. | Anita Cardozo & Ors. v/s. Nippon India Mutual Fund & Anr.                                                                      | Civil    | Court of IIIrd Additional Senior Civil Judge, Margao                         |
| 22. | Rakhi Kawatra & Anr. v/s. Kavita Thakaur & Ors. (Nippon Life India Asset Management Ltd - Respondent no. 7)                    | Civil    | Court of Civil Judge, Senior Division, Ludhiana                              |
| 23. | Balvena Sethi v/s. Pansy Sabarwal & Ors.                                                                                       | Civil    | Court of District Judge, Gurgaon, Haryana                                    |
| 24. | C.Jeslin Wilma v/s. M.Jagadeesan & Ors. (Nippon India Mutual Fund - Respondent no. 17)                                         | Civil    | Principal District Munsif Court, Coimbatore                                  |
| 25. | Padma Lochan Mohanty v/s. M/s. M.G. Mohanty & Ors.                                                                             | Civil    | Court of District Judge, Khurda, Bhubaneswar                                 |
| 26. | Kamal Lochan Mohanty v/s. M/s. M.G. Mohanty & Ors.                                                                             | Civil    | Court of District Judge, Khurda, Bhubaneswar                                 |
| 27. | Smt. Manjula Kannur & Anr. v/s. Uma Devi & Ors. [NIMF being Respondent no. 21]                                                 | Civil    | Court of Principal Senior Civil Judge and C.J.M. at Ballari                  |
| 28. | Abhishek Misra & Anr v/s. Estate of Late Rajiv Kumar Misra & Ors.                                                              | Civil    | Court Of Civil Judge (Senior Division), Malihabad, Lucknow                   |
| 29. | Vijay Sharma & Ors v/s. Nirmala Devi & Ors                                                                                     | Civil    | Court Of Civil Judge (Senior Division), Shimla                               |
| 30. | Aradhana Basu Roy & Ors v/s. Sushanta Bhadra & Ors.                                                                            | Civil    | Court of Additional District Judge, North West District, Rohini Court, Delhi |
| 31. | Smt. Malkud Sandhya & Anr. v/s. Mr. B. Venkateswar Rao & Ors.                                                                  | Civil    | Court of XXVI Additional Chief Judge, City Civil Court, Hyderabad            |
| 32. | Smt. Vijay Laxmi v/s. State (Govt. of NCT of Delhi) & Ors                                                                      | Civil    | Court of Senior Civil Judge cum RC, East, Karkardooma Court, Delhi           |
| 33. | Vijay Kumar Soni v/s. Shanti Dabar & Ors.                                                                                      | Civil    | Court of District and Sessions Judge, Jaipur                                 |
| 34. | Roop Kamal v/s. Gurpreet Kaur & Ors.                                                                                           | Civil    | Court of Civil Judge, Senior Division, Ludhiana                              |

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| 35. | Ritu Singh v/s. State & Ors.                                                                                | Civil    | Court of District & Sessions Judge, Central, Tis Hazari Court, Delhi |
| 36. | Jagdish Krushnachandra & Ors. v/s. Padama Dax Madhusudan Joshi & Ors. [NIMF being R. 12]                    | Civil    | Addl Civil Judge & JMFC, Civil Court, Surat                          |
| 37. | Arunima Dubey & Ors. v/s. Estate of Late Dr. Vivek Dubey & Ors. [NIMF being R. 4]                           | Civil    | Court of Civil Judge Senior Division, Malihabad, Lucknow             |
| 38. | Vijay Kumar Srivastava v/s. Unit Trust of India & Ors. [NIMF being Respondent No. 2]                        | Civil    | Court of Senior Civil Judge, Gorakhpur, U.P.                         |
| 39. | Dhanalakshmi & Anr. v/s. Lavanya & Ors                                                                      | Civil    | Court of Addl. City Civil & Sessions Judge, Bengaluru, Karnataka     |
| 40. | Sweetey Jindal v/s. General Public & Ors.                                                                   | Civil    | Court of Ld. Civil Judge (Senior Division) Panipat, Haryana          |
| 41. | Padma v/s. Jagdish Krushnachandra & Ors.                                                                    | Civil    | High Court of Ahmedabad, Gujarat                                     |
| 42. | Suneel Kumar v/s. Axis Bank & Ors.                                                                          | Civil    | Court of Civil Judge Senior Division, Etawah (UP)                    |
| 43. | Sheetal Dhir v/s. Monika & Ors.                                                                             | Civil    | Court of Civil Judge (Junior Division) Amritsar                      |
| 44. | Abhimanyu Bhatamishra vs Nippon India Mutual Fund                                                           | Consumer | District Consumer Disputes Redressal Commission, Koraput, Jeypore    |
| 45. | Dineshchandra Damodardas Vora vs Mrudulaben & Ors. [NIMF being Respondent no. 9]                            | Civil    | Court of Principal Senior Civil Judge, Bhuj, Kutch                   |
| 46. | Neha Bhargava & Anr. v/s. Ruchi Bhargava & Ors.                                                             | Civil    | Court of Senior Civil Judge - I, Charminar, Hyderabad                |
| 47. | Amaar Lal Sethi v/s. LIC & Ors.                                                                             | Civil    | Court of Additional Civil Judge (Senior Division), Abohar, Punjab    |
| 48. | Bhupesh Patel & Ors. v/s. Nippon India Mutual Fund & Anr.                                                   | Civil    | Court of Additional Chief Judge, Secunderabad                        |
| 49. | Rajjaq Miya & Ors. v/s. Nippon India Mutual Fund & Ors.                                                     | Civil    | Court of Chief Judicial Magistrate, Durg, Chhattisgarh               |
| 50. | Rekha Rani v/s. Karanveer Singh & Ors.                                                                      | Civil    | Court of Civil Judge (Junior Division) Ludhiana                      |
| 51. | Kavita Devi & Ors. v/s. State & Ors.                                                                        | Civil    | Court of Ld. ACJ/CCJ/ARC, Patiala House Court, New Delhi             |
| 52. | Arti Gupta v/s. Archana Gupta & Ors.                                                                        | Civil    | Court of Civil Judge, Senior Division, Allahabad                     |
| 53. | Smt. Urmila Surendar Singh & Ors. vs Aayushi Surendar Singh & Ors. [Nippon India Mutual Fund being at R 10] | Civil    | Court of Civil Judge, Senior Division, Nashik                        |
| 54. | Sakshi Anand & Anr. v/s. Nippon Life India Asset Management Limited & Ors. [NAM India being R1 & R2]        | Civil    | Court of Civil Judge, Senior Division, Ambala, Haryana               |
| 55. | Mayuri Pravinchandra Champaneri vs Syndicate Bank & Ors. [NIMF being at R5]                                 | Civil    | Bombay High Court                                                    |
| 56. | Mandadapu Raja Guna Ranjan Babu v/s. The State Bank of India & Ors. [NAM India being R3]                    | Civil    | Court of Principal District & Sessions Judge, Eluru, Andhra Pradesh  |
| 57. | Varsha & Ors. v/s. Sharadabai Yashwant Kamble & Ors.                                                        | Civil    | Court of Principal Civil Judge & JMFC, Dharwad, Karnataka            |
| 58. | Deepinder Singh Poonian v/s. Aman Lega & Ors. [NIMF being R9]                                               | Civil    | Court of Civil Judge (Junior Division), Chandigarh                   |
| 59. | Mayanka Chandolia & Anr. v/s. State & Ors.                                                                  | Civil    | Court of ACJ cum CCJ cum ARC North District, Rohini Court, Delhi     |

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| 60. | Sunil Mohindru v/s. General Public & Anr.                                                                                    | Civil    | Court of Additional Civil Judge (Senior Division), Kharar, Punjab                        |
| 61. | Razzak Miya & Ors. v/s. Amina Begam & Ors. [NIMF being R4] [Case no. 13/ 2024]                                               | Civil    | Court of Chief Judicial Magistrate, Durg, Chhattisgarh                                   |
| 62. | Kasturi Rajput & Ors. v/s. Nippon India Mutual Fund & Anr.                                                                   | Civil    | Court of Chief Judicial Magistrate, Bilaspur, Chhattisgarh                               |
| 63. | Seema Mule v/s. Public at large & Ors                                                                                        | Civil    | Civil Judge Class – I District & Sessions Court Indore, M.P.                             |
| 64. | Deepak Nadkarni & Ors. v/s. CAMS & Ors.                                                                                      | Civil    | Civil Judge Class – I District & Sessions Court Bhopal, M.P.                             |
| 65. | Raunak v/s. ICICI Bank & Ors. [EXECUTION APPLICATION FILED BY RONA K]                                                        | Consumer | District Consumer Redressal Commission, Etawah                                           |
| 66. | Kanan Suchdev v/s. J P Morgan Services India Pvt Ltd & Ors. [NIMF being R4]                                                  | Civil    | Principal City Civil And Sessions Judge, South Bengaluru, Karnataka                      |
| 67. | Nikhil Malviya v/s. HDFC & Ors. [NAM India being R2]                                                                         | Civil    | Court of Civil Judge, Senior Division, Prayagraj, UP                                     |
| 68. | Lavanya & Anr. v/s. Dhanalakshmi & Ors. [NIMF being R13]                                                                     | Civil    | Principal City Civil & Sessions Judge, South Bengaluru, Karnataka                        |
| 69. | Kota Sujata & Ors. v/s. HDFC Asset Management Company Ltd [NAM India being R3]                                               | Civil    | Court of Senior Civil Judge, Charminar, Hyderabad, Telangana                             |
| 70. | Lalita Kumari v/s. The State (GNCT) of Delhi & Ors. [NIMF being R7]                                                          | Civil    | Court of ACJ cum CCJ cum ARC South West District, Dwarka Court, Delhi                    |
| 71. | Kanhiya Lal Dhakar v/s. Padmini Dhakar & Ors. [NAM India being R16] [Civil Miscellaneous matter (non connected) - 35/ 2024]  | Civil    | Court of District and Sessions Judge, Bhilwara, Rajasthan                                |
| 72. | Kanhiya Lal Dhakad v/s. Padmini Dhakad & Ors. [NAM India being R15] [Civil Miscellaneous matter (non connected) - 165/ 2024] | Civil    | Court of District and Sessions Judge, Bhilwara, Rajasthan                                |
| 73. | Shakuntla Devi v/s. LIC of India & Ors. [NIMF being R4] [Civil Misc Application - 2730/2024]                                 | Civil    | Court of Senior Civil Judge - 1, District Court, Shimla, Himachal Pradesh                |
| 74. | Shakuntla Devi v/s. LIC of India & Ors. [NIMF being R4] [Suit for Permanent Injunction - 161/2024]                           | Civil    | Court of Senior Civil Judge - 1, District Court, Shimla, Himachal Pradesh                |
| 75. | Santosh Gandhi & Ors. v/s. HDFC Bank Ltd & Ors. [NIMF being R30]                                                             | Civil    | Court of Senior Civil Judge, Secunderabad, Telangana                                     |
| 76. | Paramjit Singh v/s. General Public & Ors. [NAM India being R8]                                                               | Civil    | Court of Additional Civil Judge (Senior Division), Chandigarh                            |
| 77. | Shubham Dixit v/s. Nippon India Mutual Fund & Ors. [NIMF being R1]                                                           | Civil    | Court of III Civil Judge Class - I, District Court, Jabalpur, M.P.                       |
| 78. | Prateek Khare v/s. Bhartiya State Bank & Ors. (NIMF - R3)                                                                    | Civil    | Court of Civil Judge, Senior Division, District & Sessions Court, Ujjain, Madhya Pradesh |
| 79. | Deepa Muralidhar & Anr. v/s. Indusind Bank & Anr (NAM India - R2)                                                            | Civil    | Court of Additional District Judge, Principal District Court, Salem, Tamil Nadu          |
| 80. | Rajan Bhardvaj v/s. State & Ors. (Nippon India Multi Cap Fund, a scheme of NIMF - being R23)                                 | Civil    | Court of ARC-ACJ-CCJ, Patiala House Court, New Delhi                                     |
| 81. | Urvashi Dhamija & Anr. v/s. State & Ors. (NAM India - R6)                                                                    | Civil    | Court of Administrative Civil Judge, Patiala House Court, New Delhi                      |

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| 82.  | Dhanwati Chourasiya v/s. Any other & Anr. [NIMF being R2]          | Civil    | Court of Civil Judge Senior Division & Chief Judicial Magistrate, Chhindwara, Madhya Pradesh |
| 83.  | Rohit Jain & Anr. v/s. State of NCT of Delhi & Ors. [NIMF being 3] | Civil    | Court of ACJ cum CCJ cum ARC West District, Tis Hazari Court, Delhi                          |
| 84.  | Anjali Sharma & Ors. v/s. Munni Devi & Ors. [NAM India being R19]  | Civil    | Court of Additional District Judge, Jaipur Rajasthan                                         |
| 85.  | Manoj Kumar Gandhi v/s. Nippon Life India Asset Management Limited | Civil    | Permanent Lok Adalat, Bikaner, Rajasthan                                                     |
| 86.  | Virender S Kanal v/s. Nippon India Mutual Fund & Ors. [NIMF - R1]  | Civil    | Court of XVIII Assistant City Civil Court, Chennai                                           |
| 87.  | Amraw Singh Baid v/s. Jhinkar Devi Baid & Ors. [NIMF - R23]        | Civil    | Court of Principal Senior Civil Judge & JMFC, Hubballi, Karnataka                            |
| 88.  | Krisnes v/s. Nippon India Mutual Fund                              | Civil    | Court of Principal Subordinate Judge, Thanjavur, Tamil Nadu                                  |
| 89.  | Lalit Kumar Purohit v/s. Public at Large & Ors. [R17 - NIMF]       | Civil    | High Court of MP, Indore Bench                                                               |
| 90.  | Kulwant Singh Johal v/s. Harjinder Kaur & Ors.                     | Civil    | Court of Civil Judge (Junior Division) Ludhiana, Punjab                                      |
| 91.  | NAM India & others vs Veracious Builders Private Limited & others  | Civil    | Commercial Court, Bengaluru                                                                  |
| 92.  | NAM India vs Veracious Builders                                    | Criminal | Chief Metropolitan Magistrate, Bengaluru                                                     |
| 93.  | NAM India vs M/s Fortuna India Projects PVt Ltd and Others         | Civil    | Corporate Insolvency Resolution Process (CIRP) -National Company Law Tribunal, Bangalore     |
| 94.  | NAM India vs Fortuna Buildcon India Pvt. Ltd.                      | Civil    | Corporate Insolvency Resolution Process (CIRP) -National Company Law Tribunal, Bangalore     |
| 95.  | NAM India vs BCIL Zed Ria Properties                               | Criminal | Chief Metropolitan Magistrate, Bhoiwada, Mumbai                                              |
| 96.  | NAM India vs BCIL Redearth Developers                              | Criminal | Chief Metropolitan Magistrate, Bhoiwada, Mumbai                                              |
| 97.  | NAM India vs BCIL Zed Ria Properties                               | Criminal | Chief Metropolitan Magistrate, Bhoiwada, Mumbai                                              |
| 98.  | NAM India vs BCIL Redearth Developers                              | Criminal | Chief Metropolitan Magistrate, Bhoiwada, Mumbai                                              |
| 99.  | NAM India vs BCIL Red Earth Developers (India) Private Limited     | Criminal | Chief Metropolitan Magistrate, Ballard Pier, Mumbai                                          |
| 100. | NAM India vs BCIL Red Earth Developers (India) Private Limited     | Criminal | Chief Metropolitan Magistrate, Ballard Pier, Mumbai                                          |
| 101. | NAM India vs BCIL Red Earth Developers (India) Private Limited     | Civil    | Corporate Insolvency Resolution Process (CIRP) -National Company Law Tribunal, Bangalore     |
| 102. | NAM India vs Biodiversity Conservtaion India                       | Civil    | Corporate Insolvency Resolution Process (CIRP) -National Company Law Tribunal, Bangalore     |
| 103. | NAM India vs B V Satya Sai Prasad                                  | Criminal | Chief Metropolitan Magistrate, Bhoiwada, Mumbai                                              |
| 104. | NAM India vs B V Satya Sai Prasad                                  | Criminal | Chief Metropolitan Magistrate, Bhoiwada, Mumbai                                              |
| 105. | B V Satya Sai Prasad vs NAM India                                  | Criminal | Bombay High Court                                                                            |
| 106. | B V Satya Sai Prasad vs NAM India                                  | Criminal | Bombay High Court                                                                            |

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| 107. | NAM India vs B V Satya Sai Prasad                                            | Civil    | Bombay High Court                                                                        |
| 108. | NAM India vs Fortuna Buildcon India Pvt. Ltd. & others                       | Criminal | Chief Metropolitan Magistrate, Bengaluru                                                 |
| 109. | NAM India vs Kaluvoy Sreenivasulu Reddy & Anr.                               | Civil    | Commercial Court, Bengaluru                                                              |
| 110. | NAM India vs Unishire Urbanscape Private Limited & Ors                       | Criminal | Bombay High Court                                                                        |
| 111. | NAM India & Anr. vs Veracious Builders Private Limited & others              | Civil    | Karnataka High Court                                                                     |
| 112. | M/s Arangcons vs Shri. Amit Chandrakanth shah & NAM India                    | Civil    | National Company Law Appellate Tribunal, Chennai                                         |
| 113. | BCIL Yelahanka Projects LLP vs Amit Chandrakant Shah & NAM India             | Civil    | National Company Law Appellate Tribunal, Chennai                                         |
| 114. | Mrs Rachna Rego vs Mr Amit Chandrakanta Shah & NAM India                     | Civil    | National Company Law Appellate Tribunal, Chennai                                         |
| 115. | Administrator of Dewan Housing Finance Corporation Ltd. vs. NAM India & Ors. | Civil    | National Company Law Tribunal Mumbai Bench                                               |
| 116. | NAM India & Anr. vs. Arkie Atelier Design India Private Limited              | Civil    | Corporate Insolvency Resolution Process (CIRP) -National Company Law Tribunal, Chennai   |
| 117. | Roopa Nanjundaswamy vs. NAM India & Ors                                      | Consumer | Karnataka State Consumer Dispute Redressal Commission                                    |
| 118. | Mysore Krishnamurthy Venkataram vs. NAM India & Ors                          | Consumer | Karnataka State Consumer Dispute Redressal Commission                                    |
| 119. | NAM India vs BCIL Zed Ria Proeprties                                         | Civil    | Corporate Insolvency Resolution Process (CIRP) -National Company Law Tribunal, Bangalore |

## **Annexure 2**

### **Following observations were raised during Inspection carried out by SEBI for the period April 01, 2021, to June 30, 2022**

1. By not resolving investor grievances within the given timeframe, the PMS-Nippon did not comply with Regulation 23(10) r/w Regulation 11(d) of the Regulations. This was on account of some cases where customer complaints were resolved beyond 30 days from the complaint date.
2. By failing to address the issues raised during the last inspection i.e., regarding either not obtaining written declaration containing investor's interest in various corporate bodies, which enables him to obtain price sensitive information of the body corporate or keeping the same blank; and by failing to comprehensively adhere to execution of proper documentation, the PMS - Nippon is in noncompliance to para 7 of Schedule III, Regulation 21 of the Regulations
3. By not maintaining rationale in support of every investment transaction or recommendation which will indicate the data, facts, and opinion leading to that investment decision, PMS-Nippon did not comply with the provisions of Regulation 27(1)(e) of the Regulations
4. By not providing details of risk foreseen by the portfolio manager for investment or disinvestment, in reports sent to clients, PMS -Nippon has not complied with the provisions with the provisions of Regulation 31(1) (e) of the Regulations.
5. 25 distributors who sourced business prior to Oct 1, 2020, and who did not either have NISM/AMFI certification or did not provide Code of Conduct self-certification, were paid commissions by portfolio manager during April 2021-Jun 2022. The AMC is hereby advised to disable payment of commission with immediate effect to such distributors, who do not have AMFI/NISM certification or have not submitted self-certification of code of conduct, till the time the same is regularised. The said course of action may also be followed in future, immediately from the date of non-compliance by distributors.

**Response:** All the above instances have been resolved appropriately and informed to the regulator.

### **Offsite Inspection cum surveillance of NAM India (PMS) for the period April 2023 -Sep 2023 carried out by SEBI**

1. Security (having ISIN - INE286A01017) is lying in the PMS pool account since 2006 and the PM has not acted suo-moto to reach out the client to transfer security in his demat account. PMS has reached out to client only after alerts were issued.
2. Incorrect data was submitted by the PM with respect to the listing status of securities having ISIN- INE216A08027 and INE923I07122. This has resulted into incorrect generation of an alert.
3. Incorrect data was submitted by the PMS with respect to PMS pool account. Advisory client demat account (having BOID-IN30012611243137) details were incorrectly submitted as PMS pool account resulting in incorrect generation of alert.

**Response:** With regard to observation 1 above, we have written to the customer seeking details in order to complete the transfer of this zero value security to the customer's demat account. With regard to the errors in data submission, the same is noted and rectified.

**Thematic Inspection conducted by SEBI on minimum Investment Amount per client for the period from April 01,2022 to June 30,2023.**

1. PMS failed to comply with requirement of minimum amount of investment in respect of certain transmission cases.

**Response:** Portfolio Manager has submitted a response to the regulator to reconsider this observation.

**(5) Services Offered**

**The Portfolio Manager broadly offers services under the following categories:**

**(a) Discretionary Services**

Under these services, the choice as well as the timing of making investment decisions on an on-going basis rest solely with the Portfolio Manager. The Portfolio Manager shall have the sole and absolute discretion to invest in respect of the Client's account in any type of Security as per the Client Agreement and make such changes in the investments and invest some or all of the Client's Funds in such manner and in such markets as it deems fit. The Client may give informal guidance to customize the Portfolio or any investment restrictions applicable to the Client; however, the final decision rests with the Portfolio Manager. The Securities invested / divested by the Portfolio Manager for Clients under the same Investment Approach may differ from one Client to another Client. The Portfolio Managers' decision taken in good faith towards deployment of the Clients' account is absolute and final and cannot be called in question or be open to review at any time during the currency of the Client Agreement or any time thereafter except on the ground of mala fide intent, fraud, conflict of interest or gross negligence. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with applicable law in force from time to time.

Under these services, the Clients may authorize the Portfolio Manager to invest their Funds in specific financial instruments or a mix of specific financial instruments or restrict the Portfolio Manager from investing in specific financial instruments or Securities. Depending on the individual Client requirements, the Portfolio can also be tailor made based on the Client specification.

**(b) Non-Discretionary Services**

Under these services, the assets of the Client are managed in consultation with the Client. The Client decides their own investments, with the Portfolio Manager only facilitating the research and execution of transactions. The Portfolio Manager's role would include but not limited to providing research, structuring of Client Portfolios, investment advice, and guidance and trade execution at the Client's request. The Portfolio Manager shall execute orders as per the mandate received from Clients. The deployment of the Client's Funds by the Portfolio Manager on the instructions of the Client is absolute and final and cannot be 'called in question or shall not be open to review at any time during the currency of the Client Agreement or at any time thereafter except on the ground of mala fide, fraud, conflict of interest or gross negligence. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with applicable law in force from time to time.

**(c) Investment Advisory Services**

Under these services, the Portfolio Manager advises both individual & institutional clients on investments in general and any specific advice required by the Clients and agreed upon in the Client Agreement. The Portfolio Manager will render non-binding advice to the Client having regard to the Client's needs and the environment on such terms as mentioned in the Client Agreement. For such services, the Portfolio Manager charges the Client a fee for services rendered mentioned in the Client Agreement. The advice may be either general or specific in nature and may pertain to a particular Portfolio.

**The Clients shall have an option to place Funds directly with Portfolio Manager for availing discretionary services, non-discretionary services and/or investment advisory services.**

**(d) Type of Securities where investments may be made by the Portfolio Manager as permissible under the Regulations and depending on services availed**

- (i) shares, scrips, stocks, bonds, debentures, debentures stock or other marketable Securities of a like nature in or of any incorporated company or other body corporate;
- (ii) derivatives;
- (iii) units or any other instrument issued by any collective investment scheme to the investors in such schemes;
- (iv) security receipt as defined in clause (zg) of section 2 of the Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002;
- (v) Government Securities;
- (vi) units or any other such instrument issued to the investors under any mutual fund scheme;
- (vii) Any certificate or instrument (by whatever name called), issued to any investor by any issuer being a special purposes distinct entity which possesses any debt or receivable, including mortgage debt, assigned to such entity, and acknowledging beneficial interest of such investor in such debt or receivable, including mortgage debt, as the case may be;
- (viii) such other instruments as may be declared by the Central Government to be securities; and
- (ix) Rights or interest in Securities.

The above mentioned Securities are illustrative in nature. Investments can be made in various equity and equity related Securities including convertible/non-convertible and/or cumulative/non-cumulative preference shares, convertible and/or cumulative/non-cumulative debentures, bonds and warrants carrying the right to obtain equity shares, units of mutual funds, ETFs and other eligible modes of investment as may permitted by the Regulations from time to time. The Portfolio Manager may from time to time invest the idle cash balance in units of liquid schemes of mutual funds. Investments could also be made in bonds and debentures that are listed, unlisted, convertible, non-convertible, secured, unsecured, rated or unrated or of any maturity, and acquired through secondary market purchases, RBI auctions, open market sales conducted by RBI etc., initial public offers (IPOs), other public offers, bilateral offers, placements, rights, offers, negotiated deals, etc. The debt category will include all types of debt Securities including but not limited to Securitised Debt, Pass Through Certificates, Debentures (fixed, floating, variable coupon, and equity index /stocks /stocks basket linked), bonds, government securities issued or guaranteed by Central or State Government, non-convertible part of partially convertible Securities, corporate debt of both public and private sector undertakings, Securities issued by banks (both public and private sector) and development financial institutions, bank fixed deposits, commercial papers, certificate of deposit, trade bills, treasury bills and other money market instruments, units of mutual funds, units of SEBI registered alternative investment funds, floating rate debt Securities and fixed income derivatives like interest rate swaps, forward rate agreements etc. as may be permitted under the applicable laws.

Asset classes for investment will always be subject to applicable laws and the scope of investments as may be agreed upon between the Portfolio Manager and the Client by way of any agreement, explicit or implied including this disclosure document, addenda thereof, other documents and communications in writing and emails duly authenticated and exchanged between the Client and NAM India.

**(e) In line with Regulation 24(15) of the Regulations, Portfolio Manager shall not hold the listed securities, belonging to the Portfolio, in its own name on behalf of its clients either by virtue of contract with clients or otherwise.**

The Portfolio Manager shall segregate each client's funds and Portfolio and keep them separate from his own funds and securities and be responsible for safe keeping of clients' funds and securities. In terms of paragraph 2.2 of the SEBI Master Circular SEBI/HO/IMD/IMD-POD-1/P/CIR/2024/80 dated June 07, 2024 it is hereby clarified that Portfolio Manager may keep the funds of all clients in a separate bank account maintained by the Portfolio Manager subject to the following conditions:

- a) There shall be a clear segregation of each Client's fund through proper and clear maintenance of back office records
- b) Portfolio Managers shall not use the funds of one Client for another client
- c) Portfolio Managers shall also maintain an accounting system containing separate Client-wise data for their funds and provide statement to Clients for such accounts at least on monthly basis
- d) Portfolio Managers shall reconcile the client-wise funds with the funds in the aforesaid bank account on daily basis.

**(f) Investment objectives and policies / Investment Philosophy**

**Equity Investment Philosophy**

The Portfolio Manager plans to identify superior businesses with healthy cash flows and high operating margins and hold for the long term to allow the power of compounding to work in our favour. Equity investments are proportionate ownership of the business and the attempt is to value a company based on its business model and operating parameters.

The Portfolio Manager would identify companies for investments, based on the following criteria among others: -

1. Sound Management;
2. Good track record of the company;
3. Potential for future growth; and
4. Industry and economic scenario.

Besides, it is expected that a portion of the Funds will also be invested in initial offering and other primary market offering.

The objective evaluation of an investment case would be founded on data and reasoning. Extensive research would be carried on before committing Client's Funds.

**Debt Investment Philosophy**

Investment decision would be based on:

1. Active views on the interest rates and yield curves;
2. Active duration management;
3. Credit quality of the Portfolio;
4. Liquidity of the Security; and
5. Any other view taken by the Portfolio Manager from time to time.

The Portfolio Manager would endeavour to maintain a balance between safety, liquidity and profitability aspects of various Investment Approaches; they would also endeavour to develop a well-diversified quality Portfolio in order to minimize the credit and liquidity risk. The duration of the debt Portfolio would primarily be managed with a view to generate coupon income with minimum interest rate risk. The Portfolio Manager would endeavour to mitigate the risk associated with debt Securities by diversification and effective use of hedging techniques.

As per the Regulations, the Portfolio Manager shall not deploy the Clients' funds in bill discounting, badla financing or for the purpose of lending or placement with Corporate or non-corporate bodies.

### Trading in Derivatives

Portfolio Manager can also participate in the derivatives trading subject to Regulations.

Accordingly, the Portfolio Manager may use derivative instruments for hedging and Portfolio rebalancing like Stock Index Futures, Stock Futures, Options on Stocks and Stocks Indices, Interest Rate Swaps, Forward Rate Agreements and other such derivative instruments as may be introduced from time to time, as permitted by SEBI.

No leveraging of the Portfolio shall be allowed in derivatives, i.e. derivative positions (excluding cross-cancelling hedging positions) together with underlying equity, bond and cash positions must aggregate to 100% of value of the Portfolio.

## (g) Investment Approaches of the Portfolio Manager

**Strategy:** Equity

### (i) Absolute Freedom Portfolio

**Investment Objective:** To generate outsize returns over 3 -5 years, through a portfolio which may predominantly invest in large cap stocks and selectively in quality mid cap, small cap and microcap stocks.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S&P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing in a Portfolio that may primarily invest in large cap & selectively in midcap, small cap & microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 & revised Annexure I received on 31<sup>st</sup> March 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

#### Risk associated with the Investment Approach

- (i) The Portfolio may have some exposure to midcap, small cap & microcap stocks which tend to be relatively more illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (ii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

### (ii) Absolute Freedom Portfolio - 1

**Investment Objective:** To generate outsize returns over 3 -5 years, through a portfolio which may predominantly invests in large cap stocks and selectively in quality mid cap, small cap and microcap stocks.

**Type of Securities:** Portfolio Manager will invest in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing in a portfolio that may primarily invest in large cap & selectively in midcap, small cap & microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 & revised Annexure I received on 31<sup>st</sup> March 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Other salient feature:** The equity allocation in the portfolio has been reduced to the extent of entry load / upfront fees charged to the Investor as per the mandate received by the Portfolio Manager.

#### **Risk associated with the Investment Approach**

- (i) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (ii) Kindly refer to paragraph 6 ([Risk Factors](#)) for detailed statement on risks associated with the Investment Approach.

#### **(iii) Absolute Freedom Portfolio - Systematic Rebalancing option**

**Investment Objective** To generate outsize returns over 3 -5 years, through a portfolio which may predominantly invests in large cap stocks and selectively in quality mid cap, small cap and micro-cap stocks. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & Equity related instruments: 0%-100% | Debt Instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S&P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing in a portfolio that may primarily invest in large cap & selectively in midcap, small cap & microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 & revised Annexure I received on 31<sup>st</sup> March 2023 issued by Association of Portfolio Managers in India

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (ii) Kindly refer to paragraph 6 ([Risk Factors](#)) for detailed statement on risks associated with the Investment Approach.

#### **(iv) Emerging India Portfolio**

**Investment Objective:** The objective of this Investment Approach is to deliver superior returns by participating in India growth story through a focussed Portfolio of high growth emerging businesses that are existing / potential leaders in their field of operations. The Portfolio Manager would endeavour to generate capital appreciation by investing primarily in mid cap and small cap stocks. The Portfolio may also have allocation to cash and Money Market Instruments/funds as an investment tool.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing primarily in mid cap and small cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The stocks in the portfolio are relatively illiquid and more volatile as compared to large cap stocks. Due to these limitations in a falling market for a short period of time there is inherent risk of high volatility in prices of such stocks as investors sell them and invest in large cap stocks.
- (ii) Kindly refer to paragraph 6 ([Risk Factors](#)) for detailed statement on risks associated with the Investment Approach.

#### **(v) Emerging India Portfolio - 1**

**Investment Objective:** The objective of the Portfolio is to deliver superior returns by participating in India growth story through a focussed Portfolio of high growth emerging businesses that are existing / potential leaders in their field of operations. The Portfolio

Manager would endeavour to generate capital appreciation by investing primarily in mid cap and small cap stocks. The Portfolio may also have allocation to cash and Money Market Instruments/funds as an investment tool.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing primarily in mid cap and small cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Other salient feature:** The equity allocation in the portfolio has been reduced to the extent of entry load / upfront fees charged to the Investor as per the mandate received by the Portfolio Manager.

