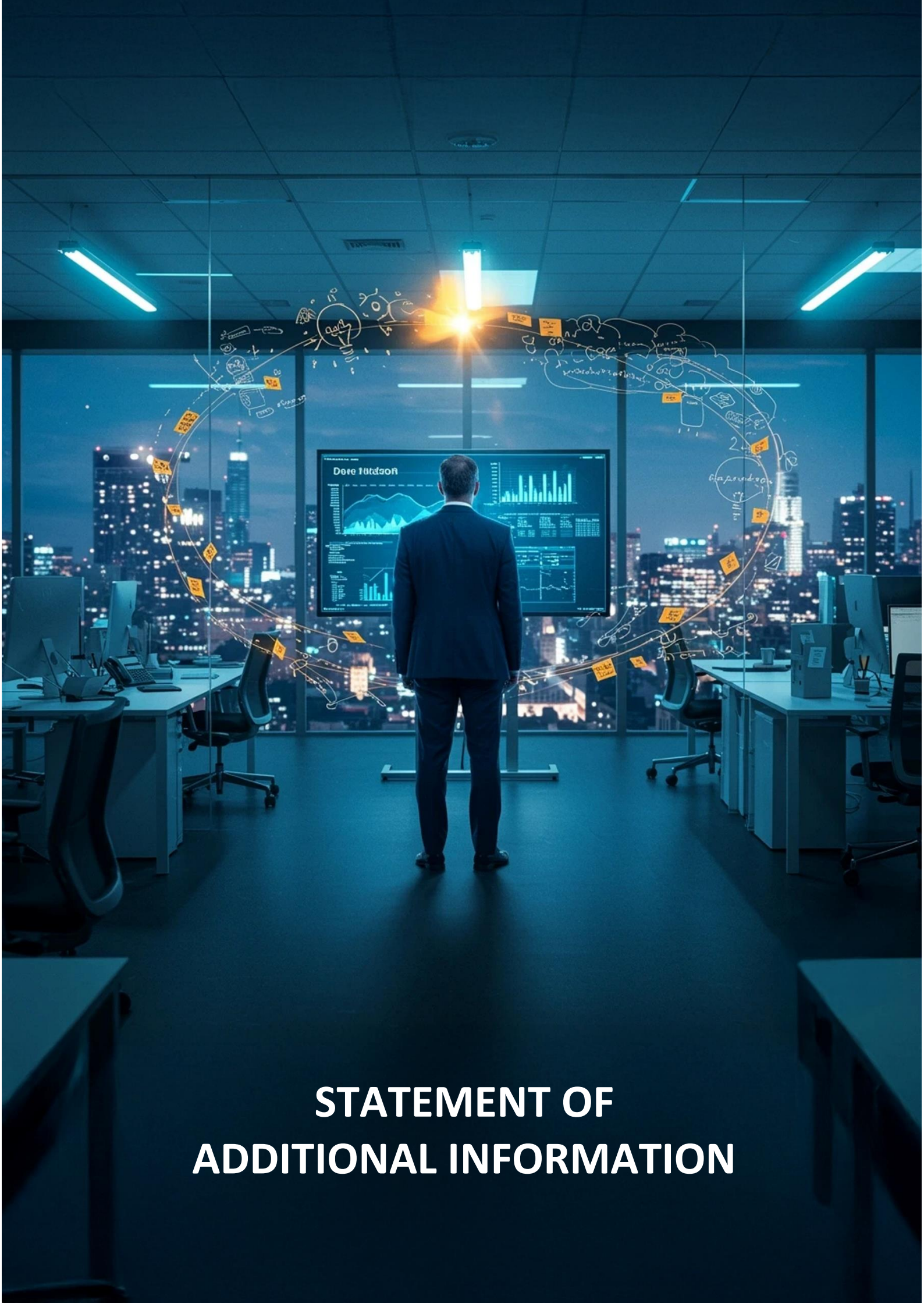


STATEMENT OF ADDITIONAL INFORMATION

This Statement of Additional Information (SAI) contains details of qsif (offered by quant Mutual Fund), its constitution, and certain tax, legal and general information. It is incorporated by reference and is legally a part of the Investment Strategy Information Document (ISID) of all the Investment Strategies of qsif (offered by quant Mutual Fund).

This SAI is dated July 30, 2026.

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I. INFORMATION ABOUT SPONSOR, AMC AND TRUSTEE COMPANIES

A. Constitution of quant Mutual Fund ("Mutual Fund"/"Fund")

quant Mutual Fund has been constituted as a trust on April 15,1996 in accordance with the provisions of the Indian Trusts Act, 1882. (2 of 1882) with quant Capital Finance & Investments Private Limited as the Sponsor, and quant Capital Trustee Limited as the Trustee to the Fund. The Trust Deed has been registered under the Indian Registration Act, 1908. The Mutual Fund was registered with SEBI on June 11, 2018 under the Registration Code MF/028/96/4.

The Deed of Variation to the Trust Deed was executed between Escorts Finance Limited (erstwhile Sponsor), quant Capital Trustee Limited and quant Capital Finance & Investments Private Limited on June 28, 2018.

B. Constitution of the Specialized Investment Fund

qsif ('SIF') is offered by quant Mutual Fund in terms of Regulation 48(1) of SEBI (Mutual Funds) Regulations, 2026 ("SEBI Regulations") with quant Capital Trustee Limited as the Trustee and quant Money Managers Limited as the Asset Management Company (AMC). quant Mutual Fund was granted approval to establish the SIF by SEBI on May 07, 2025.

C. Sponsor

quant Mutual Fund is sponsored by **quant Capital Finance & Investments Private Limited.**

quant Capital Finance & Investments Private Limited ('QCFIPL') is a company incorporated on December 31, 1981 under the Companies Act, 1956 and is also a Non-Systemically Important, Non deposit taking, Non-Banking Financial Company registered with RBI w.e.f May 24, 2010 under registration number B-13.00501. The Sponsor is primarily engaged in the business, inter alia of formation and mobilization of capital, managing capital savings and investments, financing, money lending, corporate lending with or without securities.

The Sponsor is the Settlor of the Mutual Fund Trust. The Sponsor has entrusted a sum of Rs. 1 lakh to the Trustee as the initial contribution towards the corpus of the Mutual Fund.

Financial Performance of the Sponsor (quant Capital Finance & Investments Private Limited) (past three years):

(Amt. in INR crs)

Particulars	Apr 25 – Mar 26	Apr 24 - Mar 25	Apr 23 - Mar 24
Net Worth	54.26	50.98	51.33
Total Income	2.24	0.72	0.32
Profit after tax	0.14	0.05	(0.01)
Assets Under Management (if applicable)	NA	NA	NA

D. The Trustee

quant Capital Trustee Limited (the '**Trustee'**), through its Board of Directors, shall discharge its obligations as trustee of qsif (offered by quant Mutual Fund). The Trustee ensures that the transactions entered into by quant Money Managers Limited (the **'AMC'**) are in accordance with the SEBI (Mutual Funds) Regulations, 2026 (**'Regulations'**) and will also review the activities carried on by the AMC.

As regards to the SIF, the Trustee ensures that all the activities of the SIF are in accordance with the provisions of the SEBI Regulations and Circulars issued in this regard from time to time.

1. Details of Trustee Directors:

Name	Age	Educational Qualification	Brief Experience

Mr. Rajnish Kumar Independent Director	68 years	MSc in Physics & Certified Associate of Indian Institute of Bankers	Mr. Rajnish Kumar is former Chairman of State Bank of India. He completed his 3 years term as Chairman in October 2020. He is credited with steering the Bank successfully through very challenging times. During his tenure, the Bank developed YONO, a digital platform, which has established the Bank as a global leader in adoption of technology and innovation. Mr. Kumar is a career banker with nearly 4 decades of service with State Bank of India. His expertise in corporate credit and project finance is well recognized. He served the bank in various capacities across the country including in the North East as Chief General Manager. He successfully managed UK operations of the Bank immediately after the crisis caused by the collapse of Lehman Brothers. Earlier he worked as Vice President (Credit) at Toronto. Mr. Rajnish Kumar was also the Chairman of SBI's subsidiaries, important ones being, SBI Life Insurance Company Limited, SBI Foundation, SBI Capital Markets Limited, and SBI Cards & Payments Services Limited. He also served as Director on the boards of various organisations, viz. Export - Import Bank of India, Institute of Banking Personnel Selection, National Institute of Bank Management, Pune, Indian Banks Association, Khadi & Village Industries Commission, Indian Institute of Banking & Finance, among others. Mr. Rajnish Kumar is currently serving as an Independent Director on the Boards of many prestigious companies like HSBC, Asia Pacific and Brookfield Property Management Ltd. He is also Non-Executive Chairman of Resilient Innovations Pvt Ltd. (BharatPe), one of the fastest growing Fintech in the country and Independent Director on the Board of Lighthouse Communities Foundation. Mr. Kumar is also an advisor with BPEA EQT Pte Ltd. apart from being Member, to the Board of Governors, Management Development Institute, Gurugram.
Mr. Yogesh Parekh, Independent Director	63 years	Graduate in Science (B.Sc)	Mr. Yogesh is an eminent entrepreneur who cofounded the Adfactors Group in the 1990s. In this capacity he was one of the leading innovators in the advertising & marketing of various financial instruments and has vast experience in design and structuring of complex financial products and of marketing them successfully to a diverse group of target investors in India & overseas. He has helped numerous entrepreneurs enter the capital market through Initial Public Offerings. He subsequently founded Crossnet Ventures and is currently engaged in setting up a cargo venture in the emerging aviation transportation sector. A sport aviation enthusiast, Yogesh is also a qualified pilot and was one of the founders of the Bombay Hang-Gliders Club and is a Life Member of the Bombay Flying

			Club. He was the pilot member of the 3-member team that designed, built & flew the first microlight aircraft in India. Leveraging the combination of his marketing and aviation skills, Mr Parekh pioneered the concept of aerial advertising in India, including banner towing, leaflet & flower dropping and helium & hot air balloons. He has also been involved in operations of aerial crop spraying, cloud seeding & aviation transport to inaccessible places.
Mr. Lancelot Joseph, Independent Director	61 years	Graduate in Commerce (B.Com)	Mr. Lancelot Joseph is a prominent and well-respected name in the world of Journalism. He has been associated with Business India since 2004 and is now designated as an Executive Editor. His specialization and strength has been balance sheet and equity analysis, and equity and commodity markets. He has 15+ years of experience as Executive Editor with India's leading business magazine Business India.
Mr. Laxmikant Gupta, Independent Director	56 years	FRM, Grad CWA, B.Com (Rank holder in CA), Cleared CFA Level II)	Mr. Laxmikant has been part of the financial industry for over 15 years! Since 2007, he has been in leadership positions relating to Risk Management and Compliance at various AMC's namely – Franklin Templeton (2002-07), Birla Sunlife (2007-09), ICICI Venture (2010-2015). He also worked with ICICI Bank, I-Sec, A F Ferguson & Co. Between Feb 2017 and September 2018, he was appointed as the Chief Regulatory Officer at the National Commodity Derivatives Exchanges Limited (NCDEX), a role where he was closely involved with Risk Management, Surveillance and Compliance functions. In addition, Laxmikant has worked on projects relating to review of Anti-bribery and Anti-corruption measures under the assignment and guidance from the World Bank. He has 10+ years of vast experience in the area of Risk Management, and has served as a Chief Regulatory Officer for National Commodity Derivatives Exchanges Limited (NCDEX).
Mr. Milan Ganatra, Non-executive Director	55 years	Graduate in Commerce (B.Com)	Mr. Milan has been associated with the wealth and asset management industry through his company Miles Software Solutions Pvt Ltd, a company he founded in March 1999. At Miles, Milan has been pioneering strategy, product marketing, sales, services, and support of Miles solutions under the brand MoneyWare™; He has successfully defined and implemented a strong vision for Miles to make it amongst the leading provider of wealth and portfolio management solutions. Milan has deep domain knowledge on wealth management and wide experience in leveraging technological advancement for efficient investment management. He has 20+ years of experience in Formulating strategy, product marketing, sales, services and support of Miles solutions under the brand MoneyWare ™ for the wealth and asset management industry.

2. Rights, Obligations, Duties and Responsibilities of the Trustee under the Trust Deed and the SEBI Regulations:

1. The Trustee Company and the AMC have entered into an Investment Management Agreement with the prior approval of SEBI.
2. The Investment Management Agreement contains clauses as are mentioned in the Third Schedule of the SEBI MF Regulations and such other clauses as are necessary for the purpose of making investments.
3. The Trustee Company shall ensure that the AMC has the necessary expertise, internal control systems and risk management mechanism to invest and manage assets of the Mutual Fund.
4. The Trustees shall ensure that the AMC shall comply with such other requirements related to risk management, investor protection, disclosures and reporting, as may be specified by SEBI from time to time.
5. The Trustees shall ensure that the AMC establishes systems and submits reports and information that the Trustees may require in discharging their responsibility under the SEBI MF Regulations including matters relating to:
   (i) Prevention and oversight of mis-selling;
   (ii) Prevention and oversight of undue influence of Sponsor;
   (iii) Ensuring adequate systems are in place to prevent misconduct including market abuse; and
   (iv) Addressing potential conflict of interest.
6. Where the Trustees have reason to believe that the conduct of business of the asset management company is not in accordance with these regulations, the contraventions by asset management company and remedial action taken by the trustees shall immediately be informed to SEBI.
7. The Trustee Company may terminate the assignment of the AMC, with the prior approval of SEBI, under the following circumstances:
   - The Trustees on their own accord, if they have reasons to believe that the affairs of the AMC are being conducted in contravention to the provisions of the SEBI MF Regulations; or
   - If requested by the AMC.
8. The Trustees shall take all necessary measures as they deem necessary to ensure that any conflict of interest involving the AMC is effectively addressed and such measures shall include:
   (a) conducting a quarterly review of reports submitted by the AMC on transactions between the Mutual Fund and the AMC or its associates;
   (b) ensure that the AMC does not grant unfair advantage to its associates or engage in transactions that may prejudice the interests of unitholders;
   (c) ensure that the AMC manages the SIF Investment Strategy(ies) independently of its other business activities, and adopts safeguards to ensure fair and equitable treatment of investors across all SIF Investment Strategy(ies), without compromising the interests of one SIF Investment Strategy for another or for its other businesses; and
   (d) approve broker empanelment policy of the AMC and ensuring that brokers are empaneled after requisite due diligence, and that broker transactions are monitored to avoid undue concentration of business or unfair advantage to any associate or group entity.
9. The Trustees shall ensure that the AMC adheres to the Code of Conduct applicable to it and all activities of the Mutual Fund are in accordance with the provisions of the SEBI MF Regulations.
10. The Trustee Company shall have a right to obtain from the AMC such information as is considered necessary by the Trustee Company.
11. The Trustee Company shall ensure that the transactions under the SIF Investment Strategy(ies) are in accordance with the provisions of the SEBI MF Regulations and the Trust Deed, and the AMC makes investments only in permissible instruments, in compliance with the SEBI MF Regulations and in alignment with the stated investment objectives of each SIF Investment Strategy.

12. The Trustee Company shall be accountable for, and be the custodian of, the funds and property of the respective SIF Investment Strategy and shall hold the same in trust for the benefit of the unitholders in accordance with the Regulations and the provisions of the Trust Deed.
13. The Trustee Company shall ensure that the AMC complies with the obligations under regulation 22 of SEBI MF Regulations.
14. The Trustees shall abide by the Code of Conduct as specified in the Fourth Schedule – PART A of the Regulations.
15. The Trustee Company shall obtain the consent of the unitholders of the SIF Investment Strategy:

a) Whenever required to do so by SEBI for the benefit of the unitholders; or

b) Whenever required to do so, on the requisition made by three-fourths of the unitholders of any SIF Investment Strategy under the Specialized Investment Fund; or

c) When the majority of the directors of the Trustee Company decide to wind up the SIF Investment Strategy.

16. The trustees shall request details of securities transactions by key personnel of the asset management company, whether made in their own name or in the name of the asset management company, and report to SEBI when required.
17. The trustees shall periodically review investor complaints and their resolution by the asset management company.
18. The Trustees shall appoint an auditor, who is not in any manner associated with the auditor of the AMC, for audit of the annual statement of accounts of the SIF Investment Strategy(ies).
19. The Trustee Company shall furnish to SEBI on a half-yearly basis,
    a) A report on the activities of the Mutual Fund.
    b) A certificate stating that the Trustee Company has satisfied itself that there have been no instances of self-dealing or front running by any of the director of the Trustee Company, directors and key personnel of the AMC.
    c) A certificate to the effect that the AMC has been managing the SIF Investment Strategy(ies) independently of any other activities, and any conflicts were addressed to protect unitholders' interests.
20. The independent Directors of the Trustee Company shall review and give their comments on the reports received from the AMC regarding the investments by the Mutual Fund in the securities of group companies of the Sponsor.
21. The trustees shall review the asset management company's net worth quarterly to ensure compliance with clause (e) of sub-regulation (1) of regulation 5 of the SEBI MF Regulations.
22. The trustees shall periodically review service contracts related to custody arrangements and ensure they serve the unitholders' interests.
23. The trustees shall review the details of securities transactions filed by directors of the asset management company on a quarterly basis.
24. The Trustee Company shall exercise due diligence as under:

A. General Due Diligence:

i. The Trustees shall be discerning in the appointment of the directors on the Board of the asset management company.
ii. Trustees shall review the desirability or continuance of the asset management company if substantial irregularities are observed in any of the SIF Investment Strategy(ies) and shall not allow the asset management company to float new SIF Investment Strategy(ies) until the irregularities are resolved.
iii. The Trustee shall ensure that the trust property is properly protected, held and administered by proper persons and by a proper number of such persons.
iv. The Trustee shall ensure that all service providers engaged for mutual fund related services are holding appropriate registrations from SEBI or concerned regulatory authority.
v. The Trustees shall arrange for test checks of service contracts relating to key service providers whose services, functions, operations and access to information/assets is critical to, or could materially influence the protection of investor interests.
vi. Trustees shall immediately report to SEBI of any special developments in the mutual fund.