#### **Risk associated with the Investment Approach**

- (i) The stocks in the Portfolio are relatively illiquid and more volatile as compared to large cap stocks. Due to these limitations in a falling market for a short period of time there is inherent risk of high volatility in prices of such stocks as investors sell them and invest in large cap stocks.
- (ii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

#### **(vi) Emerging India Portfolio - Systematic Rebalancing Option**

**Investment Objective:** The objective of the Portfolio is to deliver superior returns by participating in India growth story through a focussed Portfolio of high growth emerging businesses that are existing / potential leaders in their field of operations. The Portfolio would endeavour to generate capital appreciation by investing primarily in mid cap and small cap stocks. The Portfolio may also have allocation to cash and Money Market Instruments/funds as an investment tool. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | debt instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing primarily in mid cap and small cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The stocks in the Portfolio are relatively illiquid and more volatile as compared to large cap stocks. Due to these limitations in a falling market for a short period of time there is inherent risk of high volatility in prices of such stocks as investors sell them and invest in large cap stocks.
- (ii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

#### **(vii) The Indian Economic Transformation Portfolio**

**Investment Objective:** This Investment Approach aims to deliver superior returns by participating in India growth story through a focussed portfolio of high growth businesses that stand to benefit from economic transformation in India, including the shift in business from unorganised to organised sector.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically

used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the Portfolio Manager managing a multi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged down periods. Hence investors may expect volatility in this Investment Approach.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile *vis-a-vis* large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (iii) Thematic portfolios can concentrate portfolio risks more as compared to open ended equity diversified funds. There is inherent risk of entire returns of the theme getting realised beyond the maturity date of the Portfolio. Thematic portfolio entail tracking a plethora of domestic and international triggers that could bring the theme in danger.
- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

**(viii) The Indian Economic Transformation Portfolio - Systematic Rebalancing Option**

**Investment Objective:** This Investment Approach aims to deliver superior returns by participating in India growth story through a focussed portfolio of high growth businesses that stand to benefit from economic transformation in India, including the shift in business from unorganised to organised sector. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | Debt Instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the Portfolio Manager managing a multi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged down periods. Hence investors may expect volatility in this Investment Approach.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile *vis-a-vis* large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (iii) Thematic portfolios can concentrate portfolio risks more as compared to open ended equity diversified funds. There is inherent risk of entire returns of the theme getting realised beyond the maturity date of the Portfolio. Thematic portfolio entail tracking a plethora of domestic and international triggers that could bring the theme in danger.
- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

**(ix) High Conviction Equity Portfolio**

**Investment Objective:** The Portfolio Manager aims to generate outsize returns over 3 -5 years, through a diversified multi-cap portfolio out of top 20-25 most compelling investment ideas. The Portfolio may also have large allocation to cash and Money Market Instruments/funds as an investment tool.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the Portfolio Manager managing a multi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged down periods. Hence investors may expect volatility in this Investment Approach.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (iii) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

**(x) High Conviction Equity Portfolio - 1**

**Investment Objective:** The Portfolio Manager aims to generate outsize returns over 3 -5 years, through a diversified multi-cap portfolio out of top 20-25 most compelling investment ideas. The Portfolio may also have large allocation to cash and Money Market Instruments/funds as an investment tool.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Other salient feature:** The equity allocation in the Portfolio has been reduced to the extent of entry load / upfront fees charged to the Investor as per the mandate received by the Portfolio Manager.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the Portfolio Manager managing a multi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged down periods. Hence investors may expect volatility in this Investment Approach.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (iii) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

**(xi) High Conviction Equity Portfolio - Systematic Rebalancing Option**

**Investment Objective:** The Portfolio Manager aims to generate outsize returns over 3 -5 years, through a diversified multi-cap portfolio out of top 20-25 most compelling investment ideas. The Portfolio may also have large allocation to cash and Money Market Instruments/funds as an investment tool. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of this Investment Approach. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | Debt Instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the Portfolio Manager managing a multi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged down periods. Hence, investors may expect volatility in this Investment Approach.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively more illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market for a short period of time will tend to be highly volatile.
- (iii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

**(xii) Tactical Asset Allocation Plan**

**Investment Objective:** The primary objective of Tactical Asset Allocation Plan shall be to construct a diversified portfolio and endeavour to generate capital appreciation by taking active equity allocation calls depending upon the prevalent market condition. The portfolio shall primarily invest, but shall not be restricted to, in equity and equity related securities, debt securities, money market instruments and units of mutual funds including the Gold Exchange Traded Fund.

**Type of Securities:** Portfolio Manager will invest in listed equity and equity related instruments. The portfolio can have some exposure Gold ETF & debt instruments including money market instruments, units of Mutual Fund, fixed deposits or any other securities permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the inhouse proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection. Gold ETF investment will be basis the prevailing market conditions and future outlook on international gold prices.

**Allocation:** Equity & Equity related Instruments: 70%-100% | Gold ETF & Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; Since the Portfolio Manager tends to generate long term capital appreciation by taking active equity allocation calls, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Investor. However, the indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Allocation strategy seeks to mitigate overall portfolio volatility by combining equity, debt and gold asset classes which historically have low correlations to each other, meaning they do not move in the same direction at the same time. However, recently there have been instances where these correlations have been higher specifically during market turbulence and generally due to globalisation.
- (ii) Since the Portfolio also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the Portfolio Manager managing a multi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged down periods. Hence investors may expect volatility in this Investment Approach.

- (iii) The Clients will be bearing the recurring expenses of the Portfolio, in addition to the expenses of underlying ETF portfolio. Hence, the Portfolio's performance may depend upon the performance of the underlying ETF portfolio. Any change in the investment policies or the fundamental attributes of the underlying portfolio could affect the performance of the Portfolio. Risk associated with Portfolio such as Central banks' actions, macro-economic factors, geopolitical issues, seasonal demand, change in duties & levies may also have an impact on the return generated by the Portfolio.
- (iv) Risks associated with Investment in Gold Exchange Traded Funds are as follows:
  - a. Market Risk: The NAV of gold ETFs is closely related to the value of gold held by the portfolio. The value (price) of gold may fluctuate for several reasons and all such fluctuations will result in changes in the NAV of gold ETFs.
  - b. Risks associated with Physical gold: There is a risk that part or all of the underlying portfolio's gold could be lost, damaged or stolen. Access to it could also be restricted by natural events or human actions. Any of these actions may have adverse impact on the operations of the gold ETF and consequently on the Portfolio.
  - c. Indirect taxation: For the valuation of gold by the underlying portfolio, indirect taxes like customs duty would also be considered. Hence any change in the rates of indirect taxation would affect the valuation of the gold ETF.
- (v) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

#### (xiii) Large Cap Portfolio

**Investment Objective:** A relatively stable investment option with investments predominantly in large-cap stocks. The primary objective of the Investment Approach is to ensure liquidity and lower impact cost leading to the construction of a relatively more stable Portfolio. The portfolio management process will also focus on using cash as an investment tool and derivatives as a hedging tool.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws. The Portfolio also may use derivatives as a hedging tool.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & Equity related Instruments: 70-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** NIFTY 50; Portfolio would endeavour to generate capital appreciation by investing primarily in large cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

#### (xiv) Deep Value Portfolio

**Investment Objective:** The Portfolio Manager would endeavour to generate capital appreciation by investing primarily into larger mid-caps and smaller mid-caps.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & Equity related Instruments: 70-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio will primarily comprise mid-cap and small-cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The stocks in the Portfolio are relatively illiquid and more volatile as compared to large cap stocks. Due to these limitations in a falling market for a short period of time there is inherent risk of high volatility in prices of such stocks as investors sell them and invest in large cap stocks.
- (ii) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

(xv) **Nippon India Royal Portfolio**

**Investment Objective:** A highly flexible investment option, which offers a diversified investment Portfolio across large-cap, mid-cap, small-cap and micro-cap stocks. This option follows an aggressive approach to Portfolio construction with focus on highly active money management, using cash as an investment tool; and derivatives as a hedging tool.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity and equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; Portfolio intends to invest in listed equity and equity related instruments across market capitalisation i.e. large-cap, mid-cap, small and micro-cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Investor. However, the indicative investment horizon for this Portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also invests in mid-cap and small-cap stocks, they are riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the portfolio manager of a multi-cap strategy can increase his exposure to mid and small-sized companies to benefit from earnings. It can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when he expects prolonged down periods.
- (ii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the investment approach.

(xvi) **MAAP**

**Investment Objective:** The primary investment objective of the investment approach is to seek to generate long-term capital appreciation by investing in a Portfolio of equity and equity related Securities and/or debt Securities/ money market Securities including units of mutual funds. This option may endeavour to optimize Portfolio returns by combining varied investment opportunities in funds / stocks across market capitalisation. The option may also endeavour to capture the positive outlook on a particular sector by increasing exposure into the sector specific funds/ stocks.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Units of equity related mutual funds may be selected basis in-house research based on past track record and current positioning of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity and equity related instruments including equity related mutual funds: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; Portfolio intends to invest in listed equity, equity related mutual funds and other equity related instruments across market capitalisation i.e. large-cap, mid-cap, small and micro-cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India..

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Investor. However, the indicative investment horizon for this Portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also invests in mid-cap and small-cap stocks, they are riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the portfolio manager of a multi-cap strategy can increase his exposure to mid and small-sized companies to benefit from earnings. It can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when he expects prolonged down periods.
- (ii) Risks related to investment in other funds:
  - (a) The Portfolio will invest primarily in a combination of the specified equity, debt and other asset class schemes of Nippon India Mutual Fund or other mutual fund houses. Hence, scheme specific risk factors of the underlying schemes will be applicable. All risks associated with underlying schemes, including performance of their underlying stocks, derivative instruments etc. are applicable in the case of the Portfolio.
  - (b) Investors who intend to invest in the Portfolio have deemed to have understood the merits of allocation to the Portfolio in the context of their overall portfolio from their investment advisor or representative of NAM India.
  - (c) In a rising market, the Portfolio due to over diversification may not outperform a fully invested equity portfolio.

- (d) Redemptions by the Portfolio from the underlying schemes would be subject to applicable exit loads, which may impact performance of the Portfolio.

(iii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the investment approach.

#### (xvii) Pearl Portfolio

**Investment Objective:** The Investment Approach aims to generate long term capital appreciation by investing in large-cap, mid-cap and small-cap companies across select sectors that would be engines of growth and key driver for the Indian economy. The Portfolio may also have large allocation to cash and money market instruments/funds as an investment tool.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including money market instruments, units of mutual fund including fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity and equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; Portfolio Intends to invest in listed equity and equity related instruments across market capitalisation i.e. large-cap, mid-cap, small and micro-cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Investor. However, the indicative investment horizon for this Portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The Portfolio Manager will invest primarily in a combination of the specified equity, debt and other asset class schemes of Nippon India Mutual Fund or other mutual fund houses. Hence, scheme specific risk factors of the underlying schemes will be applicable. All risks associated with underlying schemes, including performance of their underlying stocks, derivative instruments etc. are applicable in the case of the Portfolio.
- (ii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

#### (xviii) Emerging Sector Opportunity Portfolio

**Investment Objective:** This will be a thematic equity Investment Approach. Portfolios under this option would endeavour to outperform the underlying benchmark by capturing the upsides in the stocks of various sectors which the Portfolio Manager believes would be key drivers of Indian economy, making them an integral part of the long-term growth story.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity and equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; Portfolio Intends to invest in listed equity and equity related instruments across market capitalisation i.e. large-cap, mid-cap, small and micro-cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Investor. However, the indicative investment horizon for this Portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The Portfolio Manager will invest primarily in a combination of the specified equity, debt and other asset class schemes of Nippon India Mutual Fund or other mutual fund houses. Hence, scheme specific risk factors of the underlying schemes will be applicable. All risks associated with underlying schemes, including performance of their underlying stocks, derivative instruments etc. are applicable in the case of the Portfolio.
- (ii) Thematic portfolios can concentrate the portfolio risk more as compared to open ended equity diversified portfolios. There is inherent risk of entire returns of the theme getting realised beyond the maturity date of the Portfolio. Thematic portfolios entail tracking a plethora of domestic and international triggers that could bring the theme in danger.
- (iii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

#### (xix) Concentrated Portfolio

**Investment Objective:** This investment objective of concentrated option is to achieve long term capital appreciation from equity and equity related investments. This investment option endeavours to invest in a focused manner in high growth companies that are expected to compound wealth over medium to long term.

**Type of Securities:** Portfolio Manager will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity and equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; Portfolio Intends to invest in listed equity and equity related instruments across market capitalisation i.e. large-cap, mid-cap, small and micro-cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Investor. However, the indicative investment horizon for this Portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) The Portfolio Manager will invest primarily in a combination of the specified equity, debt and other asset class schemes of Nippon India Mutual Fund or other mutual fund houses. Hence, scheme specific risk factors of the underlying schemes will be applicable. All risks associated with underlying schemes, including performance of their underlying stocks, derivative instruments etc. are applicable in the case of the Portfolio.
- (ii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

**(xx) Reimagine India Portfolio**

**Investment Objective:** The Portfolio Manager aims to deliver superior returns by investing in India growth story through a diversified flexicap portfolio of high growth businesses that stand to benefit over next 5 to 7 years.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Rebalancing between Large cap, Mid cap and Small cap may not play out as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Thematic portfolios can result in greater concentration, greater risk and higher volatility as compared to diversified equity portfolio. There is inherent risk of portfolio theme not playing out as anticipated.
- (iv) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

**(xxi) Reimagine India Portfolio - Systematic Rebalancing Option**

**Investment Objective:** The Portfolio Manager aims to deliver superior returns by investing in India growth story through a diversified flexi-cap portfolio of high growth businesses that stand to benefit over next 5 to 7 years. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | Debt Instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Rebalancing between Large cap, Mid cap and Small cap may not payout as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Thematic portfolios can result in greater concentration, greater risk and higher volatility as compared to diversified equity portfolio. There is inherent risk of portfolio theme not playing out as anticipated.
- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

**(xxii) The Next Billion Opportunity Portfolio**

**Investment Objective:** The Portfolio Manager aims to deliver superior returns through a diversified flexi-cap portfolio of high growth businesses that stand to benefit from a paradigm shift in the in the economy unleashed by the NEXT Billion of India's population

**Type of Securities:** Portfolio Manager will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Rebalancing between Large cap, Mid cap and Small cap may not payout as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Thematic portfolios can result in greater concentration, greater risk and higher volatility as compared to diversified equity portfolio. There is inherent risk of portfolio theme not playing out as anticipated.
- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

(xxiii) **The Next Billion Opportunity Portfolio - Systematic Rebalancing Option**

**Investment Objective:** The Portfolio Manager aims to deliver superior returns through a diversified flexi-cap portfolio of high growth businesses that stand to benefit from a paradigm shift in the in the economy unleashed by the NEXT Billion of India's population. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio Manager will invest in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | Debt Instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the Portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Rebalancing between Large cap, Mid cap and Small cap may not payout as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Thematic portfolios can result in greater concentration, greater risk and higher volatility as compared to diversified equity portfolio. There is inherent risk of portfolio theme not playing out as anticipated.
- (iv) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the investment approach.

(xxiv) **The Ten Trillion-Dollar Opportunity Portfolio**

**Investment Objective:** The Portfolio Manager aims to deliver superior returns by investing in India growth story through a diversified flexi-cap portfolio of high growth businesses that stand to benefit from India becoming a ten trillion-dollar economy over the decade.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt Instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move Investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Rebalancing between Large cap, Mid cap and Small cap may not payout as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.

- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Thematic portfolios can result in greater concentration, greater risk and higher volatility as compared to diversified equity portfolio. There is inherent risk of portfolio theme not playing out as anticipated.
- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

**(xxv) The Ten Trillion-Dollar Opportunity Portfolio - Systematic Rebalancing Option**

**Investment Objective:** The Portfolio Manager aims to deliver superior returns by investing in India growth story through a diversified flexi-cap portfolio of high growth businesses that stand to benefit from India becoming a ten trillion-dollar economy over the decade. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | Debt Instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager intends to make investments in listed equity and equity related instruments across market capitalisation i.e. Large Cap, Mid Cap, Small & Microcap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Rebalancing between Large cap, Mid cap and Small cap may not play out as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Thematic portfolios can result in greater concentration, greater risk and higher volatility as compared to diversified equity portfolio. There is inherent risk of portfolio theme not playing out as anticipated.
- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

**(xxvi) Unicorn Portfolio**

**Investment Objective:** The objective of the Portfolio is to deliver superior returns by participating in India growth story through a focussed portfolio of hyper growth small businesses. The Portfolio would endeavour to generate capital appreciation by investing predominantly in small & microcap stocks. It may have some allocation to large & midcap space from a tactical perspective. The Portfolio may also have allocation to cash and Money Market Instruments/funds as an investment tool.

**Type of Securities:** Portfolio will be invested in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 70%-100% | Debt instruments: 0-30%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing primarily in small cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the indicative investment horizon for the portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Tactical allocation to large cap and/or Mid cap may not play out as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the investment approach.

#### **(xxvii) Unicorn Portfolio - Systematic Rebalancing Option**

**Investment Objective:** The objective of the Portfolio is to deliver superior returns by participating in India growth story through a focussed portfolio of hyper growth small businesses. The Portfolio would endeavour to generate capital appreciation by investing predominantly in small & micro cap stocks. It may have some allocation to large & midcap space from a tactical perspective. The Portfolio may also have allocation to cash and Money Market Instruments/funds as an investment tool. The equity allocation for the investor will be increased in a staggered manner as per the mandate received by the Portfolio Manager.

**Type of Securities:** Portfolio will invest in listed equity and equity related instruments. The portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

**Allocation:** Equity & equity related instruments: 0%-100% | debt instruments: 0-100%

**Benchmark and basis for choice of benchmark:** S & P BSE 500; The Portfolio Manager would endeavour to generate capital appreciation by investing primarily in small cap stocks. Hence, an equity benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 and revised Annexure I received on 31<sup>st</sup> March, 2023 issued by Association of Portfolio Managers in India

**Indicative investment horizon:** Ideal investment horizon for any equity investment should be long term in nature for compounding to work for the Client. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) Since the Portfolio also seeks to invest in mid-cap and small-cap stocks, it is riskier than large-cap portfolio. In a robust economic environment, the Portfolio Manager managing a flexi-cap approach can increase his exposure to mid and small-sized companies to benefit from earnings upgrade. The Portfolio Manager can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when it expects prolonged period of slowdown. Tactical allocation to Large cap and/or Mid cap may not play out as anticipated and therefore the portfolio may significantly underperform the benchmark which may result in material erosion of capital invested.
- (ii) The Portfolio may have some exposure to midcap, small cap & micro-cap stocks which tend to be relatively illiquid and volatile vis-a-vis large cap stocks. To extent of such exposure, the Portfolio in a falling market may significantly underperform the benchmark which may result in material erosion of capital invested.
- (iii) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

**Strategy:** Debt

#### **(xxviii) Enhanced Equity Portfolio**

**Investment Objective:** The primary objective of the Portfolio is to generate returns by investing in equity linked non-convertible debentures (NCD). The payment of coupon and principal of these instruments could be linked to performance of underlying actively managed reference index as decided by the Investment Manager. The Portfolio Manager can construct portfolios in the form of Series under this offering from time to time.

**Type of Securities:** Portfolio will typically invest in listed equity linked non-convertible debentures. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Equity Linked NCDs will be selected basis the outlook of the equity markets and assessment of the credit risk associated with investment in NCD of the concerned Issuer. Debt instruments will be typically used for temporary parking of funds pending deployment in NCD wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity Linked NCDs: 80-100% | Debt Instruments: 0-20%

**Benchmark and basis for choice of benchmark:** CRISIL Composite Bond Fund Index; Since the Portfolio will invest in NCDs where in the coupon & principal payment is linked to performance of actively managed reference Index as decided by the Portfolio Manager, a debt benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon will be aligned to tenure of the underlying equity linked NCDs. The same may vary depending on the terms of the issuance of respective series. However, the minimum indicative investment horizon for the portfolio should be at least 3 years

#### **Risk associated with the Investment Approach**

- (i) The issuer of equity index linked securities or any of its agents, from time to time may have long or short positions or make markets including in NIFTY indices, futures and options (hereinafter referred to as “**Reference Assets**”) (and other similar assets), they may act as an underwriter or distributor of similar instruments, the returns on which or performance of which, may be at variance with or asymmetrical to those on the securities, and they may engage in other public and private financial transactions (including the purchase of privately placed investments or securities or other assets). The foregoing activities of “the issuer of index linked securities” or any of its agents and related markets (such as the foreign exchange market) may affect the value of the Securities. In particular, the value of the Securities could be adversely impacted by a movement in the Reference Assets, or activities in related markets, including by any acts or inactions of “the Issuer of index linked securities” or any of its agents;
- (ii) The equity index linked securities, even after being listed, may not be marketable or may not have a market at all;
- (iii) The returns on the structured securities, primarily are linked to the CNX Nifty Index and/or any other equity benchmark as the Reference Asset, and even otherwise, may be lower than prevalent market interest rates or even be nil or negative depending entirely on the movement in the underlying index and futures values as also that over the life of the Securities (including the amount if any, payable on maturity, redemption, sale or disposition of the securities) the security holder may receive no income/return at all or negative income/return on the security, or less income/return than the security-holder may have expected, or obtained by investing elsewhere or in similar investments.
- (iv) The return on investment in Securities would depend on the prevailing market conditions, both domestically as well as internationally.
- (v) In equity index linked securities, in the event of any discretions to be exercised, in relation to method and manner of any of the computations including due to any disruptions in any of the financial markets or if for any other reason, the calculations cannot be made as per the method and manner originally stipulated or referred to or implied, such alternative methods or approach shall be used as deemed fit by the issuer and may include the use of estimates and approximations. All such computations shall be valid and binding on the investor, and no liability to the issuer of equity index linked securities;
- (vi) There is a risk of receiving lower than expected or negligible returns or returns lower than the initial investment amount in respect of such equity index linked securities over the life and/or part thereof or upon maturity, of the securities.
- (vii) At any time during the life of such Securities, the value of the securities may be substantially less than its redemption value. Further, the price of the Securities may go down in case the credit rating of the issuer goes down;
- (viii) The Securities and the return and/or maturity proceeds hereon, are not guaranteed or insured in any manner by the issuer of equity index linked securities;
- (ix) Performance of the Reference Index will have a direct bearing on the performance of the Portfolio. In the event the Reference Index is dissolved or withdrawn by the index provider, such as, NSE Indices Limited (formerly known as India Index Services & Products Limited – IISL) (for NSE- Nifty), BSE for BSE-Sensex etc., the Debenture-Trustees upon request by the issuer may modify the terms of issue of debentures, so as to track a different and suitable index and appropriate intimation will be sent to the debenture holders.
- (x) Credit Risk: Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income security (i.e. will be unable to make timely principal and interest payments on the security). Because of this risk debentures are sold at a yield spread above those offered on Treasury securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default. Investing in Bonds and Fixed Income securities may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity.
- (xi) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the investment approach.

#### **(xxix) Blended- Debt Plus Hybrid Option**

**Investment Objective:** The primary objective of the Portfolio is to generate returns by investing in equity linked non-convertible debentures (NCD). The payment of coupon and principal of these instruments could be linked to performance of Nifty 50 (only Nifty). The Portfolio Manager can construct portfolios in the form of series under this offering from time to time.

**Type of Securities:** Portfolio will typically invest in listed equity linked non-convertible debentures. The Portfolio can have some exposure to debt instruments including money market instruments, units of Mutual Fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Equity Linked NCDs will be selected basis the outlook of the of equity markets and assessment of the credit risk associated with investment in NCD of the concerned Issuer. Debt instruments will be typically used for temporary parking of funds pending deployment in NCD wherein liquidity and safety will be primary basis for selection.

**Allocation:** Equity Linked NCDs: 80-100% | Debt Instruments: 0-20%.

**Benchmark and basis for choice of benchmark:** CRISIL Composite Bond Fund Index; Since the portfolio will invest in NCDs where in the coupon & principal payment is linked to performance of Nifty 50, a debt benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal investment horizon will be aligned to tenure of the underlying equity linked NCDs. The same may vary depending on the terms of the issuance of respective series. However, the minimum indicative investment horizon for the portfolio should be at least 3 years.

#### **Risk associated with the Investment Approach**

- (i) The issuer of equity index linked securities or any of its agents, from time to time may have long or short positions or make markets including in NIFTY indices, futures and options (hereinafter referred to as “**Reference Assets**”) (and other similar assets), they may act as an underwriter or distributor of similar instruments, the returns on which or performance of which, may be at variance with or asymmetrical to those on the securities, and they may engage in other public and private financial transactions (including the purchase of privately placed investments or securities or other assets). The foregoing activities of “the issuer of index linked securities” or any of its agents and related markets (such as the foreign exchange market) may affect the value of the Securities. In particular, the value of the Securities could be adversely impacted by a movement in the Reference Assets, or activities in related markets, including by any acts or inactions of “the Issuer of index linked securities” or any of its agents;
- (ii) The equity index linked securities, even after being listed, may not be marketable or may not have a market at all;
- (iii) The returns on the structured securities, primarily are linked to the CNX Nifty Index and/or any other equity benchmark as the Reference Asset, and even otherwise, may be lower than prevalent market interest rates or even be nil or negative depending entirely on the movement in the underlying index and futures values as also that over the life of the Securities (including the amount if any, payable on maturity, redemption, sale or disposition of the securities) the security holder may receive no income/return at all or negative income/return on the security, or less income/return than the security-holder may have expected, or obtained by investing elsewhere or in similar investments.
- (iv) The return on investment in Securities would depend on the prevailing market conditions, both domestically as well as internationally. The returns mentioned in the term sheets are indicative and may or may not accrue to an investor accordingly.
- (v) In equity index linked securities, in the event of any discretions to be exercised, in relation to method and manner of any of the computations including due to any disruptions in any of the financial markets or if for any other reason, the calculations cannot be made as per the method and manner originally stipulated or referred to or implied, such alternative methods or approach shall be used as deemed fit by the issuer and may include the use of estimates and approximations. All such computations shall be valid and binding on the investor, and no liability therefore will attach to the issuer of equity index linked securities;
- (vi) There is a risk of receiving lower than expected or negligible returns or returns lower than the initial investment amount in respect of such equity index linked securities over the life and/or part thereof or upon maturity, of the securities.
- (vii) At any time during the life of such Securities, the value of the securities may be substantially less than its redemption value. Further, the price of the Securities may go down in case the credit rating of the issuer goes down;
- (viii) The Securities and the return and/or maturity proceeds hereon, are not guaranteed or insured in any manner by the issuer of equity index linked securities;
- (ix) Performance of the Reference Index will have a direct bearing on the performance of the Portfolio. In the event the Reference Index is dissolved or withdrawn by the index provider, such as, NSE Indices Limited (formerly known as India Index Services & Products Limited – IISL) (for NSE- Nifty), BSE for BSE-Sensex etc., the Debenture-Trustees upon request by the issuer may modify the terms of issue of debentures, so as to track a different and suitable index and appropriate intimation will be sent to the debenture holders
- (x) Credit Risk: Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income security (i.e. will be unable to make timely principal and interest payments on the security). Because of this risk debentures are sold at a yield spread above those offered on Treasury securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default. Investing in Bonds and Fixed Income securities may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity.
- (xi) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the investment approach.

#### **(xxx) Yield Maximiser Option**

**Investment Objective:** The primary objective of Yield Maximizer Option is to invest in high yielding secured debentures issued by companies / entities participating directly or indirectly in the real estate sector. The Portfolio Manager can construct portfolios in the form of series under this offering from time to time. The Portfolio may comprise one or more security/ debenture.

**Type of Securities:** Portfolio will typically invest in high yielding secured non-convertible debentures. The Portfolio can have some exposure to debt instruments including Money Market Instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Investment in non-convertible debentures related and issued by companies / entities participating directly or indirectly in real estate sector will be selected basis the inhouse proprietary due diligence carried out by the portfolio management team in accordance with investment objective of the Investment Approach. Debt instruments will be typically used for temporary parking of funds pending deployment in market wherein liquidity and safety will be primary basis for selection.

**Allocation:** Non-Convertible Debentures: 50-100% | Debt Instruments: 0-50%

**Benchmark and basis for choice of benchmark:** CRISIL Credit Index; The Portfolio shall comprise of structured non-convertible Debentures (NCDs) issued by real estate developers typically against residential projects. Due to bespoke nature of these structured transactions, there is not publicly available appropriate benchmark which captures risk return trade off of such Portfolio. Since the portfolio is typically investing in NCDs or debt instruments, a debt benchmark will be an appropriate choice to compare the performance. Hence, the above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal Investment Horizon for this Portfolio is 36-60 months.

**Risk associated with the Investment Approach**

- (i) The investments of the Portfolio will be in entities, companies and/or bodies corporate involved in real estate sector and therefore are subject to varying degrees of general risks and risks inherent to real estate property investments. The yields available from investments in real estate depend on the amount of income earned and capital appreciation generated by the portfolio entities in which the Portfolio invests as well as the expenses incurred in connection therewith. If any of the portfolio entities do not generate income sufficient to meet operating expenses, including debt service and capital expenditures, the Portfolio's interest could be adversely affected. Income from, and the value of, the portfolio entities may be adversely affected by the general economic conditions, climate, local conditions such as oversupply, or a reduction in demand for such properties in the areas in which they are located, the attractiveness of the underlying properties to potential tenants/buyers, competition from other properties, the portfolio entities' ability to provide adequate maintenance and insurance and increases in operating costs (including insurance premiums, utilities and real estate taxes) all of which tend to increase over time and are largely beyond the control of the owner. In addition, revenues from properties and real estate values are affected by such factors as the cost of compliance with regulations and the potential for liability under applicable laws and are also affected by interest rate levels and the availability of financing. Certain significant expenditures associated with an investment in real estate (such as mortgage payments, real estate taxes and maintenance costs) generally do not decline when circumstances cause a reduction in income from the property;
- (ii) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

**(xxxi) Liquid Portfolio**

**Investment Objective:** The objective of the Portfolio is to invest predominantly in short term instruments including money market instruments, units of mutual fund, fixed deposits or any other permissible securities under the applicable laws wherein safety and liquidity of the underlying investment is of primary importance.

**Type of Securities:** Portfolio will predominantly be invested in units of mutual funds, money market instruments, fixed deposits or permissible securities under the applicable laws.

**Basis of selection:** Liquidity and safety of the underlying investment will be primary basis for selection.

**Allocation:** Debt Instruments: 0-100 %.

**Benchmark and basis for choice of benchmark:** CRISIL Composite Bond Fund Index; The portfolio would endeavour to generate optimum returns by investing short term debt instruments. Hence, a debt benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** upto 12 months

**Risk associated with the Investment Approach**

Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

**(xxxii) High Grade Portfolio**

**Investment objective:** Portfolio will be typically invested in high grade, listed, secured/unsecured, non-convertible debentures.

**Type of Securities:** The Portfolio, under this approach, will typically consist of listed debentures. The Portfolio may have some exposure to debt instruments including Money Market Instruments, listed PTCs, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Investment in non-convertible debentures issued by companies. The Investment Approach shall be sector agnostic but given the higher issuance are from the banking, financial services, and insurance ("BFSI") sector, the allocation to BFSI would be higher compared to other sectors. The Portfolio Manager will invest in well-researched securities of issuers with ratings ranging between AAA to AA-, with minimum allocation of 50% towards AAA rated securities and may have upto 20% allocation to PTCs.

**Allocation:** Non-convertible debentures, government securities, state development loans, treasury bills, commercial papers, certificate of deposit: 75-100% | Other Instruments including FDs, MF units: 0-25%.

**Benchmark and basis for choice of benchmark:** Nifty Medium to Long Duration Debt Index; The Portfolio shall be sector agnostic but given the higher issuance are from the BFSI sector, Portfolio will be tilted towards BFSI. Due to the nature of these

transactions, there is not publicly available appropriate benchmark which captures risk return trade off of such Portfolio. Since the Portfolio, under this approach, will be typically invested in non-convertible debentures or debt instruments, a debt benchmark will be an appropriate choice to compare the performance. Hence, the above-mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal Investment Horizon for this portfolio is 36-60 months.

**Risk associated with the Investment Approach:**

- **Investment in Debt Instruments**

The Portfolio Manager shall invest in debt instruments including non-convertible debt instruments, listed debt instruments. The obligor of a debt security or instrument may not be able or willing to pay interest or to repay principal when due in accordance with the investment documents. An obligor's willingness to pay interest or to repay principal due in a timely manner may be affected by, among other factors, its cash flow. Sometimes, the fluctuation in the market price of such instruments is likely to have a direct bearing on the value of the investment in Portfolio Entities. Further, there may be additional costs involved in complying with the disclosure and regulatory requirements. Further, such investments in listed debt instruments may be required to be made on the basis of publicly available information only due to the limited ability to conduct due diligence on such companies.

- **Credit Risks**

One of the fundamental risks associated with the investments under this approach is credit risk, i.e., the risk of non-payment of agreed amounts by Portfolio Entities and other obligors, to the Client. Such non-payment will result in a reduction in returns and a reduction in the value of the relevant investments in the Portfolio Entities. In addition, in case of the bankruptcy of a Portfolio Entity, there could be significant delays in the enforcement and realization of the collateral securing an investment in a Portfolio Entity. Further, such collateral may be released without the consent of the Portfolio Manager.

- **Interest Rate Risk**

The Portfolio may be exposed to interest rate risks. Changes in prevailing market interest rates could affect the value of such investments. Factors that may affect market interest rates include inflation, deflation, slow or stagnant economic growth or recession, unemployment, money supply, governmental monetary policies, international disorders and instability in domestic and foreign financial markets. The Portfolio Manager may or may not seek to hedge its interest rate risk.

- **Risk of Rating Migration**

Change of rating (credit worthiness) would impact the price of debt securities. If it is downgraded, its market value would drop. If the security is upgraded its market value would increase. The extent of decline or increase would depend on the extent of rating change and the residual tenor of the debt security.

- **Basis Risk**

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

- **Spread Risk**

In a floating rate security, the coupon is expressed in terms of a spread or mark up over the benchmark rate. However, depending upon the market conditions the spreads may move adversely or favourably leading to fluctuation in valuation of the assets of the Client.

- **Liquidity Risk**

The corporate debt market is relatively illiquid vis-a- vis the government securities market. There could therefore be difficulties in exiting from corporate bonds in times of uncertainties. Liquidity therefore may suffer. Even though the government securities market is more liquid compared to that of other debt instruments, on occasions, there could be difficulties in transacting in the market due to extreme volatility or unusual constriction in market volumes or on occasions when an unusually large transaction has to be put through. The liquidity, in general, in the Indian debt market is considerably lower than that of developed markets.