B. Specific due diligence:

The Trustees shall:

i. obtain internal audit reports at regular intervals from independent auditors appointed by the Trustees,
ii. obtain compliance certificates at regular intervals from the asset management company,
iii. shall meet periodically to review reports and functioning of asset management company and ensure compliance with these regulations.,
iv. maintain records of the decisions of the Trustees at their meetings and of the minutes of the meetings,
v. prescribe and adhere to a code of ethics by the Trustees, asset management company and its personnel,
vi. communicate in writing to the asset management company of the deficiencies and checking on the rectification of deficiencies.

The independent directors of the trustee company and asset management company shall:

i. the investment management agreement and the compensation paid under the agreement;
ii. fees and ensure that fees charged in service contracts entered with associates are not higher than those charged by outside contractors for the similar services;
iii. securities transactions involving associates to the extent such transactions are permitted;
iv. selecting and nominating individuals to fill independent directors' vacancies;
v. ensuing code of ethics designed prevents fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions;
vi. the reasonableness of fees paid to sponsors, asset management company and any others for services provided; and
vii. any service contract with the associates of the asset management company.

25. The Trustees shall ensure that the asset management company has the necessary expertise, internal control systems and risk management mechanism to invest in and manage investments; the asset management company complies with such other requirements related to risk management, investor protection, disclosures and reporting, as may be specified by SEBI from time to time; and all activities of the Specialized Investment Fund are in accordance with the provisions of these regulations.
26. Notwithstanding anything contained in the Regulations, the Directors of the Trustee Company shall not be held liable for acts done in good faith, if they have exercised adequate due diligence.
27. The trustees shall also exercise due diligence on such matters as may be specified by SEBI from time to time.

C. Core Responsibilities of the Trustees:

a) The Trustees shall ensure the fairness of the fees and expenses charged by the AMCs.
b) The Trustees shall review the performance of AMC in its investment strateg(ies) vis-à-vis performance of peers or the appropriate benchmarks.
c) The Trustees shall ensure that the AMCs have put in place adequate systems to prevent mis-selling to increase assets under their management and valuation of the AMCs.
d) The Trustees shall ensure that operations of AMCs are not unduly influenced by the AMCs Sponsor, its associates and other stakeholders of AMCs.
e) The Trustees shall ensure that undue or unfair advantage is not given by AMCs to any of their associates/group entities.
f) The Trustees shall be responsible to address conflicts of interest, if any, between the shareholders /stakeholders /associates of the AMCs and unitholders.
g) The Trustees shall ensure that the AMC has put in place adequate systems to prevent misconduct including market abuse/ misuse of information by the employees, AMC and connected entities of the AMCs.

- The Trustees shall take steps to ensure that there are system level checks in place at AMCs' end to prevent fraudulent transactions including front running by employees, form splitting/ mis-selling by distributors etc. The Trustees shall review such checks periodically.
- The Trustees and their resource persons shall independently evaluate the extent of compliance by AMCs vis-à-vis the identified key areas and not merely rely on AMCs' submissions/external assurances.
- AMCs shall put in place suitable mechanisms/systems to generate system based information/data/reports for evaluation and effective due diligence by the Trustees. AMCs shall provide alerts based automated reports to the Trustees as may be required by the Trustees.

- The Trustees shall ensure that suitable mechanisms/systems are put in place by the AMCs to generate system-based information/data/reports for evaluation and effective due diligence by the Trustees. The Trustees shall also ensure that the AMCs periodically review such systems.
- AMCs shall submit exception reports/analytical information to the Trustees, that add value to the process of exercising their oversight role. The Trustees shall evaluate the nature and adequacy of the alerts and the manner of dealing with such alerts by AMCs.

Supervisory Role of the Trustee

The supervisory role of the Trustee will be discharged inter alia by reviewing the information and operations of the Specialized Investment Fund based on the reports furnished by AMC, internal audit reports/compliance reports received on a periodical basis. The board meeting of the Trustee shall be held at least once in every quarter and at least four such meetings shall be held every year or at such frequency as may be prescribed under the SEBI (Mutual Fund) Regulations, 2026. Further, the board of directors of the Trustee has constituted an audit committee and risk committee. The audit committee shall meet periodically to discuss the internal control systems, the scope of audit of the internal auditors, as well as the observations made by them. The scope of the risk committee shall be as per the SEBI (MF) Regulations and the SEBI Master Circular for Mutual Funds dated March 20,2026 which lays down broad framework for Risk Management.

II. Asset Management Company

quant Money Managers Limited (the **'AMC'**) is an unlisted public limited company incorporated under the Companies Act, 1956 on December 01, 1995, having its Registered Office at 6th Floor, Sea Breeze Building, Appasaheb Marathe Marg, Prabhadevi, Mumbai – 400 025. The quant Money Managers Limited has been appointed as the Asset Management Company of the qsif (offered by quant Mutual Fund) by the Trustee vide Investment Management Agreement (IMA) dated December 12, 2018, and executed between the Trustee and the AMC. quant Money Managers Limited is also the AMC of quant Mutual Fund.

As on March 31, 2026, Equity Shareholding pattern of quant Money Managers Limited is as follows:

Sr. No	Name of the Equity Shareholders	% of paid-up equity share capital	Type of person
1.	quant Capital Finance and Investments Private Limited	90.998	Non-Banking Financial Company
2.	Other Shareholders	9.002	Individuals

A. Details of AMC Directors:

Name	Age	Educational Qualification	Brief Experience
Mr. Sandeep Tandon, Executive Director	56 years	MBA in Finance	Sandeep is the Founder & Chief Investment Officer of the quant Group and has a vast experience of over 33 years in capital markets. His journey in the money management business started in FY 1992-93 with GIC mutual fund (a JV partner with George Soros in India) where he was a trainee. He later joined IDBI Asset Management (now Principal Asset Management), where he was a founding member and was part of the core team that initialized the asset management business. He played a key role in devising, conceptualizing and marketing one of India's most successful mutual fund schemes: IDBI I-NITS 95. Furthermore, Sandeep worked in pivotal positions at several reputed financial services firms including ICICI Securities (a JVpartner with

			J P Morgan in India), Kotak Securities (a J V partner with Goldman Sachs in India) and REFCO (erstwhile global derivatives firm). He has also worked at the Economic Times Research Bureau (a research wing of Bennett, Coleman and Company Limited).
Mr. Mahendra Kumar Jajoo Whole Time Director	58 Years	B. Com, ACA, ACS, CFA (USA)	Mahendra Jajoo has over 30 years of extensive experience, having worked at esteemed institutions like ICICI, ABN AMRO, Tata Group and Mirae Asset. Before his appointment in quant Money Managers Limited, he served as Chief Investment Officer for fixed income at Mirae Asset Investment Managers India, where he played a crucial role in overseeing various debt schemes at Mirae Asset Mutual Fund. His career also includes tenures with Pramerica Asset Managers Ltd., Tata Asset Management Ltd. and ABN AMRO Asset Management Ltd.
Mr. Shashi Menghraj Kataria, Executive Director and Chief Financial Officer	48 years	Chartered Accountant	Shashi has 20 years' total experience in Accounting, Audit, Direct & Indirect Taxation, Financials & MIS, Payroll and Labour Law compliance out of which 13 years are from the Indian Mutual Fund industry. His last assignment was with PPFAS Asset Management Private Limited as CFO & Director. He was previously associated with DSP Blackrock Investment Managers Private Limited as Manager Finance. He had also worked on assignment basis in various companies like Cargotec India Private Limited, Redbull India Private Limited, UTV Software Limited, UCB Pharmaceuticals Limited, Cravatex Limited, among several others, while he was associated with Ganesh Jagadeesh & Co. Chartered Accountants. He is a Commerce graduate from Mumbai University and a fellow member of Institute of Chartered Accountants of India (ICAI).
Mr. Nishith Mehta Independent Director	46 years	Bachelor of Commerce, Company Secretary (ICSI)	Nishith Mehta leads the Risk and Compliance Practice at Trilegal, with a focus on regulatory strategy, governance, and control frameworks for financial institutions. He works closely with clients in banking, NBFCs, fintech, asset management, and securities sectors, advising on complex regulatory, compliance, and operational risk matters. His practice integrates global best practices, drawing from regulatory standards in the US, UK, and Asia, tailored to the needs of Indian and regional markets. Prior to joining Trilegal in August 2025, Nishith spent over 15 years at Bank of America Merrill Lynch, where he was Co-Head of Asia Pacific Compliance and

			Operational Risk. He led the Compliance and Operational Risk function for India, Japan, and South Asia (Singapore, Indonesia, Malaysia, Thailand, and the Philippines), covering a broad spectrum of businesses, products and asset classes within Global Banking and Markets. Nishith also served as the Country Head of Compliance and Operational Risk and Chief Compliance Officer for all regulated entities in India. Over a career spanning 25 years, Nishith has held senior compliance roles at Lehman Brothers, HSBC, Kotak Mahindra group (a JV with Goldman Sachs), and Edelweiss group. He has served on multiple regional and global governance forums, including the APAC Executive Committee of Bank of America
Mr. Deep Shukla, Independent Director	53 years	B. Com, LL.B, FCS	For over a decade and half now, Mr. Deep has been engaged as consultant/retainer with significant number of Reputed Listed Companies, Foreign Companies and Private Companies. He is also associated with some of the entities in capacity of a Professional Director. Due to his various involvements as professional corporate law advisor, he has vast associations with various industry experts and professionals from wide range of disciplines like Solicitors, Advocates, Chartered Accountants and Cost Accountants. Deep is a Fellow Member of Institute of Company Secretaries of India (ICSI) and a Graduate of Bachelor of Commerce and Law (specialized as professional Corporate Law Advisor). His clientele is diverse and ranges from Agrotech to IT and BFSI to Logistics & Travel.
Mr. Kamal Kumar Basu, Independent Director	63 years	B.Com and Marketing Management, Diploma from Jamnalal Bajaj Institute of Management Studies	Mr. Kamal Basu has over 30 years of rich experience in Marketing and Brand Leading. His passion for brands and its consumers took him on a career journey traversing marquee advertising agency brands like Young & Rubicam, Ogilvy, and Saatchi & Saatchi. During his career, he managed brands across service categories (British Airways, American Express Cards), Pharmacy (Glaxo, Smithkline Beecham, Novartis, J&J) to Personal and Body Care (Hindustan Unilever, P&G) amongst others. He started his career with Rediffusion Y&R, after which he subsequently moved to Ogilvy & Mather. He then became the youngest CEO of Saatchi & Saatchi for 11 years and led the agency into the top 10 agencies. Later, he worked as Head of Marketing with SKODA India and then as Head of Marketing & PR with Volkswagen India. He has also worked as Advisor – ecommerce and Brand Lead with Nissan Motor, India and as Head e-commerce & CRM with Petromin Automotive.

Mr. Rickson Rodricks Independent Director	47 years	Digital Information Technology	Mr. Rickson is an M.B.B.S dropout turned Serial entrepreneur with over 25 years of experience in varied sectors such as Internet business, Film productions, Hospitality, Currency and Commodity trading & Portfolio management services. He has been amongst the earliest Digital marketing trainers, SEO professionals & Growth hackers in India.

Duties and Responsibilities of the Asset Management Company (AMC) as specified in Regulation.

Asset Management Company and its obligations as specified in the SEBI (Mutual Funds) Regulations 2026 are as under:

1. The AMC shall ensure that all its activities adhere to these regulations including taking all reasonable steps and exercise due diligence to ensure that the investment of funds pertaining to SIF Investment Strategy(ies) is not contrary to the provisions of the Regulations, circulars / and guidelines and the Trust Deed.
2. The AMC shall exercise due diligence and reasonable care in all its investment decisions as would be exercised by other persons engaged in the same business.
3. The board of directors of the AMC shall ensure before the launch of any SIF Investment Strategy(ies) that the AMC has:

a) Systems in place for its back office, dealing room and accounting;
b) Appointed all Key Personnel including fund manager(s) for the SIF Investment Strategy(ies) and submitted their bio-data which shall contain the educational qualifications, past experience in the securities market to the Trustee Company, within 15 calendar days of their appointment;
c) Appointed Auditors to audit its accounts;
d) appointed a compliance officer who shall be responsible for monitoring the compliance of the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by SEBI or the Central Government and for redressal of investors grievances;
e) Appointed Registrars and transfer agent and laid down parameters for their supervision;
f) Prepared a compliance manual and designed internal control mechanisms including internal audit systems;
g) Specified norms for empanelment of brokers and marketing agents; and
h) Obtained, wherever required under the Regulations, prior in principle approval from the recognised stock exchange(s) where units are proposed to be listed, in a manner specified by the exchanges.

4. The asset management company shall invest such amounts in such SIF Investment Strategy(ies) of the mutual fund, based on the risks associated with the SIF Investment Strategy(ies), as may be specified by SEBI.
5. The asset management company shall invest a percentage of the remuneration of employees in units of SIF Investment Strategy(ies) based on the designation or roles, as specified by SEBI.
6. The asset management company shall not invest in any of its SIF Investment Strategy(ies) unless full disclosure of its intention to invest has been made in the offer documents.
7. The asset management company shall not charge any fees on its own investments in a SIF Investment Strategy(ies) of a mutual fund managed by it.
8. The Chief Executive Officer of the AMC shall ensure that the Mutual Fund complies with all the provisions of the Regulations and the guidelines or circulars issued in relation thereto from time to time and that the investments made by the fund managers are in the interest of the Unitholders and shall also be responsible for the overall risk management function of the Mutual Fund.
9. The Chief Executive Officer shall also ensure that the AMC has adequate systems in place to ensure that the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fourth Schedule of the Regulations are adhered to in letter and spirit. Any breach of the said Code of Conduct shall be brought to the attention of the Board of Directors of the AMC and the Trustee Company.
10. The fund managers (whatever the designation may be including the Chief Investment Officer) shall ensure that the funds of the SIF Investment Strategys are invested to achieve the objectives of the SIF Investment Strategy, are in the interest of the Unitholders and in compliance with the provisions of the Regulations and related guidelines and circulars.
11. The fund managers (whatever be the designation including the Chief Investment Officer) shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fourth

Schedule of the Regulations and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any.

12. The dealers (whatever be the designation) shall ensure that orders are executed on the best available terms, taking into account the relevant market at the time for transactions of the kind and size concerned to achieve the objectives of the SIF Investment Strategy(ies) and in the best interest of all the unit holders.
13. The dealers (whatever be the designation) shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fourth Schedule of the Regulations and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any.
14. The Compliance Officer appointed shall independently and immediately report to SEBI for any non-compliance.
15. The employees of the AMC shall not render, directly or indirectly any investment advice about any security in the publicly accessible media, whether real-time or non-real-time, unless a disclosure of his interest including long or short position in the said security has been made, while rendering such advice. Provided that in case of rendering investment advice, he/she shall also disclose the interest of his dependent family members and the employer including their long or short position in the said security, while rendering such advice.
16. The asset management company shall ensure that the purchase or sale of securities through any stock broker that is an associate of the sponsor does not, on average, exceed five percent of the aggregate value of securities purchased or sold by the mutual fund across all its SIF Investment Strategys.
17. The asset management company may undertake purchase or sale of securities through a stock broker which is not an associate of the sponsor in excess of five percent of the aggregate value of securities transacted by the mutual fund across all its SIF Investment Strategys, provided that the justification for exceeding the limit is recorded in writing and reported to the trustees on a quarterly basis. Explanation: The limits specified in clauses shall apply for each block of three months and shall exclude transactions relating to the sale and distribution of units issued by the mutual fund.
18. Where an asset management company proposes to utilise the services of the sponsor or any of its associates, employees or their relatives, for the purpose of any securities transaction, distribution and sale of securities, the proposed engagement of such persons shall be disclosed to the unitholders and the brokerage or commission paid shall be disclosed in the half-yearly and annual accounts of the mutual fund. The half-yearly and yearly annual accounts disclosure shall include: a. subscription by the SIF Investment Strategys in the issues lead managed by associate companies; and b. subscription to any equity or debt issue on a private placement basis where the sponsor or its associate companies acted as arranger or manager.
19. If the asset management company enters into any securities transactions with any of its associates, a report to that effect shall be placed before the trustees at their next meeting.
20. If the investment made by any company in a SIF Investment Strategy(ies) exceeds five per cent of the net asset value of the SIF Investment Strategy(ies) , the investment made by that SIF Investment Strategy(ies) or by any other SIF Investment Strategy(ies) of the same mutual fund in that company or its subsidiaries shall be brought to the notice of the trustees by the asset management company and be disclosed in the half-yearly and annual accounts of the respective schemes, with justification for such investment, where the cross investment is made within a period of one year before or after the initial investment.
21. The AMC shall submit to the Trustees quarterly reports on its activities and the compliance with the Regulations. The board of directors shall ensure that there has been exercise of due diligence on the reports submitted by the AMC to the Trustees.
22. The AMC shall file with the Trustee Company and SEBI:
    a) detailed biodata of all its directors along with their interest in other companies within fifteen calendar days of their appointment;
    b) a half yearly report regarding any change in the interests of directors; and
    c) a quarterly report to the Trustee Company giving details and adequate justification about the purchase and sale of the securities of the group companies of the Sponsor or the AMC, as the case may be, by the Mutual Fund during the said quarter.
23. Each director of the AMC shall file the details of his transactions of dealing in securities with the Trustee Company on a quarterly basis in accordance with guidelines issued by SEBI.
24. The asset management company shall file with trustees the details of transactions in securities by its key personnel in their own name or in the name of the asset management company, and shall report to SEBI, as required.
25. The board of directors of the asset management company shall ensure that –

a. the asset management company has been diligent in empaneling brokers, monitoring securities transactions with brokers, and avoiding undue concentration of business with specific brokers;
b. the asset management company has not given any undue or unfair advantage to any associate or dealt with any associate in any manner detrimental to the interest of unit holders;
c. the transactions entered into by the asset management company align with these regulations, investment objective and asset allocation of the respective schemes;
d. mutual fund transactions align with the provisions of the trust deed; e. the net worth of the asset management company is reviewed quarterly to ensure continuous compliance with the threshold provided in clause (e) of sub-regulation (1) of regulation 5;
e. all service contracts, including custody arrangements for assets and transfer agency of securities, are executed in the interest of unit holders and test checks of service contracts are arranged;
f. there is no conflict of interest between the deployment of the asset management company's net worth and the interest of unit holders;
g. investor complaints are periodically reviewed and redressed;
h. all service providers hold appropriate registrations with SEBI or relevant regulatory authority;
i. any special developments in the mutual fund are immediately reported to the trustees; and
j. due diligence is exercised on such matters as specified by the SEBI.
k. The AMC shall be responsible for the acts of commission or omission by its employees or the persons whose services have been procured by the AMC, where such act or omission is committed in the course of carrying out functions under the Regulations and involve negligence, breach of duty or failure to comply with applicable law.

26. The AMC shall abide by the Code of Conduct as specified in Part A of the Fourth Schedule of the Regulations.
27. The AMC shall establish, implement and maintain an institutional mechanism as may be specified by SEBI, for the identification and deterrence of potential market abuse including front-running and fraudulent transactions in securities.
28. The Chief Executive Officer or Managing Director or such other person of equivalent or analogous rank and Chief Compliance Officer of the AMC shall be responsible and accountable for implementation of such an institutional mechanism for deterrence of potential market abuse, including front-running and fraudulent transactions in securities.
29. The AMC shall establish, implement and maintain a documented whistle blower policy that shall (a) provide for a confidential channel for employees, directors, Trustees, and other stakeholders to raise concerns about suspected fraudulent, unfair or unethical practices, violations of regulatory or legal requirements or governance vulnerability, and (b) establish procedures to ensure adequate protection of the whistle blowers.
30. The AMC shall constitute a Unit Holder Protection Committee in the form and manner and with a mandate as may be specified by SEBI.
31. The Asset management company shall ensure compliance with the Investor Charter specified by SEBI.
32. The AMC shall appoint registrars and share transfer agents who are registered with SEBI, provided if the work relating to the transfer of units is processed in-house, the charges at competitive market rates may be debited to the SIF Investment Strategy(ies) and for rates higher than the competitive market rates, prior approval of the Trustee Company shall be obtained and reasons for charging higher rates shall be disclosed in the annual accounts.
33. The AMC shall compute and carry out valuation of investments made by the schemes of the Mutual Fund in accordance with the investment valuation norms specified in Seventh Schedule and shall publish the same.
34. The AMC and the Sponsor shall be liable to compensate the affected investors and/or the SIF Investment Strategy(ies) for any unfair treatment to any investor as a result of inappropriate valuation.
35. The AMC shall report and disclose all the transactions in debt and money market securities, including inter SIF Investment Strategy(ies) transfers, as may be specified by SEBI from time to time.
36. The AMC shall ensure that no change in the fundamental attributes of any SIF Investment Strategy(ies) or the trust, fees and expenses payable or any other change which would modify the SIF Investment Strategy(ies) and affect the interest of unit holders, shall be carried out unless:-

a) a written communication (including digital modes such as email/sms etc.) about the proposed change is sent to each unit holder;
b) details, as specified by SEBI, are appropriately displayed on the website of the AMC; and
c) the unit holders are given an option to exit at the prevailing Net Asset Value without any exit load.

37. The asset management company shall be responsible for calculating any income due to be paid to the mutual fund and also any income received in the mutual fund for the unit holders of any scheme, in accordance with these regulations and the trust deed.
38. The asset management company shall conduct stress testing for such schemes as specified by SEBI and disclose the results in the form and manner specified by SEBI.
39. The AMC shall not carry out its fund management operations or execution of transactions relating to the Mutual Fund, outside the territory of India, except for execution of trades for investment in overseas securities.
40. The AMC may request the Trustees for termination of the assignment of the AMC at any time. Provided that such termination shall become effective only after the Trustees have accepted the termination of assignment and communicated their decision in writing to the AMC.
41. Notwithstanding anything contained in any contract or agreement or termination, the AMC or its directors or other officers shall not be absolved of liability to the Mutual Fund for their acts of commission or omission, while holding such position or office.
42. The AMC shall not appoint any person as key personnel who has been found guilty of any economic offence or involved in violation of securities laws.
43. The AMC shall obtain, wherever required under the Regulations, prior in-principle approval from the recognized stock exchange(s) where units are proposed to be listed.
44. The AMC shall –

– not act as a trustee of any mutual fund;

– not undertake any business activities other than in the nature of management and advisory services provided to pooled assets including offshore funds, insurance funds, pension funds, provident funds, or such categories of foreign portfolio investor subject to such conditions as maybe specified by SEBI from time to time, if any of such activities are not in conflict with the activities of the Mutual Fund.

Provided that the AMC may itself or through its subsidiaries undertake any such activities, if it satisfies SEBI and ensures that the conditions as laid under the applicable regulations are met.

Provided further that the AMC may, itself or through its subsidiaries, undertake portfolio management services and advisory services for other than broad based fund till further directions, as may be specified by SEBI, subject to complying with the following additional conditions viz. (i) that bank and securities accounts are segregated activity wise (ii) that the capital adequacy requirements, if any, separately for each such activity are met and that separate approval, if necessary under the relevant regulations is obtained; (iii) there is no material conflict of interest across different activities (iv) absence of conflict of interest shall be disclosed to the trustees and unit holders in Investment Strategy information document and statement of additional information (v) if there are unavoidable conflict of interest situations, it shall satisfy itself that disclosures are made of source of conflict, potential 'material risk or damage' to investor interests and detailed parameters for the same; (vi)it appoints separate fund manager for each separate fund managed by it unless the investment objectives and asset allocation are same and the portfolio is replicated across all the funds managed by the fund manager as may be specified by SEBI from time to time are adhered to.

Provided further that the asset management company may, itself or through its subsidiaries, undertake portfolio management services and advisory services for other than broad based fund till further directions, as may be specified by SEBI, subject to compliance with the following additional conditions:-

(i) it satisfies SEBI that key personnel of the asset management company, the system, back office, bank and securities accounts are segregated activity wise and there exist system to prohibit access to inside information of various activities; and
(ii) it meets with the capital adequacy requirements, if any, separately for each of such activities and obtain separate approval, if necessary under the relevant regulations:

The AMC may become a proprietary trading member for carrying out trades in the debt segment of a recognised stock exchange, on behalf of a mutual fund and may also become a self-clearing

member of the recognised clearing corporations to clear and settle trades in the debt segment on behalf of its schemes.

45. (i) The AMC for each SIF Investment Strategy(ies) shall keep and maintain proper books of account, records and documents, for each SIF Investment Strategy(ies) so as to explain its transactions (including inter SIF Investment Strategy(ies) transactions and rationale for valuation), maintain a complete audit trail and to disclose at any point of time the financial position of each SIF Investment Strategy(ies) and in particular give a true and fair view of the state of affairs of the Mutual Fund and intimate to the SEBI the place where such books of account, records and documents are maintained.

(iii) The AMC shall maintain and preserve for a period of eight years its books of account, records and documents.

46. The AMC shall not carry out its fund management operations or execution of transactions relating to the Mutual Fund, outside the territory of India, except for execution of trades for investment in overseas securities.

47. The AMC shall put in place suitable mechanisms/systems to generate system-based information/data/reports for evaluation and effective due diligence by the Trustees. AMC shall provide alerts based automated reports to the Trustees as may be required by the Trustees.

The asset management company shall ensure that the Specialized Investment Fund has distinct identification, separate from that of the mutual fund, to maintain a clear differentiation between the offerings of the Specialized Investment Fund and that of a mutual fund. The asset management company shall comply with the provisions relating to branding, advertising, standard disclaimers, guidelines on usage of sponsor or asset management company or mutual fund's brand name and maintenance of a separate website, as may be specified by the Board from time to time.

AMC shall observe the above-mentioned duties and obligations. Notwithstanding this, duties and obligations as stated in the regulations, from time to time, shall prevail upon stated above.

As and when there is an addition/deletion/modification in the duties and responsibilities of the AMC due to a change in the Regulations, such additions/deletions/modifications shall be applicable in line with SEBI MF Regulations from time to time.

A. Information on Key Personnel:

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
Mr. Sandeep Tandon	56 Years	Chief Investment Officer and Fund Manager-Equity	MBA in Finance	Over 34 years of experience of Capital Markets	Sandeep is the Founder & Chief Investment Officer of the quant Group and has a vast experience of over 33 years in capital markets. His journey in the money management business started in FY 1992- 93 with GIC mutual fund (a JV partner with George Soros in India) where he was a trainee. He later joined IDBI Asset Management (now Principal Asset Management), where he was a founding member and was part of the core team that initialized the asset management business. He played a key

					role in devising, conceptualizing and marketing one of India's most successful mutual fund schemes: IDBI I-NITS 95. Furthermore, Sandeep worked in pivotal positions at several reputed financial services firms including ICICI Securities (a JV partner with J P Morgan in India), Kotak Securities (a J V partner with Goldman Sachs in India) and REFCO (erstwhile global derivatives firm). He has also worked at the Economic Times Research Bureau (a research wing of Bennett, Coleman and Company Limited). **Relevant Experience in managing the investment strategies for SIF.** Earlier, as Chief Executive Officer of Quant Broking from 2008 to 2018, Sandeep led the proprietary trading vertical, overseeing a daily average turnover exceeding $1 billion. Under his leadership, the vertical executed a diverse range of derivative long-short strategies, including equity arbitrage, equity volatility arbitrage, commodity arbitrage, pair trading, sectoral long-short, event-driven long-short, spread strategies and special situations. Over the 10-year period, the proprietary trading operations consistently achieved profitability, with no recorded yearly or quarterly losses at the aggregate level.
Mr. Prempraka sh Dubey	47 Years	Head-Operations	Master in Business Administrations, Masters in Commerce, Bachelor in Commerce, Govt. Diploma in Co-operation & Accountancy, Diploma in	Over 25 years of experience	Premprakash has overall 24 years of experience involving over 19 years in Mutual Fund FA & Treasury & Trade Operations. Prior to this he was with PPFAS Asset Management Private Limited, as Chief Manager – Operations, in the domain of NAV, trade operations, banking operations &

			Business Management		reporting. Prior to that he was with DSP Mutual Fund as Senior Manager-Trade & Treasury Operations (TTO) monitoring end-to-end trade reporting and settlement & managing daily cash flow reporting & team supervision activities. His various prior stints include Matsun Casting Private Limited as Account Assistant, G D Rathi & Company as part of the audit staff, Kanak Vora Capital Private Limited etc. He has rich and varied experience across investment Banking, evaluation of information, processing of accounts, managing confidential information for corporate and retail clients & portfolio management. As a trade operations professional, he has assisted clients on complete trade life cycle from trade confirmation to settlement, clearing and reporting, monitoring trades for settlement in the market and payment processing. He has expertise in managing service operations for rendering and achieving quality services; providing first line customer support by answering trade related queries & resolving their issues and ensuring minimum TAT. He holds an M.Com degree, a Government Diploma in Co-operative and Accountancy (G.D.C.A.) and is a MBA (Finance).
Ms. Ushalakshmi Raman	59 Years	Chief Compliance Officer & Company Secretary	B Com (Hons), Chartered Accountant, Cost Accountant, Company Secretary	Over 31 years of experience	Usha Lakshmi Raman, has over 30 years of experience in the industry and has previously held leadership roles at SBI Funds Management as Head of Internal Audit and at JPMorgan where she was responsible for Custody Securities Operations and Risk Management. She brings to the table seasoned expertise in many areas of internal

					audit, operations, process improvement and strategy. Usha is accomplished as a CA, CS and Cost Accountant and is a regular speaker at the Institute of Chartered Accountants of India. In 2024, she received an award as the STAR Woman of WIRC of ICAI. Her leadership will be instrumental in upholding our commitment to the highest standards of integrity and ethical business practices. By ensuring that our compliance framework evolves and adapts to the ever-changing needs of the industry and regulators, Usha will play a key role in reinforcing our dedication to responsible governance and operational excellence.
Mr. Anupam Saxena	52 years	Chief Business Officer – Retail	Post Graduate in Management SIESCOMS, Certificate program in Business Strategy – IIM Kozhikode, Ruth Cohn Leadership Program – Tata Institute of Fundamental Research, Mumbai	Over 21 years of experience	Mr. Anupam has prolific experience of more than 20 years in the Mutual Fund Industry. He completed his post graduate in Management from SIESCOMS, a Certificate program in Business Strategy from IIM Kozhikode and was part of Ruth Cohn Leadership Program at Tata Institute of Fundamental Research. Before joining quant, Anupam has worked at leading Mutual Fund houses including DSP Blackrock MF, LIC MF and Motilal Oswal MF. Given his vast experience and qualifications, Anupam handles various responsibilities of Sales, Business Development and Internal Training programs.
Mr. Surendra Yadav	51 years	Chief Business Officer-Wealth & Management Investors	B.com, MBA - Marketing	Over 21 years of experience	Mr. Surendra has over two decades' experience in Sales and Business Development. His last assignment was with Sundaram Asset Management where he was working as Senior Vice President and National Head Sales; responsible for managing sales and distributors across various

					segments including MFDs, National distributors, and Banks. Surendra has also worked with Strategic Capital Corporation Pvt. Ltd. and India Infoline Distribution Company Ltd. He holds a Commerce degree and is an MBA with specialization in Marketing. In his free time; he loves to practice yoga and is an avid marathoner.
Ms. Khushboo Meshri	29 Years	Chief Risk Officer	MBA, M.com (Hons) in Finance	More than 8 years of experience	Khushboo Meshri is the Chief Risk Officer at quant Mutual Fund. Before joining quant, Khushboo worked in market surveillance at the Bombay Stock Exchange. In Financial Surveillance she conducted investigations and coordinated with the regulator to create a framework for proactive identification of financial frauds. In Online Surveillance, Khushboo was responsible for strengthening systems that generate periodic alerts & monitor various segments of the market for any aberrant activity. Prior to that, she worked in internal audit at the State Bank of Mauritius, where she helped identify and reduce all business risks through effective implementation and monitoring of controls. Khushboo holds a dual MBA and Master of Commerce degree from the University of Mumbai. She is an alumni of St. Xavier's College, Mumbai.
Ms. Sudha Biju	49 years	Chief Investor Relations Officer	Masters in Financial Management from Welingkar Institute of Management	Over 21 years of experience	Sudha has two decades of experience in client services, complaint investigation and resolution. She was previously working with HDFC Asset Management Private Limited as AVP – Corporate Client Service where she led the Call Centre team, focused on performance management and ensured high-quality customer service and efficient handling of inquiries. She was also

					responsible for client servicing and service operations for HNIs and was responsible for the development/documentation of various processes/ activities handled by the client services team. Previous to this, she worked with HSBC Asset Management as Associate Vice President – Customer Service. She also worked with HDFC Limited as a Call Centre Head for recoveries and was a part of the Six Sigma Project while restructuring the Call Centre. She also did stints with e-Serve International as a Unit Head – External Business and Citibank Credit Cards. She holds an M'Com degree and a Master in Financial Management.
Mr. Shashi Menghraj Kataria	47 years	Executive Director & Chief Financial Officer	Chartered Accountant	Over 21 years of experience	Shashi has 20 years' total experience in Accounting, Audit, Direct & Indirect Taxation, Financials & MIS, Payroll and Labour Law compliance out of which 13 years are from the Indian Mutual Fund industry. His last assignment was with PPFAS Asset Management Private Limited as CFO & Director. He was previously associated with DSP Blackrock Investment Managers Private Limited as Manager Finance. He had also worked on assignment basis in various companies like Cargotec India Private Limited, Redbull India Private Limited, UTV Software Limited, UCB Pharmaceuticals Limited, Cravatex Limited, among several others, while he was associated with Ganesh Jagadeesh & Co. Chartered Accountants. He is a Commerce graduate from Mumbai University and a fellow member of Institute of Chartered Accountants of India (ICAI)