- **Inadequate Collateral**

If there is a decrease in the value of the underlying securities, there may not be sufficient collateral to cover losses and may experience losses upon foreclosure. It is generally believed that the Portfolio Entities generally are and will be able to repay the debt investments from their available capital, from future capital-raising transactions or from cash flow from operations. However, to mitigate the credit risks, Portfolio Manager may take a security interest in all or a portion of the assets of the Portfolio Entities, including the equity interests of their subsidiaries. There is a risk that the collateral securing the debt investments may decrease in value over time, may be difficult to appraise or sell in a timely manner and may fluctuate in value based upon the business and market conditions, including as a result of an inability of the Portfolio Entity to raise additional capital, and, in some circumstances, the Client's lien could be subordinated to claims of other creditors. In addition, deterioration of a Portfolio Entity's financial condition and prospects, including its inability to raise additional capital, may be accompanied by deterioration of the value of the collateral for the debt investments. Consequently, although such debt investment is secured, the Client may not receive principal and interest payments according to the debt investment's terms and the value of the collateral may not be sufficient to recover the Client's investment should the Client be forced to enforce the remedies.

In addition, because the Portfolio Manager may invest in small and medium sized companies, a portion of the assets securing the Portfolio Investment may be in the form of intellectual property, if any, inventory, equipment, cash and accounts receivables. Intellectual property, if any, which secures a debt investment could lose value if the company's rights to the intellectual property are challenged or if the company's license to the intellectual property is revoked or expires. In addition, in lieu of a security interest in a Portfolio Entity's intellectual property, security interest may be obtained in all assets of the Portfolio Entity other than intellectual property and also obtain a commitment by the Portfolio Entity not to grant liens to any other creditor on the company's intellectual property. In these cases, the Client may have additional difficulty recovering the principal in the event of a foreclosure.

- **Other Debt in Portfolio Entities ranking pari-passu / senior**

In a few instances, the Portfolio Entities may incur debt that ranks equally with, or senior to, the Portfolio Investments in Portfolio Entities. The Portfolio Manager plans to invest in debt investments issued by the Portfolio Entities. Some of the Portfolio Entities are permitted to have other debt that ranks equally with, or senior to, the debt investments in the Portfolio Entity. By their terms, these debt instruments may provide that the holders thereof are entitled to receive payment of interest or principal on or before the dates on which the Client is entitled to receive payments in respect of the Portfolio Investments. These debt instruments may prohibit the Portfolio Entities from paying interest on or repaying the investments in the event of, and during, the continuance of a default under the debt instruments. In addition, in the event of insolvency, liquidation, dissolution, reorganization or bankruptcy of a Portfolio Entity, holders of debt instruments ranking senior to the Fund's investment in that Portfolio Entity would typically be entitled to receive payment in full before the Fund receives any payment in respect of its investment. After repaying senior creditors, a Portfolio Entity may not have any remaining assets to use for repaying its obligation to the Client. In the case of debt ranking equally with the Portfolio Investments, the Client would have to share on an equal basis any distributions with other creditors holding such debt in the event of an insolvency, liquidation, dissolution, reorganization or bankruptcy.

- **Pre-payments of the Portfolio Investments**

The Portfolio is subject to the risk that the investments made in Portfolio Entities may be repaid prior to maturity. At the time of a liquidity event, such as a sale of the business, refinancing or public offering, many of the Portfolio Entities may avail themselves of the opportunity to repay the investments prior to maturity. The Portfolio Investments generally allow for repayment at any time subject to certain penalties. When this occurs, the Portfolio Manager generally re-invests these proceeds in temporary investments, pending their future investment in new Portfolio Entities. These temporary investments have substantially lower yields than the debt being prepaid and could experience significant delays in reinvesting these amounts. Any future investment in a new Portfolio Entity may also be at lower yields than the debt that was repaid. As a result, the results of operations of Client Portfolio could be materially adversely affected if one or more of the Portfolio Entities elects to prepay amounts owed to the Client.

- **Bankruptcy of Portfolio Entity**

Various laws enacted for the protection of debtors may operate to the detriment if it is a creditor of a Portfolio Entity that experiences financial difficulty. For example, if a Portfolio Entity becomes insolvent or files for bankruptcy protection, there is a risk that a court may subordinate the Portfolio Investment to other creditors or require the Portfolio Manager to return amounts previously paid to it by such Portfolio Entity. If a Portfolio Company becomes insolvent or bankrupt, the risk of subordination of the Client's claim increases.

- **Temporary Investments:**

To the extent that the Portfolio Manager has already called capital from the Clients, pending investment in Portfolio Entities, these funds may be retained in cash or may be invested in temporary investments. Such investments may substantially reduce the Portfolio's overall return.

- **Development Risk**

The investments may be made in stressed projects of the Portfolio Entities. There may arise scenarios where the development of such stressed projects are not completed, and the Portfolio Manager may appoint a development manager to complete the same. In such a scenario, the Portfolio may be exposed to additional risks, including but not limited to risks of title of property, approvals from statutory authorities, construction, marketing, sales, legal, taxation and environmental risks. The Portfolio Manager will take steps to mitigate the same on a best effort basis, including by appointing an experienced development manager as mentioned above.

Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

(xxxiii) **High Grade Portfolio – Part II**

**Investment objective:** Portfolio will be typically invested in high grade, listed, secured/unsecured, non-convertible debentures.

**Type of Securities:** The Portfolio, under this approach, will typically consist of listed debentures. The Portfolio may have some exposure to debt instruments including Money Market Instruments, listed PTCs, units of mutual fund, fixed deposits, or any other permissible securities under the applicable laws.

**Basis of selection:** Investment in non-convertible debentures issued by companies. The Investment Approach shall be sector agnostic but given the higher issuance are from the banking, financial services, and insurance ("BFSI") sector, the allocation to BFSI would be higher compared to other sectors. The Portfolio Manager will invest in well-researched securities of issuers with ratings ranging between AAA to AA-, and may have upto 20% allocation to PTCs.

**Allocation:** Non-convertible debentures, government securities, state development loans, treasury bills, commercial papers, certificate of deposit: 75-100% | Other Instruments including FDs, MF units: 0-25%.

**Benchmark and basis for choice of benchmark:** Nifty Medium to Long Duration Debt Index; The Portfolio shall be sector agnostic but given the higher issuance are from the BFSI sector, Portfolio will be tilted towards BFSI. Due to the nature of these transactions, there is not publicly available appropriate benchmark which captures risk return trade off of such Portfolio. Since the Portfolio, under this approach, will be typically invested in non-convertible debentures or debt instruments, a debt benchmark will be an appropriate choice to compare the performance. Hence, the above-mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal Investment Horizon for this portfolio is 36-60 months.

**Risk associated with the Investment Approach:**

- **Investment in Debt Instruments**

The Portfolio Manager shall invest in debt instruments including non-convertible debt instruments, listed debt instruments. The obligor of a debt security or instrument may not be able or willing to pay interest or to repay principal when due in accordance with the investment documents. An obligor's willingness to pay interest or to repay principal due in a timely manner may be affected by, among other factors, its cash flow. Sometimes, the fluctuation in the market price of such instruments is likely to have a direct bearing on the value of the investment in Portfolio Entities. Further, there may be additional costs involved in complying with the disclosure and regulatory requirements. Further, such investments in listed

debt instruments may be required to be made on the basis of publicly available information only due to the limited ability to conduct due diligence on such companies.

- **Credit Risks**

One of the fundamental risks associated with the investments under this approach is credit risk, i.e., the risk of non-payment of agreed amounts by Portfolio Entities and other obligors, to the Client. Such non-payment will result in a reduction in returns and a reduction in the value of the relevant investments in the Portfolio Entities. In addition, in case of the bankruptcy of a Portfolio Entity, there could be significant delays in the enforcement and realization of the collateral securing an investment in a Portfolio Entity. Further, such collateral may be released without the consent of the Portfolio Manager.

- **Interest Rate Risk**

The Portfolio may be exposed to interest rate risks. Changes in prevailing market interest rates could affect the value of such investments. Factors that may affect market interest rates include inflation, deflation, slow or stagnant economic growth or recession, unemployment, money supply, governmental monetary policies, international disorders and instability in domestic and foreign financial markets. The Portfolio Manager may or may not seek to hedge its interest rate risk.

- **Risk of Rating Migration**

Change of rating (credit worthiness) would impact the price of debt securities. If it is downgraded, its market value would drop. If the security is upgraded its market value would increase. The extent of decline or increase would depend on the extent of rating change and the residual tenor of the debt security.

- **Basis Risk**

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

- **Spread Risk**

In a floating rate security, the coupon is expressed in terms of a spread or mark up over the benchmark rate. However, depending upon the market conditions the spreads may move adversely or favourably leading to fluctuation in valuation of the assets of the Client.

- **Liquidity Risk**

The corporate debt market is relatively illiquid vis-a- vis the government securities market. There could therefore be difficulties in exiting from corporate bonds in times of uncertainties. Liquidity therefore may suffer. Even though the government securities market is more liquid compared to that of other debt instruments, on occasions, there could be difficulties in transacting in the market due to extreme volatility or unusual constriction in market volumes or on occasions when an unusually large transaction has to be put through. The liquidity, in general, in the Indian debt market is considerably lower than that of developed markets.

- **Inadequate Collateral**

If there is a decrease in the value of the underlying securities, there may not be sufficient collateral to cover losses and may experience losses upon foreclosure. It is generally believed that the Portfolio Entities generally are and will be able to repay the debt investments from their available capital, from future capital-raising transactions or from cash flow from operations. However, to mitigate the credit risks, Portfolio Manager may take a security interest in all or a portion of the assets of the Portfolio Entities, including the equity interests of their subsidiaries. There is a risk that the collateral securing the debt investments may decrease in value over time, may be difficult to appraise or sell in a timely manner and may fluctuate in value based upon the business and market conditions, including as a result of an inability of the Portfolio Entity to raise additional capital, and, in some circumstances, the Client's lien could be subordinated to claims of other creditors. In addition, deterioration of a Portfolio Entity's financial condition and prospects, including its inability to raise additional capital, may be accompanied by deterioration of the value of the collateral for the debt investments. Consequently, although such debt investment is secured, the Client may not receive principal and interest payments according to the debt investment's terms and the value of the collateral may not be sufficient to recover the Client's investment should the Client be forced to enforce the remedies.

In addition, because the Portfolio Manager may invest in small and medium sized companies, a portion of the assets securing the Portfolio Investment may be in the form of intellectual property, if any, inventory, equipment, cash and accounts receivables. Intellectual property, if any, which secures a debt investment could lose value if the company's rights to the intellectual property are challenged or if the company's license to the intellectual property is revoked or expires. In addition, in lieu of a security interest in a Portfolio Entity's intellectual property, security interest may be obtained in all assets of the Portfolio Entity other than intellectual property and also obtain a commitment by the Portfolio Entity not to grant liens to any other creditor on the company's intellectual property. In these cases, the Client may have additional difficulty recovering the principal in the event of a foreclosure.

- **Other Debt in Portfolio Entities ranking pari-passu / senior**

In a few instances, the Portfolio Entities may incur debt that ranks equally with, or senior to, the Portfolio Investments in Portfolio Entities. The Portfolio Manager plans to invest in debt investments issued by the Portfolio Entities. Some of the Portfolio Entities are permitted to have other debt that ranks equally with, or senior to, the debt investments in the Portfolio Entity. By their terms, these debt instruments may provide that the holders thereof are entitled to receive payment of interest or principal on or before the dates on which the Client is entitled to receive payments in respect of the Portfolio Investments. These debt instruments may prohibit the Portfolio Entities from paying interest on or repaying the investments in the event of, and during, the continuance of a default under the debt instruments. In addition, in the event of insolvency, liquidation, dissolution, reorganization or bankruptcy of a Portfolio Entity, holders of debt instruments ranking senior to the Fund's investment in that Portfolio Entity would typically be entitled to receive payment in full before the Fund receives any payment in respect of its investment. After repaying senior creditors, a Portfolio Entity may not have any remaining assets to use for repaying its obligation to the Client. In the case of debt ranking equally with the Portfolio Investments, the Client would have to share on an equal basis any distributions with other creditors holding such debt in the event of an insolvency, liquidation, dissolution, reorganization or bankruptcy.

- **Pre-payments of the Portfolio Investments**

The Portfolio is subject to the risk that the investments made in Portfolio Entities may be repaid prior to maturity. At the time of a liquidity event, such as a sale of the business, refinancing or public offering, many of the Portfolio Entities may avail

themselves of the opportunity to repay the investments prior to maturity. The Portfolio Investments generally allow for repayment at any time subject to certain penalties. When this occurs, the Portfolio Manager generally re-invests these proceeds in temporary investments, pending their future investment in new Portfolio Entities. These temporary investments have substantially lower yields than the debt being prepaid and could experience significant delays in reinvesting these amounts. Any future investment in a new Portfolio Entity may also be at lower yields than the debt that was repaid. As a result, the results of operations of Client Portfolio could be materially adversely affected if one or more of the Portfolio Entities elects to prepay amounts owed to the Client.

- **Bankruptcy of Portfolio Entity**

Various laws enacted for the protection of debtors may operate to the detriment if it is a creditor of a Portfolio Entity that experiences financial difficulty. For example, if a Portfolio Entity becomes insolvent or files for bankruptcy protection, there is a risk that a court may subordinate the Portfolio Investment to other creditors or require the Portfolio Manager to return amounts previously paid to it by such Portfolio Entity. If a Portfolio Company becomes insolvent or bankrupt, the risk of subordination of the Client's claim increases.

- **Temporary Investments:**

To the extent that the Portfolio Manager has already called capital from the Clients, pending investment in Portfolio Entities, these funds may be retained in cash or may be invested in temporary investments. Such investments may substantially reduce the Portfolio's overall return.

- **Development Risk**

The investments may be made in stressed projects of the Portfolio Entities. There may arise scenarios where the development of such stressed projects are not completed, and the Portfolio Manager may appoint a development manager to complete the same. In such a scenario, the Portfolio may be exposed to additional risks, including but not limited to risks of title of property, approvals from statutory authorities, construction, marketing, sales, legal, taxation and environmental risks. The Portfolio Manager will take steps to mitigate the same on a best effort basis, including by appointing an experienced development manager as mentioned above.

Kindly refer to paragraph 6 ([Risk Factors](#)) for detailed statement on risks associated with the Investment Approach.

#### (xxxiv) **High Yield Portfolio**

**Investment objective:** Portfolio Manager will typically invest in secured/unsecured non-convertible debentures to maximise the yield.

**Type of Securities:** The Portfolio will be invested in listed debentures. The Portfolio may have some exposure to other debt instruments including Money Market Instruments, interest/credit derivatives, listed PTCs, units of mutual funds, fixed deposits or any other permissible securities under the applicable laws.

**Basis of selection:** Investment in non-convertible debentures issued by companies. The Portfolio shall be sector agnostic but given the higher issuance are from the BFSI sector, the allocation to BFSI would be higher compared to other sectors. Portfolio will invest in well-researched securities of issuers with ratings ranging between BBB+ to AA.

**Allocation:** Non-convertible debentures, government securities, state development loans, treasury bills, commercial papers, certificate of deposits: 75-100% | Other Instruments including FDs, units of mutual funds: 0-25%

**Benchmark and basis for choice of benchmark:** CRISIL Credit Index; The Portfolio shall be sector agnostic but given the higher issuance are from the BFSI sector, portfolio will be tilted towards BFSI. Due to the nature of the transactions, there is not publicly available appropriate benchmark which captures risk return trade off of such Portfolio. Since the portfolio is typically investing in non-convertible debentures or debt instruments, a debt benchmark will be an appropriate choice to compare the performance. Hence, the above-mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Ideal Investment Horizon for this Portfolio is 24-36 months.

**Risk associated with the Investment Approach:**

- **Investment in Debt Instruments**

The Portfolio Manager expects to invest in debt instruments including non-convertible debt instruments, listed debt instruments, The obligor of a debt security or instrument may not be able or willing to pay interest or to repay principal when due in accordance with the investment documents. An obligor's willingness to pay interest or to repay principal due in a timely manner may be affected by, among other factors, its cash flow. Sometimes, the fluctuation in the market price of such instruments is likely to have a direct bearing on the value of the investment in the Portfolio Entities. Further, there may be additional costs involved in complying with the disclosure and regulatory requirements. Further, such investments in listed debt instruments may be required to be made on the basis of publicly available information only due to the limited ability to conduct due diligence on such companies.

- **Credit Risks**

One of the fundamental risks associated with the intended investments is credit risk, i.e., the risk of non-payment of agreed amounts by Portfolio Entities and other obligors, to the Client. Such non-payment will result in a reduction of the returns and a reduction in the value of the relevant investments in the Portfolio Entities. In addition, in case of the bankruptcy of a Portfolio Entity, the Client could experience significant delays in the enforcement and realization of the collateral securing an investment in a Portfolio Entity. Further, such collateral may be released without the consent of the Portfolio Manager.

- **Interest Rate Risk**

The Portfolio Investments may be exposed to interest rate risks. Changes in prevailing market interest rates could affect the value of such investments. Factors that may affect market interest rates include inflation, deflation, slow or stagnant economic growth or recession, unemployment, money supply, governmental monetary policies, international disorders and instability in domestic and foreign financial markets. The Portfolio Manager may or may not seek to hedge its interest rate risk.

- **Risk of Rating Migration**

Change of rating (credit worthiness) would impact the price of debt securities. If it is downgraded, its market value would drop. If the security is upgraded its market value would increase. The extent of decline or increase would depend on the extent of rating change and the residual tenor of the debt security.

- **Basis Risk**

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

- **Spread Risk**

In a floating rate security the coupon is expressed in terms of a spread or mark up over the benchmark rate. However, depending upon the market conditions the spreads may move adversely or favourably leading to fluctuation in valuation of the assets of the Client.

- **Liquidity Risk**

The corporate debt market is relatively illiquid vis-a- vis the government securities market. There could therefore be difficulties in exiting from corporate bonds in times of uncertainties. Liquidity therefore may suffer. Even though the government securities market is more liquid compared to that of other debt instruments, on occasions, there could be difficulties in transacting in the market due to extreme volatility or unusual constriction in market volumes or on occasions when an unusually large transaction has to be put through. The liquidity, in general, in the Indian debt market is considerably lower than that of developed markets.

- **Inadequate Collateral**

If there is a decrease in the value of the underlying securities of the Portfolio Investment, the Client may not have sufficient collateral to cover losses and may experience losses upon foreclosure. It is generally believed that the Portfolio Entities generally are and will be able to repay the debt investments from their available capital, from future capital-raising transactions or from cash flow from operations. However, to mitigate the credit risks, the Portfolio Manager may take a security interest in all or a portion of the assets of the Portfolio Entities, including the equity interests of their subsidiaries. There is a risk that the collateral securing the debt investments may decrease in value over time, may be difficult to appraise or sell in a timely manner and may fluctuate in value based upon the business and market conditions, including as a result of an inability of the Portfolio Entity to raise additional capital, and, in some circumstances, the lien could be subordinated to claims of other creditors. In addition, deterioration of a Portfolio Entity's financial condition and prospects, including its inability to raise additional capital, may be accompanied by deterioration of the value of the collateral for the debt investments. Consequently, although such debt investment is secured, the Client may not receive principal and interest payments according to the debt investment's terms and the value of the collateral may not be sufficient to recover the Client's investment should the Client be forced to enforce the remedies.

In addition, because the Portfolio may be invested in small and medium sized companies in the target industries, a portion of the assets securing the investment may be in the form of intellectual property, if any, inventory, equipment, cash and accounts receivables. Intellectual property, if any, which secures a debt investment could lose value if the company's rights to the intellectual property are challenged or if the company's license to the intellectual property is revoked or expires. In addition, in lieu of a security interest in a Portfolio Entity's intellectual property the Client may sometimes obtain a security interest in all assets of the Portfolio Entity other than intellectual property and also obtain a commitment by the Portfolio Entity not to grant liens to any other creditor on the company's intellectual property. In these cases, the Client may have additional difficulty recovering the Client's principal in the event of a foreclosure.

- **Other Debt in Portfolio Entities ranking pari-passu / senior**

In a few instances, the Portfolio Entities may incur debt that ranks equally with, or senior to, the Portfolio's investments in such companies. The Portfolio Manager plans to invest in debt investments issued by the Portfolio Entities. Some of the Fund's Portfolio Entities are permitted to have other debt that ranks equally with, or senior to, the Fund's debt investments in the Portfolio Entity. By their terms, these debt instruments may provide that the holders thereof are entitled to receive payment of interest or principal on or before the dates on which the Client is entitled to receive payments in respect of the Portfolio's debt investments. These debt instruments may prohibit the Portfolio Entities from paying interest on or repaying the Fund's investments in the event of, and during, the continuance of a default under the debt instruments. In addition, in the event of insolvency, liquidation, dissolution, reorganization or bankruptcy of a Portfolio Entity, holders of debt instruments ranking senior to the Client's investment in that Portfolio Entity would typically be entitled to receive payment in full before the Client receives any payment in respect of its investment. After repaying senior creditors, a Portfolio Entity may not have any remaining assets to use for repaying its obligation to the Client. In the case of debt ranking equally with the Client's debt investments, the Client would have to share on an equal basis any distributions with other creditors holding such debt in the event of an insolvency, liquidation, dissolution, reorganization or bankruptcy.

- **Pre-payments of the debt investments**

The Portfolio is subject to the risk that the investments made in Portfolio Entities may be repaid prior to maturity. At the time of a liquidity event, such as a sale of the business, refinancing or public offering, many of the Portfolio Entities may avail themselves of the opportunity to repay the debt investments prior to maturity. The Portfolio Investments generally allow for repayment at any time subject to certain penalties. When this occurs, the Portfolio Manager generally re-invests these proceeds in temporary investments, pending their future investment in new Portfolio Entities. These temporary investments have substantially lower yields than the debt being prepaid, and the Client could experience significant delays in reinvesting these amounts. Any future investment in a new Portfolio Entity may also be at lower yields than the debt that was repaid. As a result, the Client's results of operations could be materially adversely affected if one or more of the Portfolio Entities elects to prepay amounts owed to the Client.

- **Bankruptcy of Portfolio Company**

Various laws enacted for the protection of debtors may operate to the detriment of the Portfolio if it is a creditor of a Portfolio Entity that experiences financial difficulty. For example, if a Portfolio Entity becomes insolvent or files for bankruptcy protection, there is a risk that a court may subordinate the Portfolio Investment to other creditors or require the Client to return amounts previously paid to it by such Portfolio Entity.

- **Temporary Investments:**

To the extent that the Portfolio Manager has already called capital from the Investors, pending investment in Portfolio Entities, these funds may be retained in cash or may be invested in Temporary Investments. Such investments may substantially reduce the Portfolio's overall return.

- **Development Risk**

The investments may be made in stressed projects of the Portfolio Entities. There may arise scenarios where the development of such stressed projects are not completed, and the Portfolio Manager may appoint a development manager to complete the same. In such a scenario, the Portfolio may be exposed to additional risks, including but not limited to risks of title of property, approvals from statutory authorities, construction, marketing, sales, legal, taxation and environmental risks. The Portfolio Manager will take steps to mitigate the same on a best effort basis, including by appointing an experienced development manager as mentioned above.

refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the Investment Approach.

**Strategy:** Hybrid

(xxxv)

**Signature Option**

**Investment Objective:** A highly flexible investment option which offers long term wealth creation by investing in a Portfolio across listed equities, units of mutual fund, debt instruments including Money Market Instruments, fixed deposits & any other instrument as may be prescribed by SEBI from time to time and as per the mandate received from the client. The Portfolio Manager can construct portfolios in the form of series under this offering from time to time.

**Type of Securities:** The Portfolio Manager will have complete flexibility to invest in equity or equity related instruments and debt or debt related instruments including units of mutual fund to create long term wealth for the Client.

**Basis of selection:** Listed equity and equity related instruments will be selected basis the in-house proprietary research carried out by the portfolio management team. Debt or debt related Instruments will be selected basis the assessment of credit risk, liquidity risk and interest rate risk of the underlying instrument. Units of mutual fund will be selected basis the in-house research of the underlying funds, in accordance with the mandate received by the Portfolio Manager.

**Allocation:** Equity or equity related instruments including units of equity oriented mutual funds: 0-100% | Debt or debt instruments including units of debt oriented mutual funds: 0-100%

**Benchmark and basis for choice of benchmark:** CRISIL Hybrid 50+50 - Moderate Index; The objective of the investment approach is to create long term wealth by allocating investments into debt and equity instruments including units of mutual funds as per the mandate received from the client. Hence, a hybrid benchmark will be an appropriate choice to compare the performance. The above mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** Given that objective of the Investment Approach is to generate long term wealth, the indicative investment horizon for the portfolio should be at least 5 years.

**Risk associated with the Investment Approach**

- (i) Since the Portfolio Manager also invests in mid-cap and small-cap stocks, they are riskier than large-cap portfolio that invest mostly in large companies. In a robust economic environment, the portfolio manager of a multi-cap strategy can increase his exposure to mid and small-sized companies to benefit from earnings. It can also choose to move investor money from shares of mid-cap companies to large-cap companies to take a shelter when he expects prolonged down periods.
- (ii) Allocation strategy seeks to mitigate overall Portfolio volatility by combining equity and debt asset classes which historically have low correlations to each other, meaning they do not move in the same direction at the same time. However, recently there have been instances where these correlations have been higher specifically during market turbulence and generally due to globalisation.

**(iii) Risks related to investment in other funds:**

- (a) The Portfolio will be invested primarily in a combination of the specified equity, debt and other asset class schemes of Nippon India Mutual Fund or other mutual fund houses. Hence, scheme specific risk factors of the underlying schemes will be applicable. All risks associated with underlying schemes, including performance of their underlying stocks, derivative instruments etc. are applicable in the case of the Portfolio.
- (b) Investors who intend to invest in the Investment Approach have deemed to have understood the merits of allocation to the Portfolio in the context of their overall portfolio from their investment advisor or representative of NAM India.
- (c) In a rising market, the Portfolio due to over diversification may not outperform a fully invested equity portfolio.
- (d) Redemptions by the Portfolio from the underlying schemes would be subject to applicable exit loads, which may impact performance of the Portfolio.

- (iv) Kindly refer to paragraph 6 (Risk Factors) for detailed statement on risks associated with the investment approach.

(xxxvi)

**Employees' State Insurance Corporation**

**Investment Objective:** The objective of the Portfolio Manager is to invest in a basket of securities as defined/permitted by the Employees' State Insurance Corporation (ESIC). The Portfolio Manager would endeavour to strictly adhere to the investment guidelines laid down by ESIC to generate optimum returns with maximum emphasis on safety of investments.

**Type of Securities:** Investment can be made in government securities, state development loans, PSU bonds, Money Market Instruments like certificate of deposits, commercial papers and TREPS, term deposits of scheduled commercial banks, and any such instrument as permitted by the applicable regulations and mandated by ESIC.

**Basis of selection:** As per the investment guidelines for investments provided in the Client Agreement for ESIC Funds.

**Allocation: Debt Instruments:** 0-100% in debt instruments including government securities & related instruments, debt instruments & related instruments and short-term debt instruments and related instruments.

**Benchmark and basis for choice of benchmark:** The investment must be in accordance to the investment pattern as provided by ESIC and any subsequent changes from time to time, advisor to ESIC, prepares a benchmark for performance evaluation

**Indicative investment horizon:** This offering seeks to manage the corporates of Employees' State Insurance Corporation. ESI portfolio is a type of social security portfolio for employees in the organised sector. Employee's State Insurance (ESI) is a self-financing social security and health insurance portfolio for Indian workers which provides for certain benefits to Employees in case of sickness, maternity and employment injury and to make provisions for related matters. All employees of a covered unit, whose monthly incomes (excluding overtime, bonus, leave encashment) does not exceed Rs. 21,000 per month, are eligible to avail benefits under the Portfolio. Given the objective of the Portfolio, the investment horizon under this approach will be long term by nature.

#### **Risk associated with the Investment Approach**

(i) Kindly refer to paragraph 6 (*Risk Factors*) for detailed statement on risks associated with the Investment Approach.

#### **(xxxvii) Post Life Insurance & Rural Post Life Insurance**

**Investment Objective:** To deliver consistent risk adjusted returns in medium to long term by investing in defined/permissible securities as per investment guidelines (amended time to time) approved by The Directorate of Post Life Insurance for Post Life Insurance Fund & Rural Post Life Insurance Fund. Portfolio Manager would provide portfolio management services which shall be non-discretionary investment management accordance with the investment policy of Postal Life Insurance/Rural Postal Life Insurance. The investment objective for equity would be conservative in nature i.e. to deliver consistent and stable returns in the medium to long term with lower volatility of the fund returns compared to broader market.

#### **Type of Securities:**

**Debt:** Central Government Securities, State Development Securities, Rated Bonds or debentures issued by the companies, Money market instruments like Certificate of Deposits, Commercial Papers and TREPS, T-bills, Term deposits of Scheduled Commercial Banks, Liquid Fund of Mutual Funds and any such instrument as permitted by the applicable regulations and mandated by Postal Office Life Insurance Fund (POLIF) /Rural Post Officer Life Insurance Fund (RPOLIF).

**Equity:** Predominately in Large cap stocks that have high market liquidity.

**Basis of selection:** As per the Investment Guidelines for investments provided in the Portfolio Management Agreement for POLIF/RPOLIF.

#### **Allocation:**

Debt Investments:

1. Central Government Securities - Not Less than 25%,
2. Central & State Government Securities or other approved securities - Not less than 50%,
3. Approved Investment as specified in Regulation 3 (a), (b) & other Investment specified in Sec 27A (2) & schedule I to these regulation (all taken together) - Not exceeding 50%,
4. Other Investment specified in Sec 27A (2) - Not exceeding 15%
5. Investment in Housing & Infrastructure - Not to be less than 15% (above all taken together).

Equity & Equity related Instruments - Not exceeding 14.5%

The above allocation is as per the investment guidelines approved by the Directorate of Postal Life Insurance which may be amended by POLIF / RPOLIF at a later date.

**Benchmark and basis for choice of benchmark:** For Debt: 10-year G-sec | For Equity: BSE 200 - as per the investment policy provided by POLI/RPOLI.

**Indicative investment horizon:** POLI is a welfare scheme for postal employees and then subsequently extended to employees of central & state government, public sector undertakings, Government aided institutions, nationalised bank, local bodies etc. PLI was then permitted to extend its coverage to rural areas to transact life insurance business by utilizing vast network of post office. The prime objective of the scheme was to spread awareness as well as provide insurance cover to rural population especially the weaker sections and women workers. Given the objective of the portfolio, the investment horizon under this approach, will be long term investment in fundamentally strong, safe, reliable and low volatile securities and stocks in order to ensure protection, safety and liquidity of policyholders' funds.

#### **Risk associated with the Investment Approach**

This is a mandate to be invested in equity, fixed income and Money Market Instruments based on the investment guidelines laid down by POLIF/RPOLIF.

Given below are some of the common risks associated with investments in fixed income and money market securities. These risks include but are not restricted to:

- i. **Interest Rate Risk:** As with all debt securities, changes in interest rates will affect the valuation of the Portfolios, as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of longer-term securities generally fluctuate more in response to interest rate changes than do shorter-term securities. Interest rate

movements in the Indian debt markets can be volatile leading to the possibility of large price movements up or down in debt and money market securities.

- ii. Credit Risk: Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income security (i.e. will be unable to make timely principal and interest payments on the security). Because of this risk debentures are sold at a yield spread above those offered on treasury securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default. Investing in Bonds and Fixed Income securities may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity.
- iii. Reinvestment Risk: This risk refers to the interest rate levels at which cash flows received from the securities under a Portfolio are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk refers to the fall in the rate for reinvestment of interim cash flows.
- iv. In case the portfolio invests in mutual funds registered with SEBI, portfolio specific risk factors of each such underlying portfolio will be applicable to the Portfolio. All risks associated with such underlying portfolio, including performance of their underlying stocks, derivative instruments; stock-lending, overseas investments etc. will therefore be applicable to the Portfolio.
- v. Kindly refer to paragraph 6 (Risk Factors) for a detailed statement on risks associated with the investment approach.

The terms of the tenure of each Investment Approach, subscription and redemption etc. shall be as per the Client Agreement and other documents executed with the Investor.

The investors are requested to note that there is no material impact on Portfolio, on account of alignment of PMS strategies as Investment Approach in line with new Regulations. **Strategy:** Multi-Asset

#### (xxxviii) REITs and INVITs Income Portfolio

**Investment objective:** To generate regular cashflows and capital gain for the investors through a portfolio which invests in units of Real Estate Investment Trust (REITs) and/or Infrastructure Investment Trusts (INVITs) and other permissible securities.

**Type of Securities:** Portfolio will invest in units of publicly listed and privately listed units of REITs and/or INVITs. The portfolio can have exposure to debt instruments including Non-Convertible Debentures (NCDs); units of arbitrage funds and other instruments including but not limited to units of mutual fund, fixed deposits, money market instruments or any other permissible securities under the applicable laws.

**Basis of selection:** Selected basis the in-house proprietary research carried out by the portfolio management team, in accordance with investment objective of the Portfolio. Other instruments will be typically used for temporary parking of Funds pending deployment in market wherein liquidity and safety will be the primary basis for selection.

##### **Allocation:**

- Units of publicly listed and privately listed units of REITs and/or INVITs: 0%-100%
- Arbitrage funds: 0%-30%
- Debt instruments: 0%-30%
- Other Instruments including FDs, MF units, money market instruments: 0-100%.

**Benchmark and basis for choice of benchmark:** NSE Multi Asset Index 2. The mentioned benchmark is the most suitable amongst the benchmarks made available vide circular APMI/2022-23/02 dated March 23, 2023 & revised Annexure I received on 31st March 2023 issued by Association of Portfolio Managers in India.

**Indicative investment horizon:** The indicative investment horizon for the portfolio should be 2-3 years. However, the same can be determined as per instructions received from investor.

##### **Risk associated with REITs/INVITs**

###### **REITs Risks:**

- i. Market Volatility: REITs are subject to market fluctuations, affecting their net asset value (NAV).
- ii. Property Market Risks: Changes in property demand, supply, and prices can impact REITs' performance.
- iii. Interest Rate Risks: Changes in interest rates can affect REITs' borrowing costs and profitability.
- iv. Occupancy and Rental Risks: Vacancy rates, rental income, and tenant creditworthiness can impact REITs' cash flows.