Mr. Dinesh Khot	39 years	Chief Information Security Officer	Bachelor's degree in Science (Information Technology)	Over 13 years of experience	Dinesh Khot is a Chief Manager and Chief Information Security Officer at quant Money Managers Limited. He is responsible for the overall information and cyber security strategy and its implementation across the organization. Dinesh has over 12 years of industry experience across Information Technology and Cyber Security domains. He is skilled in IT Strategy and Services, Technology Implementation, Business Automation and Processes, Business Continuity Planning and Disaster Recovery Planning (BCP-DRP) and Vendor Management. Dinesh holds a Bachelor's degree in Science (Information Technology). His professional certifications include VCP and MCITP Certified Professional
Mr. Sanjeev Sharma	49 years	Fund Manager Debt & Chief Dealer - Debt	M.Com, PGDBA (Fin), Certification in Treasury, Forex & Risk Management	Overs 21 years of experience in Fixed Income dealing	Sanjeev has total work experience of more than two decade of experience in equity, debt, fund management and treasury operations. **Relevant Experience in managing the investment strategies for SIF.** He has total work experience of more than two decades in treasury and has extensive experience in deploying various strategies for all instruments viz. equity, debt and derivatives.
Mr. Ankit Pande	41 years	Fund Manager Equity	CFA, MBA	Overs 14 years of experience	Ankit has Experience of more than 14 years in Indian equities and of over 3 years in software products with Infosys' core banking software, Finacle. Began his career in equity research in 2011, picking up the (U.S. based) CFA charter in 2015 and MBA from The Chinese University of Hong Kong in 2017. He won the Thomson Reuters StarMine Award for

					best stock picker in the IT sector in 2014 and is a lifetime member of the Beta Gamma Sigma Honour society. **<u>Relevant Experience in managing the investment strategies for SIF.</u>** Under the leadership of Mr. Sandeep Tandon, at Quant Broking, Ankit was tasked with developing fundamental long-short investment ideas, incorporating strategies such as covered calls and protective puts. Ankit is also Fund Manager of various schemes of quant Mutual Fund and has successfully generated superior risk-adjusted returns in his tenure.
Mr. Sameer Kate	56 years	Fund Manager-Equity & Chief Dealer-Equity	Bachelor of Computer Science - Pune University, MBA from IME Pune	Over 21 years of experience	Sameer has over two decades of experience in Indian equities and derivatives dealing. Prior to joining quant MF, Sameer was Sr. Sales Trader at Investec Capital covering equity and derivatives trading for domestic and foreign institutional clients. He has also worked for over 16 years at Kotak Securities (Institutional Equities) as a Derivatives Sales Trader. **<u>Relevant Experience in managing the investment strategies for SIF.</u>** Sameer started his career with world's largest derivative group REFCO and worked as a derivatives dealer. Later for 16 years he was part of Kotak group and served as Senior Derivatives Sales Trader for Kotak Securities - JV with Goldman Sachs. He also served as an advisor to the Kotak Group Proprietary Desk managing assets under management (AUM) exceeding ₹500 crore. Renowned in the industry for his expertise in synthetic derivatives, Sameer later

					joined Investec Capital, focusing on equity and derivatives trading for domestic and institutional clients. Currently at quant, he holds the role of Chief Dealer and is focused on Arbitrage opportunities, overseeing of various derivative investment strategies.
Mr. Jignesh Shah	54 years	Fund Manager – Equity	Graduate - Sydenham College of Commerce and Economics, Mumbai - CFA - ICFAI	Over 34 years	Jignesh brings over three decades of experience in the securities markets, having begun his investment career in 1993. Over this period, he has developed deep expertise across equity, macroeconomic, and commodity markets, shaped by his experience through multiple global market cycles. He has had prior professional engagement with the Quant group and has developed a strong familiarity with its investment philosophy, institutional processes, and disciplined risk management framework. Earlier in his career, he worked with Nippon Life AMC as an Investment Analyst, where he tracked global commodities and built a strong foundation in fundamental research. He subsequently held senior portfolio management positions at leading asset management firms including ICICI Prudential AMC and Aditya Birla Sun Life AMC, where he successfully managed diversified equity portfolios across varying market conditions. His experience and familiarity with quant's investment framework further strengthen the continuity, depth, and institutional robustness of the investment team.
Mr. Haroonvardhan Sirohi	23 Years	Dealer - Debt & Fund Manager – Debt	Bachelor of Commerce (Honours) – Jindal School of Banking & Finance	8 months	Haroonvardhan has been working at quant Mutual Fund as a Trainee with the Investment Department assisting Fund Managers with research/ operations for the past seven months.

Mr. Yug Tibrewal	31 years	Dealer- Equity	Bachelor of Management studies (B.M.S), CFA charterholder	Over 8 Years of Experience	Yug Tibrewal is a CFA charterholder with over seven years of diverse experience in financial markets. At quant Mutual Fund, he specializes in liquidity analytics, fundamental research, and portfolio risk mitigation, while overseeing trade execution and analytics.
Mr. Sourav Banerjee	28 years	Dealer - Equity	MMS – MFM from Jamnalal Bajaj Institute of Management Studies, B.com, M.com.	Over 9 years of experience	Sourav Banerjee has experience in dealing of securities and audits.
Mr. Harshvardhan Bharatia	23 years	Dealer-Debt,	Bcom (Honours) in Finance CFA Level-1	Over 2 years of experience	Harshvardhan brings valuable experience in trading global fixed income products, including Secured Overnight Financing Rates (SOFR), Federal Funds Rates (FFR), and Treasury Bonds, from his time at Axxela Research and Analytics. Holding a degree in finance, he leverages various analytical tools to mitigate portfolio risks while maximizing returns. With over a year of experience in the quant MF investment team, Harshvardhan has honed his expertise in credit risk evaluation and interest rate management, skills he uses to strategically position the portfolio for optimal performance
Mr. Ravtej Batra	22 Years	Dealer – Equity	Finance Graduate from Australian National University, with a specialization in Asian capital markets	5 Months	Ravtej, during his tenure at Grant Thornton within the Corporate Intelligence practice, was involved in supporting due diligence and risk assessment assignments, developing a disciplined approach to data analysis, information verification, and regulatory sensitivity. His stint at Arimus Law and Robonomics AI further strengthened his understanding of governance, documentation standards, and structured processes. He brings analytical rigor, attention to detail, and a process-oriented mindset to

					the execution and monitoring of equity trades.
Mr. Shubham Ray	22 Years	Dealer – Equity	Bachelor of Commerce (Honours) degree from Narsee Monjee Institute of Management Studies (NMIMS)	10 Months	Shubham has gained early career exposure at Faclon Labs and Air India SATS, where he worked across data, software, and operational teams, developing a structured approach to workflow coordination and real-time problem-solving. He brings operational discipline, cross-functional coordination skills, and a systems-oriented perspective to the execution and settlement of equity transactions.

PROCEDURE AND MANNER OF RECORDING INVESTMENT DECISIONS

The fund managers carry out daily investment activities within the framework of SEBI guidelines in accordance with the investment objectives.

All investment decisions are recorded and documented in the format approved by the Boards of the AMC and Trustee and are monitored on a test-check basis by the Trustee Auditors. The fund manager continuously monitors all investment decisions and their impact on the performance of the investment strategies and carries out suitable adjustment on periodic intervals. Adherence to overall risk parameters is monitored by the Chief Investment Officer & CEO on a regular basis. The Boards of AMC and Trustee review the performance of the investment strategies in comparison with investment strategies of other Specialized Investment Fund (with similar investment objective and asset profile generally) and benchmark of the investment strategy.

III. Service providers

Service provider	Name	Address	SEBI Regn. No.
Custodian	HDFC Bank Limited	Empire Plaza 1, 04th Floor, LBS Marg, Vikhroli (W), Mumbai 400083	IN/CUS/001
Registrar and Transfer Agent #	Kfin Technologies Limited	Selenium, Tower B, Plot No 31 And 32, Financial District, Nanakramguda, Serilingampally, Hyderabad, Telangana, 500032.	INR000000221
Statutory Auditor for Specialized Investment Fund	M/s. M M Nissim & Co. LLP	Barodawala Mansion, B Wing, 3rd Floor, 81, Dr. Annie Besant Road, Worli, Mumbai - 400 018.	N.A.

Legal Counsel	There are no retained legal counsels to the Specialized Investment Fund or AMC. The AMC uses the services of renowned legal counsel, if need arises.	N.A.	N.A.
Fund Accountant	HDFC Bank Limited	Empire Plaza 1, 04th Floor, LBS Marg, Vikhroli (W), Mumbai 400083	N.A.
Collecting Banker	During the NFO of the investment strategies, the AMC may appoint the Collecting Bankers to accept the applications for investments into the investment strategies. The details of the collecting bankers i.e. Name, Address and other required details will be communicated during the respective NFOs of the investment strategies or as and when the Bankers are appointed.		

The Boards of AMC and Trustee have ensured that the Registrar has adequate capacity to discharge responsibilities with regard to processing of applications and dispatching unit certificates to unit holders within the time limit prescribed in the Regulations and also has sufficient capacity to handle investor complaints.

IV. Condensed financial information (CFI) *for all the investment strategies launched by SIF during the last three fiscal years (excluding redeemed investment strategies) in the format given below:*

HISTORICAL PER UNIT STATISTICS	**qsif Equity Long-Short Fund (Date of Allotment: October 07, 2025)**		
	April 1, 2025 - March 31, 2026	**April 01, 2024- March 31, 2025**	**April 01, 2023- March 31, 2024**
NAV at the beginning of the year			
Growth Option – Direct Plan	N.A.	N.A.	N.A.
Growth Option – Regular Plan	N.A.	N.A.	N.A.
IDCW Option – Direct Plan	N.A.	N.A.	N.A.
IDCW Option – Regular Plan	N.A.	N.A.	N.A.
Income Distribution cum Capital Withdrawal (IDCW)*		N.A.	N.A.
NAV at the end of the year		N.A.	N.A.
Growth Option – Direct Plan	9.1001	N.A.	N.A.
Growth Option – Regular Plan	9.0356	N.A.	N.A.
IDCW Option – Direct Plan	9.1001	N.A.	N.A.
IDCW Option – Regular Plan	9.0356	N.A.	N.A.
Annualized return**		N.A.	N.A.
Growth Option - Direct Plan	-12.01%	N.A.	N.A.
Growth Option - Regular Plan	-12.81%	N.A.	N.A.
Net Assets end of period (in Rs. Crs)	500.47	N.A.	N.A.
Ratio of Recurring Expenses to net assets (%)		N.A.	N.A.
Direct Plan	0.97	N.A.	N.A.
Regular Plan	2.44	N.A.	N.A.

*** Only for growth option.*

HISTORICAL PER UNIT STATISTICS	**qsif Hybrid Long-Short Fund (Date of Allotment: October 15, 2025)**		
	April 1, 2025 - March 31, 2026	**April 01, 2024- March 31, 2025**	**April 01, 2023- March 31, 2024**
NAV at the beginning of the year			

Growth Option – Direct Plan	N.A.	N.A.	N.A.
Growth Option – Regular Plan	N.A.	N.A.	N.A.
IDCW Option – Direct Plan	N.A.	N.A.	N.A.
IDCW Option – Regular Plan	N.A.	N.A.	N.A.
Income Distribution cum Capital Withdrawal (IDCW)*		N.A.	N.A.
NAV at the end of the year		N.A.	N.A.
Growth Option – Direct Plan	9.9227	N.A.	N.A.
Growth Option – Regular Plan	9.8523	N.A.	N.A.
IDCW Option – Direct Plan	9.9227	N.A.	N.A.
IDCW Option – Regular Plan	10.0167	N.A.	N.A.
Annualized return**		N.A.	N.A.
Growth Option - Direct Plan	-1.56%	N.A.	N.A.
Growth Option - Regular Plan	-2.28%	N.A.	N.A.
Net Assets end of period (in Rs. Crs)	135.09	N.A.	N.A.
Ratio of Recurring Expenses to net assets (%)		N.A.	N.A.
Direct Plan	0.62	N.A.	N.A.
Regular Plan	2.16	N.A.	N.A.

HISTORICAL PER UNIT STATISTICS	**qsif Equity Ex-Top 100 Long-Short Fund (Date of Allotment: November 12, 2025)**		
	April 1, 2025 - March 31, 2026	**April 01, 2024- March 31, 2025**	**April 01, 2023- March 31, 2024**
NAV at the beginning of the year			
Growth Option – Direct Plan	N.A.	N.A.	N.A.
Growth Option – Regular Plan	N.A.	N.A.	N.A.
IDCW Option – Direct Plan	N.A.	N.A.	N.A.
IDCW Option – Regular Plan	N.A.	N.A.	N.A.
Income Distribution cum Capital Withdrawal (IDCW)*		N.A.	N.A.
NAV at the end of the year		N.A.	N.A.
Growth Option – Direct Plan	8.7933	N.A.	N.A.
Growth Option – Regular Plan	8.7425	N.A.	N.A.
IDCW Option – Direct Plan	8.7933	N.A.	N.A.
IDCW Option – Regular Plan	8.7425	N.A.	N.A.
Annualized return**		N.A.	N.A.
Growth Option - Direct Plan	-16.17%	N.A.	N.A.
Growth Option - Regular Plan	-16.84%	N.A.	N.A.
Net Assets end of period (in Rs. Crs)	174.19	N.A.	N.A.
Ratio of Recurring Expenses to net assets (%)		N.A.	N.A.
Direct Plan	0.95	N.A.	N.A.
Regular Plan	2.45	N.A.	N.A.

*** Only for growth option.*

V. RISK FACTORS

1. Standard Risk Factors

Some of the specific risk factors related to the Investment strategy include, but are not limited to the following:

(i) Risk factors associated with investing in equities and equity related instruments

- Equity shares and equity related instruments are volatile and prone to price fluctuations on a daily basis. Investments in equity shares and equity related instruments involve a degree of risk and investors should not invest in the Investment strategy unless they can afford to take the risks.
- Securities, which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges. Investment in such securities may lead to increase in the investment strategy portfolio risk.
- While securities that are listed on the stock exchange carry lower liquidity risk, the ability to sell these investments is limited by the overall trading volume on the stock exchanges and may lead to the Investment strategy incurring losses till the security is finally sold.
- Investment strategy's performance may differ from the benchmark index to the extent of the investments held in the debt segment, as per the investment pattern indicated under normal circumstances.

(ii) Risk factors associated with investing in Fixed Income Securities

- The Net Asset Value (NAV) of the Investment strategy, to the extent invested in Debt and Money Market instruments, will be affected by changes in the general level of interest rates. The NAV of the Investment strategy is expected to increase from a fall in interest rates while it would be adversely affected by an increase in the level of interest rates.
- Money market instruments, while fairly liquid, lack a well developed secondary market, which may restrict the selling ability of the Investment strategy and may lead to the Investment strategy incurring losses till the security is finally sold.
- Investments in money market instruments involve credit risk commensurate with short term rating of the issuers.
- Investment in Debt instruments are subject to varying degree of credit risk or default (i.e. the risk of an issuer's inability to meet interest or principal payments on its obligations) or any other issues, which may have their credit ratings downgraded. Changes in financial conditions of an issuer, changes in economic and political conditions in general, or changes in economic or and political conditions specific to an issuer, all of which are factors that may have an adverse impact on an issuer's credit quality and security values. The Investment Manager will endeavour to manage credit risk through in-house credit analysis. This may increase the risk of the portfolio. The Investment Manager will endeavour to manage credit risk through in-house credit analysis.
- **Prepayment Risk**: Certain fixed income securities give an issuer the right to call back its securities before their maturity date, in periods of declining interest rates. The possibility of such prepayment may force the Investment strategy to reinvest the proceeds of such investments in securities offering lower yields, resulting in lower interest income for the Investment strategy.
- **Reinvestment Risk**: This risk refers to the interest rate levels at which cash flows received from the securities in the Investment strategy are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk is that the rate at which interim cash flows can be reinvested may be lower than that originally assumed.
- **Settlement risk**: Different segments of Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances. Delays or other problems in settlement of transactions could result in temporary periods when the assets of the Investment strategy are uninvested and no return is earned thereon. The inability of the Investment strategy to make intended securities purchases, due to settlement problems, could cause the Investment strategy to miss certain investment opportunities. Similarly, the inability to sell securities held in the Investment strategy's portfolio, due to the absence of a well developed and liquid secondary market for debt securities, may result at times in potential losses to the Investment strategy in the event of a subsequent decline in the value of securities held in the Investment strategy's portfolio.
- Government securities where a fixed return is offered run price-risk like any other fixed income security. Generally, when interest rates rise, prices of fixed income securities fall and when interest rates drop, the prices increase. The extent of fall or rise in the prices is a function of the existing coupon, days to maturity and the increase or decrease in the level of interest rates. The new level of interest rate is determined by the rates at which government raises new money and/or the price levels at which the market is already dealing in existing securities. The price-risk is not unique to Government Securities. It exists for all fixed income securities. However, Government Securities are unique in the sense that their credit risk generally remains zero. Therefore, their prices are influenced only by movement in interest rates in the financial system.
- Different types of fixed income securities in which the Investment strategy would invest as given in the Investment Strategy Information Document carry different levels and types of risk. Accordingly, the

Investment strategy risk may increase or decrease depending upon its investment pattern. e.g. corporate bonds carry a higher level of risk than Government securities. Further even among corporate bonds, AAA rated bonds are comparatively less risky than AA rated bonds.

- The AMC may, considering the overall level of risk of the portfolio, invest in lower rated / unrated securities offering higher yields as well as zero coupon securities that offer attractive yields. This may increase the absolute level of risk of the portfolio.
- As zero coupon securities do not provide periodic interest payments to the holder of the security, these securities are more sensitive to changes in interest rates and are subject to issuer default risk. Therefore, the interest rate risk of zero coupon securities is higher. The AMC may choose to invest in zero coupon securities that offer attractive yields. This may increase the risk of the portfolio. Zero coupon or deep discount bonds are debt obligations that do not entitle the holder to any periodic payment of interest prior to maturity or a specified date when the securities begin paying current interest and therefore, are generally issued and traded at a discount to their face values. The discount depends on the time remaining until maturity or the date when securities begin paying current interest. It also varies depending on the prevailing interest rates, liquidity of the security and the perceived credit risk of the Issuer. The market prices of zero coupon securities are generally more volatile than the market prices of securities that pay interest periodically.
- The Investment strategy at times may receive large number of redemption requests, leading to an asset-liability mismatch and therefore, requiring the investment manager to make a distress sale of the securities leading to realignment of the portfolio and consequently resulting in investment in lower yield instruments.
- **Risks associated with investment in unlisted securities**:
  Except for any security of an associate or group company, the investment strategy can invest in securities which are not listed on a stock exchange ("unlisted Securities") which in general are subject to greater price fluctuations, less liquidity and greater risk than those which are traded in the open market. Unlisted securities may lack a liquid secondary market and there can be no assurance that the Investment strategy will realise their investments in unlisted securities at a fair value.
- Investment in unrated instruments may involve a risk of default or decline in market value higher than rated instruments due to adverse economic and issuer-specific developments. Such investments display increased price sensitivity to changing interest rates and to a deteriorating economic environment. The market values for unrated investments tends to be more volatile and such securities tend to be less liquid than rated debt securities.

(iii) Risks associated with Investing in Structured Obligation (SO) & Credit Enhancement (CE) rated securities

The risks factors stated below for the Structured Obligations & Credit Enhancement are in addition to the risk factors associated with debt instruments.

- Credit rating agencies assign CE rating to an instrument based on any identifiable credit enhancement for the debt instrument issued by an issuer. The credit enhancement could be in various forms and could include guarantee, shortfall undertaking, letter of comfort, etc. from another entity. This entity could be either related or non-related to the issuer like a bank, financial institution, etc. Credit enhancement could include additional security in form of pledge of shares listed on stock exchanges, etc. SO transactions are asset backed/ mortgage backed securities, securitized paper backed by hypothecation of car loan receivables, securities backed by trade receivables, credit card receivables etc. Hence, for CE rated instruments evaluation of the credit enhancement provider, as well as the issuer is undertaken to determine the issuer rating. In case of SO rated issuer, the underlying loan pools or securitization, etc. is assessed to arrive at rating for the issuer.
- **Liquidity Risk**: SO rated securities are often complex structures, with a variety of credit enhancements. Debt securities lack a well-developed secondary market in India, and due to the credit enhanced nature of CE securities as well as structured nature of SO securities, the liquidity in the market for these instruments is adversely affected compared to similar rated debt instruments. Hence, lower liquidity of such instruments, could lead to inability of the investment strategy to sell such debt instruments and generate liquidity for the investment strategy or higher impact cost when such instruments are sold.
- **Credit Risk**: The credit risk of debt instruments which are CE rated is based on the combined strength of the issuer as well as the structure. Hence, any weakness in either the issuer or the structure could have an adverse credit impact on the debt instrument. The weakness in structure could arise due to inability of the investors to enforce the structure due to issues such as legal risk, inability to sell the underlying collateral or enforce guarantee, etc. In case of SO transactions, comingling risk and risk of

servicer increases the overall risk for the securitized debt or assets backed transactions. Therefore apart from issuer level credit risk such debt instruments are also susceptible to structure related credit risk.

(iv) Risk factors associated with investment in Tri-Party Repo

The Mutual Fund/SIF is a member of securities segment and Triparty Repo trade settlement of the Clearing Corporation of India (CCIL). All transactions of the SIF in government securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL; thus reducing the settlement and counterparty risks considerably for transactions in the said segments. The members are required to contribute an amount as communicated by CCIL from time to time to the default fund maintained by CCIL as a part of the default waterfall (a loss mitigating measure of CCIL in case of default by any member in settling transactions routed through CCIL). As per the waterfall mechanism, after the defaulter's margins and the defaulter's contribution to the default fund have been appropriated, CCIL's contribution is used to meet the losses. Post utilization of CCIL's contribution if there is a residual loss, it is appropriated from the default fund contributions of the non-defaulting members. Thus the investment strategy is subject to risk of the initial margin and default fund contribution being invoked in the event of failure of any settlement obligations. In addition, the fund contribution is allowed to be used to meet the residual loss in case of default by the other clearing member (the defaulting member). CCIL shall maintain two separate Default Funds in respect of its Securities Segment, one with a view to meet losses arising out of any default by its members from outright and repo trades and the other for meeting losses out of any default by its members from Triparty Repo trades. The fund is exposed to the extent of its contribution to the default fund of CCIL, in the event that the contribution of the fund is called upon to absorb settlement/default losses of another member by CCIL, as a result the investment strategy may lose an amount equivalent to its contribution to the default fund.

(v) Risk factors associated with Repo in Corporate Debt Securities

In repo transactions, also known as a repo or sale repurchase agreement, securities are sold with the seller agreeing to buy them back at later date. The repurchase price should be greater than the original sale price, the difference effectively representing interest. A repo in corporate debt securities is economically similar to a secured loan, with the buyer receiving corporate debt securities as collateral to protect against default. Some of the risks associated with repo in corporate debt are given below:

- **Counterparty Risk**: Counterparty risk refers to the inability of the seller to meet the obligation to buy back securities at the contracted price on the contracted date. In case of over the counter (OTC) repo trades, the investment manager will endeavour to manage counterparty risk by dealing only with counterparties having strong credit profiles. Also, the counter-party risk is to an extent mitigated by taking collateral equivalent in value to the transaction after knocking off a minimum haircut on the intrinsic value of the collateral. In the event of default by the repo counterparty, the investment strategy shall have recourse to the corporate debt securities. In case the repo transaction is executed on exchange platform approved by RBI/SEBI, the exchange may also provide settlement guarantee.
- **Collateral Risk**: Collateral risk arises when the market value of the securities is inadequate to meet the repo obligations. This risk can be partly mitigated by restricting participation in repo transactions only in corporate debt securities which are approved by credit risk team. Additionally, to address the risk related to reduction in market value of corporate debt security held as collateral due to credit rating downgrade, the repo contract can incorporate either an early termination of the repo agreement or call for fresh margin to meet the minimum haircut requirement or call for replacement of security with eligible security. Moreover, the investment manager may apply a higher haircut on the underlying security than required as per RBI/SEBI regulation to adjust for the illiquidity and interest rate risk on the underlying instrument. To mitigate the risk of price reduction due to interest rate changes, the adequacy of the collateral can be monitored on a daily basis by considering the daily market value & applying the prescribed haircut. The investment manager or the exchange can then arrange for additional collateral from the counterparty, within a prespecified period. If the counterparty is not able to top-up either in form of cash / collateral, it would tantamount to early termination of the repo agreement, and the outstanding amount can be recovered by sale of collateral.

(vi) Risk factors associated with investing in Non- Convertible Preference Shares

- **Credit Risk**: Credit risk is the risk that an issuer will be unable to meet its obligation of payment of dividend and/ or redemption of principal amount on the due date. Further, for non-cumulative preference shares, issuer also has an option to not pay dividends on preference shares in case of inadequate profits in any year.

- **Liquidity Risk**: The preference shares generally have limited secondary market liquidity and thus we may be forced to hold the instrument till maturity.
- **Unsecured in nature** - Preference shares are unsecured in nature and rank lower than secured and unsecured debt in hierarchy of payments in case of liquidation. Thus there is significant risk of capital erosion in case the company goes into liquidation.

(vii)General Risk factors

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

(viii) Risk factors associated with investing in Foreign Securities

- **Currency Risk:** Moving from Indian Rupee (INR) to any other currency entails currency risk. To the extent that the assets of the Investment strategy will be invested in securities denominated in foreign currencies, the Indian Rupee equivalent of the net assets, distributions and income may be adversely affected by changes in the value of certain foreign currencies relative to the Indian Rupee.
- **Interest Rate Risk**: The pace and movement of interest rate cycles of various countries, though loosely co-related, can differ significantly. Hence by investing in securities of countries other than India, the Investment strategy stand exposed to their interest rate cycles.
- **Credit Risk**: Investment in Foreign Debt Securities are subject to the risk of an issuer's inability to meet interest and principal payments on its obligations and market perception of the creditworthiness of the issuer. This is substantially reduced since the SEBI (MF) Regulations stipulate investments only in debt instruments with rating not below investment grade by accredited/registered credit rating agency.
- **Taxation Risk:** Investment in Foreign Securities poses additional challenges based on the tax laws of each respective country or jurisdiction. The investment strategy may be subject to a higher level of taxes than originally anticipated and or dual taxation. The Investment strategy may be subject to withholding or other taxes on income and/or gains arising from its investment portfolio. Further, such investments are exposed to risks associated with the changing / evolving tax / regulatory regimes of all the countries where the Investment strategy invests. All these may entail a higher outgo to the Investment strategy by way of taxes, transaction costs, fees etc. thus adversely impacting its NAV; resulting in lower returns to an Investor.
- **Legal and Regulatory Risk**: Legal and regulatory changes could occur during the term of the Investment strategy which may adversely affect it. If any of the laws and regulations currently in effect should change or any new laws or regulations should be enacted, the legal requirements to which the Investment strategy and the investors may be subject could differ materially from current requirements and may materially and adversely affect the Investment strategy and the investors. Legislation/ Regulatory guidelines could also be imposed retrospectively.

- **Country Risk**: The Country risk arises from the inability of a country, to meet its financial obligations. It is the risk encompassing economic, social and political conditions in a foreign country, which might adversely affect foreign investors' financial interests. In addition, country risks would include events such as introduction of extraordinary exchange controls, economic deterioration, bi-lateral conflict leading to immobilisation of the overseas financial assets and the prevalent tax laws of the respective jurisdiction for execution of trades or otherwise.
- To manage risks associated with foreign currency and interest rate exposure, the fund may use derivatives for efficient portfolio management including hedging and in accordance with conditions as may be stipulated by SEBI/ RBI from time to time.

(ix) Risk factors associated with investing in Derivatives

- The AMC, on behalf of the Investment strategy may use various derivative products, from time to time, in an attempt to protect the value of the portfolio and enhance Unit holders' interest. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but of the derivative itself. Other risks include, the risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.
- Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies.
- The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments.

- **Credit Risk**:
  The credit risk in derivative transaction is the risk that the counter party will default on its obligations and is generally low, as there is no exchange of principal amounts in a derivative transaction
- **Market Risk**:
  Market movements may adversely affect the pricing and settlement of derivatives.
- **Illiquidity risk**:
  This is the risk that a derivative cannot be sold or purchased quickly enough at a fair price, due to lack of liquidity in the market.

(x) Risks Factors associated with investing in Derivatives for short exposure

- Derivative strategies are designed to capitalize on price movements in underlying assets. However, significant market volatility may lead to substantial losses, particularly in directional strategies or uncovered positions, where unexpected price swings could impact performance.
- Strategies employing options, are subject to time decay, where the value of options decreases as expiration nears. If anticipated price movements do not materialize within the option’s lifespan, these positions may become unprofitable, affecting returns.
- Derivative trading involves costs such as premiums, commissions, and bid-ask spreads, which can erode returns. This is particularly relevant for strategies with narrow profit margins, or complex strategies like spreads and combinations requiring multiple transactions.
- Certain derivatives may exhibit lower liquidity, resulting in wider bid-ask spreads or challenges in entering or exiting positions at optimal prices. This may increase costs or complicate trade execution, especially in advanced strategies like diagonal spreads or synthetic positions.
- Sudden market events or shifts in implied volatility can disrupt strategies, which rely on the underlying asset remaining within a specific price range. Misalignment with market conditions may lead to losses.
- Strategies involving short positions, such as synthetic stock or income generation through writing options, may require significant margin reserves. Failure to meet margin obligations could result in forced liquidations at unfavorable prices, impacting portfolio performance.

(xi) Additional Risk viz. Basis Risk associated with imperfect hedging using Interest Rate Futures (IRF):
The imperfect correlation between the prices of securities in the portfolio and the IRF contract used to hedge part of the portfolio leads to basis risk. Thus, the loss on the portfolio may not exactly match the gain from the hedge position entered using the IRF.

(xii) Risk factors associated with Securities Lending: As with other modes of extensions of credit, there are risks inherent to securities lending, including the risk of failure of the other party, in this case the approved intermediary, to comply with the terms of the agreement entered into between the lender of securities i.e. the Investment strategy and the approved intermediary. Such failure can result in the possible loss of rights to the collateral put up by the borrower of the securities, the inability of the approved intermediary to return the securities deposited by the lender and the possible loss of any corporate benefits accruing to the lender from the securities deposited with the approved intermediary. The investment strategy may not be able to sell lent out securities, which can lead to temporary illiquidity & loss of opportunity.

(xiii) Risk factors associated with investing in Securitised Debt: The Risks involved in Securitised Papers described below are the principal ones and does not represent that the statement of risks set out hereunder is exhaustive.

- **Limited Liquidity & Price Risk**
  There is no assurance that a deep secondary market will develop for the Certificates. This could limit the ability of the investor to resell them.
- **Limited Recourse, Delinquency and Credit Risk**
  The Credit Enhancement stipulated represents a limited loss cover to the Investors. These Certificates represent an undivided beneficial interest in the underlying receivables and do not represent an obligation of either the Issuer or the Seller or the originator, or the parent or any affiliate of the Seller, Issuer and Originator. No financial recourse is available to the Certificate Holders against the Investors' Representative. Delinquencies and credit losses may cause depletion of the amount available under the Credit Enhancement and thereby the Investor Payouts to the Certificate Holders may get affected if the amount available in the Credit Enhancement facility is not enough to cover the shortfall. On persistent default of a Obligor to repay his obligation, the Servicer may repossess and sell the Asset. However many factors may affect, delay or prevent the repossession of such Asset or the length of time required to realise the sale proceeds on such sales. In addition, the price at which such Asset may be sold may be lower than the amount due from that Obligor.
- **Risks due to possible prepayments and Charge Offs**
  In the event of prepayments, investors may be exposed to changes in tenor and yield. Also, any Charge Offs would result in the reduction in the tenor of the Pass Through Certificates (PTCs).
- **Bankruptcy of Bank with Liquidity facility**
  If the Bank with Liquidity facility, becomes subject to bankruptcy proceedings then an investor could experience losses or delays in the payments.
- **Risk of Co-mingling**
  With respect to the Certificates, the Servicer will deposit all payments received from the Obligors into the Collection Account. However, there could be a time gap between collection by a Servicer and depositing the same into the Collection account especially considering that some of the collections may be in the form of cash. In this interim period, collections from the Loan Agreements may not be segregated from other funds of originator. If originator in its capacity as Servicer fails to remit such funds due to Investors, the Investors may be exposed to a potential loss.

(xiv) Risk factors associated with investments in Perpetual Debt Instrument (PDI)

Perpetual Debt instruments are issued by Banks, NBFCs and corporates to improve their capital profile. Some of the PDIs issued by Banks which are governed by the RBI guidelines for Basel III Capital Regulations are referred to as Additional Tier I (AT1 bonds). While there are no regulatory guidelines for issuance of PDIs by corporate bodies, NBFCs issue these bonds as per guidelines issued by RBI. The instruments are treated as perpetual in nature as there is no fixed maturity date. The key risks associated with these instruments are highlighted below:

Key Risk Factors: -

- **Risk on coupon servicing**

Banks

As per the terms of the instruments, Banks may have discretion at all times to cancel distributions/ payment of coupons. In the event of non-availability of adequate distributable reserves and surpluses or inadequacy in terms of capital requirements, RBI may not allow banks to make payment of coupons.

NBFCs

While NBFCs may have discretion at all times to cancel payment of coupon, coupon can also be deferred (instead of being cancelled), in case paying the coupon leads to breach of capital ratios.