###### **INVITs Risks:**

- i. Infrastructure Project Risks: INVITs are exposed to risks associated with infrastructure projects, such as construction delays, cost overruns, and regulatory issues.
- ii. Cash Flow Risks: INVITs' cash flows may be affected by project-specific risks, such as traffic volume, toll collection, and operational performance.
- iii. Credit Risks: INVITs may face credit risks associated with their underlying assets, such as loans or bonds

## **Risk associate with Credit risk in REITs and INVITs**

### **REITs Credit Risks:**

- i. Tenant Creditworthiness: Risk of tenants defaulting on rent payments or lease agreements.
- ii. Borrowing Risks: REITs' debt obligations, such as loans or bonds, can increase credit risk.
- iii. Counterparty Risks: Risks associated with contractual agreements with third-party service providers.

### **InvITs Credit Risks:**

- i. Project Company Credit Risks: InvITs' underlying project companies may face credit risks, such as loan defaults or debt servicing issues.
- ii. Debt Servicing Risks: InvITs' ability to service debt obligations, such as interest and principal payments.
- iii. Counterparty Risks: Risks associated with contractual agreements with project sponsors, contractors, or other stakeholders.

## **Liquidity Risk in REITs and INVITs**

- i. The REIT/Invit market is relatively illiquid vis-a-vis the broad equity market. There could therefore be difficulties in exiting from REIT/Invit units in times of uncertainties. Liquidity therefore may suffer.

## **Risk associated with Arbitrage Funds**

### **Market Risks:**

1. Market Volatility: Arbitrage funds may be exposed to market fluctuations, which can affect their ability to capitalize on price differences.
2. Liquidity Risks: Insufficient liquidity in the market can make it challenging for the fund to execute trades.

### **Execution Risks:**

1. Trade Execution: The fund's ability to execute trades at desired prices can impact its performance.
2. Order Execution: Delays or failures in order execution can result in losses.

## **Risk associated with Debt**

Given below are some of the common risks associated with investments in fixed income and money market securities. These risks include but are not restricted to:

- i. Interest Rate Risk: As with all debt securities, changes in interest rates will affect the valuation of the Portfolios, as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of longer-term securities generally fluctuate more in response to interest rate changes than do shorter-term securities. Interest rate movements in the Indian debt markets can be volatile leading to the possibility of large price movements up or down in debt and money market securities.
- ii. Credit Risk: Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income security (i.e. will be unable to make timely principal and interest payments on the security). Because of this risk debentures are sold at a yield spread above those offered on treasury securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default. Investing in Bonds and Fixed Income securities may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity.
- iii. Reinvestment Risk: This risk refers to the interest rate levels at which cash flows received from the securities under a Portfolio are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk refers to the fall in the rate for reinvestment of interim cash flows.

## **Temporary Investments**

To the extent that the Portfolio Manager has already called capital from the Investors, pending investment in Portfolio Entities, these funds may be retained in cash or may be invested in Temporary Investments. Such investments may substantially reduce the Portfolio's overall return.

Kindly refer to paragraph 6 (*Risk Factors*) for a detailed statement on risks associated with the investment approach.

## **(h) Policy for investments in Group / Associate Companies and availing of services of Group/Associate Companies**

The Portfolio Manager may invest in shares, units of mutual funds, debt, deposits and other financial instruments issued by any of the group /associate companies of the Portfolio Manager to the extent permitted under the Regulations.

Portfolio Manager shall invest up to a maximum of 30 percent of their client's portfolio (as a percentage of the client's assets under management) in the securities of their own associates/related parties. Further, the Portfolio Manager shall ensure compliance with the following limits:

| Security | Limit for investment in single associate/related party (as percentage of client's AUM) | Limit for investment across multiple associates/related parties (as percentage of client's AUM) |
|----------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Equity   | 15%                                                                                    | 25%                                                                                             |

|                                 |     |     |
|---------------------------------|-----|-----|
| Debt and hybrid securities      | 15% | 25% |
| Equity+ Debt +Hybrid Securities | 30% |     |

The aforementioned limits shall be applicable only to direct investments by Portfolio Managers in equity and debt/hybrid securities of their own associates/related parties and not to any investments in the mutual funds

Hybrid securities include units of Real Estate Investment Trusts (REITs), units of Infrastructure Investment Trusts (InvITs), convertible debt securities and other securities of like nature.

## (6) Risk Factors

- (i) Investments in Securities are subject to market risks and there is no assurance or guarantee that the objectives of any of the Investment Approaches will be achieved.
- (ii) Investors are not being offered any guaranteed or indicative returns through any of the Investment Approaches.
- (iii) The past performance of the Portfolio Manager in any Investment Approach is not indicative of the future performance. There is no assurance that past performances achieved earlier in a particular Investment Approach will be repeated.
- (iv) The names of the Investment Approaches do not in any manner indicate their prospects or returns. The various factors which may impact the value of the investments under an Investment Approach include, but are not limited to, fluctuations in the equity and bond markets, fluctuations in interest rates, prevailing political and economic environment, changes in government policy, factors specific to the issuer of the securities, tax laws, liquidity of the underlying instruments, settlement periods, trading volumes etc.
- (v) The Portfolio's investment in some of the niche sectors like technology run the risk of volatility, high valuation, obsolescence and low liquidity.
- (vi) The investments made are subject to external risks such as war, natural calamities, policy changes of local/International markets which affects stock markets.
- (vii) In case the Portfolio invests in mutual funds registered with SEBI, scheme specific risk factors of each such underlying scheme will be applicable to the Portfolio. All risks associated with such underlying schemes, including performance of their underlying stocks, derivative instruments; stock-lending, overseas investments etc. will therefore be applicable to the Portfolio.
- (viii) Risk arising out of non-diversification: The investment objectives of one or more of the Investment Approaches could result into concentration on a specific asset/ asset class/sector/ issuer etc., which could lead to non-diversified Portfolio which tends to be more volatile than diversified Portfolio.
- (ix) Equity and equity related instruments on account of its volatile nature are subject to price fluctuations on daily basis. The volatility in the value of the equity and equity related instruments is due to various micro and macro economic factors affecting the securities markets. This may have adverse impact on individual Securities /sector and consequently on the value of the Portfolio. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of the Investments.
- (x) The inability of the Portfolio Manager to make intended Securities purchases due to settlement problems could cause the Portfolio to miss certain investment opportunities as in certain cases, settlement periods may be extended significantly by unforeseen circumstances. Similarly, the inability to sell Securities held in the Portfolio may result, at times, in potential losses to the Portfolio, should there be a subsequent decline in the value of the Securities held in the Portfolio.
- (xi) The Portfolio Manager may, subject to authorization by the Client in writing, participate in securities lending. There are risks inherent in securities lending, including the risk of failure of the other party. Such failure can result in a possible loss of rights to the collateral, and the possible loss of corporate benefits accruing thereon. The Portfolio Manager is not responsible or liable for any loss resulting from the management of the Portfolio.
- (xii) Each Portfolio will be exposed to various risks depending on the investment objective, investment strategy and the asset allocation. The investment objective, investment strategy and the asset allocation may differ from Client to Client. However, generally, highly concentrated Portfolios with lesser number of stocks will be more volatile than a Portfolio with a larger number of stocks. Portfolios with higher allocation to equities will be subject to higher volatility than Portfolios with low allocation to equities.
- (xiii) Risks associated with investment in derivatives. The Portfolio Manager may use derivatives as may be permitted by SEBI from time to time. As and when the investments are made in the derivatives market, there are risk factors and issues concerning the use of derivatives that the Client should understand. Derivatives are specialized instruments that require investment techniques and risk analyses different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but also of the derivative itself. Derivatives require maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the Portfolio and other related capabilities. There is the possibility that a loss may be sustained by the Portfolio as a result of the failure of another party (usually referred to as the "counter party") to comply with the terms of the derivatives contract. Other risks in using derivatives include market risk, valuation risk, option risk, liquidity risk and basis risk. Also, it is to be noted that the market for derivative instruments is nascent in India.
- (xiv) Given below are some of the common risks associated with investments in debt, fixed income and Money Market Instruments. These risks include but are not restricted to:
  - a. **Interest Rate Risk:** As with all debt Securities, changes in interest rates will affect the valuation of the Portfolios, as the prices of Securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of longer-term Securities generally fluctuate more in response to interest rate changes than do shorter-term Securities. Interest rate movements in the Indian debt markets can be volatile leading to the possibility of large price movements up or down in debt and Money Market Instruments and thereby to possibly large movements in the valuation of Portfolios.

- b. **Liquidity or Marketability Risk:** This refers to the ease at which a Security can be sold at or near its true value. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. Liquidity risk is characteristic of the Indian fixed income market.
- c. **Credit Risk:** Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income Security (i.e. will be unable to make timely principal and interest payments on the Security). Because of this risk debentures are sold at a yield spread above those offered on treasury Securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income Security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default. Investing in bonds and fixed income Securities may also be subject to price volatility due to such factors as interest rate sensitivity, market perception of the creditworthiness of the issuer and general market liquidity (market risk).
- d. **Reinvestment Risk:** This risk refers to the interest rate levels at which cash flows received from the Securities under a particular Portfolio are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk refers to the fall in the rate for reinvestment of interim cash flows.
- (xv) As with any other debt instrument, the following risk factors have to be taken into consideration while investing in Pass Through Certificates ("PTC"):
- Credit Risk: Defaults/losses pertaining to the underlying assets backing a PTC may cause credit risk in the PTC itself. However, since most of the PTCs are drawn from a cherry picked pool of underlying assets, the risk of delay / default due to poor credit quality is low. Furthermore, most of the PTCs enjoy additional cashflow coverage in terms of subordination by another lower class of PTCs or in terms of excess cash collateralisation.
  - Liquidity Risk: Listed PTCs and could suffer from low secondary market liquidity. However, since the maturity of the PTCs will be in line with the maturity of the Portfolio, the risk arising from low secondary market liquidity of such instruments is low.
  - Price Risk / Interest Rate Risk: The price risk of these instruments shall be in line with the maturity / duration of such instruments.
- (xvi) Domestic securitised debt can have different underlying assets and these assets have different risk characteristics. These may be as given in the following example:
- Security 1 -Backed by receivables of personal loans originated by a commercial bank.  
Specific Risk Factors: Loss due to default and/or payment delay on Receivables, Premature Termination of Facility Agreements, Limited loss cover, Delinquency and Credit Risk, Limited Liquidity and Price Risk, Originator/Collection Agent Risk, Bankruptcy of the Originator, Co-mingling of funds.
  - Security 2 - Senior Series Pass Through Certificates backed by commercial vehicles and two-wheeler loan and loan receivables from a commercial bank.  
Specific Risk Factors - Credit and Rating Downgrade Risk, Prepayment and Foreclosures Risk for Senior PTC Series, Prepayment and Foreclosures Risk for Senior PTC Series, Servicing Agent Risk, Co-mingling Risk, and Bankruptcy of the Seller.
- (xvii) Specific Risk Factors & Disclosures pertinent to Structured Notes like Equity index linked Securities offerings / Options / Index Linked Debentures & Securitised Debt Instruments
- Presently, secondary market for such securitised papers is not very liquid. There is no assurance that a deep secondary market will develop for such Securities. This could limit the ability of the Portfolio Manager to resell them. Even if a secondary market develops and sales were to take place, these secondary transactions may be at a discount to the initial issue price due to changes in the interest rate structure.
  - Securitized transactions are normally backed by pool of receivables and credit enhancement as stipulated by the rating agency, which differ from issue to issue. The credit enhancement stipulated represents a limited loss cover to the Investors. These certificates represent an undivided beneficial interest in the underlying receivables and there is no obligation of either the issuer or the seller or the originator, or the parent or any affiliate of the seller, issuer and originator. Delinquencies and credit losses may cause depletion of the amount available under the credit enhancement and thereby the investor payouts may get affected if the amount available in the credit enhancement facility is not enough to cover the shortfall. On persistent default of an obligor to repay his obligation, the seller may repossess and sell the underlying asset. However, many factors may affect, delay or prevent the repossession of such asset or the length of time required to realize the sale proceeds on such sales. In addition, the price at which such asset may be sold may be lower than the amount due from that obligor.
  - The Structured Notes like the Index linked Securities, are high risk instruments. A small movement in returns generated by the underlying index could have a large impact on their value and may also result in a loss.
  - The issuer of equity index linked Securities or any of its agents, from time to time may have long or short positions or make markets including in NIFTY indices, futures and options (hereinafter referred to as "Reference Assets") (and other similar assets), they may act as an underwriter or distributor of similar instruments, the returns on which or performance of which, may be at variance with or asymmetrical to those on the Securities, and they may engage in other public and private financial transactions (including the purchase of privately placed investments or Securities or other assets). The foregoing activities of 'The Issuer of index linked securities' or any of its Agents and related markets (such as the foreign exchange market) may affect the value of the Securities. In particular, the value of the Securities could be adversely impacted by a movement in the Reference Assets, or activities in related markets, including by any acts or inactions of 'The Issuer of index linked securities' or any of its agents;
  - The equity Index linked Securities, even after being listed, may not be marketable or may not have a market at all;
  - The returns on the Structured securities, primarily are linked to the CNX Nifty Index and/or any other equity benchmark as the Reference Asset, and even otherwise, may be lower than prevalent market interest rates or even be nil or negative depending

entirely on the movement in the underlying index and futures values as also that over the life of the Securities (including the amount if any, payable on maturity, redemption, sale or disposition of the Securities) the Security holder may receive no income/return at all or negative income/return on the Security, or less income/return than the security-holder may have expected, or obtained by investing elsewhere or in similar investments.

- g. The return on investment in Securities would depend on the prevailing market conditions, both domestically as well as internationally. The returns mentioned in the term sheets are indicative and may or may not accrue to an investor accordingly.
  - h. In equity index linked Securities, in the event of any discretions to be exercised, in relation to method and manner of any of the computations including due to any disruptions in any of the financial markets or if for any other reason, the calculations cannot be made as per the method and manner originally stipulated or referred to or implied, such alternative methods or approach shall be used as deemed fit by the issuer and may include the use of estimates and approximations. All such computations shall be valid and binding on the Investor, and no liability therefore will attach to the issuer of equity index linked Securities;
  - i. There is a risk of receiving lower than expected or negligible returns or returns lower than the initial investment amount in respect of such equity index linked Securities over the life and/or part thereof or upon maturity, of the Securities.
  - j. At any time during the life of such Securities, the value of the Securities may be substantially less than its redemption value. Further, the price of the Securities may go down in case the credit rating of the company or issuer goes down;
  - k. the Securities and the return and/or maturity proceeds hereon, are not guaranteed or insured in any manner by the issuer of equity index linked securities;
  - l. Performance of the reference index will have a direct bearing on the performance of the Portfolio. In the event the reference index is dissolved or withdrawn by the index provider, such as, NSE Indices Limited (formerly known as India Index Services & Products Limited – IISL) (for NSE- Nifty), BSE for BSE-Sensex etc., the debenture-trustees upon request by the issuer may modify the terms of issue of debentures, so as to track a different and suitable index and appropriate intimation will be sent to the debenture holders.
  - m. Tracking errors are inherent in any equity index linked Security and such errors may cause the equity index-linked Security to generate returns which are not in line with the performance of the reference index or one or more securities covered by / included in the reference index. Such variations, referred to as tracking error, are expected to be around 2% per annum, but may vary substantially due to several factors including but not limited to:
    - i. Any delay experienced in the purchase or sale of Securities due to liquidity of the market, settlement and realisation of sales proceeds and the registration of any Security transfer and any delays in receiving cash and scrip dividends and resulting delays in reinvesting them.
    - ii. The reference index reflects the prices of Securities at close of business hours.
    - iii. The index provider undertakes a periodic review of the scripts that comprise the reference index and may either drop or include new Securities.
  - n. The issuer of equity index linked Securities or any person acting on behalf of the issuer of equity index linked Securities, may have an interest/position as regards the Portfolio Manager and/or may have an existing banking relationship, financial, advisory or other relationship with them and/or may be in negotiation/discussion with them as to transactions of any kind,
  - o. The Issuer of equity index linked Securities or any of its agents, have the legal ability to invest in the units offered herein and such investment does not contravene any provision of any law, regulation or contractual restriction or obligation or undertaking binding on or affecting the Investor, and/or its assets;
- (xix) In the interest of Investors, the Portfolio Manager may, at its sole discretion (in case of discretionary service), invest up to 100% of the Portfolio in liquid and / or debt mutual fund schemes. Moreover, the Portfolio Manager may at its sole discretion decide not to apply to the Securities and return the Funds to Investors, in case there is any change in the risk/return profile of the Investor in the backdrop of changed market conditions or for any other reason that the Portfolio Manager may deem appropriate.
- (xix) Portfolio manager has not availed any services from the group companies and associates company.
- (xx) There are nil conflict of interest purchase and sale transactions between portfolio manager investment operations employees and client portfolio.

## (7) Client Representation

- (i) Category of Clients as on June 30, 2025

|          | Category Of Clients                | No. Of Clients | Funds Managed (Rs. In Crs) | Discretionary / Non-Discretionary             |
|----------|------------------------------------|----------------|----------------------------|-----------------------------------------------|
| <b>A</b> | <b>Associate / Group Companies</b> |                |                            |                                               |
|          | As on 30th June, 2025              | -              | -                          | Discretionary                                 |
|          | As on 31st March, 2025             | -              | -                          | Discretionary                                 |
|          | As on 31st March, 2024             | -              | -                          | Discretionary                                 |
|          | As on 31st March, 2023             | -              | -                          | Discretionary                                 |
| <b>B</b> | <b>Others</b>                      |                |                            |                                               |
|          | As on 30th June, 2025              | 1039           | 82750                      | Discretionary, Non-Discretionary and Advisory |

|                                                                                                                                               |                        |      |         |                                               |
|-----------------------------------------------------------------------------------------------------------------------------------------------|------------------------|------|---------|-----------------------------------------------|
|                                                                                                                                               | As on 31st March, 2025 | 1074 | 79819   | Discretionary, Non-Discretionary and Advisory |
|                                                                                                                                               | As on 31st March, 2024 | 1254 | 72882   | Discretionary, Non-Discretionary and Advisory |
|                                                                                                                                               | As on 31st March, 2023 | 1432 | 61642   | Discretionary, Non-Discretionary and Advisory |
| <b>C</b>                                                                                                                                      | <b>Total</b>           |      |         |                                               |
|                                                                                                                                               | As on 30th June, 2025  | 1039 | *82750  | Discretionary, Non-Discretionary and Advisory |
|                                                                                                                                               | As on 31st March, 2025 | 1074 | **79819 | Discretionary, Non-Discretionary and Advisory |
|                                                                                                                                               | As on 31st March, 2024 | 1254 | ^72882  | Discretionary, Non-Discretionary and Advisory |
|                                                                                                                                               | As on 31st March, 2023 | 1432 | ^^61642 | Discretionary, Non-Discretionary and Advisory |
| No. of clients and Fund Managed includes Equity, Fixed Income & Structured Solution client's portfolios.                                      |                        |      |         |                                               |
| * PLI - Rs. 82,061 and Others – Rs. 689 Crores                                                                                                |                        |      |         |                                               |
| ** PLI - Rs. 79,270 and Others – Rs. 548 Crores                                                                                               |                        |      |         |                                               |
| ^ PLI - Rs. 72,223 and Others – Rs. 659 Crores                                                                                                |                        |      |         |                                               |
| ^^ PLI - Rs. 61,037 and Others – Rs. 605 Crores                                                                                               |                        |      |         |                                               |
| Out of total 1039 clients, 375 inactive clients with AUM of Rs. 0.01 Crore and 1 Advisory client with AUM of Rs.2.26 Crore are also included. |                        |      |         |                                               |

(ii) Disclosures in respect of transactions with related parties for the Financial Year ended March 31, 2025.

| Sr No.     | Name of Related Party                                    |
|------------|----------------------------------------------------------|
| <b>I</b>   | <b>Holding Company</b>                                   |
| 1          | Nippon Life Insurance Company                            |
|            |                                                          |
| <b>II</b>  | <b>Key Managerial Personnel</b>                          |
| <b>A</b>   | <b>Executive Director &amp; CEO</b>                      |
| 1          | Sundeep Sikka                                            |
|            |                                                          |
| <b>B</b>   | <b>Non-Executive Director</b>                            |
| 1          | General Ved Prakash Malik (Retd.)                        |
| 2          | Ashvin Parekh                                            |
| 3          | Balasubramanyam Sriram                                   |
| 4          | Upendra Kumar Sinha (Appointed w.e.f. May 01, 2023)      |
| 5          | Sonu Halan Bhasin (Appointed w.e.f. March 23, 2025)      |
| 6          | Ameeta Chatterjee (Ceased w.e.f March 23, 2025)          |
| 7          | Minoru Kimura                                            |
| 8          | Tomohiro Yao                                             |
| 9          | Hiroki Yamauchi (Appointed w.e.f. April 25, 2023)        |
| 10         | Akira Shibata (Ceased April 25, 2023)                    |
|            |                                                          |
| <b>III</b> | <b>Subsidiary</b>                                        |
| 1          | Nippon Life India Asset Management (Singapore) Pte. Ltd. |
| 2          | Nippon Life India AIF Management Limited                 |
|            |                                                          |
| <b>IV</b>  | <b>Associate</b>                                         |
| 1          | Reliance Capital Pension Fund Limited                    |

|            |                                                                                                 |
|------------|-------------------------------------------------------------------------------------------------|
|            |                                                                                                 |
| <b>V</b>   | <b>Subsidiary of Holding Company</b>                                                            |
| 1          | Nissay Asset Management Corporation                                                             |
| 2          | Nippon Life India Trustee Ltd                                                                   |
| 3          | Nippon Life India Private Limited (Incorporated w.e.f. April 10, 2024)                          |
|            |                                                                                                 |
| <b>VI</b>  | <b>Associate of Holding Company</b>                                                             |
| 1          | Reliance Nippon Life Insurance Company Limited                                                  |
|            |                                                                                                 |
| <b>VII</b> | <b>A Private Company in which a Director or Manager or his relative is a member or Director</b> |
|            | T R Chadha and Co LLP                                                                           |

**Transactions during the year with related parties:**

| Sr. No. | Name of related party                    | Description of transactions/ categories   | 2024-2025                 |                                           | 2023-2024                 |                                           |
|---------|------------------------------------------|-------------------------------------------|---------------------------|-------------------------------------------|---------------------------|-------------------------------------------|
|         |                                          |                                           | Transaction for the Year* | Outstanding amt. carried to balance sheet | Transaction for the Year* | Outstanding amt. carried to balance sheet |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 1       | Sundeeep Sikka                           | (i) Remuneration                          | 29.02                     | -                                         | 54.90                     | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 2       | Ameeta Chatterjee                        | (i) Sitting fees including commission     | 0.47                      | -                                         | 0.47                      | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 3       | General Ved Prakash Malik (Retd.)        | (i) Sitting fees including commission     | 0.52                      | -                                         | 0.50                      | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 4       | Balasubramanyam Sriram                   | (i) Sitting fees including commission     | 0.51                      | -                                         | 0.58                      | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 5       | Ashvin Dhirajlal Parekh                  | (i) Sitting fees including commission     | 0.50                      | -                                         | 0.53                      | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 6       | U K Sinha                                | (i) Sitting fees including commission     | 0.47                      | -                                         | 0.31                      | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 7       | Sonu Halan Bhasin                        | (i) Sitting fees including commission     | 0.01                      | -                                         | -                         | -                                         |
|         |                                          |                                           |                           |                                           |                           |                                           |
| 8       | Nippon Life India AIF Management Limited | (i) Inter corporate deposit given         | 84.52                     | -                                         | 73.85                     | -                                         |
|         |                                          | (ii) Repayment of inter corporate deposit | 81.48                     | -                                         | 80.19                     | -                                         |
|         |                                          | (iii) Interest income                     | 6.26                      | -                                         | 8.58                      | -                                         |
|         |                                          | (iv) Staff on deputation expenses         | 1.68                      | -                                         | -                         | -                                         |
|         |                                          | (v) Rent Cost                             | 0.63                      | -                                         | 0.63                      | -                                         |
|         |                                          | (vi) Reimbursement of Expenses            | 4.14                      | -                                         | 2.57                      | 0.42                                      |
|         |                                          | (vii) ESOP related cost                   | 3.56                      | -                                         | 0.46                      | -                                         |

|    |                                                          |                                                |       |       |       |       |
|----|----------------------------------------------------------|------------------------------------------------|-------|-------|-------|-------|
|    |                                                          | (viii) Transfer of Gratuity Liability          | 0.13  | -     | 0.88  | 0.06  |
|    |                                                          | (ix) Sale of Asset (Car)                       | 0.03  |       | 0.19  |       |
|    |                                                          | (x) Inter corporate deposit                    | -     | 64.40 | -     | 61.36 |
|    |                                                          |                                                |       |       |       |       |
| 9  | Reliance Capital Pension Fund Limited                    | (i) Reimbursement of expenses charged          | 0.05  | -     | 0.05  | -     |
|    |                                                          |                                                |       |       |       |       |
| 10 | Nippon Life India Asset Management (Singapore) Pte. Ltd. | (i) Advisory Fees                              | 17.32 | -     | 11.82 | -     |
|    |                                                          | (ii) ESOP related cost                         | 0.75  |       | -     | -     |
|    |                                                          | (iii) Offshore advisory fee receivable         | -     | 2.92  | -     | 2.65  |
|    |                                                          |                                                |       |       |       |       |
| 11 | Reliance Nippon Life Insurance Company Limited           | (i) Insurance Charges (net of claims received) | 3.37  | -     | 4.50  | -     |
|    |                                                          | (ii) Reimbursement of expenses paid            | 0.59  | -     | 0.67  | -     |
|    |                                                          | (iii) payment of funded gratuity               | 7.00  | -     | 4.00  | -     |
|    |                                                          | (iv) Advance towards insurance policies        | -     | 0.16  | -     | 0.04  |
|    |                                                          |                                                |       |       |       |       |
| 12 | Nissay Asset Management Ltd                              | (i) Advisory Fees Income                       | 8.26  | -     | 7.81  | -     |
|    |                                                          | (ii) Offshore Advisory fee paid                | 1.11  | -     | 1.18  | -     |
|    |                                                          | (iii) Advisory Fee Receivable                  | -     | 0.27  | -     | 0.31  |
|    |                                                          |                                                |       |       |       |       |
| 13 | Nippon Life India Private Limited                        | (i) Rent Cost                                  | 0.16  | 0.02  | -     | -     |
|    |                                                          |                                                |       |       |       |       |
| 14 | Nippon Life India Trustee Ltd                            | (i) Rent Cost                                  | 0.03  | -     | -     | -     |
|    |                                                          |                                                |       |       |       |       |
| 15 | T R Chadha And Co LLP                                    | (i) Professional Fees                          | 0.01  | -     | -     | -     |

\*Note: Above figures are excluding GST

## 8) Financial Performance of the Portfolio Manager - As on March 31, 2025

The following exhibit states the key financial data pertaining to the Portfolio Manager as per the audited financial statements.

Summarized Financial Statement - Balance Sheet

| Particulars                   | As on March 31, 2025<br>(Rs. in Crores) | As on March 31, 2024<br>(Rs. in Crores) | As on March 31, 2023<br>(Rs. in Crores) |
|-------------------------------|-----------------------------------------|-----------------------------------------|-----------------------------------------|
| <b>EQUITY AND LIABILITIES</b> |                                         |                                         |                                         |
| Shareholders' funds           | 4014.16                                 | 3818.32                                 | 3411.77                                 |
| Financial Liabilities         | 227.94                                  | 200.59                                  | 156.36                                  |
| Non-Financial Liabilities     | 173.50                                  | 139.62                                  | 129.43                                  |
| <b>ASSETS</b>                 |                                         |                                         |                                         |

| Particulars         | As on March 31, 2025<br>(Rs. in Crores) | As on March 31, 2024<br>(Rs. in Crores) | As on March 31, 2023<br>(Rs. in Crores) |
|---------------------|-----------------------------------------|-----------------------------------------|-----------------------------------------|
| Financial Asset     | 3483.23                                 | 3774.04                                 | 3341.26                                 |
| Non-Financial Asset | 932.27                                  | 384.49                                  | 356.30                                  |

Summarized Financial Statement - Profit & Loss A/c

| Particulars                                | For the year<br>ended March<br>31, 2025<br>(Rs. in Crores) | For the year<br>ended March<br>31, 2024<br>(Rs. in Crores) | For the year<br>ended March<br>31, 2023<br>(Rs. in Crores) |
|--------------------------------------------|------------------------------------------------------------|------------------------------------------------------------|------------------------------------------------------------|
| Total Income                               | 2348.28                                                    | 1877.08                                                    | 1431.18                                                    |
| Total expenses before Depreciation and Tax | 664.17                                                     | 554.22                                                     | 484.33                                                     |
| Profit before Depreciation and Tax         | 1684.11                                                    | 1322.86                                                    | 946.85                                                     |
| Depreciation                               | 29.44                                                      | 28.38                                                      | 29.08                                                      |
| Exceptional Items                          | -                                                          | -                                                          | -                                                          |
| Profit Before Tax                          | 1654.67                                                    | 1294.48                                                    | 917.77                                                     |
| Provision for Tax (including adjustments)  | 402.44                                                     | 247.25                                                     | 202.83                                                     |
| Profit after tax                           | 1252.23                                                    | 1047.23                                                    | 714.94                                                     |

#### (9) Portfolio Management Performance

Product / Option wise Performance Report as on June 30, 2025

|    | Offerings / Option                                         | Period                             |                                    |                                    |                                    |
|----|------------------------------------------------------------|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
|    |                                                            | YTD<br>01.04.2025 to<br>30.06.2025 | YTD<br>01.04.2024 to<br>31.03.2025 | YTD<br>01.04.2023 to<br>31.03.2024 | YTD<br>01.04.2022 to<br>31.03.2023 |
| A. | <b>Equity</b>                                              |                                    |                                    |                                    |                                    |
|    | <b>(Investment Approach)</b>                               |                                    |                                    |                                    |                                    |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Absolute Freedom Portfolio                                 | 11.75%                             | 0.36%                              | 47.18%                             | -1.99%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Absolute Freedom Portfolio - 1                             | 11.37%                             | -0.68%                             | 45.83%                             | -2.12%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Absolute Freedom Portfolio - Systematic Rebalancing Option | 11.64%                             | -0.13%                             | 47.44%                             | -2.17%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Concentrated Portfolio                                     | 8.44%                              | 5.10%                              | 41.08%                             | -3.6%                              |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Deep Value Portfolio                                       | 0.00%                              | 0.00%                              | 0.00%                              | 10.4%                              |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Emerging India Portfolio                                   | 14.27%                             | 7.08%                              | 51.13%                             | -3.38%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Emerging India Portfolio - 1                               | 14.23%                             | 9.10%                              | 49.41%                             | -3.14%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Emerging India Portfolio - Systematic Rebalancing Option   | 14.00%                             | 8.74%                              | 50.27%                             | -3.64%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |
|    |                                                            |                                    |                                    |                                    |                                    |
|    | Emerging Sector Opportunity Portfolio                      | 0.00%                              | 0.00%                              | 0.00%                              | 34.90%                             |
|    | Benchmark - S&PBSE500TRI                                   | 10.77%                             | 5.96%                              | 40.16%                             | -0.91%                             |

|           |                                                                              |         |         |         |         |
|-----------|------------------------------------------------------------------------------|---------|---------|---------|---------|
|           |                                                                              |         |         |         |         |
|           | High Conviction Equity Portfolio                                             | 9.36%   | 2.03%   | 49.69%  | -2.99%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | High Conviction Equity Portfolio – 1                                         | 9.04%   | 1.82%   | 49.52%  | -3.83%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | High Conviction Equity Portfolio -Systematic Rebalancing Option              | 8.92%   | 2.24%   | 49.09%  | -3.11%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | MAAP                                                                         | 10.35%  | -0.56%  | 47.29%  | -2.01%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | Nippon India Royal Portfolio                                                 | 8.26%   | 1.59%   | 51.88%  | -4.01%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | Pearl Portfolio                                                              | 13.82%  | -5.54%  | 47.81%  | -6.85%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | Tactical Asset Allocation Plan                                               | 11.58%  | -2.17%  | 47.24%  | -1.34%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | The Indian Economic Transformation Portfolio                                 | 12.74%  | 1.81%   | 41.94%  | -3.67%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
|           | The Indian Economic Transformation Portfolio - Systematic Rebalancing Option | 12.68%  | 2.23%   | 41.43%  | -3.41%  |
|           | Benchmark - S&PBSE500TRI                                                     | 10.77%  | 5.96%   | 40.16%  | -0.91%  |
|           |                                                                              |         |         |         |         |
| <b>B.</b> | <b>Debt</b>                                                                  |         |         |         |         |
|           | <b>(Investment Approach)</b>                                                 |         |         |         |         |
|           |                                                                              |         |         |         |         |
|           | Enhanced Equity Portfolio                                                    | 0.00%   | 161.26% | 6.46%   | 63.89%  |
|           | Benchmark – CCBFI                                                            | 0.00%   | 8.79%   | 8.26%   | 3.80%   |
|           |                                                                              |         |         |         |         |
|           | Blended- Debt Plus Hybrid Option                                             | 0.00%   | 141.22% | -1.65%  | -0.22%  |
|           | Benchmark – CCBFI                                                            | 0.00%   | 8.79%   | 8.26%   | 3.80%   |
|           |                                                                              |         |         |         |         |
|           | High Yield Portfolio (June25 Month Performance)                              | 0.75%   | NA      | NA      | NA      |
|           | Benchmark – CRISILCREDIT                                                     | 0.55%   | NA      | NA      | NA      |
|           |                                                                              |         |         |         |         |
|           | Yield Maximiser Option                                                       | 120.32% | -10.01% | -32.05% | -20.17% |
|           | Benchmark – CRISILCREDIT                                                     | 2.10%   | 10.47%  | 11.11%  | 8.71%   |
|           |                                                                              |         |         |         |         |
| <b>C.</b> | <b>Hybrid</b>                                                                |         |         |         |         |
|           | <b>(Investment Approach)</b>                                                 |         |         |         |         |
|           |                                                                              |         |         |         |         |
|           | Signature Option                                                             | 4.10%   | 8.70%   | 4.36%   | -3.50%  |
|           | Benchmark – CRISILHYBRID                                                     | 5.94%   | 7.77%   | 22.68%  | 1.82%   |
|           |                                                                              |         |         |         |         |

#### Notes

- 1) The performance of all portfolios and segregated Investment Approaches has been computed basis Time Weighted Rate of Return (TWRR) including all Fees and Expenses. The performance has been calculated considering all cash holdings and investment in liquid funds.
- 2) TWRR Method: Time weighted daily valuation method is used for rate of return calculation. Portfolio valuation is done on the date of any external cash flow with daily weighted cash flows. Periodic returns are geometrically linked. Total return includes realized and unrealized gains and income. Calculations are after deduction of transaction charges. Trade date accounting is used for calculations. Accrual accounting

is used for fixed income securities. Market values of fixed income securities include accrued income. Accrual accounting is used for dividends as of ex-dividend date.