Corporates

Corporates usually have discretion to defer the payment of coupon. However, the coupon is usually cumulative and any deferred coupon shall accrue interest at the original coupon rate of the PDI.

- **Risk of write-down or conversion into equity**

Banks

As per the regulatory requirements, Banks have to maintain a minimum Common Equity Tier-1 (CET-1) ratio of Risk Weighted Assets (RWAs), failing which the AT-1 bonds can get written down. Further, AT-1 Bonds are liable to be written down or converted to common equity, at the discretion of RBI, in the event of Point of Non Viability Trigger (PONV). PONV is a point, determined by RBI, when a bank is deemed to have become non-viable unless there is a write off/ conversion to equity of AT-1 Bonds or a public sector capital injection happens. The write off/conversion has to occur prior to public sector injection of capital. This risk is not applicable in case of NBFCs and Corporates.

- **Risk of instrument not being called by the Issuer**

Banks

The issuing banks have an option to call back the instrument after minimum specified period from the date of issuance and thereafter, subject to meeting the RBI guidelines. However, if the bank does not exercise the call on first call date, the Investment strategy may have to hold the instruments for a period beyond the first call exercise date.

NBFCs

The NBFC issuer has an option to call back the instrument after minimum specific period as per the regulatory requirement from date of issuance and thereafter, subject to meeting the RBI guidelines. However, if the NBFC does not exercise the call option the Investment strategy may have to hold the instruments for a period beyond the first call exercise date. Corporates There is no minimum period for call date. However, if the corporate does not exercise the call option, the Investment strategy may have to hold the instruments for a period beyond the call exercise date.

(xv) Risk factors associated with Short Selling

Short-selling is the sale of shares which are not owned by the seller at the time of trade. Instead, he borrows it from someone who already owns it. Later, the short seller buys back the stock he shorted and returns the stock to close out the loan. If the price of the stock corrects, Short seller can buy the stock back for less than he received for selling it and earn profit (the difference between higher short sale price and the lower purchase price).If the price of stock appreciates, short selling results in loss. Thus, Short positions carry the risk of losing money and these losses may grow theoretically unlimited if the price increases without limit and shall result into major losses in the portfolio.

(xvi) Risk factors associated with processing of transaction through Stock Exchange Mechanism

The trading mechanism introduced by the stock exchange(s) is configured to accept and process transactions for fund units in both Physical and Demat Form. The allotment and/or redemption of Units through NSE and/or BSE or any other recognised stock exchange(s), on any Business Day will depend upon the modalities of processing viz. collection of application form, order processing/settlement, etc. upon which the Fund has no control. Moreover, transactions conducted through the stock exchange mechanism shall be governed by the operating guidelines and directives issued by respective recognized stock exchange(s).

(xvii) Risk factors associated with REITs and InvITs:

- **Price Risk:** Securities/Instruments of REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. The extent of fall or rise in the prices is a fluctuation in general market conditions, factors and forces affecting capital market, Real Estate and Infrastructure sectors, level of interest rates, trading volumes, settlement periods and transfer procedures.
- **Interest Rate Risk:** Securities/Instruments of REITs and InvITs run interest rate risk. Generally, when interest rates rise, prices of units fall and when interest rates drop, such prices increase.
- **Credit Risk**: Credit risk means that the issuer of a REIT/InvIT security/ instrument may default on interest payment or even on paying back the principal amount on maturity. Securities/ Instruments of REITs and InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be pre scheduled.
- **Liquidity Risk:** This refers to the ease with which securities/instruments of REITs/InvITs can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence there would be time when trading in the units could be infrequent. The subsequent valuation of illiquid units

may reflect a discount from the market price of comparable securities/instruments for which a liquid market exists. As these products are new to the market they are likely to be exposed to liquidity risk.

- **Reinvestment Risk:** Investments in securities/instruments of REITs and InvITs may carry reinvestment risk as there could be repatriation of funds by the Trusts in form of buyback of units or Dividend pay-outs, etc. Consequently, the proceeds may get invested in assets providing lower returns.
- **Legal and Regulatory Risk:** The regulatory framework governing investments in securities/instruments of REITs and InvITs comprises a relatively new set of regulations and is therefore untested, interpretation and enforcement by regulators and courts involves uncertainties. Presently, it is difficult to forecast as to how any new laws, regulations or standards or future amendments will affect the issuers of REITs/InvITs and the sector as a whole. Furthermore, no assurance can be given that the regulatory system will not change in a way that will impair the ability of the Issuers to comply with the regulations, conduct the business, compete effectively or make distributions.

(xviii) Risk factors associated for investments in SIF Investment strategy

1. Movements in the Net Asset Value (NAV) of the Investment strategy may impact the performance. Any change in the investment policies or fundamental attributes of this Investment strategy will affect the performance of the Investment strategy to the extent of investment in such investment strategy.

2. Redemptions in this Investment strategy would be subject to applicable exit loads.

2. Special Considerations

i. As the liquidity of the investment strategy investments may sometimes be restricted by trading volumes and settlement periods, the time taken by the Specialized Investment Fund for redemption of Units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the investment strategy portfolios. In view of this, the Trustee has the right, in its sole discretion, to limit redemptions under certain circumstances.

ii. Neither the ISID and SAI, nor the Units have been registered in any jurisdiction. The distribution of the ISID in certain jurisdictions may be restricted or subject to registration requirements and, accordingly, persons who come into possession of the ISID and the SAI in such jurisdictions are required to inform themselves about, and to observe, any such restrictions. No person receiving a copy of the ISID or any accompanying application form in such jurisdiction may treat the ISID or such application form as constituting an invitation to them to subscribe for Units, nor should they in any event use any such application form, unless in the relevant jurisdiction such an invitation could lawfully be made to them and such application form could lawfully be used without compliance of any registration or other legal requirement.

iii. The Specialized Investment Fund is not assuring any returns nor is it assuring that it will make periodic distributions. All Income Distribution cum capital withdrawal (IDCW) distributions are subject to the investment performance of the investment strategy, availability of distributable profits and computed in accordance with SEBI (MF) Regulations

iv. The Specialized Investment Fund/AMC has not authorized any person to give any information or make any representations, either oral or written, not stated in the ISID/SAI in connection with issue of Units under any of the investment strategy of qsif. Prospective investors are advised not to rely upon any information or representations not incorporated in ISID/SAI as the same have not been authorized by the Specialized Investment Fund or the AMC. Any subscription, purchase or sale made by any person on the basis of statements or representations which are not contained in ISID/ SAI or which are inconsistent with the information contained herein shall be solely at the risk of the investor.

v. Suspicious Transaction Reporting: If after due diligence, the AMC believes that any transaction is suspicious in nature as regards money laundering, the AMC shall report any such suspicious transactions to competent authorities under PMLA and rules/guidelines issued thereunder by SEBI and/or RBI, furnish any such information in connection therewith to such authorities and take any other actions as may be required for the purposes of fulfilling its obligations under PMLA and rules/guidelines issued thereunder by SEBI and/or RBI without obtaining the prior approval of the investor/Unit Holder/any other person.

vi. The AMC and its Registrar reserve the right to disclose/share investors' personal information with the following third parties:

1. Registrar, Banks and / or authorised external third parties who are involved in transaction processing, dispatches, etc., of investors' investment in the investment strategy;

2. Distributors or Sub-brokers or Registered Investment Advisors through whom applications of investors are received for the investment strategy; or;
3. Any other organisations for compliance with any legal or regulatory requirements or to verify the identity of investors for complying with anti-money laundering requirements.
4. Account statements or financial information pertaining to the investor, if it is to be sent over the internet to the Unitholder, distributors or any other entity as indicated above, will be sent only through a secure means and / or through encrypted electronic mail.

vii. Non-Individual Investors should note the following:

1. A list of specimen signatures of the authorized officials, duly certified / attested should also be attached to the Application Form.
2. In case of application for any transaction, the authorized signatories/officials should sign such application under their official designation and as per the authority granted to them under their constitutional documents/board resolutions etc.
3. In case a generic board resolution authoring investment has been submitted, the AMC/Fund reserves the right to consider such generic resolution as a valid authorisation for all other financial and non-financial transactions including but not limited to redemption/switches etc. Accordingly, all transactions executed by the officials named in such generic resolution would be processed by the AMC/Fund.

viii. The tax benefits described in the Investment Strategy Information Document and Statement of Additional Information are as available under the present taxation laws and are available subject to relevant conditions. The information given is included only for general purpose and is based on advise received by the AMC regarding the law and practice currently in force in India and the Unit holders should be aware that the relevant fiscal rules or their interpretation may change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of an investment in any of the investment strategy will endure indefinitely. In view of the individual nature of tax consequences, each Unit holder is advised to consult his/her own professional tax advisor.

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

x. Any dispute arising out of any of the investment strategy shall be subject to the exclusive jurisdiction of the Courts in India. Statements in the Investment Strategy Information Document and Statement of Additional Information are, except where otherwise stated, based on the law, practice currently in force in India, and are subject to changes therein.

xi. The Specialized Investment Fund may disclose details of the investor's account and transactions there under to those intermediaries whose stamp appears on the application form. In addition, the Specialized Investment Fund may disclose such details to the bankers / its agents, as may be necessary for the purpose of effecting payments to the investor. Further, the Specialized Investment Fund may disclose details of the investor's account and transactions thereunder to any Regulatory/Statutory entities as per the provisions of law.

VI. How to Apply?

Purchase

1. New investors can purchase units by using an application form or through such other modes as may be offered by the AMC, subject to KYC and various requirements and documents. Existing unit holders may use the transaction slip attached to their account statement or use a Common Transaction Form or through such other modes as may be offered by the AMC. Application forms or common transaction forms are generally available at the official points of acceptance of transactions during the business hours. The same can also be downloaded from the website of the SIF https://www.qsif.com.

2. The duly completed application form/transaction slip/common transaction form, as the case maybe, can be submitted at any of the official points of acceptance of transactions. The official point of acceptance of transaction will stamp, and return the acknowledgement slip in the application form, to acknowledge

receipt of the application, subject to verification. No other form of acknowledgement will be provided. Investors should retain the acknowledgement evidencing submission of the transaction till they receive a confirmation of acceptance or rejection of transaction. In case of difference of details in acknowledgement vis a vis actual transaction document, the details as mentioned on transaction document will prevail.

3. Investors should mandatorily use the Application Forms, Transactions Request, SIP/STP/SWP forms included in the KIM and other standard forms available at the ISCs / https://www.qsif.com or any financial/non-financial transactions, investor and MFDs may also use RTA and AMFI forms. may Any transactions received in any non-standard forms are liable to be rejected. Further, any transaction or request received on a non-standard form or document not specified by the Fund will still be governed and subject to terms and conditions of the standard forms and investment strategies related documents. Investor using application form/ transaction request for financial/ non- financial transactions not provided by the Fund declare that they have read and understood the contents of the Investment Strategy Information Document and Statement of Additional Information, Key Information Memorandum, instructions and addenda issued by quant Mutual Fund/Specialized Investment Fund from time to time. Any transactions request received with incomplete information are liable to be rejected or may be processed at the sole discretion of the AMC.

4. The AMC/Registrar may open or close offices/ISCs or change address of an office from time to time. Investors may obtain latest addresses of Official Points of Acceptance of Transactions from the relevant ISID or by calling the AMC/Registrar or available on the website of SIF i.e. www.qsif.com Investors are requested to note that no transaction shall be accepted on a day which is a public and /or bank holiday or non-business days or local holiday at an Investor Service Centre/ Official Points of Acceptance of Transaction.

5. Investors should provide details/instructions only in the space provided in the relevant form in CAPITAL case and in English language. Further, any details/notings/information/instruction provided at a non-designated area of the standard form being used, or any additional details for which space is not designated in the standard form, may not be executed by the AMC. If the details are not mentioned clearly or in capital case, the AMC will endeavour to capture client and transaction details on a best effort basis and will not be liable towards data entry errors due to illegible or unclear handwriting. Hence, investors should check all details as mentioned in the Account Statement to verify details and approach the AMC for any corrections within 15 days from the date of application.

6. Facility of transactions is available on the official website www.qsif.com for selected investment strategies of qsif. Accordingly, the said website will also be considered as an official point of acceptance for applications for subscriptions, redemptions, switches and other available facilities as the case may be.

7. The Trustees shall have absolute discretion to reject any application for purchase of Units, if in its opinion, increasing the size of the Unit Capital is not in the general interest of the Unit Holders, or if for any other reason it does not believe it would be in the best interest of the investment strategy or its Unit Holders to accept such an application.

8. Applicants have to specify the “mode of holding” in the application form. If an application is made by:

I. one investor, the mode of holding will “Single”;

II. more than one investor (maximum three permitted), the mode of holding should be specified as “Joint” or “Anyone or Survivor”. If the mode of holding is specified as “Joint”, all transactions/instructions will have to be signed by all joint holders, while for mode of holding specified as “Anyone or Survivor”, all transactions/instructions may be signed by anyone of the Unit holders. If the mode of holding is not specified or is ambiguous, it will be treated as “Joint”, where there is more than one holder. With respect to Units held in demat mode, the rules of Depository for operation of such DP account shall be applicable. Request for nomination needs to be signed by all unit holders jointly, irrespective of “mode of holding”.

9. In all cases, proceeds of redemption will be paid to the first-named holder (as determined by reference to the original application form). Further, the first named holder shall receive the account statements, all notices and correspondences with respect to the account, or IDCW or other distributions and also have the voting rights, as permitted, associated with such units.

10. The proceeds towards redemptions and IDCW will be dispatched by a reasonable mode of despatch like courier, Speed post, etc. in case of cheque/ demand draft or directly credited to the bank account (as per the details mentioned by the investor), entirely and solely at the risk of the investor. The Specialized

Investment Fund will endeavour to remit redemption proceeds via electronic means, as made available by RBI. Where such electronic means are not available or feasible under any circumstances, the Specialized Investment Fund will remit the redemption proceeds by way of cheques. The investor will not hold the Mutual Fund/Specialized Investment Fund or the AMC or the Registrar responsible for any non-receipt or delay of receipt of redemption & IDCW proceeds due to any negligence or deficiency in service by the courier company, postal authorities or the bank executing direct credits, or due to incorrect bank account details provided by the investor.

11. Investors must clearly specify investment strategies/plans/options /sub-option in the application form and ensure that the form is accompanied by a cheque/demand draft/account to account transfer instruction, bank acknowledgement favouring investment strategies/plans/options/sub-option. In case of ambiguity or any discrepancy, the application is liable to be rejected or default plan/ option may be applied for allotment of the Units at the sole discretion of the AMC.

12. Where the Investment Strategy name as written on the application form and on the payment instrument differs, the proceeds may, at the discretion of the AMC be allotted in the investment strategy as mentioned on the application form.

13. It is mandatory for all applicants/investors (including guardians, joint holders, NRIs and power of attorney holders) to mention their bank account No., permanent account number (PAN) irrespective of the amount of purchase in the application form. In order to verify that the PAN of the applicants (in case of application in joint names, each of the applicants) has been duly and correctly quoted therein, the applicants shall attach along with the purchase application, a photocopy of the PAN card or KYC status from KRA website).

14. Investors residing in the state of Sikkim are exempt from the mandatory requirement of PAN, subject to the AMC verifying the veracity of the claim of the investors that they are residents of Sikkim, by collecting sufficient documentary evidence including KYC.

15. Applications are liable to be rejected without any intimation to the applicants, if KYC requirements are not complied with by all the applicants, KYC acknowledgement is not enclosed or any of the additional details are not mentioned for any of the applicant at the time of purchase or if the KYC details are not updated in the existing folio for all unitholders, including guardian. In case where the KYC application is given along with the purchase/switch and where the purchase/switch is processed based on KYC application or based on KYC status as In-Process, the purchase/switch may be rejected in case the KYC is subsequently rejected or is on Hold. In case of such rejections, refund of the subscription amount without any interest would be made to the investor within 05 business days from the date of rejection / reversals.

16. Investors should mention the correct Tax Status. In case the Tax Status provided by the investor does not correspond to the 4th character convention of PAN, then the status as per the PAN 4th character would be updated in the investor folio.

17. Investors are requested to note that there can be only tax status, either Resident (RI) or Non-Resident (NRI) against a single PAN. There cannot be different tax status for different folios for the same investor, same PAN. In case the existing tax status in a folio is NRI and the investor makes a new investment with tax status as RI, the new investment will be processed with tax status as NRI. Similarly, if the existing status in a folio is RI and the investor makes a new purchase with tax status as NRI, the tax status of the existing RI folio will be changed to NRI. In case of any change in tax status, Investors should submit a request for change of tax status request before submitting the new investment to avoid any inconvenience. The AMC reserves the right to reject or reverse & reprocess the transactions at a later date in case of any error.

18. Contact Details and Correspondence Address

a. Applicants should provide contact information such as email id, mobile telephone number/s and correspondence address. However, the fund reserves the right to update communication postal address, email id, mobile number from KYC records of SEBI designated KYC Registration Authority (KRA).

b. Investors should ensure that, the email id, mobile number provided in the application form should be their own or any of the immediate family member and should be same as the ones provided in the KRA. Investors should clearly mention if the email id belongs to any of the immediate family members. Where the email id, mobile number are not provided or where provided but the same is found to be invalid, or seems to be not pertaining to the investor or any of the immediate family member or is of a distributor or any other agency, then AMC/ RTA reserves the right to remove the email id, mobile number without

any notice and the email id, mobile number as per KRA records may be updated in the folio.

c. Investors will need to update the email id / mobile number with the KRA in case of any change. Investor can also update the contact details through NCT form.

d. Account statements, newsletter, annual reports and other communication, including statutory communication, will be sent through email/sms only instead of physical, for investors who provide their email address/mobile on the application form. Should they wish to have a physical copy, they are requested to send an email to the AMC/RTA. It is deemed that the applicants are aware of all the security risks associated with online communication, including possible third-party interception of documents sent via email.

e. If the pin code provided in application form or as received from KYC Database of a KRA is Null or Incorrect/Invalid, the transactions will be tagged as received from a T30 location.

19. In case of any investor being suspended / debarred by any statutory or government authority, the AMC/RTA reserves the right to reject any transaction without any notice.

20. Refund if any in case of purchases will be made within 5 business days from the date of rejection and identification of remitter information of the credits received by the Investment Strategy, whichever is later.

21. In case of subscription funds received through cheque deposited in clearing or transfer banking or through electronic means like funds transfer, IMPS, RTGS/NEFT etc; and where the details provided by `the investor's bank or banking industry in general are inadequate or incomplete or unclear to establish the credit of the funds against the clients subscription application, allotment of units for such amounts would be done after due efforts of interacting with the client's bank to ascertain the remitter of the funds and consequently the NAV applicable will be based on the business day when the reconciliation and establishment of credit to application is completed, irrespective of earlier receipt of credit or the subscription application.

22. Investors should ensure that their banks provide adequate information in bank statements with respect to funds remitted through cheque deposited in transfer banking or through electronic means like funds transfer, IMPS, RTGS/NEFT etc so as to ensure credit identification against their subscription application at the earliest.

23. The AMC and its Registrar reserve the right to disclose the details of the investors and their transactions to third parties viz. banks, couriers, distributors or stock brokers or registered investment advisors or any other parties through whom the application has been sourced or facilitated, printers and any other organization for the purpose of transaction confirmations and/or execution, redemption payouts, data validations, compliance with legal and regulatory requirements, or for complying with anti-money laundering requirements.

All investments and interactions with AMC/ its Registrar is done with full knowledge of the above necessity and consent for such sharing.

AMC/ its Registrar will take utmost care in processing, storing and maintaining such information so that such sensitive and personal information shall not get exposed to any unrelated third party(ies) and used for specific & associated purpose for which such information is collected. AMC/ its Registrar has implemented all required processes and controls as required under local data protection & privacy laws (Information Technology Act, 2000 & amendments thereof from to time) and will continue to abide by all such data protection & privacy laws as notified by Government of India from time to time.

Mutual Fund / Specialized Investment Fund /AMC / its Registrar, who shall be collecting, using and sharing as indicated above, shall comply with local laws of India, which may or may not be in line with the requirements of other territorial laws. If you have any concern / query, you can write to Investor Relations Officer of the Specialized Investment Fund/AMC. By choosing to invest in the Specialized Investment Fund, it is construed that investor is providing explicit consent to AMC, RTA and other entities engaged by AMC to process investor data in their roles as per existing & prospective processes determined by Specialized Investment Fund /AMC from time to time.

24. If the investor wishes to invest directly, i.e. without involving the services of any agent or broker, "DIRECT" should be mentioned in the space provided for "ARN Number" in the application form. Any subsequent change/updation/removal of broker code will be based on the written request/authentication from the Unit holder and will be on a prospective basis only from the date when the Registrar executes such written instruction.

25. Investor/s also have the provision to specify in the application / transaction form the unique identity number (EUIN) of the employee/relationship manager/ sales person of the distributor interacting with the investor/s for the sale of Specialized Investment Funds products, along with AMFI Registration Number (ARN) of the distributor and sub-distributor ARN (if applicable). Investors are hereby requested to note the following with respect to EUIN and ARN:

a. AMFI has allotted EUIN to all the sales person of AMFI registered distributors.
b. Investor/s shall ask and specify the valid ARN code, sub-distributor ARN (if applicable) and the valid EUIN of the the sub-distributor /sales person in the application/transaction form. This will assist in handling the complaints of mis-selling if any, even if the sales person on whose advice the transaction was executed leaves the employment of the distributor.
c. Investors are requested to use the new application /transaction forms which have space for sub-broker ARN code and EUIN.
d. If EUIN is not mentioned in the application form, it will be assumed as Execution Only transaction.

The distributor of a product under a SIF shall also have to pass such other certification as may be directed by SEBI/AMFI from time to time.

26. In cases of wrong/ invalid/ incomplete ARN, any purchase or switch-in or SIP & STP registration shall be processed under Direct Plan or rejected depending on the mode of the transaction. “Invalid ARNs” shall include ARN validity period expired, ARN cancelled /terminated, ARN suspended, ARN Holder deceased, Nomenclature change, as required pursuant to IA Regulations, not complied by the MFD, MFD is debarred by SEBI, ARN not present in AMFI ARN database, ARN not empanelled with AMC.

27. Signature(s) in application form should be in English or in any of the Indian languages specified in the Eighth Schedule of the Constitution of India. Thumb impressions and signatures in languages not specified in the Eighth Schedule of the Constitution of India should be attested by a magistrate or a Notary Public or a special Executive Magistrate under his/her official seal. Applications by minors should be signed by their guardian(s). In the case of an HUF, the Karta should sign on behalf of the HUF. In the case of company, Authorized officials should sign the form under their official designation and company seal. A list of specimen signatures of the authorized officials, duly certified and attested should also be attached to the application form. In case of trust fund, a resolution from the trustee(s) authorizing such purchase or investment should be submitted.

28. Non acceptance of Third Party Payments

a. “Third Party Payment” refers to payment made from a bank account other than that of the first unitholder/applicant. For a payment to be not considered as a third party payment, the sole holder or the 1st holder of the folio (depending upon whether the folio is ‘singly’ or ‘jointly’ held) must be one of the joint holders of the bank account from which payment is made.

b. In accordance with PMLA and AMFI guidelines dated August 16, 2010 on ‘Risk mitigation process, payments by third party for investment in schemes of the Fund are not be accepted except in the following cases:

i. Payment by Employer on behalf of employee under Systematic Investment Plans or lump sum / one-time subscription, through Payroll deductions or deductions out of expense reimbursements.
ii. Custodian making investments on behalf of a FII/FPI/Client.
iii. Payment by Asset Management Company to a Distributor empanelled with it on account of commission/incentive etc. in the form of the Mutual Fund Units of the Funds managed by such AMC through Systematic Investment Plans or lump sum / one-time subscription, subject to compliance with SEBI Regulations and Guidelines issued by AMFI, from time to time.
iv. Payment by Corporate to its Agent/Distributor/Dealer (similar arrangement with Principal-agent relationship), on account of commission/incentive payable for sale of its goods/services, in the form of the Mutual Fund Units through Systematic Investment Plans or lump sum / one-time subscription, subject to compliance with SEBI Regulations and Guidelines issued by AMFI, from time to time.

Related Persons’ means any person investing on behalf of minor in consideration of natural love or affection or as a gift.

c. In case the payment falls under the above-mentioned exceptions, the following additional documents will be required to be provided together with the application form, failing which the application will be rejected/not processed/refunded without interest.

i. KYC Acknowledgment letter of the Investor and the person making the payment; and
ii. To provide the details of bank account from which the payment is made and the relationship with the investor(s).

d. To substantiate that the payment is not a third party payment i.e. the payment is from a bank

account where the first unit ho lder is an account holder, investors must mention the bank account number, bank name and branch address from where the payment is issued on the application form. These details should match with the details on payment cheque/ document (as applicable).

e. In case the bank account holder's name/s is not pre-printed on the payment instrument, investor should attach latest and certified bank pass book copy/bank statement or letter from bank certifying that the investor maintains the account with the bank in order to substantiate that the first named unit holder is one of the joint holders of the bank account. In case subscription is made through demand draft/pay order/banker's cheque, etc., such instrument should be accompanied with anyone of the following:

i. a certification from the issuing banker, stating the account holder's name and the account number which has been debited for issue of the instrument, or

ii. a copy of the acknowledgement from the bank, wherein the instructions to debit carry the bank account details and name of the investor as an account holder.

iii. a copy of the passbook/bank statement evidencing the debit for issuance of the demand draft.

f. The AMC reserves a right to reject the transaction and refund the funds without any interest or call for additional details, if payment bank account and other details are not mentioned in the application form / online transaction mode and/or do not match with payment instrument and/or necessary documents/declaration are not attached or are insufficient. In case the funds are transferred to the Mutual Fund account prior to the application rejection, then amount transferred may not be refunded or redeemed unless the investor establishes KYC with additional documentation.

29. Mode of payment: The following mode of payment can be used by Resident Investors:

a. Electronic Funds Transfer (EFT) over the internet or by way of direct credit/ Real Time Gross Settlement (RTGS)/National Electronic Funds Transfer (NEFT) / Unified Payment Interface (UPI) / Immediate Payment Service (IMPS) to designated Investment Strategy collection account by clearly mentioning the name of the investor and application number in the remark. If IFSC code provided in application form is Null or Incorrect/Invalid, then AMC/RTA reserves the right to update/overwrite/correct the details as per RBI master.

b. Through MICR cheque / demand draft/ pay order payable locally & drawn on any bank which is a member of the Banker's Clearing House /Zone in a city where the application is submitted to a designated Collection Centre (ISC). The cheques issued should confirm to the CTS 2010 standards in banking industry and be payable locally at the centre where the application forms / transaction request is submitted.

c. In order to avoid fraud and prevent misuse of payment instruments, investors are advised to draw payment instrument (i.e. cheque, demand draft, pay order etc.) favouring either "XYZ Investment Strategy A/c First Investor name" or "XYZ Investment Strategy A/c Permanent Account Number of the First investor" or "XYZ Investment Strategy A/c Folio number". For example: quant Equity Long -Short Fund A/c followed by (Name of the Investor) or quant Equity Long-Short Fund A/c followed by 10 digit PAN or quant Equity Long-Short Fund A/c followed by Folio Number.

d. Cash will not be accepted as a mode of payment. Payment by stock invests and/or posted dated cheques will not be accepted except for payment of future instalments of investment through Systematic Investment Plans (SIP).

e. With respect to online transactions, payment can also be made through various modes as may be offered on digital platforms from time to time.

f. In respect of New Fund Offer (NFO) of Investment Strategies, an investor can subscribe to the NFO through Applications Supported by Blocked Amount (ASBA) facility by applying for the Units offered under the Option(s) of the Investment Strategy(s) in the ASBA Application Form and following the procedure as prescribed in the form. For details please refer to the Section "Applications Supported by Blocked Amount (ASBA) facility".

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

Payment through Applications Supported by Blocked Amount (hereinafter referred to as "ASBA") in Specialized Investment Funds for investing in New Fund offer (NFO)

a. ASBA facility is currently available only to those investors who wish to hold the units in dematerialized form.
b. ASBA facility is not available in case of NFOs of Exchange Traded Funds (ETFs).
c. An ASBA investor shall submit a duly filled up ASBA Application form, physically or electronically to the

Self Certified Syndicate Bank (SCSB) with whom the investors holds the bank account which is to be blocked

i. In case of ASBA application in physical mode, the investor shall submit the ASBA form at the bank branch of SCSB, which is designated for the purpose and the investor must be holding a bank account with such SCSB.
ii. In case of ASBA application in electronic form, the investor shall submit the ASBA form either through the internet banking facility available with the SCSB, or such other electronically enabled mechanism for subscribing to units of SIFs authorizing to block the subscription money in a bank account.
d. The Bank Account Number in the form should necessarily be of the first applicant only. In case where the bank account is jointly held, the first applicant should be one of the joint holders.
e. ASBA application form will not be accepted by any of the offices of Fund or its Registrar & Transfer Agent, i.e. KFin Technologies Limited (KFintech).
f. Investors shall ensure that the bank account details mentioned in the ASBA application form is correct and the funds are available in the account for the SCSB to block the amount.
g. Upon submission of an ASBA form with the SCSB, investor shall be deemed to have agreed to block the entire subscription amount specified in the application form, and authorized the designated branch to block such amount in the bank account.
h. The SCSBs shall block the subscription money based on the authorization given by the account holder in the ASBA application form. The subscription money shall remain blocked in the Bank account till allotment of Units under the Investment Strategy or till rejection of the application, as the case may be.
i. The SCSBs may at any time before the closure of the NFO reject the ASBA application and inform the investor accordingly.
j. During processing of the application by the Registrar, if the application is found to be incomplete or incorrect, the SCSB will be informed on the same who will then unblock the investor account with appropriate remarks in the investor account.
k. The names of the applicants, the manner of holding, the mode of holding in the application form should exactly match with the information available in the demat account. In case of any mismatch, incorrect or incomplete information, the application may be rejected by the SCSB or the Registrar.
l. All investor related details for allotment of Units such as names of the applicants, manner of holding, mode of holding, bank account, etc will be updated as per the demat account.
m. The investors should check their demat accounts for allotment of Units within 5 working days of the NFO closure. No physical account statement will be sent to the investors by the Mutual Fund / Specialized Investment Fund or its Registrar.
n. All grievances relating to the ASBA facility may be addressed to the AMC/RTA, with a copy to the SCSB, giving full details such as name, address of the applicants, subscription amount blocked on application, bank account number and the designated branch or the collection centre of the SCSB where the ASBA from was submitted by the investor.
o. On the closure date of the NFO, the ASBA form should be submitted to the SCSB before the 3.00 p.m. or such other time as may be decided by respective SCSB.
p. Specialized Investment Fund or its Registrar shall not be liable for any negligence or mistake committed by the SCSBs.

30. Application from NRI, FII and PIOs

NRIs and PIOs may purchase units on a repatriation and non-repatriation basis, while FIIs may purchase units only on a repatriation basis. They shall enclose along with the application form a copy of the payment cheque / FIRC / Debit Certificate to enable the AMC to ascertain the repatriation status of the amount invested. The account type shall be clearly ticked as NRE or NRO or FCNR, to enable the AMC determine the repatriation status of the investment amount. The AMC and the Registrar may ascertain the repatriation status purely based on the details provided in the application form.

a. Repatriation basis

NRIs and PIOs may pay their subscription amounts by way of cheques drawn on NRE or FCNR accounts in Indian currency. FIs may pay their subscription amounts either by way of inward remittance through normal banking channels or out of funds held in Foreign Currency Accounts or Non Resident Rupee Accounts maintained with a designated branch of an authorised dealer with the approval of RBI.

In case Indian Rupee drafts are purchased abroad or from FCNR/NRE accounts, an account debit certificate from the bank issuing the draft confirming the debit shall also be enclosed. NRIs shall also be required to furnish such other documents as may be necessary and as desired by the AMC/ Mutual Fund/ Specialized Investment Fund/ Registrar, in connection with the investment in the Investment Strategys. Where redemption is received for units held by NRI and requiring credit of redemption proceeds to a NRE account, the fund may reject the redemption if the necessary documents like FIRC

evidencing payment of subscription of units through NRE account are not provided by the investor.

b. Non-Repatriation basis
NRIs and PIOs may pay their subscription amounts by cheques/demand drafts drawn out of Non-Resident Ordinary (NRO) accounts/Non-Resident Special Rupee (NRSR) accounts and Non-Resident Non-Repatriable (NRNR) accounts payable at the city where the application form is accepted.

31. Applications under Power of Attorney
In case of an application under POA or by a Limited Company, Body Corporate, Registered Society Trust or Partnership etc., the relevant POA or the Resolution or Authority to make the application as the case may be, or duly certified copy thereof, along with the Memorandum and Articles of Association /Bye-laws must be lodged at the authorized center along with the application form.

32. Bank Account Details / Multiple Bank Account Registration.
It is mandatory for all investors to provide their bank mandate which will be used for payment of redemption/Payout of Income Distribution cum Capital Withdrawal. Applications without the mandatory bank details and supporting documents are liable to be rejected. Investors should ideally mention account details of the same bank account from where the payment towards purchase is made. If the bank account details mentioned are different from purchase pay-in bank, investors should attach a cancelled cheque of the said account with name and account number pre-printed. Should the investor fail to provide the documents, the Fund/AMC/RTA reserve the right to register the pay-in bank details as the redemption bank details and use such bank account for payment of any redemption/Income Distribution cum Capital Withdrawal proceeds.

The Specialized Investment Fund offers its Unit holders, facility to register multiple bank accounts for pay-in & payout purposes and designate one of the registered bank account as “Default Bank Account”. This facility can be availed by using a designated “Bank Accounts Registration Form. In case of new investors, the bank account mentioned on the purchase application form used for opening the folio will be treated as default bank account till a separate request to register multiple bank accounts and change the default bank account to any of other registered bank account is submitted by such investor. Registered bank accounts may also be used for verification of pay ins (i.e. receiving of subscription funds) to ensure that a third party payment is not used for mutual fund / Specialized Investment Fund subscription.