- 3) Please note that there is no material impact on the Client's portfolio and performance because of the segregation of investment strategies into Investment Approaches as per new Regulations.

**4) Note for ESIC**

Employee State Insurance Scheme (ESIC) is a type of social security scheme for employees in the organised sector. Employee's State Insurance (ESI) is a self-financing social security and health insurance scheme for Indian workers which provides for certain benefits to Employees in case of sickness, maternity and employment injury and to make provisions for related matters.

Nippon India Life Asset Management Company is the Portfolio Manager to the funds of ESIC under Portfolio Management Services (PMS).

The investment must be in accordance to the investment pattern as provided by ESIC and any subsequent changes from time to time. CRISIL, advisor (consultant) to ESIC, evaluates the performance against a Benchmark (prepared by CRISIL) for performance evaluation.

Since Inception of the mandate, the performance evaluation report has not been shared with the Portfolio Manager. The same will updated as when received from ESIC.

- 5) Past performance may or may not sustain in the future. The investors are requested to read all the offer documents carefully before investing
- 6) The performance related information provided in the disclosure document is not verified by SEBI.
- 7) The actual returns of clients may differ from client to client due to different timing of investments.
- 8) Returns over one year period are annualised and returns less than one year period are absolute.
- 9) Underlying NCD's in Live series under Blended Debt Plus- Hybrid Option & Enhanced Equity Portfolio series were valued at cost till 29/08/19. W.E.F 30/08/19 the NCD'S are getting valued at valuation provided by third party valuation agencies.
- 10) The performance update of all Investment Approaches and benchmark mentioned above is as on December 31, 2024.

Further, kindly note that, in line with paragraph 4.6A.3 of the SEBI Master Circular no SEBI/HO/IMD/IMD-POD-1/P/CIR/2024/80 dated June 07, 2024 and APMI circulars, NAM India have tagged one benchmark out of the three benchmark provided by APMI to each of the Investment Approaches under "Investment Approaches of the Portfolio Manager" section which is effective from April 01, 2023. Refer section "Investment Approaches of the Portfolio Manager" for revised benchmark indices.

**(10) Audit Observations**

Nil during the preceding 3 years.

**(11) Nature of expenses**

The following are indicative types of costs and expenses for Clients availing the Portfolio Management Services. The exact basis of charge relating to each of the following services shall be annexed to the specific Client Agreements on basis of the services availed by the Clients under such agreements.

**I. Fees of the Portfolio Manager**

**a. Management Fees**

Management fees relate to the Portfolio Management Services offered to Clients. The fee may be a fixed amount charge or a percentage of the quantum of Funds Managed or linked to portfolio returns achieved or a combination of any of these, as agreed by the Client in the Client Agreement. Profit /performance shall be computed on the basis of high water mark principle (wherever applicable) over the life of the investment, for charging of performance / profit sharing fee. In case of interim contributions/ withdrawals by clients, performance fees may be charged after appropriately adjusting the High Water Mark on proportionate basis.

The Portfolio Manager charges a fixed management fee of upto 2.5% p.a. (exclusive of applicable taxes) of the Client's average daily Asset Under Management.

**Performance Fee and High Water Mark Principle:** High water mark shall be the highest value that the Portfolio/account has reached. Value of the Portfolio for computation of High water mark shall be taken to be the value on the date when performance fees are charged. For the purpose of charging performance fee, the frequency shall not be less than quarterly. The Portfolio Manager shall charge performance based fee only on increase in Portfolio value in excess of the previously achieved High water mark.

In the event of it being a fixed charge or a percentage of the quantum of Funds Managed, it shall not exceed 25% p.a. of the value of appreciation to Client's Portfolio. With regard to the performance fees, the terms will be decided as per the Client Agreement in compliance with applicable laws.

**b. Exit Fees**

Exit fees relates to exit charges payable to the Portfolio Manager at the time of complete withdrawal or partial withdrawal. The Portfolio Manager shall always comply with the limit on exit charge prescribed by SEBI under applicable laws.

The Portfolio Manager proposes to charge an exit charge of upto 3% for redemptions within 12 (twelve) months of investment, upto 2% for redemptions within 24 (twenty-four) months of investment and upto 1% redemptions within 36 (thirty-six) months of investment. The exit charge is exclusive of applicable taxes and the Client shall bear such taxes over and above the amount of exit charge.

**II. Other General Expenses applicable to all type of Portfolios**

**a. Custodian/Depository Fees**

The charges relating to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization and other charges in connection with the operation and management of the Depository Accounts.

**b. Registrar and transfer agent fee**

Charges payable to registrars and transfer agents in connection with onboarding, documentation of the Client and effecting transfer of securities and bonds including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges. Further, such charges shall also include charges payable to third party service provider in connection with maintaining client documentation & various communications to the Client.

**c. Brokerage and transaction costs**

The brokerage charges on purchase and sale of Securities shall be charged at actuals.

**d. Securities Lending and Borrowing charges**

The charges pertaining to the lender of Securities, costs of borrowing including interest, and costs associated with transfers of Securities connected with the lending and borrowing transfer operations.

**e. Professional charges**

Professional Charges payable for outsourced professional services like accounting, taxation, legal services, notarizations etc. For avoidance of doubt, such charges shall also include all expenses incurred towards court receiver fees, litigation fees, etc. in respect of recovery of investment amount from the issuer of Securities.

**f. Account activation expenses**

All expenses payable in connection with the courier expenses, stamp duty, franking, service tax, postal, telegraphic, opening and operation of bank accounts etc. at the time of account activation of the Clients.

**g. Index Licensing Fee**

Charges incurred by the Portfolio Manager towards index licensing fee payable for reference to benchmarks for respective Investment Approaches.

**h. Miscellaneous Expenses**

Any other charges incurred by the Portfolio Manager in respect to the management and operation of the Portfolio of the Client.

All fees and charges shall be levied on the actual amount of Clients' assets under management. The operating expenses (excluding brokerage) shall be charged within the applicable limits as may be prescribed by SEBI from time to time.

**(12) Taxation**

**1) Taxation**

Taxation implications for the Client: Updated by Finance Act, 2025

It may be noted that the information given hereinafter is only for general information purposes and is based on the advice received by the Portfolio Manager regarding the law and practice currently in force in India and the Clients should be aware that the relevant fiscal rules or their interpretation may change or may not be acceptable to the tax authorities. As is the case with any interpretation of any law, there can be no assurance that the tax position or the proposed tax position prevailing at the time of an investment in the Offering / Option will be accepted by the tax authorities or will continue to be accepted by them indefinitely.

Further statements with regard to tax benefits mentioned herein below are mere expressions of opinion and are not representations of the Portfolio Manager to induce any investor to invest whether directly from the Portfolio Manager or indirectly from any other persons by the secondary market operations. In view of the above, and since the individual nature of tax consequences may differ in each case on its merits and facts, each Client is advised to consult his / her or its own professional tax advisor with respect to the specific tax implications arising out of its participation in the Portfolio Management Services as a Client.

**i. General**

In view of the individual nature of tax consequences, each Client is advised to consult his or her tax advisor with respect to the specific tax consequences to him/her participation in any of the Offerings/Option. The following provisions are as per the existing Income Tax Act, 1961 ("IT Act").

The Portfolio Manager shall not be responsible for assisting in or completing the fulfilment of the client's tax obligations.

**ii. Tax deduction at source**

If any tax is required to be withheld on account of any present or future legislation, the Portfolio Manager will be obliged to act in accordance with the regulatory requirements in this regard.

**iii. Advance tax instalment obligations**

It will be the responsibility of the Client to meet the advance tax obligation instalments payable on the due dates under the IT Act.

**iv. Interest on Securities**

Income by way of interest on securities is taxable at the slab rates applicable to the assessee under the head "Income from other sources or "Profit or gains from Business & profession" as applicable.

**v. Long-term Capital Gains**

**A. Listed Equity shares and equity oriented mutual fund scheme**

| Particulars            | Transfer before 23 <sup>rd</sup> July 2024 | Transfer on or after 23 <sup>rd</sup> July 2024 |
|------------------------|--------------------------------------------|-------------------------------------------------|
| Long Term Capital Gain | 10%                                        | 12.5%                                           |

The provision of section 112A of the Act provides taxability of long-term capital gain arising from transfer of a long-term capital asset being an equity share in a company or a unit of equity oriented fund<sup>1</sup> or a unit of a business trust shall be taxed @12.5% if transfer on or after 23<sup>rd</sup> July 2024 if such capital gain exceeding Rs. 1,25,000 p.a. If transfer take place before 23<sup>rd</sup> July, 2024 then such long term capital was taxable @10%.

This concessional tax rates of 12.5% & 10% will be applicable to such long-term capital gains, if—

- i) in a case where long-term capital asset is in the nature of an equity share in a company, securities transaction tax has been paid on both acquisition and transfer of such capital asset; and
- ii) in a case where long-term capital asset is in the nature of a unit of an equity-oriented fund or a unit of a business trust, securities transaction tax has been paid on transfer of such capital asset.

Further, the provision of section 112A also proposes to provide the following: —

- i) The long-term capital gains will be computed without giving effect to the first and second provisos to section 48, i.e. inflation indexation in respect of cost of acquisitions and cost of improvement, if any, and the benefit of computation of capital gains in foreign currency in the case of a non-resident, will not be allowed.
- ii) Provision of section 55(ac) of the Act provides cost of acquisitions in respect of the long-term capital asset acquired by the assessee before the 1st day of February 2018, shall be the higher of –
  - a) the actual cost of acquisition of such asset; and
  - b) the lower of –
    - (I) the fair market value of such asset\*and
    - (II) the full value of consideration received or accruing as a result of the transfer of the capital asset.

\*Fair market value has been defined to mean –

- a) in a case where the capital asset is listed on any recognized stock exchange, the highest price of the capital asset quoted on such exchange on the 31st day of January 2018. However, where there is no trading in such asset on such exchange on the 31<sup>st</sup> January 2018, the highest price of such asset on such exchange on a date immediately preceding the 31<sup>st</sup> January, 2018 when such asset was traded on such exchange shall be the fair market value; and
- 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 the 31st January 2018.

## **B. Debt securities including Other than Equity Oriented Mutual Fund Schemes and Unlisted shares**

### **1. Debt Securities**

#### **I. Listed Debt Securities (Except other than equity oriented Mutual Fund units)**

| Particulars            | Transfer before 23 <sup>rd</sup> July 2024 | Transfer on or after 23 <sup>rd</sup> July 2024 |
|------------------------|--------------------------------------------|-------------------------------------------------|
| Long Term Capital Gain | 10%                                        | 12.5%                                           |

Any Listed Debt securities (Except other than equity oriented Mutual Fund units) listed on a recognised stock exchange held for a period of more than 12 months then any capital gain earned from such investment treated as long term capital gain. Such gain will be chargeable to tax under section 112 of the IT Act, at the rate of 12.5% if transfer on or after 23<sup>rd</sup> July 2024 and @10% if transfer before 23<sup>rd</sup> July 2024.

In case of resident individuals and Hindu Undivided Family (HUFs), where the total income as reduced by capital gains, is below the basic exemption limit, 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 tax.

#### **II. Unlisted Debt Securities**

##### **a. Unlisted debt securities (Except Other Than Equity Oriented Mutual Fund, Bonds and Debentures)**

| Particulars            | Transfer take place before 23 <sup>rd</sup> July 2024 | Transfer take place on or after 23 <sup>rd</sup> July 2024 |
|------------------------|-------------------------------------------------------|------------------------------------------------------------|
| Long Term Capital Gain | 20%                                                   | 12.5%                                                      |

##### **b. Unlisted debt securities (Bonds and Debentures)**

| Particular             | Transfer on or after 23 <sup>rd</sup> July 2024 | Transfer before 23 <sup>rd</sup> July 2024 |
|------------------------|-------------------------------------------------|--------------------------------------------|
| Long Term Capital Gain | As per Applicable Slab rate*                    | 20%                                        |

<sup>1</sup> Explanation.—For the purposes of this section,— (a) “equity oriented fund” means a fund set up under a scheme of a mutual fund specified under clause (23D) of section 10 and,— (i) in a case where the fund invests in the units of another fund which is traded on a recognised stock exchange,—(A) a minimum of ninety per cent. of the total proceeds of such fund is invested in the units of such other fund; and (B) such other fund also invests a minimum of ninety per cent. of its total proceeds in the equity shares of domestic companies listed on a recognised stock exchange; and (ii) in any other case, a minimum of sixty-five per cent. of the total proceeds of such fund is invested in the equity shares of domestic companies listed on a recognised stock exchange: Provided that the percentage of equity shareholding or unit held in respect of the fund, as the case may be, shall be computed with reference to the annual average of the monthly averages of the opening and closing figures;

\*As per section 50AA of the Act, any gain on transfer, redemption or maturity of unlisted bond and debentures would be considered as short term in nature and taxed as per applicable tax rate slab of the investor irrespective of the holding period.

c. Other Than Equity Oriented Scheme

(i) Specified Mutual Fund

| Particulars            | Transfer before 23 <sup>rd</sup> July 2024 | Transfer on or after 23 <sup>rd</sup> July 2024 |
|------------------------|--------------------------------------------|-------------------------------------------------|
| Long Term Capital Gain | As per Applicable Slab rate                |                                                 |

The Finance Act, 2023 prescribes new section 50AA, which provides that any capital gain from specified mutual fund schemes would be considered as short term in nature and taxed as per applicable tax rate slab of the investor irrespective of the holding period. This provision is applicable only for any investments made in specified mutual fund on or after 1 April 2023. Any investment made in specified mutual fund before 1 April 2023 will be taxed @12.5% if transferred on or after 23<sup>rd</sup> July 2024 and 20% with indexation if transferred before 23<sup>rd</sup> July 2024.

**Specified Mutual Fund Scheme:** "Specified Mutual Fund" means, —

(a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent of its total proceeds in debt and money market instruments; or

(b) a fund which invests sixty-five per cent or more of its total proceeds in units of a fund referred to in sub-clause (a):

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

(ii) Other than Specified Mutual Fund

| Particulars                                                                | Transfer before 23 <sup>rd</sup> July 2024 | Transfer on or after 23 <sup>rd</sup> July 2024 |
|----------------------------------------------------------------------------|--------------------------------------------|-------------------------------------------------|
| Long Term Capital Gain (If Units were acquired on or before April 1, 2023) | 20% with Indexation                        | 12.5%                                           |

## 2. Unlisted Shares

### Transfer on or after 23rd July 2024

Long-term capital gains in respect of unlisted shares, held for a period of more than 24 months, will be chargeable to tax under section 112 of the IT Act, at the rate of 12.5%

In case of resident individuals and HUFs, where the total income as reduced by capital gains, is below the basic exemption limit, 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 tax.

12.5% tax on long-term capital gains on transfer of capital assets, being unlisted shares, computed without giving effect to first and second proviso to section 48 of the IT Act i.e. without taking benefit of foreign currency fluctuation and indexation benefit for non-residents investor.

### Transfer before 23rd July 2024

Long-term capital gains in respect of unlisted shares held for a period of more than 24 months will be chargeable to tax under section 112 of the IT Act, at the rate of 20% with Indexation.

In case of resident individuals and HUFs, where the total income as reduced by capital gains is below the basic exemption limit, 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 tax.

## vi. Short-term Capital Gains

### A. Equity shares and equity oriented mutual fund schemes

Short-term capital gains in respect of Equity and Equity oriented units mean Equity or Equity Oriented units held for not more than 12 (twelve) months.

Under section 111A of the IT Act, where the total income of an assessee includes any income chargeable under the head "Capital Gains", arising from the transfer of a short-term capital asset, being an equity share in a company or a unit of an equity-oriented fund and.

- the transaction of sale of such units is entered into on or after October 01, 2004, i.e. the date on which Chapter VII of the Finance (No.2) Act, 2004 has come into force; and
- such transaction is chargeable to securities transaction tax under that Chapter, the tax payable by the assessee on such short-term capital gains is as follows:

| Particulars             | Transfer before 23 <sup>rd</sup> July 2024 | Transfer on or after 23 <sup>rd</sup> July 2024 |
|-------------------------|--------------------------------------------|-------------------------------------------------|
| Short Term Capital Gain | 15%                                        | 20%                                             |

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, 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 the above tax rates. The said tax rates would be increased by an applicable surcharge, health and education cess. Where the total income of an assessee includes any short-term capital gains, the deduction under Chapter VI-A shall be allowed from the income tax on the total income as reduced by such short-term capital gains.

On short-term capital assets other than equity shares in a company: Such short-term capital gains will be added to the total income of the assessee and taxed at the applicable slab rates specified by the IT Act and would be increased by an applicable surcharge and cess.

## **B. Debt securities and Other than Equity Oriented Mutual Fund Schemes**

### **i. Listed Debt and any other listed securities**

Short-term capital gains in respect of listed debt securities on recognised stock exchange held for not more than 12 (twelve) months is added to the total income of the assessee and taxed at the applicable slab rates specified by the IT Act.

### **ii. Unlisted Debt securities**

Short-term capital gains in respect of unlisted debt securities held for not more than 36 (thirty-six) months if transferred before 23<sup>rd</sup> July 2024 and for not more than 24 (twenty-four) months if transferred on or after 23<sup>rd</sup> July 2024 is added to the total income of the assessee and taxed at the applicable slab rates specified by the IT Act.

### **iii. Other than Equity Oriented mutual Fund Units**

Short-term capital gains in respect of other than equity oriented mutual fund units held for not more than 36 (thirty-six) months if transferred before 23<sup>rd</sup> July 2024 and for not more than 24 (twenty-four) months if transferred on or after 23<sup>rd</sup> July 2024 is added to the total income of the assessee and taxed at the applicable slab rates specified by the IT Act.

However, w.e.f. April 01, 2023, as per Finance Bill 2023 any capital gain from specified mutual fund schemes would be considered as short term in nature and taxed as per applicable tax rate slab of the investor irrespective of the holding period. This provision is applicable only for any fresh investments made on or after April 01, 2023.

**Specified Mutual Fund Scheme:** "Specified Mutual Fund" means, —

(a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent of its total proceeds in debt and money market instruments; or

(b) a fund which invests sixty-five per cent or more of its total proceeds in units of a fund referred to in sub-clause (a):

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

### **iv. Dividend Income**

Dividend received from mutual fund and equity share was exempt from tax under section 10(35) and section 10(34) till March 31, 2020. The Finance Act, 2020 has amended the provisions of section 10(34) and 10(35) of the Act and rescinded the exemptions w.e.f. April 01, 2020, onwards. Hence the dividend received from mutual fund, equity and preference share is taxable in the hands of recipients at the applicable rates from April 01, 2020, onwards.

### **v. Securities Transaction Tax**

| <b>Name of Transaction</b>                                                                                                                                                                                          | <b>Payable by</b>                            | <b>Rate From April 1, 2014, onwards</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|-----------------------------------------|
| Purchase and sale of units of an equity-oriented Funds                                                                                                                                                              | Purchaser                                    | Nil                                     |
|                                                                                                                                                                                                                     | Seller                                       | 0.001%                                  |
| Purchase and sale of equity shares in a company on a recognised stock exchange on delivery basis                                                                                                                    | Purchaser                                    | 0.1%                                    |
|                                                                                                                                                                                                                     | Seller                                       | 0.1%                                    |
| Sale in a recognised stock exchange of equity shares of a company or units of equity-oriented funds on non-delivery basis                                                                                           | Seller                                       | 0.025%                                  |
| Derivatives: Futures                                                                                                                                                                                                | Seller                                       | 0.02%                                   |
| Derivatives: Options                                                                                                                                                                                                | Where Option is not exercised- Seller to pay | 0.1%                                    |
|                                                                                                                                                                                                                     | Where Option is exercised - Buyer to pay     | 0.125%                                  |
| Sale of units of equity-oriented funds to the mutual fund                                                                                                                                                           | Seller                                       | 0.001%                                  |
| Sale of unlisted equity shares by any holder of such shares under an offer for sale to the public included in an initial public offer and where such shares are subsequently listed on a recognised stock exchange; | Seller                                       | 0.2%                                    |

### **vi. Foreign Institutional Investors (FIIs)**

Long-term capital gains of notified FIIs (specified as FIIs by the government) arising on sale/repurchase of securities, would be taxed at the rate of 10% if sale/repurchase is before 23<sup>rd</sup> July 2024 and 12.5% if sale/repurchase is on or after 23<sup>rd</sup> July 2024 under Section 115AD of the IT Act. The said tax rate would be increased by an applicable surcharge and health and education cess.

Such gains would be calculated without the inflation index and currency fluctuations.

Short-term capital gains arising on sale/repurchase of units would be taxed at 30% (Short-term capital gains in nature referred in section 111A of the IT Act, discussed elsewhere in this Document shall be taxed at 15% if sale/repurchase is before 23<sup>rd</sup> July 2024 and at 20% if sale/repurchase is on or after 23<sup>rd</sup> July 2024). The said tax rate would be increased by an applicable surcharge and health and education cess.

However, w.e.f. April 01, 2023, as per Finance Act 2023 any capital gain from specified mutual fund schemes would be considered as short term in nature and taxed as per applicable tax rate slab of the investor irrespective of the holding period. This provision is applicable only for any fresh investments made on or after April 01, 2023.

"Specified Mutual Fund" as defined by The Finance Act, 2023 means a Mutual Fund scheme which does not invest more than 35% in equity shares of domestic companies.

## **vii. Deduction of Tax at source**

### **A) Dividend**

**Resident Investors:** As per provision of section 194 of the IT Act, a domestic company, before making any payment in respect of any dividend to resident shareholder, shall deduct withholding tax at the rate of 10%.

Further as per Section 194K of the IT Act, any person responsible for paying to a resident any income in respect of units of a Mutual Fund specified under clause (23D) of section 10 of the IT Act. Mutual Fund shall at the time of credit of such income to the account of the payee or at the time of payment thereof by any mode, whichever is earlier, deduct income tax there on at the rate of 10%.

**Non-Resident Investor:** As per provision of section 196A, any person responsible for paying to a non-resident any income in respect of units of a Mutual Fund specified under clause (23D) of section 10 of the IT Act. Mutual Fund shall at the time of credit of such income to the account of the payee or at the time of payment thereof by any mode, whichever is earlier, deduct income tax there on at the rate of 20%. The said tax rate would be increased by an applicable surcharge and cess.

**Foreign Institutional Investors:** As per provision of Section 196D of the IT Act, where any income in respect of securities referred to in section 115AD of the IT Act, is payable to a Foreign Institutional Investor, the person responsible for making the payment shall, deduct income-tax thereon at the rate of 20%. The said tax rate would be increased by an applicable surcharge and cess. However, no deduction of tax shall be made from any income, by way of capital gains arising from the transfer of securities referred to in section 115AD of the IT Act, payable to a FIIL.

**Specified overseas financial organizations:** As per section 196B of the IT Act, income tax is deductible on long-term capital gains arising on repurchase of units purchased in foreign currency, at the rate of 10%. The said tax rates would be increased by an applicable surcharge and cess.

### **B) Capital Gain**

#### **In the case of a non-resident other than a foreign company**

1. Income tax is deductible on long-term capital gains arising on sale of equity shares or repurchase of equity oriented mutual fund units at with rate of 10% if sale/repurchase is before 23<sup>rd</sup> July 2024 and at with rate of 12.5% if sale/repurchase is on or after 23<sup>rd</sup> July 2024.

Income tax is deductible on short-term capital gains arising

- On sale of equity shares and equity oriented mutual fund scheme where Securities Transaction Tax (STT) is applicable @15% if sale/repurchase is before 23<sup>rd</sup> July 2024 and @20% if sale/repurchase is on or after 23<sup>rd</sup> July 2024.
- On sale of equity shares and other than equity oriented mutual fund scheme where no STT paid, tax @applicable slab rates.

The above tax rates would be increased by an applicable surcharge and cess.

However, w.e.f. April 01, 2023, as per Finance Act 2023 any capital gain from specified mutual fund schemes would be considered as short term in nature and taxed as per applicable tax rate slab of the investor irrespective of the holding period. This provision is applicable only for any fresh investments made on or after April 01, 2023.

"Specified Mutual Fund" as defined by The Finance Act, 2023 means a Mutual Fund scheme which does not invest more than 35% in equity shares of domestic companies.

2. As per section 196A of the IT Act, any person responsible for paying to a non-resident, not being a company, or to a foreign company, any income in respect of units of a Mutual Fund, shall, at the time of credit of such income to the account of the payee or at the time of payment thereof whichever is earlier, deduct income-tax thereon at the rate of 20%.

#### **In the case of a foreign company**

Income tax is deductible on long-term capital gains arising on sale/ transfer of units at the rate of 10% if sale/repurchase is before 23<sup>rd</sup> July 2024 and at with rate of 12.5% if sale/repurchase is on or after 23<sup>rd</sup> July 2024. Income tax is deductible on short-term capital gains arising on sale/ transfer of units at the rate of 40% if sale/repurchase is before 23<sup>rd</sup> July 2024 and at with rate of 35% if sale/repurchase is on or after 23<sup>rd</sup> July 2024.

The Finance Act 2023 categorized other than equity-oriented scheme into two categories i.e. Specified Mutual Funds and other than specified Mutual Fund Scheme.

**Specified Mutual Fund Scheme:** Any capital gains would be considered as short term in nature and taxed as per applicable slab rate of the investor irrespective of the holding period. This provision is applicable only for any investments made on or after 1 April 2023.

**Specified Mutual Fund Scheme:** "Specified Mutual Fund" means, —

(a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent of its total proceeds in debt and money market instruments; or

(b) a fund which invests sixty-five per cent or more of its total proceeds in units of a fund referred to in sub-clause (a):

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

#### **viii. Tax Treaty**

Income tax is required to be deducted at source from the capital gains chargeable to tax under section 195 of the Act at the applicable rates. In the case of an assessee resident of a country with which a Double Tax Avoidance Agreement ('DTAA') is in force, the tax should be withheld as per provisions in the Act or as per the provisions in the DTAA whichever is more beneficial to the non-resident investor. However, such a non-resident unit holder will be required to provide appropriate documents to the Fund i.e. Tax Residency Certificate, Electronic Form 10F and No Permanent Establishment & self-declaration certificate to be entitled to a beneficial rate under such DTAA.

As per Finance Act, 2012 a non-resident shall not be entitled to claim treaty benefits, unless the non-resident obtains a Tax Residency Certificate ('TRC') from their home country, containing such particulars as specified in notification no. 39/2012 dated September 17, 2012.

Further, The Central Board of Direct Taxes ('CBDT') has issued a notification no.3/2022 dated July 16th, 2022, amending the Income-tax Rules, 1962, prescribing the additional information required to be provided by a non-resident in Electronic Form No. 10F along with TRC to avail treaty benefits. The non-resident is required to provide the following information duly signed by the authorised signatory in the prescribed electronic form 10F:

- 1) Status (individual, company, firm etc.) of the non-resident.
- 2) Permanent Account Number (PAN) of the non-resident if allotted.
- 3) Nationality (in case of an individual) or country or specified territory of incorporation or registration (in case of others).
- 4) Non-resident's tax identification number in the country or specified territory of residence and in case there is no such number, then, a unique number based on which the person is identified by the Government of the country or the specified territory of which the non-resident claims to be a resident.
- 5) Period for which the residential status, as mentioned in the certificate referred to in sub-section (4) of section 90 or sub-section (4) of section 90A, is applicable; and
- 6) Address of the non-resident in the country or specified territory outside India, during the period for which the certificate, as mentioned in (5) above, is applicable

#### **ix. Default in furnishing the PAN**

Section 206AA of the IT Act inserted by the Finance (No.2) Act, 2009, operative with effect from April 1, 2010, states that the deductee is required to mandatorily furnish his PAN to the deductor failing which the deductor shall deduct tax at source at higher of the following rates:

1. the rate prescribed in the IT Act.
2. at the rate in force i.e., the rate mentioned in the Finance Act; or
3. at the rate of 20%

However, as per notification no. 53/2016, in the case of a non-resident, not being a company, or a foreign company and not having PAN, the aforementioned provisions of section 206AA of the IT Act shall not be applicable on payments for transfer of capital asset, if the following documents are provided by the deductee to the Deductor:

- a. Name, e-mail address, contact number and address.
- b. A certificate of the deductee being resident in their respective countries from the Governments of those countries if the law of that country provides for issuance of such certificate; and
- c. Tax Identification Number or a unique number on the basis of which the deductee could be identified by their government as a resident of those countries.

#### **x. Linking of PAN-Aadhaar**

Under the provisions of the IT Act, every person who has been allotted a PAN as on July 01, 2017, and is eligible to obtain Aadhaar Number, is required to intimate his Aadhaar to the prescribed authority.

The PAN of taxpayers who have failed to intimate their Aadhaar, as required, shall become inoperative and the consequences during the period that PAN remains inoperative will be as follows:

- a. No refund shall be made to such PANs.
- b. Interest shall not be payable on such refund for the period during which PAN remains inoperative; and
- c. TDS and TCS shall be deducted /collected at a higher rate, as provided in the Act.

The PAN can be made operative again upon intimation of Aadhaar to the prescribed authority after payment of specified fees. Those persons who have been exempted from PAN-Aadhaar linking will not be liable to the consequences mentioned above. This category includes those residing in specified states, a non-resident as per the IT Act, an individual who is not a citizen of India or individuals of the age of eighty years or more at any time during the previous year.

### **(13) Accounting policy/Valuation Guidelines**

The following Accounting policy will be applied for the Portfolio investments of Clients:

- (a) Investments are stated at cost of acquisition (for reflection in the balance sheets of Clients).

- (b) Transactions for purchase and sale of investments are recognized as of trade date. In determining the holding cost of investments and gain or loss on sale of investments, the "First in First Out" (FIFO) Method is followed.
- (c) Dividend income shall be recorded on the ex-dividend date.
- (d) Management fees shall be accrued as a percentage of the daily average market value (including unrealized appreciation / depreciation) of the Portfolio.
- (e) Variable management fees, if any, shall be computed at an annualized rate at the end of the Financial Year or Anniversary Date based on the Portfolio returns (realized and unrealized), subject to High Water Marking principle, earned during the period and are charged to the profit and loss account. Absolute returns are annualized (for Clients introduced during the year) for the purpose of variable management fees calculations in accordance with the terms of the portfolio services agreement.
- (f) Custody Charges and Other Expenses shall be accrued as a percentage of the daily average market value (including unrealized appreciation / depreciation) of the Portfolio or on actual basis to revenue account in accordance with the terms in Portfolio Management Agreement
- (g) Exit Charges, if any, shall be recognized in accordance with the terms in the Portfolio Management Agreement to the revenue account at the time of introduction / withdrawal of capital
- (h) Net Gain/Loss on sale of Securities shall include an unrealized gain / loss accrued on account of transfer of Securities, if any, on withdrawal of portfolio management funds by the Investor, being the difference between the carrying cost of investments and the closing market rate on the date of transfer, which is not realized.
- (i) Interest income on non-convertible debentures and discount amortization on zero coupon bonds, if any, shall be accrued at the end of every calendar quarter.

The Portfolio Manager shall comply with any circular/guideline/notification issued by SEBI in this regard from time to time.

The following Valuation Guidelines will be applied for the portfolio investments of Clients:

#### 1. Traded Shares

If on a valuation date a share is traded, then closing price of the principal stock exchange where it is listed shall be considered. In case the prices are not available from principal stock exchange, then any other stock exchange shall be considered. These shall include the Equity shares (including Indian Depository Receipts) and other instruments, as the case may be.

#### 2. Not traded on Valuation date

In case a share is not traded on a valuation date, latest closing price of either principal / secondary or any other stock exchange would be used, provided such date is not more than 30 days prior to the valuation date. This process to be reviewed by the Valuation Committee every 30 days.

#### 3. Unlisted Shares

Unlisted shares would be valued by independent valuer appointed by the Portfolio manager semi-annually basis valuation principles outlined in the APMI circular dated 23<sup>rd</sup> March 2023.

#### 4. Warrants

- i) In case of the warrants been traded separately they would be valued as an equity share and valued accordingly.
- ii) In case of the non-traded warrants, the warrants will be valued at the value of the share which would be obtained on exercise less the amount payable on exercise of the warrant.
- iii) On exercise of warrant, the warrants would be transferred to the normal equity and valued accordingly.

#### 5. Rights

If the rights are traded separately then the traded price is the valuation price.

If rights are not traded separately then the rights would be valued as follows.

Rights would be valued as per the following formula:

$$V_r = n * (P_{ex} - P_{of}), \text{ where}$$

$$V_r = \text{Value of rights}$$

$$n = \text{no. of rights offered}$$

$$P_{ex} = \text{Ex - rights price}$$

$$P_{of} = \text{Rights Offer price}$$

If the rights are on non-traded shares or unlisted shares, then the rights would be valued at zero market price.

#### 6. Valuation of Suspended/Non traded Share / Corporate Actions

In case a Security is suspended/non-traded/ awaiting corporate actions, then the Valuation of such Security shall be done on the basis of good faith relying upon prevailing practices elsewhere. The valuation committee shall take note of such methodology and accordingly value the Security.

#### 7. Valuation of Mutual Funds

- Investments in Mutual Funds shall be valued at the latest available NAV of the respective scheme.
- Investment in Exchange listed (ETF) shall be valued at the closing price on the primary exchange.

If on a valuation date Exchange Traded Funds (ETF) is not traded either on the primary or secondary stock exchange, ETF shall be valued at the latest available NAVs of the ETF Scheme

#### **8. Futures and Options**

- The instruments shall be valued as per the last traded prices available from the relevant stock exchange. In case not available, then the settlement price as disclosed by the exchange or as computed by applying internal models shall be used.

#### **9. Structured Offerings**

- Structured Offerings would be valued independently basis the price provided by valuation agency appointed by the portfolio manager empanelled with APMI

#### **10. Zero Coupon Bonds**

Zero coupon bonds would be valued independently basis the price provided by valuation agency appointed by the portfolio manager empanelled with APMI.

#### **11. Pass Through Certificates**

Pass through Certificates would be valued independently basis the price provided by valuation agency appointed by the portfolio manager empanelled with APMI.

#### **12. Government Securities:**

Central and State Government Securities shall be valued independently basis the price provided by valuation agency empanelled with APMI appointed by the portfolio manager.

#### **13. Non-Convertible Debentures (NCDs)**

**NCDs** would be valued independently basis the price provided by valuation agency empanelled with APMI.

##### **Real Estate Issuer Non-Convertible Debentures (NCDs)**

NCDs would be valued independently basis the price provided by valuation agency empanelled with APMI.

##### **Market Linked Debentures**

Market Linked Debentures would be valued independently basis the price provided by valuation agency empanelled with APMI.

#### **14. Units of REITs & INVITS**

Units of REIT and InvIT listed would be valued based on traded closing prices. The units of InvIT and REIT shall be valued at the last quoted closing price on the principal stock exchange. If units have not been traded on the principal stock exchange on the valuation date, then the value at which it is traded on the secondary stock exchange may be used. When such units are not traded on any stock exchange on a particular valuation day, the last traded price may be used provided such date is not more than 30 days prior to valuation date. In absence of traded price, price provided by an independent valuation agency(ies) In absence of above, the valuation Committee shall take a decision on valuation and one of the following approaches may be adopted . price at which the units are allotted provided the valuation date does not exceed the allotment date by greater than one year, or • the latest NAV declared by the trust provided the valuation date does not exceed the computation date of NAV by more than six months, or • delegate the valuation to Portfolio Manager(s) of the scheme(s). The Valuation shall be reviewed by Valuation committee within 90 day

#### **Any other Valuation requirements**

While the guidelines have been framed keeping into account the current practices and instruments, in case new instruments and/or new practices develop, the valuation of such instruments shall be done on the principles as laid down by the Valuation Committee to reflect fair valuation

Valuation would be basis principles outlined in SEBI Circular dated 16<sup>th</sup> December 2022 and APMI (Association of Portfolio Managers in India) circular dated 23<sup>rd</sup> March 2023.

#### **(14) Investor Services**

The Portfolio Manager will ensure prompt investor services. Investors can send queries related to their investments to the following e-mail IDs: [pms@nipponindiaim.com](mailto:pms@nipponindiaim.com)

In addition to the above, for complaints and grievances, investors can write to the portfolio manager on: [grievance.pms@nipponindiaim.com](mailto:grievance.pms@nipponindiaim.com).

Emails received on these email IDs, if any, are promptly replied to by the investor servicing team of the Portfolio Manager.

Complaints can also be addressed to the Principal Officer:

Mr. Gurbir Chopra,

Nippon Life India Asset Management Limited (Portfolio Management Services)

4th Floor, Tower A, Peninsula Business Park,

Ganapatrao Kadam Marg, Lower Parel (W),

Mumbai - 400 013. Tel No. +91 022 6808 7000

The Portfolio Manager also monitors the SCORES portal of SEBI and Online Dispute Resolution ('ODR') Portal on daily basis monitor and address complaints logged, if any. Replies to the complaints logged on the portal shall be responded to the Investors and the details updated on the portal.

Online Dispute Resolution ('ODR') Portal has been established to harnesses online conciliation and arbitration for resolution of disputes. The investors can access the ODR portal on <https://smartodr.in>. The link to ODR portal is also available on the website.

The Portfolio Manager will endeavor to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time. If the Investor remains dissatisfied with the remedies offered or the stand taken by the Portfolio Manager, the Investor and the Portfolio Manager shall abide by the following mechanisms.

Online Dispute Resolution ('ODR') Portal has been established to harnesses online conciliation and arbitration for resolution of disputes. The investors can access the ODR portal on <https://smartodr.in>. The link to ODR portal is also available on the website.

All disputes, differences, claims and questions whatsoever arising between the Client and the Portfolio Manager and/or their respective representatives shall be settled in accordance with and subject to the provisions of the Arbitration and Conciliation Act, 1996, or any statutory requirement, modification or re-enactment thereof. Such Arbitration proceedings shall be held at Mumbai or such other place as the Portfolio Manager thinks fit.

**(15) Details of investments in the securities of related parties of the Portfolio Manager**

| Sr. No. | Investment Approach if any | Name of the associate/ related Party | Investment amount (cost of investment) as on June 30, 2025 (INR in crores) | Value of investment as on June 30, 2025 (INR in crores) | Percentage of total AUM as on June 30, 2025 |
|---------|----------------------------|--------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------|---------------------------------------------|
| Nil     |                            |                                      |                                                                            |                                                         |                                             |

**(16) Details of the diversification policy of the portfolio manager r**

Please refer below points on Diversification Policy for our Investment Approaches:

| Sr. No | Investment Approaches                                                        | Particulars                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------|------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1      | Absolute Freedom Portfolio                                                   | <ul style="list-style-type: none"> <li>➤ The portfolio will have at least 8 stocks</li> <li>➤ No stock will have more than 15% weight in the portfolio</li> <li>➤ At any one time we will be diversified across at least 4 sectors</li> <li>➤ No business group will have more than 25% weight in the portfolio</li> </ul>                                                                                                                                                                                                          |
| 2      | Absolute Freedom Portfolio - 1                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3      | Concentrated Portfolio                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4      | Emerging India Portfolio                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5      | Emerging India Portfolio - 1                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 6      | Emerging Sector Opportunity Portfolio                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 7      | High Conviction Equity Portfolio                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 8      | High Conviction Equity Portfolio - 1                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9      | MAAP                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10     | Nippon India Royal Portfolio                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 11     | Pearl Portfolio                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12     | Tactical Asset Allocation Plan                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 13     | The Indian Economic Transformation Portfolio                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 14     | Absolute Freedom Portfolio - Systematic Rebalancing Option                   | <ul style="list-style-type: none"> <li>➤ The portfolio will have at least 8 stocks</li> <li>➤ No stock will have more than 15% weight in the portfolio</li> <li>➤ At any one time we will be diversified across at least 4 sectors</li> <li>➤ No business group will have more than 25% weight in the portfolio</li> <li>➤ The Portfolio shall have significant exposure to Liquid Fund / Overnight Fund / Mutual Fund / Fixed Deposits pending deployment in Equities as per the instruction received from the investor</li> </ul> |
| 15     | Emerging India Portfolio - Systematic Rebalancing Option                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 16     | High Conviction Equity Portfolio -Systematic Rebalancing Option              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 17     | The Indian Economic Transformation Portfolio - Systematic Rebalancing Option |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 18     | Blended- Debt Plus Hybrid Option                                             | <ul style="list-style-type: none"> <li>➤ The Portfolio shall invest in Equity Linked Non-Convertible Debentures</li> <li>➤ Portfolio Manager can invest upto 100% of the portfolio with single issuer of MLD subject to prior approval of the investor</li> </ul>                                                                                                                                                                                                                                                                   |
| 19     | Enhanced Equity Portfolio                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 20     | Signature Option                                                             | <ul style="list-style-type: none"> <li>➤ This Portfolio is highly flexible investment option wherein the investment can be upto 100% in a single security</li> <li>➤ The Portfolio will have complete flexibility to invest in equity or equity related instruments and debt or debt related instruments including units of Mutual Fund to create long term wealth for the Client.</li> </ul>                                                                                                                                       |

|    |                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 21 | Deep Value Portfolio              | As no fresh investment are expected in the above Portfolio as these are under wind up stage and hence diversification policy is not applicable for the same.                                                                                                                                                                                                                                                                                                                                                                                                       |
| 22 | Yield Maximiser Option            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 23 | High Grade Portfolio              | <ul style="list-style-type: none"> <li>➤ The Portfolio shall invest in Debt Instrument Including Mutual Fund Units.</li> <li>➤ Portfolio Manager can invest upto 100% of the portfolio with single issuer/Security.</li> </ul>                                                                                                                                                                                                                                                                                                                                     |
| 24 | High Grade Portfolio – Part II    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 25 | High Yield Portfolio              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 26 | REITs and INVITs Income Portfolio | <ul style="list-style-type: none"> <li>➤ Portfolio will invest in units of publicly listed and privately listed units of REITs and/or INVITs. The portfolio can have exposure to debt instruments including Non-Convertible Debentures (NCDs); units of arbitrage funds and other instruments including but not limited to units of mutual fund, fixed deposits, money market instruments or any other permissible securities under the applicable laws</li> <li>➤ Portfolio Manager can invest upto 100% of the portfolio with single issuer/Security.</li> </ul> |

The Portfolio manager will endeavour to adhere to the above policy in normal market conditions and might deviate from the above policy to safeguard the interest of investors. The policy would not be applicable at the Portfolio construction stage.

#### (17) General

The Portfolio Manager and the Client can mutually agree to be bound by specific terms through a written two-way agreement between themselves in addition to the standard Client Agreement for Portfolio Management Services.

**(18) Name and signature of at least two Directors of Portfolio Manager**

| SR. No. | Name of the Director | Signature |
|---------|----------------------|-----------|
| 1.      | Sundeeep Sikka       | Sd/-      |
| 2.      | Ashvin Parekh        | Sd/-      |

Date: July 31, 2025

Place: Mumbai



## Nippon Life India Asset Management Limited

### Client Profiling Form

Investor Code : \_\_\_\_\_

Investor Name : \_\_\_\_\_

Distributor Name : \_\_\_\_\_

Strictly Confidential. For Private Circulation Only, not for Public Distribution.

Portfolio Manager: Nippon Life India Asset Management Limited (NAM India)  
(Formerly known as Reliance Nippon Life Asset Management Limited)  
Corporate Office Address: 4th Floor, Tower A, Peninsula Business Park,  
Ganapatrao Kadam Marg, Lower Parel (W), Mumbai 400013.

Date of Application

Distributor Name \_\_\_\_\_

☐ New Investor ☐ Existing Investor \_\_\_\_\_ Client Code \_\_\_\_\_ APRN \_\_\_\_\_ EUIN \_\_\_\_\_

#### Applicant Details

Name of Sole/First applicant Mr./Ms./M/s.

Date of Birth

Aadhar No: \_\_\_\_\_

PAN: \_\_\_\_\_

PAN/Aadhar Linked ☐ Yes ☐ No

Date of Birth

Name of Parent/Guardian in case of Minor Mr./Mrs.

Guardian Aadhar: \_\_\_\_\_

Guardian PAN: \_\_\_\_\_

CKYC Number \_\_\_\_\_

Residential Status: ☐ Resident ☐ Non-Resident

KRA KYC Complaint: ☐ Yes ☐ No

Nationality: ☐ Indian ☐ Others \_\_\_\_\_

Regn no. \_\_\_\_\_ Net-worth in (Mandatory for Non-Individuals) \_\_\_\_\_ as on \_\_\_\_\_ (Not older than 1 year) Date of commencement of business \_\_\_\_\_ GST Number: \_\_\_\_\_ DIN (if whole time Director) ☐ Yes ☐ No DIN \_\_\_\_\_

If the following is additional applicable

☐ Civil Servant

☐ Politician

☐ Current/Formal MP/MLA/Head of State

☐ Political-Party Official

☐ Senior Executive of State owned corporation

☐ Forex Dealer

☐ PEP/Related to PEP

☐ Not Applicable

Income Details ☐ Upto Rs.25 Lakhs ☐ Rs.25 Lakhs to Rs.1 Crore ☐ Crore Rs.1 Crore to 5 Crore ☐ Rs.5 Crore & above

Occupation (Tick as applicable - For individuals only)

☐ Service  
Others \_\_\_\_\_

☐ Professional

☐ Business

☐ Housewife

☐ Retired

☐

Source of fund

☐ Salary

☐ Business Income

☐ Agriculture

☐ Investment Income

☐ Others \_\_\_\_\_

Mobile No. \_\_\_\_\_

Email Id: \_\_\_\_\_

☐ I hereby authorize NAM India to send important information and regular updates to me on WhatsApp & Email

Name of Second applicant Mr./Ms.

Date of Birth

Aadhar No: \_\_\_\_\_

PAN: \_\_\_\_\_

PAN/Aadhar Linked ☐ Yes ☐ No

KRA KYC Complaint: ☐ Yes ☐ No CKYC

Number \_\_\_\_\_

Residential Status: ☐ Resident ☐ Non-Resident

Occupation (Tick as applicable - For individuals only)

☐ Service

☐ Professional

☐ Business

☐ Housewife

☐ Retired

☐ Others \_\_\_\_\_

Source of fund

☐ Salary

☐ Business Income

☐ Agriculture

☐ Investment Income

☐ Others \_\_\_\_\_

If the following is additional applicable

☐ Civil Servant

☐ Politician

☐ Current/Formal MP/MLA/Head of State

☐ Political-Party Official

☐ Senior Executive of State owned corporation

☐ Forex Dealer

☐ PEP/Related to PEP

☐ Not Applicable

Income Details ☐ Upto Rs.25 Lakhs ☐ Rs.25 Lakhs to Rs.1 Crore ☐ Crore Rs.1 Crore to 5 Crore ☐ Rs.5 Crore & above

Mobile No. \_\_\_\_\_

Email Id: \_\_\_\_\_

☐ I hereby authorize NAM India to send important information and regular updates to me on WhatsApp & Email

Name of Third applicant Mr./Ms.

Date of Birth

Aadhar No: \_\_\_\_\_

PAN: \_\_\_\_\_

PAN/Aadhar Linked ☐ Yes ☐ No

Guardian Aadhar: \_\_\_\_\_

Guardian PAN: \_\_\_\_\_

CKYC Number \_\_\_\_\_

Residential Status: ☐ Resident ☐ Non-Resident

KRA KYC Complaint: ☐ Yes ☐ No

Nationality: ☐ Indian ☐ Others \_\_\_\_\_

If the following is additional applicable

☐ Civil Servant

☐ Politician

☐ Current/Formal MP/MLA/Head of State

☐ Political-Party Official

☐ Senior Executive of State owned corporation

☐ Forex Dealer

☐ PEP/Related to PEP

Income Details ☐ Upto Rs.25 Lakhs ☐ Rs.25 Lakhs to Rs.1 Crore ☐ Crore Rs.1 Crore to 5 Crore ☐ Rs.5 Crore & above

Occupation (Tick as applicable - For individuals only)

☐ Service

☐ Professional

☐ Business

☐ Housewife

☐ Retired

☐ Others \_\_\_\_\_

Source of fund

☐ Salary

☐ Business Income

☐ Agriculture

☐ Investment Income

☐ Others \_\_\_\_\_

Mobile No. \_\_\_\_\_

Email Id: \_\_\_\_\_

☐ I hereby authorize NAM India to send important information and regular updates to me on WhatsApp & Email

#### General Details

Permanent Address

City

State

Landmark

PIN

Address for Correspondence (Foreign address in respect of NR/FII Applicants)

Same as above

Proof of address submitted: \_\_\_\_\_

City

State/Country

Tel No. STD/ISD code \_\_\_\_\_ Office \_\_\_\_\_ Residence \_\_\_\_\_ Fax \_\_\_\_\_

**Mode of Operations** ☐ Single ☐ Joint ☐ Any one or Survivor

**For Non- Individual Clients only**

Legal Status:

☐ Partnership Firm ☐ FII ☐ Society ☐ AOP/BOI bank ☐ FI ☐ Trust ☐ Charitable Organisation  
☐ Company/Body Corporate ☐ HUF ☐ Government Body ☐ NGO ☐ Defense Establishment ☐ Other \_\_\_\_\_

**Aadhar Copy of Authorised Signatory/officers/employees/directors/managers/**

**person holding an attorney on behalf of the company/Partnership firm/Trust** ☐ Yes ☐ No

**Date of Incorporation**

**Listed on Stock Exchange** ☐ Yes ☐ No

**Networth (last 3 years) (Mandatory)**

First Year ☐ Upto Rs.25 lakhs ☐ Rs.25 Lakh to Rs.1 crore ☐ Rs.1 Crore to 5 Crore ☐ Rs.5 Crore & Above  
Second Year ☐ Upto Rs.25 lakhs ☐ Rs.25 Lakh to Rs.1 crore ☐ Rs.1 Crore to 5 Crore ☐ Rs.5 Crore & Above  
Third Year ☐ Upto Rs.25 lakhs ☐ Rs.25 Lakh to Rs.1 crore ☐ Rs.1 Crore to 5 Crore ☐ Rs.5 Crore & Above

**Applicant Details**

Initial Investment Amount

By cheque (Rs)

By Securities Worth (Rs)

Cheque / Draft No.

Bank Drawn on

Date

**Bank Account Details:**

A/c No.

IFSC Code

Bank Name &  
Address

**A/c Type:** ☐ Saving ☐ Current ☐ Other \_\_\_\_\_

**Investment Details**

**Overall Investment Goal (Please specify):**

☐ Capital Appreciation

☐ Capital appreciation & Regular Income

☐ Regular Income

**Risk tolerance (please specify):**

☐ Low risk

☐ Medium risk

☐ High risk

**Time Horizon for your Investments (please specify)\*:**

☐ 7 years

☐ 8 years

☐ 9 years

☐ 10 years

Investment experience regarding securities \_\_\_\_\_ years

I wish to opt for Systematic Withdrawal Option (Please specify):

☐ Yes

☐ No Frequency (if yes) \_\_\_\_\_

**Investment Options (Please specify) :**

Investment Approach \_\_\_\_\_ Amount \_\_\_\_\_

Investment Approach \_\_\_\_\_ Amount \_\_\_\_\_

Investment Approach \_\_\_\_\_ Amount \_\_\_\_\_

Total \_\_\_\_\_

For details of investment objective under various Investment Approaches, provision for withdraw etc. please refer to the Disclosure Document, the Portfolio Management Agreement and the Product Brochures.

**Details investment objectives of the client:**

☐ Equity: Nature of equities in which investments are desired, may be indicated

☐ Balanced: Percentage of debt/equity

☐ Debt: Government Bonds, Corporate debt etc.

☐ Mutual Funds

☐ Others

\*The period of portfolio investments shall be co-terminus with the term of the agreement as provided under clause 27 of the client agreement.

**Nomination**

☐ I wish to Nominate

☐ I do not wish to Nominate

| Nomination can be made upto 3            | Details of 1 <sup>st</sup> Nominee | Details of 2 <sup>nd</sup> Nominee | Details of 3 <sup>rd</sup> Nominee |
|------------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| Name of the Nominee(s) (Mr./Ms.          |                                    |                                    |                                    |
| Date of Birth                            |                                    |                                    |                                    |
| Share of each Nominee                    |                                    |                                    |                                    |
| Relationship with the Applicant (If Any) |                                    |                                    |                                    |
| Address of Nominee(s):                   |                                    |                                    |                                    |
| Mobile/Telephone No. of nominee(s)       |                                    |                                    |                                    |
| Email ID of nominee(s)                   |                                    |                                    |                                    |
| Nominee Identification details           |                                    |                                    |                                    |

**Below fields should be filled only if nominee(s) is a minor.**

|                                                             |  |  |  |
|-------------------------------------------------------------|--|--|--|
| Date of Birth:<br>{In case of minor nominee(s)}             |  |  |  |
| Name of Guardian (Mr./Ms.)<br>{In case of minor nominee(s)} |  |  |  |
| Address of Guardian(s):                                     |  |  |  |
| Mobile/Telephone No. of Guardian(s)                         |  |  |  |
| Email ID of Guardian(s)                                     |  |  |  |
| Guardian Identification details                             |  |  |  |

**Applicant's Latest Photograph to be Affixed**

Sole/ 1st applicant & Guardian incase of minor

PLEASE AFFIX A  
RECENT PASSPORT  
SIZE PHOTOGRAPH  
& SIGN ACROSS THE  
PHOTO

(First Holder)

PLEASE AFFIX A  
RECENT PASSPORT  
SIZE PHOTOGRAPH  
& SIGN ACROSS THE  
PHOTO

(Second Holder)

PLEASE AFFIX A  
RECENT PASSPORT  
SIZE PHOTOGRAPH  
& SIGN ACROSS THE  
PHOTO

(Third Holder)

**Declaration**

I/ We have read and understood the terms and conditions of the Portfolio Management Services Agreement, the Disclosure Document and the product brochure and undertake and agree to abide by and be bound with the provision of the same. All the information and particulars given by myself/us are true and correct in all respect. I /We agree to promptly inform the Portfolio Manager of any change in such information(s). I/We confirm that the amount invested by me/ us is through legitimate sources/ channel only and does not involve and is not designed for the purpose of any contravention or evasion of the provision of any Act, Rules, Regulations, Notifications or Directions of Income Tax Act, Prevention of Money Laundering act, Anti Corruption Act or any other applicable laws, as may be in force from time to time.

**Applicable to NRIs Only**

I/ We confirm that I am/ we are Non-Resident Indian(s) by me/us. I/we hereby confirm that the funds for investment have been remitted from abroad through approved banking channels or from in my/our Non-Resident External/ Non-Resident/ ordinary account/ FCNR Account.

|                                            |                                      |                                      |
|--------------------------------------------|--------------------------------------|--------------------------------------|
| <b>(Sign)</b> _____                        | <b>(Sign)</b> _____                  | <b>(Sign)</b> _____                  |
| Sole/ 1st applicant / Authorised Signatory | 2nd applicant / Authorised Signatory | 3rd applicant / Authorised Signatory |

Place: \_\_\_\_\_ Date: \_\_\_\_\_

**Client consent for Related Parties Transaction**  
(Please submit these details separately for all holders)

1. This document is for obtaining the consent/dissent for investment by Portfolio Manager in its associates/related parties.
2. As per SEBI (Portfolio Managers) Regulations, 2020, the limits applicable for investment in the securities of associates/related parties of Portfolio Manager are as under:

| Security                          | Limit for investment in single associate/related party (as percentage of client's AUM) | Limit for investment across multiple associates/related parties (as percentage of client's AUM) |
|-----------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Equity                            | 15%                                                                                    | 25%                                                                                             |
| Debt and hybrid securities        | 15%                                                                                    | 25%                                                                                             |
| Equity + Debt + Hybrid securities | 30%                                                                                    |                                                                                                 |

3. The client may choose not to invest in the securities of associates/related parties of the Portfolio Manager. Further, the client may choose a limit lower than the limits prescribed at para 2 above.
4. The risks and conflict of interest associated with investment by the Portfolio Manager in the securities of its associates/related parties are as under:

**Risks:**

**Conflict of Interest:**

5. In case the client wants the Portfolio Manager to invest in the securities issued by associated/related parties of Portfolio Manager and provides the consent for the same, the investments shall be subject to the following limits:

| Security                          | Limit for investment in single associate/related party (as percentage of client's AUM) | Limit for investment across multiple associates/related parties (as percentage of client's AUM) |
|-----------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| Equity                            |                                                                                        |                                                                                                 |
| Debt and hybrid securities        |                                                                                        |                                                                                                 |
| Equity + Debt + Hybrid securities |                                                                                        |                                                                                                 |

6. In case of passive breach of investment limits (i.e., occurrence of instances not arising out of omission and/or commission of Portfolio Manager) as decided at para 5 above, a rebalancing of the portfolio is required to be completed by Portfolio Managers within a period of 90 days from the date of such breach. However, the client may give an informed, prior positive consent to the Portfolio Manager for a waiver from the requirement of rebalancing of the portfolio to rectify the passive breach of investment limits. The client may choose not to provide any waiver.
7. Please indicate consent or dissent as under:

**Limits on investment**

- ☐ **Consent:** Portfolio Manager can invest in the securities of its associates/related parties within the limits agreed upon at para 5 above.
- ☐ **Dissent:** Portfolio Manager cannot invest in the securities of its associates/related parties.

**Waiver from rebalancing of portfolio on passive breach of investment limits**

- ☐ **Consent:** Portfolio Manager need not rebalance the portfolio on passive breach of investment limits.
- ☐ **Dissent:** Portfolio Manager should rebalance the portfolio on passive breach of investment limits.

-----  
**Signature of the client**

## Acknowledgment

To,

Nippon Life India AIF Management Limited  
Portfolio Management Services  
Address: 4th Floor, Tower A, Peninsula Business Park,  
Ganpatrao Kadam Marg, Lower Parel,  
Mumbai- 400013

Dear Sir,

Subject : Acknowledgment for receipt of PMS Disclosure document

I / We \_\_\_\_\_  
hereby acknowledge receipt of the PMS Disclosure Document issued by Nippon Life India Asset Management Limited  
(for, along with a certificate in Form C (part of the Disclosure Document)), prior to entering into the PMS agreement with  
Nippon Life India Asset Management Limited.

Regards,

Sign Here 

-----  
**Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory**

Sign Here 

-----  
**2<sup>nd</sup> Applicant/  
Authorised Signatory**

Sign Here 

-----  
**3<sup>rd</sup> Applicant/  
Authorised Signatory**

Date:\_\_\_\_\_

Place:\_\_\_\_\_

## Illustration to explain the methodology for charging of fees and charges

Please note that the sample portfolio and the calculations given below are only illustrative. They may be used primarily to understand how the fees and charges are levied on the portfolio. The actual fees and charges applicable to each client's portfolio may vary from the illustration.

The assumptions for the illustration are as follows:

1. Size of portfolio: ₹ 1 Crore\*
2. Period: 1 year.
3. Brokerage, Securities transaction tax etc. charges are assumed to be at 10 basis points for the year. Other expenses, if any are assumed to be charged at 50 basis points for the year. However, in actual practice charges are a function of the volume of purchase/ sale trades and therefore may differ from strategy, period to period etc.
4. Management fee 1.00% p.a. shown below as charged at the end of the year, in actual practice may be charged monthly/quarterly, depending on fee schedule signed by the investor.

### Scenario 1: Performance fees applicable: Gain of 20% at the end of 12 Months/ Financial Year end

| Nature of Fees                                                             | Amt `      | Amt `      |
|----------------------------------------------------------------------------|------------|------------|
| Capital Contribution*                                                      | 10,000,000 |            |
| Less: Any other fees (please enumerate)                                    | -          |            |
| Assets under Management/ Amount invested                                   | 10,000,000 |            |
| Add: Profits on investment during the year @20% on assets under management | 20,00,000  |            |
| Gross Value of the portfolio at the end of the year                        |            | 120,00,000 |
| (A) Average Assets Under Management                                        |            | 11,000,000 |
| Less: Equity Brokerage, Securities transaction tax : 0.10% p.a. on (A)     | 11,000     |            |
| Less: Management Fees: 1.00% P.a. on (A)                                   | 110,000    |            |
| Less: Other Expenses @ 0.50% p.a. on (A)                                   | 55,000     |            |
| Total Charges during the year                                              |            | 176,00, 0  |
| Net value of the portfolio at the end of the year                          |            | 11,824,000 |
| % change over capital contributed                                          |            | 18.24%     |

### Scenario 2: Loss of 20% at the end of 12 months/ financial year end

| Nature of Fees                                                             | Amt `      | Amt `     |
|----------------------------------------------------------------------------|------------|-----------|
| Capital Contribution*                                                      | 10,000,000 |           |
| Less: Any other fees (please enumerate)                                    | -          |           |
| Assets under Management/ Amount invested                                   | 10,000,000 |           |
| Less: Losses on investment during the year @20% on assets under management | 20,00,000  |           |
| Gross Value of the portfolio at the end of the year                        |            | 80,00,000 |
| (A) Average Assets Under Management                                        |            | 90,00,000 |
| Less: Equity Brokerage, Securities transaction tax : 0.10% p.a. on (A)     | 9,000      |           |
| Less: Management Fees: 1.00% P.a. on (A)                                   | 90,000     |           |
| Less: Other Expenses @ 0.50% p.a. on (A)                                   | 45,000     |           |
| Total Charges during the year                                              |            | 14,4000   |
| Net value of the portfolio at the end of the year                          |            | 78,56,000 |
| % change over capital contributed                                          |            | -21.44%   |

### Scenario 3: No profit No loss at the end of 12 months/ financial year end

| Nature of Fees                          | Amt `      | Amt ` |
|-----------------------------------------|------------|-------|
| Capital Contribution*                   | 10,000,000 |       |
| Less: Any other fees (please enumerate) | -          |       |

|                                                                             |            |            |
|-----------------------------------------------------------------------------|------------|------------|
| Assets under Management/ Amount invested                                    | 10,000,000 |            |
| No Profits No loss on investment during the year on assets under management | -          |            |
| Gross Value of the portfolio at the end of the year                         |            | 10,000,000 |
| (A) Average Assets Under Management                                         |            | 10,000,000 |
| Less: Equity Brokerage, Securities transaction tax : 0.10% p.a. on (A)      | 10,000     |            |
| Less: Management Fees: 1.00% P.a. on (A)                                    | 1,00,000   |            |
| Less: Other Expenses @ 0.50% p.a. on (A)                                    | 50,000     |            |
| Total Charges during the year                                               |            | 1,60,000   |
| Net value of the portfolio at the end of the year                           |            | 98,40,000  |
| % change over capital contributed                                           |            | -1.60%     |

\*For illustration purpose only.

Notes:

1. In the illustration, Management fee is assumed to be charged annually. However, the Portfolio Manager can charge fee at any frequency i.e. Daily, Monthly, Quarterly, Semi-annually, Annually or at any other frequency as defined in the PMS agreement and as permitted under SEBI regulations.
2. Portfolio Manager can charge Management Fee on Average portfolio value for the management fee period or the closing portfolio value or in any other manner as defined in the PMS agreement.
3. Returns are assumed to be generated linearly through the year.
4. Other Expenses includes Account Opening charges, stamp duty / Audit Fee/ Bank charges / Fund Accounting charges / Custody Fee / demat charges or other miscellaneous expense
5. Brokerage and transaction cost for the illustration purpose is charged on the Average AUM. However, Brokerage and Transaction cost are charged on basis the actuals trades.
6. All Fees and charges are subject to GST.
7. This is only a generic illustration, each portfolio manager can modify the illustration as per the terms and condition of their PMS agreement.
8. Portfolio Managers are advised to also refer to the illustrations provided in Annexure 4A of Master Circular for Portfolio Managers dated June 07, 2024.

## Fees Schedule

Investment Approach

1. \_\_\_\_\_

2. \_\_\_\_\_

The exact basis of charge relating to services rendered is a follow:

| Sr No. | Particulars                                                                                                                                                                                                              | Basis of calculations                                                                                                                                                                                                                                                                                                                                                                                                                        | Frequency of charge                                    |
|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| 1.     | Management Fees *                                                                                                                                                                                                        | _____% p.a. of Daily Average portfolio value                                                                                                                                                                                                                                                                                                                                                                                                 | Monthly in arrears                                     |
| 2.     | Equity Brokerage                                                                                                                                                                                                         | 25%                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                        |
| 3.     | Exit Fees applicable on full /partial redemption on investors request*                                                                                                                                                   | <ul style="list-style-type: none"> <li>If redeemed before or on completion of 1 year from the date of inflow: ____% of redemption amount.</li> <li>If redeemed after completion of 1 year but before or on completion of 2 years from the date of inflow: ____% of redemption amount.</li> <li>If redeemed after completion of 2 year but before or on completion of 3 years from the date of inflow: ____% of redemption amount.</li> </ul> | On redemption amount at the time of redemption pay-out |
| 4.     | Operating Expenses including but not limited to Custodian / Depository fees, Registrar & Transfer agent fee and charges, Professional charges, Securities lending & borrowing charges and Account activation expenses.*# | <ul style="list-style-type: none"> <li>At Actuals upto the limit as may be specified by regulations from time to time.</li> </ul>                                                                                                                                                                                                                                                                                                            | Monthly/ Incidental                                    |
| 5.     | Performance Fee subject to High Water Mark*                                                                                                                                                                              | 0% upto ____%<br>____% above ____%                                                                                                                                                                                                                                                                                                                                                                                                           | Quarterly / Inception anniversary / Financial year end |
| 6.     | Any other charges, please specify*                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                        |

\*Plus, applicable GST and other statutory levies which may differ from time to time as per changes in Tax Laws.

#For further details please refer to PMS Agreement

I hereby declare that I have read and understand the fees structure as above. (to be written by investor)

\_\_\_\_\_

Sign Here 

Sign Here 

Sign Here 

\_\_\_\_\_  
Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory

\_\_\_\_\_  
2<sup>nd</sup> Applicant/  
Authorised Signatory

\_\_\_\_\_  
3<sup>rd</sup> Applicant/  
Authorised Signatory

## Fees Schedule

Investment Approach

1. \_\_\_\_\_
2. \_\_\_\_\_

The exact basis of charge relating to services rendered is a follow:

| Sr No. | Particulars                                                                                                                                                                                                              | Basis of calculations                                                                                                                                                                                                                                                                                                                                                                                                                              | Frequency of charge                                    |
|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| 1.     | Management Fees *                                                                                                                                                                                                        | _____% p.a. of Daily Average portfolio value                                                                                                                                                                                                                                                                                                                                                                                                       | Monthly in arrears                                     |
| 2.     | Equity Brokerage                                                                                                                                                                                                         | 25%                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                        |
| 3.     | Exit Fees applicable on full /partial redemption on investors request*                                                                                                                                                   | <ul style="list-style-type: none"> <li>• If redeemed before or on completion of 1 year from the date of inflow: ____% of redemption amount.</li> <li>• If redeemed after completion of 1 year but before or on completion of 2 years from the date of inflow: ____% of redemption amount.</li> <li>• If redeemed after completion of 2 year but before or on completion of 3 years from the date of inflow: ____% of redemption amount.</li> </ul> | On redemption amount at the time of redemption payout  |
| 4.     | Operating Expenses including but not limited to Custodian / Depository fees, Registrar & Transfer agent fee and charges, Professional charges, Securities lending & borrowing charges and Account activation expenses.*# | <ul style="list-style-type: none"> <li>• At Actuals upto the limit as may be specified by regulations from time to time.</li> </ul>                                                                                                                                                                                                                                                                                                                | Monthly/ Incidental                                    |
| 5.     | Performance Fee subject to High Water Mark*                                                                                                                                                                              | 0% upto ____%<br>____% above ____%                                                                                                                                                                                                                                                                                                                                                                                                                 | Quarterly / Inception anniversary / Financial year end |
| 6.     | Any other charges, please specify*                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                        |

\*Plus, applicable GST and other statutory levies which may differ from time to time as per changes in Tax Laws.

#For further details please refer to PMS Agreement

I hereby declare that I have read and understand the fees structure as above. (to be written by investor)

\_\_\_\_\_

Sign Here 

Sign Here 

Sign Here 

\_\_\_\_\_  
Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory

\_\_\_\_\_  
2<sup>nd</sup> Applicant/  
Authorised Signatory

\_\_\_\_\_  
3<sup>rd</sup> Applicant/  
Authorised Signatory

## Transaction Form

Date: \_\_/\_\_/20\_\_

To,

Fund Manager, Nippon India PMS  
Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Client Code : \_\_\_\_\_ Client Name : \_\_\_\_\_

Would request you to perform following action from my PMS Investment with you.

☐ Investment in equity ☐ Switch ☐ Partial Redemption ☐ Full Redemption

Please redeem Rs. from liquid funds in my portfolio & make it available to fund manager for investment in equity shares as per product structure.

Please switch my investments From (Existing Scheme) \_\_\_\_\_  
to (New Scheme) \_\_\_\_\_

In case of Part/Full Redemption, Proceed by using following action

☐ By way of Stock ☐ Sale By way of Stock transfer ☐ From Liquid MF/Cash & Equivalent in portfolio\*

In Case of Partial Redemption, Amount: Rs. \_\_\_\_\_

In Case of Partial / full Redemption by shares transfer – Please Provide CML copy / Personal Demat account statement.  
Partial Share transfer requires list of stocks to be transferred as separate annexure.

Reason for Redemption \_\_\_\_\_

Request you to Credit the Proceeds in my bank account registered at your end.  
(Kindly attach a self attested copy of a cheque or bank Statement for verification purpose)

If payout is needed in bank account other than registered bank account, please provide change of bank mandate request. Redemption will be processed after recording new bank mandate in the system.

Thanking you

Sign Here 

\_\_\_\_\_  
**Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory**

Sign Here 

\_\_\_\_\_  
**2<sup>nd</sup> Applicant/  
Authorised Signatory**

Sign Here 

\_\_\_\_\_  
**3<sup>rd</sup> Applicant/  
Authorised Signatory**

Note:

Applicable Exit load will be charged as per fee structure.

\*Includes investments in Bank Fixed Deposit, Liquid Fund, Overnight Fund or Short Term Fixed Income instruments

## Declaration

To,

Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Subject: Disclosure of interest in corporate bodies (listed companies only)

Dear Sir,

I/We, (of \_\_\_\_\_  
Director. Trustee/ Authorised Officials) of \_\_\_\_\_

Having entered into portfolio management services agreement with Nippon Life India Asset Management Limited the Portfolio Manager, hereby give notice that I we may be considered as holding interest in various corporate bodies which enables me/ us to obtain unpublished price sensitive information of the body corporate in the following entities:

| 1st /2nd/<br>3rd Appli-<br>cant | Name of the company | Nature if<br>Interest | Designation<br>(if applicable) | No. of shares held<br>in the company (if<br>applicable) | % of capital<br>paid-up |
|---------------------------------|---------------------|-----------------------|--------------------------------|---------------------------------------------------------|-------------------------|
|                                 |                     |                       |                                |                                                         |                         |
|                                 |                     |                       |                                |                                                         |                         |
|                                 |                     |                       |                                |                                                         |                         |
|                                 |                     |                       |                                |                                                         |                         |
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|                                 |                     |                       |                                |                                                         |                         |
|                                 |                     |                       |                                |                                                         |                         |

Further, I undertake to intimate Nippon Life India Asset Management Limited. Portfolio Manager in case of any modification to the above.

Sign Here 

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**Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory**

Sign Here 

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**2<sup>nd</sup> Applicant/  
Authorised Signatory**

Sign Here 

-----  
**3<sup>rd</sup> Applicant/  
Authorised Signatory**

Note: Strike out the entire declaration form and sign, if note applicable

## Transfer of Shares

To,

Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Subject: Transfer of Shares from my/our demat account to the demat account of Nippon Life India Asset Management Limited A/c PMS.

Dear Sir,

Following are the details of my demat account and the shares held therein for the purpose of transfer of shares to Nippon Life India Asset Management Limited - A/C PMS demat account.

Name of the Investor's DP: \_\_\_\_\_ Client ID Number : \_\_\_\_\_  
DP ID Number : \_\_\_\_\_ Execution Date : \_\_\_\_\_

List of Securities to be transferred:

| Name of the Security | ISIN No. | Quantity | Original Date of Acquisition | Original Cost |
|----------------------|----------|----------|------------------------------|---------------|
|                      |          |          |                              |               |
|                      |          |          |                              |               |
|                      |          |          |                              |               |
|                      |          |          |                              |               |
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|                      |          |          |                              |               |
|                      |          |          |                              |               |
|                      |          |          |                              |               |
|                      |          |          |                              |               |

Thank You,  
Yours Faithfully

Sign Here 

Sign Here 

Sign Here 

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**Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory**

-----  
**2<sup>nd</sup> Applicant/  
Authorised Signatory**

-----  
**3<sup>rd</sup> Applicant/  
Authorised Signatory**

Note: Strike out the entire declaration form and sign, if not applicable

### **Declaration**

Applicable only if TAN Number is not provided on the form

To,

Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Dear Sir,

We refer to the agreement executed on \_\_\_\_\_ with Nippon Life India Asset Management Limited (NAM India)- PMS for availing portfolio management service.

We understand that there is a Liability of payment of TDS on Management fees charges to client for the services provided by NAM India.

Presently, TDS has been paid by NAM India on client's behalf provided the investor does submit Tax Deduction Account Number (TAN) to NAM India.

In this context, we hereby instruct you to not deduct any tax at source (TDS) for the management fees paid to Nippon Life India Asset Management Limited for availing Portfolio Management Services.

Regards,

\_\_\_\_\_  
(Name of the Client)

Note: Strike out the entire declaration form and sign, if note applicable

## Investor Declaration

Date: \_\_/\_\_/20\_\_

To,  
Fund Manager, Nippon India PMS  
Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Dear Sir,

I/We confirm that my distributor has informed me/us about the fees or commissions to be earned by it for onboarding my/our investment(s) in the following investment approach/approaches.

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

I/We confirm that my distributor has provided me/us full and latest information about investment approaches and has also highlighted the assumptions made in performance calculations, risk assessment, performance projections, if any, for such investment approach/approaches.

I/We confirm that my distributor has informed me/us about the risks and level of control over the administration of portfolio associated with Discretionary PMS offered.

Thanking you,

Sign Here 

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**Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory**

Sign Here 

-----  
**2<sup>nd</sup> Applicant/  
Authorised Signatory**

Sign Here 

-----  
**3<sup>rd</sup> Applicant/  
Authorised Signatory**

## Access of Reports

Date: \_\_/\_\_/20\_\_

To,

Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Subject: Access of reports of my investments

Dear Sir,

Kindly provide the access of the following reports to my investments advisor whose particulars are also mentioned below:

Mode of Access

Email Report

Portfolio Performance Report

Holding Report, Trades Transaction Report & Statement of Profit & Loss and Balance.

Name of Investment Advisor:\_\_\_\_\_

Email of the Investment Advisor:\_\_\_\_\_

## Email Requests during Force Majeure situations

In case of force majeure/ exceptional/ pandemic kind of event, please accept transactions & other requests from below email id registered with you\_\_\_\_\_

I agree to provide physical instructions once the situation normalises. The right to decide the exceptional situation & accepting the transactions lies with portfolio manager. I / We understand and acknowledge that there are inherent risks involved in sending the instructions/communications/ documents to you via emails and hereby agree and confirm that all risks shall be fully borne by me / us and I / we assume full responsibility for the same, and I/ we will not hold the portfolio manager liable for any losses or damages including legal fees arising upon your performing or your non performing or any delay /default in performing any act , wholly or in part in accordance with the instructions so received which could be a result of any miscommunication, or technological error beyond the control of the portfolio manager considering the mode in which the same was conveyed.

Sign Here 

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**Sole/ 1<sup>st</sup> Applicant/  
Authorised Signatory**

Sign Here 

-----  
**2<sup>nd</sup> Applicant/  
Authorised Signatory**

Sign Here 

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**3<sup>rd</sup> Applicant/  
Authorised Signatory**

### Risk Profiler

Investors Name: \_\_\_\_\_

Occupation: \_\_\_\_\_

|    |                                                                                                                                                            |                                                                                                                                                  |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Please mention your age (in years)                                                                                                                         | <input type="checkbox"/> 18-35 <input type="checkbox"/> 35-50 <input type="checkbox"/> 50-60 <input type="checkbox"/> above 60                   |
| 2  | What would you consider your risk appetite to be when it comes to investing?                                                                               | <input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low                                                       |
| 3  | Expected years to retirement                                                                                                                               | <input type="checkbox"/> 0-5 <input type="checkbox"/> 5-10 <input type="checkbox"/> 11-15 <input type="checkbox"/> 15+                           |
| 4  | What percentage of your network do you intend to invest                                                                                                    | <input type="checkbox"/> less than 50% <input type="checkbox"/> 50%-60%                                                                          |
| 5  | Are you dependent on income from your investment for living expenses?                                                                                      | <input type="checkbox"/> Yes <input type="checkbox"/> No                                                                                         |
| 6  | What is the time horizon for investment? How long you can stay invested before the need to access it?                                                      | <input type="checkbox"/> 1-3 yrs <input type="checkbox"/> 3-5 yrs <input type="checkbox"/> above 5 yrs                                           |
| 7  | What is the objective of your investment decision? Rank in order of priority                                                                               | <input type="checkbox"/> Capital preservation <input type="checkbox"/> Regular Income<br><input type="checkbox"/> Long Term Capital Appreciation |
| 8  | Are you alright with investment in secured / unsecured unrated/ high yielding securities which could be classified as high risk/ high return investments ? | <input type="checkbox"/> Yes <input type="checkbox"/> No                                                                                         |
| 9  | Are you alright with investing in Interest rate futures/ interest rate swaps which may be used to take fresh positions or to hedge the existing exposure   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                                                                         |
| 10 | As a percentage of your network, what would be your current borrowings?                                                                                    | <input type="checkbox"/> Nil <input type="checkbox"/> upto 10% <input type="checkbox"/> 10%-20% <input type="checkbox"/> >20%                    |
| 11 | Appetite to bear temporary loss / fluctuations in the portfolio to meet the desired investment objective                                                   | <input type="checkbox"/> Nil/Negligible <input type="checkbox"/> Mild<br><input type="checkbox"/> Moderate <input type="checkbox"/> Significant  |

NAM India – PMS is required by law to understand your risk profile, financial situation, and particular needs. A key consideration in understanding product suitability for investment entails understanding client's tolerance to risk. We thank you for your valuable time and efforts in helping us to better judge your requirements from the perspective of our PMS offering.

I have understood the above questionnaire and all the answers given by me for each of the questions are true to the best of my knowledge and belief.

Investor Name: \_\_\_\_\_

Investor Signature: \_\_\_\_\_

Conclusion of investor risk profiling

Ok to Invest in Equities   ☐ Yes   ☐ No

Employee name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Note: If the prospective investor is above 60 years old then kindly provide age declaration. (SPECIMEN MENTIONED OVERLEAF)

## Age Declaration

To,

Nippon Life India Asset Management Limited  
4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg,  
Lower Parel (W), Mumbai 400013.

Sub :- Regarding equity investment in Nippon India Portfolio Management

Sir/Madam,

I wish to make investments in \_\_\_\_\_ portfolio. I understand that this portfolio will invests in equity and equity related securities and the investments are subjected to market risk and such investments can also generate potential negative returns.

My age is \_\_\_\_\_ years and I have sufficient net worth to undertake such investments in equities. I confirm that I am not dependent on the returns of the investment for meeting my living and other expenses.

The current investment of Rs \_\_\_\_\_ is not greater than 35% of my net worth.

Thanking you

Investor Name: \_\_\_\_\_

Signature: \_\_\_\_\_ (Sign)

## Annexure 4

### Most Important Terms and Conditions (MITC) for the clients of the Portfolio Managers

|                                                                                 |                                |
|---------------------------------------------------------------------------------|--------------------------------|
| Name of the Portfolio Manager & SEBI Registration Number                        | ISIN No.                       |
| Contact details of Portfolio Manager                                            |                                |
| Name of the Client (Details of all the holders)                                 |                                |
| Distributor Name                                                                |                                |
| Service Opted by the Client                                                     |                                |
| Amount Invested                                                                 |                                |
| Date of PMS Agreement                                                           |                                |
| Risk Tolerance of the Client                                                    | Low/Medium/High                |
| Strategy                                                                        | Equity/Debt/Hybrid/Multi Asset |
| Investment Approach                                                             |                                |
| Benchmark for the Investment Approach                                           |                                |
| Investment tenure/horizon                                                       |                                |
| Related party investments                                                       | Allowed/Not allowed            |
| Fees & Charges including exit load, if any levied by the Portfolio Manager      |                                |
| Details of bank and demat accounts where client's funds and securities are kept |                                |
| Tenure of the PMS agreement                                                     |                                |
| Disclosure of interest in various corporate bodies by Client                    | Yes/No                         |
| Nominee along with share of each nominee in PMS, Demat and Bank accounts        |                                |
| Name of Guardian, in case the Nominee is a minor                                |                                |
| Name and contact details of Investor Relations Officer                          |                                |
| Other important T&Cs                                                            |                                |

The MITC and all information provided here above are applicable to you. The MITC is in addition to and are to be read in conjunction with the PMS-Client Agreement executed between you and the Portfolio Manager.

Sign Here 

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**Sole/ 1<sup>st</sup> Applicant/  
 Authorised Signatory**

Sign Here 

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**2<sup>nd</sup> Applicant/  
 Authorised Signatory**

Sign Here 

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**3<sup>rd</sup> Applicant/  
 Authorised Signatory**

## Check list for compliance with PMS KYC & AML policy

Client Name: \_\_\_\_\_  
Country : \_\_\_\_\_  
Checked in Worldcheck: \_\_\_\_\_  
Worldcheck proof retained: \_\_\_\_\_

Classification as High Risk

Politically exposed persons (PEP). : \_\_\_\_\_

Politically exposed persons are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state-owned corporations, important political party officials, etc

Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, where there is unusual banking secrecy, Countries active in narcotics production, Countries where corruption (as per Transparency International Corruption Perception Index) is highly prevalent, Countries against which government sanctions are applied, Countries reputed to be any of the following – Havens / sponsors of international terrorism, offshore financial centers, tax havens, countries where fraud is highly prevalent.

Clients with dubious reputation as per public information available etc

Designated Individuals/Entities as per the consolidated List maintained and established by the 1267 committee of the United Nations Security Council and any additions or deletions to it. This List includes name of the individual and/or entities which are subject to various measures such as freezing of assets/accounts, denial of financial services etc. as approved by Security Council Committee

If the client has an address that is not in an FATF Member /Observer country then treat that client as a high risk client - <http://www.fatf-gafi.org/countries/> any country that does not have an 'm' or an 'o' in the FATF category: India is an FATF member country

Trust, Charities, NGOs and organizations receiving donations.

Client classified as High Risk as per the above?

Approval of Head PMS – NAM India obtained if client is classified as High Risk:

Additional Due Diligence on High Risk clients:

- a. If it is a trust,
  - who the beneficiaries (>15% of benefits),
  - KYC and Worldcheck done for the beneficiaries?
  - KYC on Trustees and key controllers done?
  - Declaration of the sources of income of the Trust received?
- b. If it is an NGO,
  - what they do and how they fund themselves ( a self-declaration is ok);
  - if they have any society registration documents that define their charter;
  - whether they have BOG exemption (If an NGO does not have BOG approval, this makes them more risky, since audits etc. are not mandatory. )
  - whether they receive foreign donations and if so,
  - whether they have FCRA approval
- c. For other High Risk clients,
  - sources of investible funds received?
  - If this does not make sense, then reject the client
  - suspicious transactions of the nature as under observed if any:
    - a) give rise to a reasonable ground of suspicion that it may involve the proceeds of crime; or
    - b) appears to be made in circumstances of unusual or unjustified complexity ; or
    - c) appears to have no economic rationale or bonafide purpose

Some examples:

- a. If transaction sizes do not match with the customer's known sources of income
- b. If the customer wants to do transactions where investments will be made in the name of non-dependent third parties

- c. Where other people are paying funds on behalf of the customer
- d. Where the customer keeps taking out money and then invests again (there is exceptional and unusual churn, which will actually hurt his investments)

Report Suspicious transactions:

Inform Head PMS – NAM India:\_\_\_\_\_

Provide details to Compliance team who will take the final call on whether the transactions needs to be reported in STR to FIU-IND etc:\_\_\_\_\_

Prepared by:\_\_\_\_\_

Checked by:\_\_\_\_\_

**FATCA DECLARATION FORM FOR INDIVIDUAL APPLICANTS/INVESTORS**

Annexure to the Account opening form for Individual (Requirements under section 285BA of the Act).

**Section 1: Identification of Accountholder**

| APPLICANTS                 | First Applicant                                        | Second Applicant                                       |
|----------------------------|--------------------------------------------------------|--------------------------------------------------------|
| Name of the Account holder |                                                        |                                                        |
| Place of Birth             |                                                        |                                                        |
| Country of Birth           | India      US      Other                               | India      US      Other                               |
|                            | Others (please state)                                  | Others (please state)                                  |
| Nationality                | Country 1 (Name of country and Tax 10 No. to be given) | Country 1 (Name of country and Tax 10 No. to be given) |
|                            | Country 2                                              | Country 2                                              |
|                            | Country 3                                              | Country 3                                              |

**Section 2: Declaration of Tax Residency / Citizenship**

For the purposes of taxation, I am a resident in the following countries and my Tax Identification Number (TIN)/functional equivalent in each country is set out below or I have indicated that a TIN/functional equivalent is unavailable (kindly fill details of all countries of tax residence if more than one):

| Country/countries of tax | Tax identification number (TIN) | Tax issuing Country | Type of documentary evidence attached |
|--------------------------|---------------------------------|---------------------|---------------------------------------|
|                          |                                 |                     |                                       |
|                          |                                 |                     |                                       |
|                          |                                 |                     |                                       |

**Section 3: Declaration and Undertakings**

I/We certify that:

- the information provided in the Form is in accordance with section 285BA of the Income Tax Act, 1961 read with Rules 114F to 114H of the Income tax Rules, 1962.
- the information provided by me/us in the Form, its supporting Annexures as well as in the documentary evidence provided by me/us are, to the best of our knowledge and belief, true, correct and complete and that I/we have not withheld any material information that may affect the assessment/categorization of the account as a Reportable account or otherwise.
- I/We permit/authorise the Company to collect, store, communicate and process information relating to the Account and all transactions therein, by the Company and any of its affiliates wherever situated including sharing, transfer and disclosure between them and to the authorities in and/or outside India of any confidential information for compliance with any law or regulation whether domestic or foreign.
- I / We undertake the responsibility to declare and disclose within 30 days from the date of change, any changes that may take place in the information provided in the Form, its supporting Annexures as well as in the documentary evidence provided by us or if any certification becomes incorrect and to provide fresh self certification alongwith documentary evidence.
- I / We also agree that our failure to disclose any material fact known to us, now or in future, may invalidate our application and the Company would be within its right to put restrictions in the operations of my/our account or close it or report to any regulator and/or any authority designated by the Government of India (GOI) / RBI for the purpose or take any other action as may be deemed appropriate by the Company if the deficiency is not remedied by us within the stipulated period.
- I / We hereby accept and acknowledge that the Company shall have the right and authority to carry out investigations from the information available in public domain for confirming the information provided by me I us to the Company.
- It shall be my / our responsibilities to educate myself / ourself and to comply at all times with all relevant laws relating to reporting under section 285BA of the Act read with the Rules thereunder.
- I/We also agree to furnish such information and/or documents as the Company may require from time to time on account of any change in law either in India or abroad in the subject matter herein. I/We shall indemnify the Company for any loss that may arise to the Company on account of providing incorrect or incomplete information.

✍ Sign Here

(Sole/1st applicant)  
Authorised Signatory

Name:

✍ Sign Here

(2nd applicant)  
Authorised Signatory

Name:

Date : \_\_\_\_\_

Place : \_\_\_\_\_

## FATCA, CRS & ULTIMATE BENEFICIAL OWNERSHIP (UBO) SELF CERTIFICATION FORM FOR NON -INDIVIDUALS

(Please consult your professional tax advisor for further guidance on FATCA & CRS classification)

|                              |                                                                                                                                                                       |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of the entity           |                                                                                                                                                                       |
| Type of address given at KRA | <input type="checkbox"/> Residential or Business <input type="checkbox"/> Residential<br><input type="checkbox"/> Business <input type="checkbox"/> Registered Office |
| PAN                          |                                                                                                                                                                       |
| Date of Incorporation        |                                                                                                                                                                       |
| City of incorporation        |                                                                                                                                                                       |
| Country of incorporation     |                                                                                                                                                                       |

|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Worth in INR. In Lakhs                                        | Rs. .... Net Worth as on (DD/MM/YYYY) ..... <i>(Date should not be older than one year)</i>                                                                                                                                                                                                                                                                                                                                                                            |
| Gross Annual Income (INR)                                     | <input type="checkbox"/> < 1 Lakh <input type="checkbox"/> 1-5 Lacs <input type="checkbox"/> 5-10 Lacs <input type="checkbox"/> 10-25 Lacs <input type="checkbox"/> 25 Lacs-1 Cr <input type="checkbox"/> > 1 Cr                                                                                                                                                                                                                                                       |
| Is the entity involved in / providing any of these services:  | Foreign Exchange / Money Changer Services <input type="checkbox"/> Yes <input type="checkbox"/> No<br>Gaming / Gambling / Lottery Services [e.g. casinos, betting syndicates] <input type="checkbox"/> Yes <input type="checkbox"/> No<br>Money Laundering / Pawning <input type="checkbox"/> Yes <input type="checkbox"/> No (Any other information [if applicable])                                                                                                  |
| Entity Constitution Type<br><i>Please tick as appropriate</i> | <input type="checkbox"/> Partnership Firm <input type="checkbox"/> HUF <input type="checkbox"/> Private Limited Company <input type="checkbox"/> Public Limited Company <input type="checkbox"/> Society<br><input type="checkbox"/> Trust <input type="checkbox"/> Liquidator <input type="checkbox"/> Limited Liability Partnership <input type="checkbox"/> Artificial Juridical Person <input type="checkbox"/> AOP/BOI<br><input type="checkbox"/> Others specify |

### FATCA & CRS Declaration

Please tick the applicable tax resident declaration-

**1. Is "Entity" a tax resident of any country other than India**    ☐ Yes    ☐ No

(If yes, please provide country/ies in which the entity is a resident for tax purposes and the associated Tax ID number below.)

| Sr.No. | Country | Tax Identification Number* | Identification Type<br>(TIN or Other*, please specify) |
|--------|---------|----------------------------|--------------------------------------------------------|
| 1      |         |                            |                                                        |
| 2      |         |                            |                                                        |
| 3      |         |                            |                                                        |

% In case Tax Identification Number is not available, kindly provide its functional equivalent or Company Identification Number or Global Entity Identification Number.

In case the Entity's Country of Incorporation / Tax residence is U.S. (United States) but Entity is not a Specified U.S. Person, mention Entity's exemption code here

### PART A (to be filled by Financial Institutions or Direct Reporting NFEs)

|    |                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | We are a,<br>Financial institution<br>(Refer 1 of Part C)<br>or<br>Direct reporting NFE<br>(Refer 3(vii) of Part C)<br>(please tick as appropriate) | <b>GIIN</b><br>Name of sponsoring entity _____<br><br><b>Note:</b> If you do not have a GIIN but you are sponsored by another entity, please provide your sponsor's<br>GIIN above and indicate your sponsor's name below<br><b>GIIN (of sponsoring Entity, if any)</b><br><br><input type="checkbox"/> <b>Applied for</b> <input type="checkbox"/> Not obtained-Non-participating FI<br><input type="checkbox"/> Not required to apply for - please specify 2 digits sub-category<br><input type="checkbox"/> (Refer 1 A of Part C) |
|    | <b>GIIN not available</b><br>(please tick as applicable)                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|                                                                                                            |                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                               |
|------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>PART B</b> (please fill any one as appropriate "to be filled by NFEs other than Direct Reporting NFEs") |                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                               |
| 1.                                                                                                         | Is the Entity a publicly traded company (that is, a company whose shares are regularly traded on an established securities market) (Refer 2a of Part C)            | Yes <input type="checkbox"/> (If yes, please specify any one stock exchange on which the stock is regularly traded)<br>Name of stock exchange _____                                                                                                                                                                                                           |
| 2.                                                                                                         | Is the Entity a related entity of a publicly traded company (a company whose shares are regularly traded on an established securities market) (Refer 2b of Part C) | Yes <input type="checkbox"/> (If yes, please specify name of the listed company and one stock exchange on which the stock is regularly traded)<br>Name of listed company _____<br>Nature of relation:<br><input type="checkbox"/> Subsidiary of the Listed Company or <input type="checkbox"/> Controlled by a Listed Company<br>Name of stock exchange _____ |
| 3.                                                                                                         | Is the Entity an active NFE (Refer 2c of Part C)                                                                                                                   | Yes <input type="checkbox"/><br>Nature of Business _____<br>Please specify the sub-category of Active NFE<br><input type="checkbox"/> (Mention code-refer 2c of Part C)                                                                                                                                                                                       |
| 4.                                                                                                         | Is the Entity a passive NFE (Refer 3(ii) of Part C)                                                                                                                | Yes <input type="checkbox"/><br>Nature of Business _____                                                                                                                                                                                                                                                                                                      |

### FATCA - CRS Terms and Conditions

The Central Board of Direct Taxes has notified Rules 114F to 114H, as part of the Income-tax Rules, 1962, which require Indian financial institutions to seek additional personal, tax and beneficial owner information and certain certifications and documentation from all our unit holders. In relevant cases, information will have to be reported to tax authorities/ appointed agencies. Towards compliance, we may also be required to provide information to any institutions such as withholding agents for the purpose of ensuring appropriate withholding from the account or any proceeds in relation thereto. Should there be any change in any information provided by you, please ensure you advise us promptly, i.e., within 30 days. Please note that you may receive more than one request for information if you have multiple relationships with us or our group entities. Therefore, it is important that you respond to our request, even if you believe you have already supplied any previously requested information. If you have any questions about your tax residency, please contact your tax advisor. If any controlling person of the entity is a US citizen or resident or green card holder, please include United States in the foreign country information field along with the US Tax Identification Number. It is mandatory to supply a TIN or functional equivalent if the country in which you are tax resident issues such identifiers. If no TIN is yet available or has not yet been issued, please provide an explanation and attach this to the form.

### Declaration for Ultimate Beneficial Ownership [UBO] / Controlling Persons

**Category** (Please tick applicable category):

☐ Our company is a Listed Company on a recognized stock exchange in India / Subsidiary of a or Controlled by a Listed Company *[If this category is selected, no need to provide UBO details]*

Name of the Stock Exchange where it is listed. \_\_\_\_\_

Security ISIN \_\_\_\_\_

Name of the Listed Company (applicable if the investor is subsidiary/associate): \_\_\_\_\_

☐ Unlisted Company

☐ Limited Liability Partnership Company

☐ Partnership Firm

☐ Unincorporated association / body of individuals

☐ Public Charitable Trust

☐ Religious Trust

☐ Private Trust

☐ Trust created by a Will

☐ Others (please

specify \_\_\_\_\_)

### Ultimate Beneficiary Owner (UBO) / Controlling Person(s) / Senior Managing Official details

**Does your company/entity have any individual person(s) who holds direct / indirect controlling ownership above the prescribed threshold limit?** ☐ Yes ☐ No

If 'YES' - We hereby declare that the following individual person holds directly / indirectly controlling ownership in our entity a prescribed threshold limit. Details of such individual(s) are given below.

If 'NO' - declare that no individual person (directly / indirectly) holds controlling ownership in our entity above the prescribed threshold limit. Details of the individual who holds the position of Senior Managing Official (SMO) are provided below.

| Details                                                                                                          | UBO1 /Senior Managing Official (SMO)                                                                                                                                 | UBO2                                                                                                                                                                 | UBO3                                                                                                                                                                 |
|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of the UBO / SMO#.                                                                                          |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| (For Foreign National, TIN to be provided)                                                                       |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO Country of Tax Residency#.                                                                             |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO Taxpayer Identification Number / Equivalent ID Number#.                                                |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO Identity Type                                                                                          |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO Place & Country of Birth#                                                                              | Place of Birth :<br>-----<br>Country of Birth:<br>-----                                                                                                              | Place of Birth:<br>-----<br>Country of Birth:<br>-----                                                                                                               | Place of Birth :<br>-----<br>Country of Birth:<br>-----                                                                                                              |
| UBO / SMO Nationality                                                                                            |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO Date of Birth [dd-mmm yyyy]#                                                                           |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO PEP#                                                                                                   | <input type="checkbox"/> PEP <input type="checkbox"/> Related to PEP<br><input type="checkbox"/> Not a PEP                                                           | <input type="checkbox"/> PEP <input type="checkbox"/> Related to PEP<br><input type="checkbox"/> Not a PEP                                                           | <input type="checkbox"/> PEP <input type="checkbox"/> Related to PEP<br><input type="checkbox"/> Not a PEP                                                           |
| UBO / SMO Address Type                                                                                           | <input type="checkbox"/> Residence <input type="checkbox"/> Business<br><input type="checkbox"/> Registered office                                                   | <input type="checkbox"/> Residence <input type="checkbox"/> Business<br><input type="checkbox"/> Registered office                                                   | <input type="checkbox"/> Residence <input type="checkbox"/> Business<br><input type="checkbox"/> Registered office                                                   |
| UBO / SMO Occupation                                                                                             | <input type="checkbox"/> Public Service<br><input type="checkbox"/> Private Service<br><input type="checkbox"/> Business<br><input type="checkbox"/> Others<br>----- | <input type="checkbox"/> Public Service<br><input type="checkbox"/> Private Service<br><input type="checkbox"/> Business<br><input type="checkbox"/> Others<br>----- | <input type="checkbox"/> Public Service<br><input type="checkbox"/> Private Service<br><input type="checkbox"/> Business<br><input type="checkbox"/> Others<br>----- |
| SMO Designation#                                                                                                 |                                                                                                                                                                      |                                                                                                                                                                      |                                                                                                                                                                      |
| UBO / SMO KYC Complied.<br>If not complied, please complete KYC process independently and then submit the proof. | Please attach the KYC acknowledgement                                                                                                                                | Please attach the KYC acknowledgement                                                                                                                                | Please attach the KYC acknowledgement                                                                                                                                |

**# Mandatory column.**

**\*\* In case of Foreign Nationals, who are not KYC complied, they need to attach the ID proof in English along with the Nationality proof, Address proof again in English. If the documentary proof is in Foreign Language, it should be translated in English and should be attested by Indian Embassy of that country. Note: If the given columns are not sufficient, required information in the given format can be enclosed as additional sheet(s) duly signed by Authorized Signatory. Participating Mutual Fund(s) / RTA may call for additional information/documentation wherever required or if the given information is not clear / incomplete / correct and valid declaration should be submitted again with all the required information.**

**Declaration**

I/We acknowledge and confirm that the information provided above is true and correct to the best of my/our knowledge and belief. In case any of the above specified information is found to be false, untrue, misleading, or misrepresenting, I/We am/are aware that I/We may be liable for it including any penalty levied by the statutory/legal/regulatory authority. I/We hereby confirm the above beneficial interest after perusing all applicable shareholding pattern and MF/RTA/other registered intermediaries can make reliance on the same. I/We hereby authorize you [RTA/Fund/AMC/Other participating entities] to disclose, share, rely, remit in any form, mode or manner, all / any of the information provided by me, including all changes, updates to such information as and when provided by me to any of the Mutual Fund, its Sponsor, Asset Management Company, trustees, their employees / RTAs ('the Authorized Parties') or any Indian or foreign governmental or statutory or judicial authorities / agencies including but not limited to the Financial Intelligence Unit-India (FIU-IND), the tax / revenue authorities in India or outside India wherever it is legally required and other investigation agencies without any obligation of advising me/us of the same. Further, I/We authorize to share the given information to other SEBI Registered Intermediaries /or any regulated intermediaries registered with SEBI / RBI / IRDA / PFRDA to facilitate single submission / update & for other relevant purposes. I/We also undertake to keep you informed in writing about any changes / modification to the above information in future within 30 days of such changes and undertake to provide any other additional information as may be required at your / Fund's end or by domestic or overseas regulators/ tax authorities.

I/ We have understood the information requirements of this Form (read along with the Instructions & Definitions) and hereby confirm that the information provided by us on this Form is true, correct, and complete. I/We also confirm that I/We have read and understood the FATCA Terms and Conditions above and hereby accept the same.

|             |  |
|-------------|--|
| Name        |  |
| Designation |  |

|  |  |  |
|--|--|--|
|  |  |  |
|--|--|--|

Place \_\_\_\_\_

Date \_\_\_\_/ \_\_\_\_/ \_\_\_\_\_

## **Instructions for FATCA & CRS Declaration**

- a. Financial Institution / Foreign Financial Institution [FFI] — Means any non-US financial institutions that is a — (1) Depository institution – *accepts deposits in the ordinary course of banking or similar business*; (2) Custodian institution – *as a substantial portion of its business, hold financial assets for the accounts of others*; (3) Investment entity – *conducts a business or operates for or on behalf of a customer for any of the activities like trading in money market instruments, foreign exchange, foreign currency, etc. or individual or collective portfolio management or investing, administering or managing funds, money or financial assets on behalf of other persons; or an entity managed by this type of entity*; or (4) Insurance company – *entity issuing insurance products i.e. life insurance*; (5) Holding or Treasury company – *entity that is part of an expanded affiliate group that includes a depository, custodian, specified insurance company or investment entity*
- b. Direct Reporting NFFE – a NFFE that elects to report information about its direct or indirect substantial U.S. owners to the IRS
- c. GILIN not required category:

| Code | Sub-Category                                                                                                                                                                                            |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01   | Governmental Entity, International Organization or Central Bank                                                                                                                                         |
| 02   | Treaty Qualified Retirement Fund; a Broad Participation Retirement Fund; a Narrow Participation Retirement Fund; or a Pension Fund of a Governmental Entity, International Organization or Central Bank |
| 03   | Non-public fund of the armed forces, an employees' state insurance fund, a gratuity fund or a provident-fund                                                                                            |
| 04   | Entity is an Indian FI solely because it is an investment entity                                                                                                                                        |
| 05   | Qualified credit card issuer                                                                                                                                                                            |
| 06   | Investment Advisors and Investment Managers                                                                                                                                                             |
| 07   | Exempt collective investment vehicle                                                                                                                                                                    |
| 08   | Trustee of an Indian Trust                                                                                                                                                                              |
| 09   | FI with a local client base                                                                                                                                                                             |
| 10   | Non-registering local banks                                                                                                                                                                             |
| 11   | FFI with only Low-Value Accounts                                                                                                                                                                        |
| 12   | Sponsored investment entity and controlled foreign corporation                                                                                                                                          |
| 13   | Sponsored, Closely Held Investment Vehicle                                                                                                                                                              |
| 14   | Owner Documented FFI                                                                                                                                                                                    |

- d. Listed Company – A company is publicly traded if its stock are regularly traded on one or more *established securities markets* (*Established securities market means an exchange that is officially recognized and supervised by a governmental authority in which the securities market is located and that has a meaningful annual value of shares traded on the exchange*)
- e. Related Entity – an entity is a “Related Entity” of another entity if one controls the other, or the two entities are under common control (where control means direct or indirect ownership of more than 50% of the vote or value in an entity)
- f. Non-financial foreign entity [NFFE] — Non-US entity that is not a financial institution [including a territory NFFE]. Following NFFEs are excluded from FATCA reporting – (a) Publicly traded corporation / listed companies; (b) Related Entity of a listed company; and (c) Active NFFE
- g. Active NFFE – Any one of the following –

| Code | Sub-Category                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01   | Less than 50% of the NFE's gross income for the preceding calendar year or other appropriate reporting period is passive income and < 50% of the assets held by NFE are assets that produce or are held for the production of passive income                                                                                                                                                                                                                                                                                                                                                                                                     |
| 02   | The NFE is a Governmental Entity, an International Organization, a Central Bank , or an entity whollyowned by one or more of the foregoing;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 03   | Substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an entity shall not qualify for NFE status if the entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes; |
| 04   | The NFE is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE shall notqualify for this exception after the date that is 24 months after the date of the initial organization of the NFE;                                                                                                                                                                                                                                                                                             |
| 05   | The NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganizing with the intent to continue or recommence operations in a business other than that of a Financial Institution;                                                                                                                                                                                                                                                                                                                                                                                                |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 06 | The NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution;                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 07 | Any NFE is a nonfor profit organization which meets all of the following requirements: <ul style="list-style-type: none"> <li>• It is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organization, business league, chamber of commerce, labour organization, agricultural or horticultural organization, civic league or an organization operated exclusively for the promotion of social welfare;</li> <li>• It is exempt from income tax in India;</li> <li>• It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;</li> <li>• The applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and</li> <li>• The applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents require that, upon the NFE's liquidation or dissolution, all of its assets be distributed to a governmental entity or other non-profit organization, or escheat to the government of the NFE's jurisdiction of residence or any political subdivision thereof.</li> </ul> |

- h. Passive NFE – means any NFE that is not (i) an Active NFE or listed / publicly traded entity or entity related to the listed / publicly traded entity, or (ii) a withholding foreign partnership or withholding foreign trust pursuant to relevant U.S. Treasury Regulations or (iii) the gross income of which is primarily attributable to investing, reinvesting, or trading in financial assets, if the entity is managed by another entity that is a depository institution, a custodial institution, a specified insurance company, or an investment entity – (Note: Foreign persons having controlling interest in a passive NFE are liable to be reported for tax information compliance purposes)
- i. Passive Income — portion of gross income that consists of dividends, interest, rents and royalties (other than rents and royalties derived in the active conduct of a trade or business conducted, at least in part, by employees of the NFE), income equivalent to interest / amount received from pool of insurance contracts, annuities, excess of gains over losses from the sale or exchange of property / from transactions (including futures, forwards or similar transactions) in any commodities but not including (i) any commodity hedging transaction, determined by treating the entity as a controlled foreign corporation or (ii) active business gains or losses from the sale of commodities but only if substantially all the foreign entity's commodities are property, excess of foreign currency gains over losses, net income from notional principal contracts, amounts received under cash value insurance contracts, amounts earned by insurance company in connection with its reserves for insurance and annuity contracts
- j. Controlling Persons means the natural persons who exercise control over an entity. In the case of a trust, such term means the settlor, the trustees, the protector (if any), the beneficiaries or class of beneficiaries, and any other natural person exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term "Controlling Persons" shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations.
- k. Non-Participating FFIs [NPFFIs] – an FFI other than participating FFI, a deemed-compliant FFI, or an exempt beneficial owner
- l. Specified US Persons — Any US Person other than i). A publicly traded corporation; ii). A corporation that is a member of the same expanded affiliate group; iii). A tax exempt organization; iv). an individual retirement plan; v). the United States or an agency or instrumentality of the United States; vi). Any state [including District of Columbia and United States possession] or State Authorities; vii). A bank, viii). A real estate investment trust; ix). A regulated investment company; x). an entity registered with the SEC under the Investment Company Act of 1940; xi). A common trust fund; xii). A tax exempt trust; xiii). A registered dealer; xiv). A registered broker
- m. Expanded affiliated group – One or more chains of members connected through ownership (50% or more, by vote or value) by a common parent entity if the common parent entity owns stock or other equity interests meeting the requirements in at least one of the other members
- n. Owner documented FFI – AN FFI meeting the following requirements – (a) FFI is an FFI solely because it is an investment entity; (b) FFI is not owned by or related to any FFI that is a depository institution, custodial institution, or specified insurance company; (c) FFI does not maintain a financial account for any non-participating FFI; (d) FFI provides the designated withholding agent with all of the documentation and agrees to notify the withholding agent if there is a change in the circumstances, and (e) The designated withholding agent agrees to report to the IRS (or, in case of a reporting Model 1 IGA, to the relevant foreign government or agency thereof) all of the information described in or (as appropriate) with respect to any US specified persons and (2) Notwithstanding the previous sentence, the designated withholding agent is not required to report information with respect to an indirect owner of the FFI that holds its interest through a participating FFI, a deemed-compliant FFI (other than an owner-documented FFI), an entity that is a US person, an exempt beneficial owner, or an exempted NFE

o. Exemption Code for US persons

| Code | Sub-category                                                                                                                                                                                                                  |
|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A    | An organization exempt from tax under section 501(a) or any individual retirement plan as defined in section 7701(a)(37)                                                                                                      |
| B    | The United States or any of its agencies or instrumentalities                                                                                                                                                                 |
| C    | A state, the District of Columbia, a possession of the United States, or any of their political subdivisions or instrumentalities                                                                                             |
| D    | A corporation the stock of which is regularly traded on one or more established securities markets, as described in Reg. section 1.1472-1(c)(1)(i)                                                                            |
| E    | A corporation that is a member of the same expanded affiliated group as a corporation described in Reg. section 1.1472-1(c)(1)(i)                                                                                             |
| F    | A dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any state |
| G    | A real estate investment trust                                                                                                                                                                                                |
| H    | A regulated investment company as defined in section 851 or an entity registered at all times during the tax year under the Investment Company Act of 1940                                                                    |
| I    | A common trust fund as defined in section 584(a)                                                                                                                                                                              |
| J    | A bank as defined in section 581                                                                                                                                                                                              |
| K    | A broker                                                                                                                                                                                                                      |
| L    | A trust exempt from tax under section 664 or described in section 4947(a)(1)                                                                                                                                                  |
| M    | A tax exempt trust under a section 403(b) plan or section 457(g) plan                                                                                                                                                         |
| N    | Not Applicable                                                                                                                                                                                                                |

## Instructions on Controlling Persons / Ultimate Beneficial Owner

As per PMLA guidelines and relevant SEBI circulars issued from time to time, non-individuals and trusts are required to provide details of controlling persons [CP] / ultimate beneficiary owner [UBO] and submit appropriate proof of identity of such CPs/ UBOs. The beneficial owner has been defined in the circular as the natural person or persons, who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted and includes a person who exercises ultimate effective control over a legal person or arrangement.

### A. For Investors other than individuals or trusts:

- (i) The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest. Controlling ownership interest means ownership of/entitlement to:
  - more than 10% of shares or capital or profits of the juridical person, where the juridical person is a company.
  - more than 10% of the capital or profits of the juridical person, where the juridical person is a partnership or or who exercises control through other means." For the purpose of this clause, "Control" shall include the right to control the management or policy decision.
  - more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.
- (ii) In cases where there exists doubt under clause (i) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity of the natural person exercising control over the juridical person through other means like through voting rights, agreement, arrangements or in any other manner.
- (iii) Where no natural person is identified under clauses (i) or (ii) above, the identity of the relevant natural person who holds the position of senior managing official.

### B. For Investors which is a trust:

The identity of the settler of the trust, the trustee, the protector, the beneficiaries with 10% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership. Provided that in case of a trust, the reporting entity shall ensure that trustees disclose their status at the time of commencement of an account -based relationship or when carrying out transactions as specified in clause (b) of sub-rule (1) rule 9.

### C. Exemption in case of listed companies / foreign investors

The client or the owner of the controlling interest is a company listed on a stock exchange or is a majority-owned subsidiary of such a company, there is no need for identification and verification of the identity of any shareholder or beneficial owner of such companies and hence exempted from UBO declaration provided other requisite information is provided. Intermediaries dealing with foreign investors' viz., Foreign Institutional Investors, Sub Accounts and Qualified Foreign Investors, may be guided by the clarifications issued vide SEBI circular CIR/MIRSD/11/2012 dated September 5, 2012 and other circulars issued from time to time, for the purpose of identification of beneficial ownership of the client.

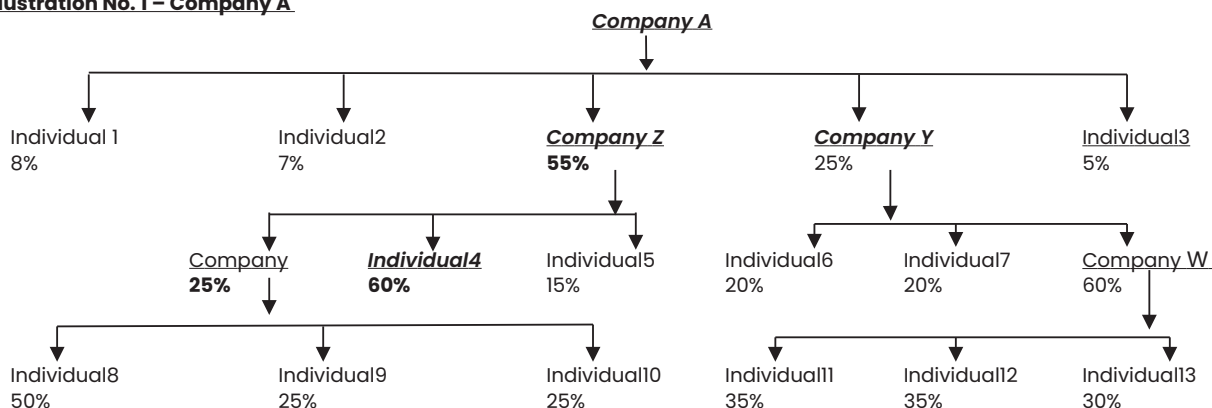
### D. KYC requirements

Beneficial Owner(s) / Senior Managing Official (SMO) is/are required to comply with the prescribed KYC process as stipulated by SEBI from time to time with any one of the KRA & submit the same to AMC. KYC acknowledgement proof is to be submitted for all the UBO(s) / SMO(s).

In case of Foreign Nationals, who are not KYC complied, they need to attach the ID proof in English along with the Nationality proof, Address proof again in English. If the documentary proof is in Foreign Language, it should be translated in English and should be attested by Indian Embassy of that country.

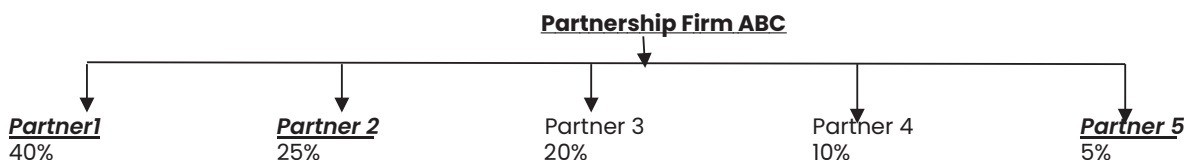
### Sample Illustrations for ascertaining beneficial ownership:

#### Illustration No. 1 – Company A



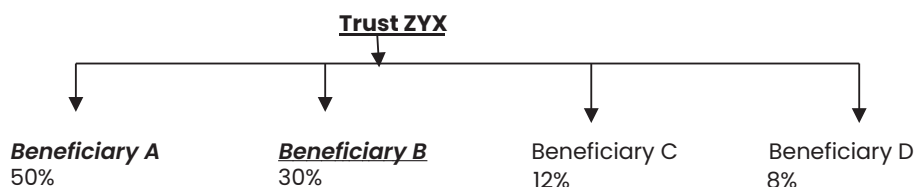
For Applicant A, Individual 4 is considered as UBO as it holds effective ownership of 33% in Company A. Hence details of Individual 4 must be provided with KYC proof, Shareholding pattern of Company A, Z & Y to be provided along with details of persons of Company Y who are senior managing officials and those exercising control.

#### Illustration No. 2 – Partner ABC



For Partnership Firm ABC, Partners 1, 2, 3 and 4 are considered as UBO as each of them holds  $\geq 10\%$  of capital. KYC proof of these partners needs to be submitted including shareholding.

#### Illustration No. 3– Trustee ZYX



For Trust ZYX, Beneficiaries A, B and C are considered as UBO as they are entitled to get benefitted for  $\geq 10\%$  of funds used. KYC proof for these beneficiaries needs to be submitted. Additionally, if they have nominated any person or group of persons as Settlor of Trust / Protector of Trust, relevant information to be provided along with the proof indicated.

**ON THE LETTERHEAD OF COMPANY/ TRUST**

Format

"For Reference Purpose Only"

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED BY THE BOARD OF DIRECTORS/ TRUSTEES AT THE MEETING OF \_\_\_\_\_

HELD ON THE \_\_\_\_\_ DAY OF AT \_\_\_\_\_

"Resolved that the Company/ Trust appoint Nippon Life India Asset Management Limited as its Portfolio Manager to provide portfolio management and other administrative services for the funds/ value of funds decided to be deployed by the Company/ Trust".

Resolved further that Mr. \_\_\_\_\_ Director/ Trustee or  
Mr. \_\_\_\_\_ Director/ Trust from time to time and do all such acts deeds  
and things including but not limited to opening Bank account. Demat Account. Broker Account and completion of other  
necessary formalities incidental thereto and to sign all necessary agreement/ deeds/ documents/ papers as may be  
required to be signed for and to take necessary action to give effect to this resolution.

Certified to be true

For \_\_\_\_\_  
Director/ Company Secretary/ Trustee

Suggested Format of the letter of authority to the Partners of a Partnership of Partnership Firm

We, the partners of \_\_\_\_\_ (firm) authorize \_\_\_\_\_  
partner of the firm servally to invest/disinvest in the Portfolio Management Service rendered by Nippon Life India Asset  
Management Limited on behalf of the firm from time to time and do all such acts, deeds and things including but not  
limited to opening Bank account, Demat Account, Broker Account and completion of other necessary formalities inci-  
dental thereto and to sign all necessary agreement/ deed/ documents/ papers as may be required to be signed for  
and to take necessary action to give effect to the same.

(Signature of all the Partners of the firm)

## **INSTRUCTIONS/CHECK LIST FOR FILLING KYC FORM**

### **A. IMPORTANT POINTS:**

1. Self attested copy of PAN card is mandatory for all clients, including Promoters/ Partners/ Karta/ Trustee and whole time directors and persons authorized to deal in securities on behalf of company/ firm/ others.
2. Copies of all documents submitted by the applicant should be self- attested and accompanied by originals for verifications. In case the original of any documents is not produces for verifications, then the copies should be properly attested by entities authorized for attesting the documents, as per the below mentioned list.
3. If any proof of identity or address is in a foreign language, the translation into English is required.
4. Name & address of the applicant mentioned on the KYC form, should match with the documentary proof submitted.
5. If correspondence & permanent address are different, them proofs for both have to be submitted.
6. Sole proprietor must make the applications in his individual name & capacity.
7. For Non-residents and foreign nationals, (allowed to trade subject to RBI and FEMA guidelines), copy of passport/ PIO Card/ OCI Card and overseas address is mandatory.
8. For foreign entities, CIN is optional; and in the absence of DIN no. Of the directors, their passport copy should be given.
9. In case Merchant Navy NRI's, Mariner's declaration or certified copy of CDC (Continuous Discharge Certificate) should be Submitted
10. For opening an account with Depository participant or Mutual Fund, for minor, photocopy of the School Leaving Certificate/ Marksheet issued by Higher secondary Board/ Passport of Minor/ Birth Certificate must be provided.
11. Politically Exposed Persons (PEP) are defined as individuals who are or have been entrusted with prominent public functions in foreign country, e.g. Heads of States or of Government, senior politicians, senior Government/ judicial/ military officers, senior executives of state owned corporation, important political party officials, etc.

### **B. Proof of Identity (POI): – List of documents admissible as Proof of Identity:**

1. Unique Identification Number (UID) (Aadhaar)/ Passport/ Voter ID card/ Driving license.
2. PAN card with photograph.
3. Identity card/ document with Contributor's Photo, issued by any of the following: Central/State Government and its Departments, Statutory/Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, Colleges affiliated to Universities, Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members; and Credit cards/Debit cards issued by Banks.

### **C. Proof of Address (POA): – List of documents admissible as Proof of Address:**

(\*Documents having an expiry date should be valid on the date of submission.)

1. Passport/ Voters Identity Card/ ration Card/ Registered lease or Sale Agreement of Residence/ Driving License/ Flat Maintenance bill/ Insurance Copy.
2. Utility bills like Telephone Bill (only land line), Electricity bill or Gas bill- Not more than 3 months old.
3. Bank Accounts Statements/ Passport – Not more than 3 months old.
4. Self-declaration by High Court and supreme court judges, giving the new address in respect of their own accounts.
5. Proof of address issued by any of the following: Bank Managers of Scheduled Commercial Banks/ Scheduled Co- Operative Bank/Multinational Foreign Banks/ Gazetted Officer/ Notary public/ Elected representative to the Legislative Assembly/ Parliament/Documents issued by any Govt. Or Statutory Authority.
6. Identity Card/ Document with address, issued by any of the following: Central/ State Governments and its Departments, Statutory/ Regulatory Authorities, Public Sector Undertakings, Scheduled Commercial Banks, Public Financial Institutions, College Affiliated to Universities and Professional Bodies such as ICAI, ICWAI, ICSI, Bar Council etc., to their Members.
7. For FI/ sub account, Power of attorney given by FI/ sub account to the custodians (which are duly notarized and /or apostilled or consularised) that gives the registered address should be taken.
8. The proof of address in the name of the spouse may be accepted.

### **D. Exemptions/clarifications to PAN**

(Sufficient documentary evidence in support of such claims to be collected.)

1. In case of transactions undertaken on behalf of Central Government and/ pr State Government and by official appointed by Courts e.g. Official liquidator, Court receiver etc.
2. Investors residing in the state of Sikkim
3. UN entities/ multilateral agencies exempt from paying taxes, filing tax returns in India.

4. SIP of Mutual Funds upto Rs. 50,000/- p.a.
5. In case of institutional clients, namely. FIs, MFs, VCFs, FVCIs, Scheduled Commercial Banks, Multilateral and bilateral development  
Financial Institutions, State Industrial development corporations, Insurance Companies registered with IRDA and Public Financial Institutions as defined under section 4A of the Companies Act, 1956, Custodians shall verify the PAN card details with the originals PAN card and provide duly certified copies of such verified PAN details to the intermediary.

**E. List of people authorised to attest the documents:**

1. Notary Public, Gazetted Officer, Manager of a Scheduled Commercial/ Co-operative Bank or Multinational Foreign Banks (Name, Designation & Seal should be affixed on the copy).
2. In Case of NRIs, authorised officials of overseas branches of Scheduled Commercial Banks registered in India, Notary Public, Court Magistrate, Judge, Indian embassy/ Consulate General in the country where the client resides are permitted to attest the documents.

## Checklist for Documentation

| <b>Checklist for the Portfolio Management Services Agreement</b> | <b>Yes/ No/ Remarks</b> |
|------------------------------------------------------------------|-------------------------|
| • The document is initiated / signed by all the Applicants       |                         |
| • The details in all blank spaces have been filled and initiated |                         |
| • Name and signature of the witness                              |                         |
| • Alterations, if any, have been countersigned                   |                         |

| <b>Checklist for Investor Profiling form</b>                                                                                                                      | <b>Yes/ No/ Remarks</b> |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| • All the details in the investor profiling form have been filled in (including address, Pan details, Investment details, disclosure of interest, nomination etc) |                         |
| All applicants/ signatories have signed the form                                                                                                                  |                         |
| • Alterations, if any, have been countersigned                                                                                                                    |                         |
| • Copy of TAN allotment letter, if applicable                                                                                                                     |                         |
| • Copy of the cheque/ direct transfer instruction for the applicant amount                                                                                        |                         |
| • All the supporting documents have been enclosed (depending upon the category of the investor) as follows:                                                       |                         |

| <b>List of documents required to be submitted along with the Client Profiling Form and Portfolio Management Services Agreement Individual</b> | <b>Yes/ No/ Remarks</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| • Copy of Pan Card                                                                                                                            |                         |
| • Aadhar Card                                                                                                                                 |                         |
| • Proof of Address Copy of Passport/ Driving license/ Bank Passbook/ Ration Card/ electricity Bill (Not more than 2 months old)               |                         |
| • Cancelled Cheque Copy/ Source of Funds                                                                                                      |                         |
| • Fee Details to be filled and handwritten declaration required on fee page                                                                   |                         |
| • STP form to be filled                                                                                                                       |                         |
| • Din Number to mentioned                                                                                                                     |                         |

Note : In case of joint holders, all the above documents are required for all holders

| <b>Companies/ Body Corporate</b>                                                                                                                                                                                                                                 | <b>Yes/ No/ Remarks</b> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| • Certified copy of the Board resolution<br>(i) For Investments in PMS<br>(ii) For authorized signatories for participants and withdrawals in PMS and to sign all the agreements and necessary documents.                                                        |                         |
| • List of Authorised Signatory and Directors (Aadhar card required of Authorised Signatory and UBO)                                                                                                                                                              |                         |
| • Certified copy of the memorandum and articles of association of the company highlighting the clause permitting the company to invest in securities (List of Directors)                                                                                         |                         |
| • Copy of PAN Card & Address (Company, Authorised Signatory, UBO, Director)                                                                                                                                                                                      |                         |
| • Copy of TAN allotment letter                                                                                                                                                                                                                                   |                         |
| • Copies of balance sheets for last two financial years (to be submitted every year)                                                                                                                                                                             |                         |
| • Copy of latest share holding pattern including list of all holding control either directly or indirectly, in the company in terms of SEBI takeover Regulations, duly certified by the company secretary/ Whole time director/ MD (to be submitted every year). |                         |
| • Last two years Audited Balance Sheet                                                                                                                                                                                                                           |                         |
| • UBO, Source of Fund, Cancelled Cheque Copy                                                                                                                                                                                                                     |                         |
| <b>Partnership Firm</b>                                                                                                                                                                                                                                          | <b>Yes/ No/ Remarks</b> |

|                                                                                                            |  |
|------------------------------------------------------------------------------------------------------------|--|
| • Copy of the partnership deed duly attested by any of the partners and authorizing them to invest in PMS  |  |
| • Registrations certificate, if the partnership firm is registered                                         |  |
| • List containing names and signatures of the partners attested by the Bank.                               |  |
| • Authorisation Letter (signed by all partners)<br>(i) For Investments in PMS                              |  |
| • NSDL NOC and NOC from all partners to appoint authorized signatories                                     |  |
| • Power of attorney granted to a partner, employee of the firms to transact business on its behalf, if any |  |
| • Copy of PAN Card                                                                                         |  |
| • Copy of TAN allotment letter                                                                             |  |
| • List of Partner, UBO, Source of Fund, Aadhar Card of Authorised Signatory and UBO                        |  |
| • Copies of balance sheets for last two financials years (To be submitted every year)                      |  |

| <b>Trust</b>                                                                                                                                                                                             | <b>Yes/ No/ Remarks</b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| • Certified of registration, if the Trust is registered                                                                                                                                                  |                         |
| • Certified copy of the Trust Deed authorizing the Trust to invest in PMS                                                                                                                                |                         |
| • Certified copy of the resolution/ authorization letter passed by the Trustees authorizing the persons for participations and withdrawals in PMS and to sign all the agreements and necessary documents |                         |
| • List of Trustee and signatures, authorized as per the above resolutions, duly attested by the Bank/ Secretary of the Trust on the Trust Letterhead                                                     |                         |
| • Power of attorney granted to transact business on its behalf, if any                                                                                                                                   |                         |
| • Copy of PAN Card                                                                                                                                                                                       |                         |
| • Copies of balance sheets for last two financials years (To be submitted every year)                                                                                                                    |                         |

| <b>HUF</b>                                                                                     | <b>Yes/ No/ Remarks</b> |
|------------------------------------------------------------------------------------------------|-------------------------|
| • Certified list of all members of the HUF (karta and co-parceners)                            |                         |
| • Copy of PAN card of HUF                                                                      |                         |
| • Proof of Address Copy of Income tax Return/ Bank statement/ Telephone Bill/ Electricity Bill |                         |
| • Proof of identity of the Karta Copy of Passport/ PAN card/ Driving license/ Voter ID         |                         |
| • List of Coparcener, in case of HUF                                                           |                         |
| • Cancelled Cheque Copy/ Source of Funds                                                       |                         |
| • Copies of balance sheets for last two financials years (To be submitted every year)          |                         |

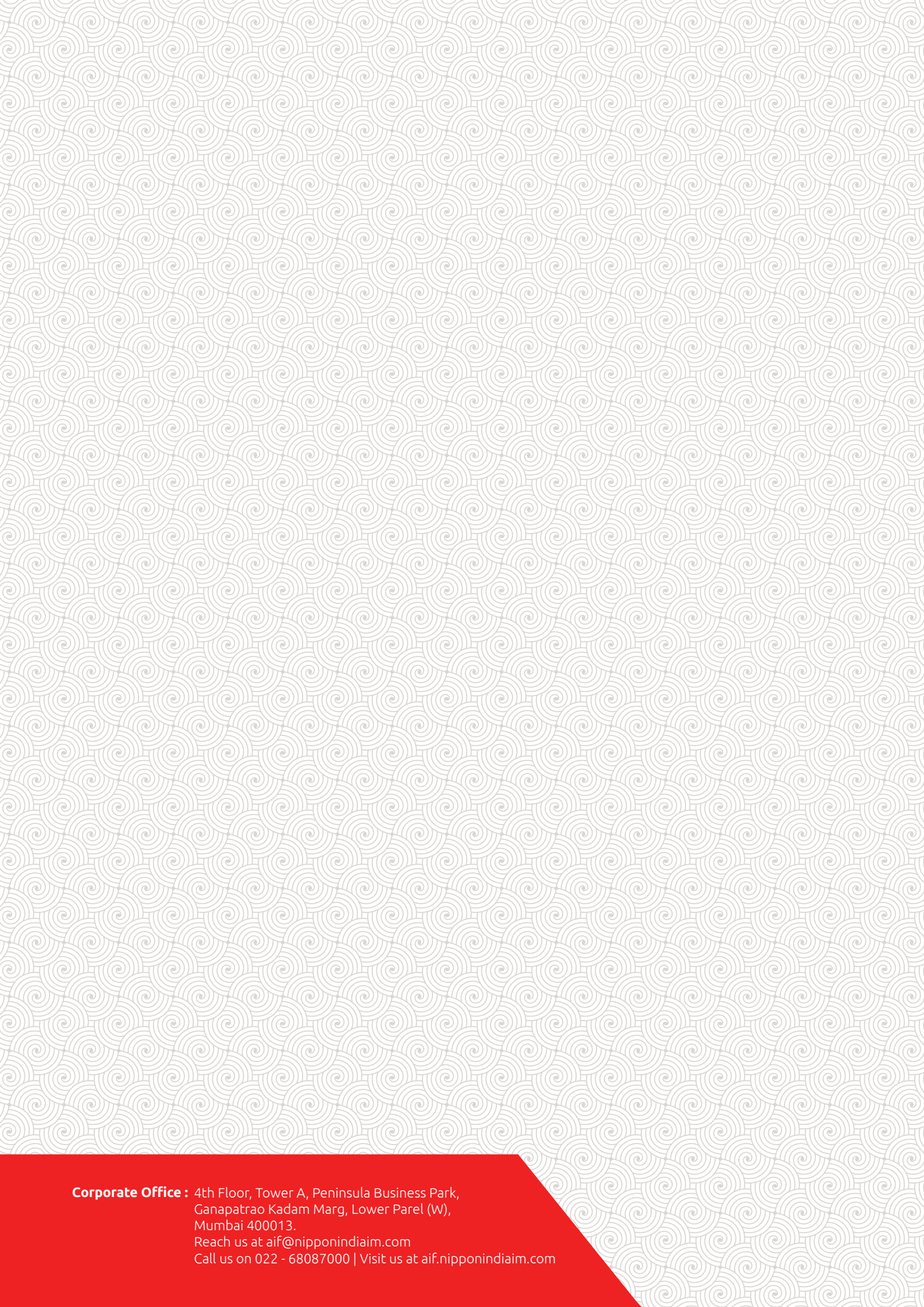
| <b>Co-operative Societies</b>                                                                                                                                                                       | <b>Yes/ No/ Remarks</b> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| • Certified copy of the Registration Certificate and Bye Laws highlighting the clause permitting to invest in securities                                                                            |                         |
| • Certified copy of the Resolution<br>(i) For Investments in PMS<br>(ii) For authorized signatories for participants and withdrawals in PMS and to sign all the agreements and necessary documents. |                         |
| • List of members (as per above resolution()) and signatures attested by the bankers                                                                                                                |                         |
| • Copy of PAN card                                                                                                                                                                                  |                         |
| • Copies of balance sheets for last two financials years (To be submitted every year)                                                                                                               |                         |

| <b>Minor</b>                                                                                           | <b>Yes/ No/ Remarks</b> |
|--------------------------------------------------------------------------------------------------------|-------------------------|
| • Proof of age of the minor (copy of birth certificate/ passport copy/ school leaving certificate etc) |                         |

|                                               |  |
|-----------------------------------------------|--|
| • Copy of PAN card of the Guardian            |  |
| • Provide the photograph of the guardian      |  |
| • PAN and Address Proof of Minor and Guardian |  |
| • Aadhar copy of Minor and Guardian           |  |
| • Cancelled cheque copy and source of Funds   |  |

| <b>NRI</b>                                                                                                 | <b>Yes/ No/ Remarks</b> |
|------------------------------------------------------------------------------------------------------------|-------------------------|
| • Duly notarized Power of Attorney executed in favour of the Portfolio Manager                             |                         |
| • Custody documentation for account opening                                                                |                         |
| • Pan Copy                                                                                                 |                         |
| • Overseas Address proof                                                                                   |                         |
| • Local Address proof required                                                                             |                         |
| • Visa copy                                                                                                |                         |
| • Latest Immigration stamp not more than 6 months                                                          |                         |
| • Bank proof to be shared as AML Supporting                                                                |                         |
| • Tin Number to be mentioned if Tax residency ticked as overseas except Saudi countries.                   |                         |
| • If any proof of identity or address is in a foreign language, then translation into English is required. |                         |

| <b>Power of Attorney</b>                                                                                                                                                                                      | <b>Yes/ No/ Remarks</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| • Original Power of Attorney on a certified copy duly notarized should be submitted with the application. The POA documents should contain the signatures of both the applicant and the constituted attorney. |                         |
| • Proof of identity and address of the POA holder.                                                                                                                                                            |                         |



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