33. Change of Bank
New bank accounts can only be registered using the designated “Bank Accounts Registration Form” / “Change of Bank Form”. If Unit holder(s) provide a new and unregistered bank mandate or a change of bank mandate request with specific redemption/ Income Distribution cum Capital Withdrawal payment request (with or without necessary supporting documents), such bank account will not be considered for payment of redemption/ Income Distribution cum Capital Withdrawal proceeds, or the Mutual Fund / Specialized Investment Fund withhold the payment for upto 10 calendar days to ensure validation of new bank mandate mentioned. Change of bank mandate would not be processed based on the request submitted along with the redemption request and the investor will have to submit a fresh request for change of bank mandate with supporting documents. Any request without the necessary documents will be treated invalid and will not be acted upon and any financial transaction, including redemptions, will be processed with the existing registered details only. Valid change of bank mandate requests with supporting documents will be processed within ten days of documents reaching the head office of the Registrar and any financial transaction request received in the interim will be carried based on the previously registered details. Investors are requested to note the following with respect to the Multiple Bank Registration Facility / Change of Bank:

a. Bank registration/deletion request from Unit holder(s) will be accepted and processed only if all the details and necessary documents are attached. The request is liable to be rejected if it is not filled completely and in case of any ambiguous/incorrect/ incomplete information.
b. The first/sole Unit holder in the folio should be amongst any one of the bank account holders. Unit holder(s) cannot provide the bank account(s) of any other person or where the first/sole Unit holder is not an account holder in the bank account provided.
c. Unit holder(s) need to attach the original cancelled cheque of the old and new bank account for updating/changing the bank details in the folio. This will help in verification of the account details and register them accurately. Where multiple banks are registered in the folio, cancelled cheque of any one of the old bank accounts will need to be provided along with the original cancelled cheque of the new bank account.
d. In case original old bank proofs is not available, investors will have to visit quant Mutual Fund /

Specialized Investment Fund or RTA's ISCs for doing In Person Verification [IPV] along with ORIGINAL PAN / Photo Identification proofs & new bank cheque copy.

e. All documents submitted should clearly evidence the bank name, account number and name of all bank account holders.
f. While registering multiple bank accounts, the Unit holder(s) has to specify any one bank account as the 'Default Bank Account'.
g. If the 'Default Bank Account' is not specified or is unclear, the Mutual Fund / Specialized Investment Fund reserves the right to designate any of the bank accounts as 'Default Bank Account'. Default Bank Account will be used for all Income Distribution cum Capital Withdrawal, redemption and maturity payouts in case of close ended Investment Strategys.
h. Investors can change the default bank account by submitting the Bank Account Registration form. In case multiple bank accounts are opted for registration as default bank account, the mutual fund / Specialized Investment Fund retains the right to register any one of them as the default bank account at its discretion.
i. Bank account Details with redemption request: Please note the following important points related to payment of redemption proceeds:
    i. Proceeds of any redemption request will be sent only to a bank account that is already registered and validated in the folio at the time of redemption transaction processing.
    ii. Unit holder(s) may choose to mention any of the existing registered bank account with redemption request for receiving redemption proceeds. If no registered bank account is mentioned, default bank account will be used.
    iii. if unit holder(s) provides a new bank mandate or a bank mandate which has not been previously registered with a specific redemption request (with or without necessary supporting documents) such bank account may not be considered for payment of redemption proceeds and proceeds will be sent to existing registered bank account only entirely at the risk of the unit holder(s) and the fund will not be liable for the same under any circumstances.
    iv. Change of bank mandate would also not be processed based on the request submitted along with the redemption request and the investor will have to submit a fresh request for change of bank mandate with supporting documents.
j. The registered bank accounts will also be used to identify the pay-in proceeds. Hence, unit holder(s) are advised to register their various bank accounts in advance using this facility and ensure that payments for ongoing purchase transactions are from any of the registered bank accounts only, to avoid fraudulent transactions and potential rejections due to mismatch of pay-in bank details with the accounts registered in the folio.
k. This facility of multiple bank registration requests or any subsequent addition/change/ deletion in the registered bank accounts would be effected within 10 business days from the receipt of a duly completed application form at the office of the Registrar in Hyderabad and a confirmation letter will be sent within 15 business days. Unit holder(s) should preserve this letter for their reference, as the account statement will reflect default bank mandate only.
l. The requests for addition/change/deletion/modification in the registered bank account(s) should be submitted using the designated application form only. Requests received on a plain paper/any other formats are liable to be rejected.
m. The Mutual fund, Specialized Investment Fund, AMC, it's registrar and other service providers shall not be held liable for any loss arising to the unit holder(s) due to the credit of the redemption proceeds into any of the bank accounts registered in the folio.

34. Transaction through Stock Exchange mode and option to hold units in dematerialized form:

a. In order to facilitate transactions in Specialized Investment Fund units through the stock exchange infrastructure, BSE and NSE have introduced their respective platforms. Investors desirous of transacting in the Units of the select Investment Strategy(s)/Plans/ Options through the stock exchange mode shall submit applications to registered stockbrokers or distributors or Registered Investment Advisors (RIA) registered with NSE or BSE.
b. The facility of transacting through the stock exchange mechanism enables investors to buy and sell the Units of the Investment Strategy(s) through the stockbrokers or distributors or RIAs registered with the BSE and/or NSE in accordance with the guidelines issued by SEBI and operating guidelines and directives issued by NSE, BSE or such other recognized stock exchange in this regard. Investors desirous of transacting through the stock exchange mode and want to hold the units in the dematerialized form may be required to have a demat account with NSDL/CDSL.
c. The Specialized Investment Fund /ISCs will not accept any request directly for transactions or service requests in respect of Units held by the investors in demat form. The AMC/Specialized Investment Fund will not send any account statement in respect of Units bought in demat mode or accept any request for statement as the units will be credited in demat account of the investor and their DPs should be

approached for issuance of statement.

d. For any grievances with respect to transactions through stock exchange mechanism, Unit Holders must approach either stockbroker or their distributors or RIA or the investor grievances cell of the respective stock exchange. The Specialized Investment Fund or the AMC will not be liable for any transactions processed based on the transaction details provided by the stock exchanges.

Option to hold units in dematerialized form:

a. Investors subscribing for Units in any of the Investment Strategy(s) of the Fund may opt to hold Units in dematerialized mode by providing details of their demat account in the purchase request submitted by them. Units shall be allotted in physical form by default, unless the investors intimate their intention of holding Units in demat form by submitting the demat account details. This option shall be available in accordance with the provisions laid under the respective Investment Strategy(s) and in terms of guidelines/ procedural requirements as laid by the depositories (NSDL/ CDSL) from time to time.
b. Investors intending to hold the Units in Demat form are required to have a demat account with the Depository Participant (DP) registered with NSDL/CDSL and will be required to provide the DP's name, DP ID number and the beneficiary account number of the Unit holder with the DP. Investors should attach copy of either Client Master List / Transaction Holding Statement / Delivery Instruction Slip (DIS) to verify the demat details provided in the form. In case the Demat account details are not provided or the details are incomplete or the details do not match with the records as per Depository(ies), Units will be allotted in physical form.
c. The sequence of names/pattern of holding as mentioned in the purchase request must be same as that in the demat account. Units shall be credited to the investors' demat account only after the funds are credited into the Investment Strategy(s) account to the satisfaction of the AMC.
d. Investors holding units in demat mode cannot directly approach the Fund House to redeem or switch the units by submitting a physical request. Investors should approach the BSE or NSE Stock Exchange Platform to submit the redemption or switch request. Investors can also approach their Depository Participant (DP) to submit the redemption request.
e. For any change in static information like address, bank details, nomination, contact etc. investors should approach their respective depository participant. The Mutual Fund/ Specialized Investment Fund/ ISCs will not accept any request directly for transactions or service requests in respect of Units held by the investors in demat form.
f. In case, the Unit holder desires to hold the Units in a Dematerialized/Rematerialized form at a later date, the request for conversion of units held in non- demat form to Demat (electronic) form or from Demat form to non-demat or physical form should be submitted along with a Demat/Remat Request Form to their Depository Participants. Dematerialization/ Rematerialization of Units will be in accordance with the provisions of SEBI (Depositories & Participants) Regulations, 1996 as may be amended from time. Units held in demat form will be transferable subject to the provisions laid under the respective Investment Strategy(s)/Plan(s) and in accordance with provisions of Depositories Act, 1996 and the Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 as may be amended from time to time.
g. The Mutual Fund/ Specialized Investment Fund/AMC will not send any account statement for units held in demat mode and investors should approach their DPs for the account statement.

35. Facility to transact in units of the Investment Strategy(s) through MFU (MF Utilities India Pvt. Ltd) and MF Central:

i. Investors can execute financial and non-financial transactions pertaining to Investment Strategy(s) of qsif electronically on the MFU (www.mfuonline.com) and MF Central portal (https://www.mfcentral.com), as and when such facility is made available by the respective platforms transactions subject to terms, conditions and processes adopted by these platforms.
ii. The AMC has entered into an Agreement with MFUI, for usage of MF Utility ("MFU") - a shared services initiative of various Asset Management Companies, which acts as a transaction aggregation portal for transacting in multiple schemes/investment strategies.
iii. The Points of Service ("POS") of MFUI with effect from the respective dates as published on MFUI website i.e. www.mfuindia.com against the POS locations will be considered as Official Point of Acceptance/ Investor Services Centre where application for financial transactions in Investment Strategy(s) of Specialized Investment Fund will be accepted on an ongoing basis. Further, investors can also submit their non-financial transaction requests at the POS.

36. APPLICATION VIA ELECTRONIC MODE

Subject to the investor fulfilling certain terms and conditions stipulated by the AMC as under, AMC, Mutual Fund, Specialized Investment Fund, the Registrar may accept transactions through any

electronic mode ("fax/web/electronic transactions") as permitted by SEBI or other regulatory authorities:

i. The acceptance of the fax/web/electronic transactions will be solely at the risk of the transmitter of the fax/web/electronic transactions and the Recipient shall not in any way be liable or responsible for any loss, damage caused to the transmitter directly or indirectly, as a result of the transmitter sending or purporting to send such transactions.
ii. The recipient will also not be liable in the case where the transaction sent or purported to be sent is not processed on account of the fact that it was not received by the recipient.
iii. The transmitter's request to the recipient to act on any fax/web/ electronic transmission is for the transmitter's convenience and the recipient is not obliged or bound to act on the same.
iv. The transmitter acknowledges that fax/web/electronic transactions is not a secure means of giving instructions/ transactions requests and that the transmitter is aware of the risks involved including those arising out of such transmission.
v. The transmitter authorizes the recipient to accept and act on any fax/web/ electronic transmission which the recipient believes in good faith to be given by the transmitter and the recipient shall be entitled to treat any such fax/ web/electronic transaction as if the same was given to the recipient under the transmitter's original signature.
vi. The transmitter accepts that the fax/web transactions shall not be considered until time stamped as a valid transaction request in the Investment Strategy in line with SEBI regulations. For electronic transactions, the time of transaction would be the time when the request of purchase /redemption /switch /SIP/STP/SWP other facilities is received on the servers of AMC/RTA as per terms and conditions of such facilities.
vii. In consideration of the recipient from time to time accepting and at its sole discretion acting on any fax/web/electronic transaction request received/ purporting to be received from the transmitter, the transmitter agrees to indemnify and keep indemnified the AMC, Directors, employees, agents, representatives of the AMC, Mutual Fund, Specialized Investment Fund and Trustees from and against all actions, claims, demands, liabilities, obligations, losses, damages, costs and expenses of whatever nature (whether actual or contingent) directly or indirectly suffered or incurred, sustained by or threatened against the indemnified parties whatsoever arising from or in connection with or any way relating to the indemnified parties in good faith accepting and acting on fax/ web/electronic transaction requests including relying upon such fax/electronic transaction requests purporting to come from the transmitter and their authorised personnel even though it may not come from the transmitter and their authorised personnel.

37. Note on prevention of money laundering and Know Your Client ("KYC") Requirements

a. Know Your Client ("KYC") formalities under the Prevention of Money laundering Act, 2002 ("PMLA") and the related guidelines issued by SEBI from time to time, are to be completed by all investors, (including Power of Attorney holders and Guardian in case of a minor) intending to invest any amounts in an Investment Strategy(s) launched under the Specialized Investment Fund.
b. Prevention of Money Laundering Act, 2002 (hereinafter referred to as "PML Act") came into effect from July 1, 2005 vide Notification No. GSR 436(E) dated July 1, 2005 issued by Department of Revenue, Ministry of Finance, Government of India. SEBI vide Circular No. SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2024/78 dated June 6, 2024 has issued a 'Master Circular on Anti Money Laundering (AML) Standards/ Combating the Financing of Terrorism (CFT)/Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002' consolidating all the requirements / instructions / obligations of Securities Market Intermediaries issued under the various circulars issued by SEBI with regard to AML/CFT , whereby all intermediaries are advised to take necessary steps to ensure compliance with the requirement of the PML Act inter-alia for the maintenance and preservation of records and reporting of information relating to cash and suspicious transactions to Financial Intelligence Unit-India (FIU-IND), New Delhi.
c. The Mutual fund/ Specialized Investment Fund/ Registrar and Transfer Agent (RTA)/ KRAs shall perform the KYC of its new investors. Investors may however, note that the fund reserves the right to conduct enhanced KYC of its investors as may be commensurate with their respective risk profiles.
d. The investor(s) should ensure that the amount invested in the Investment Strategy(s) of Specialized Investment Fund is through legitimate sources only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, Prevention of Money Laundering Act, Prevention of Corruption Act and / or any other laws in force in India from time to time or any rules, regulations, notifications or directions issued thereunder.
e. To ensure appropriate identification of the investor(s)/ Unitholder(s) under the KYC policy and with a view to monitor transactions for the prevention of money laundering, the AMC / the Mutual Fund / Specialized Investment Fund reserves the right to seek information, record investor's/Unitholder's telephonic calls and / or obtain and retain documentation for establishing the identity of the investor/ Unitholder, their beneficial owner(s), proof of residence, source of funds, etc. It may re-verify identity

and obtain any incomplete or additional information for this purpose as the case may be. The investor(s)/Unitholder(s) shall provide such documents to the satisfaction of the AMC as may be required from time to time for the verification/identification of the investor(s)/ Unitholder(s)/any transaction by the AMC/Mutual Fund/ Specialized Investment Fund. If the investor(s)/Unitholder(s) refuses / fails to provide to the AMC, the required documents/ information within the period specified, the AMC, shall have the sole and absolute discretion to freeze the folio(s) of the investor(s)/Unitholder(s), reject any application(s) / allotment of Units and report the details of such investor/Unitholder/transaction to appropriate authority.

f. The Mutual Fund, Specialized Investment Fund, AMC, quant Capital Trustee Limited and its Directors, employees and agents shall not be liable in any manner for any claims arising whatsoever on account of such freezing of folio(s) / rejection of any application / allotment of Units and/or reporting the same to appropriate authorities.

g. In terms of the PML Act, 2002, the Rules issued there under and the guidelines/circulars issued by SEBI and/or AMFI regarding the Anti Money Laundering (AML Laws) and KYC requirement, all intermediaries, including Mutual Funds, Specialized Investment Fund have to formulate and implement a client identification programme, verify and maintain the record of identity and address(es) of investors.

h. Pursuant to SEBI Circular no. MIRSD/ Cir-26/ 2011 dated December 23, 2011, SEBI (KYC Registration Agency) Regulations, 2011 and SEBI Circular no. MIRSD/SE/Cir-21/2011 dated October 5, 2011, to bring about uniformity in the Know Your Customer (KYC) process in the securities market, Common KYC Application form and supporting documents shall be used by all SEBI registered intermediaries viz. intermediaries viz. Mutual Funds, Portfolio Managers, Depository Participants, Stock Brokers, Venture Capital Funds, Collective Investors Schemes, etc. Further, to avoid duplication of KYC process across SEBI registered intermediaries, a mechanism for centralization of the KYC records in the securities market has been developed.

   Accordingly, we will be performing the initial KYC of our clients and upload the details on the system of the KYC Registration Agency (KRA). The data from the KRA shall be checked and passed onto the Central Registry of Securitization Asset Reconstruction and Security Interest (CERSAI) for generation of the KYC Identification number (KIN) of the investor. The KYC details of the client can be accessed by other intermediaries by accessing the KRA system. As a result, once the client has done KYC with a SEBI registered intermediary, he need not undergo the same process again with another intermediary. For regulating KRAs, SEBI has formulated the KYC Registration Agency (KRA) Regulations, 2011 which covers the registration of KRAs, functions and responsibilities of the KRAs and intermediaries, code of conduct, data security, etc. However, to comply with prevailing regulatory guidelines, the AMC reserves the right to carryout fresh KYC to the investors or undertake enhanced KYC measures commensuration with the risk profile of the investor.In-Person Verification (IPV) of clients has been made mandatory for all SEBI registered intermediaries. Asset Management Companies (AMCs) and the distributors who comply with the certification process of National Institute of Securities Market (NISM) or Association of Mutual Funds in India (AMFI) and have undergone the process of 'Know Your Distributor (KYD)' can perform the IPV for mutual fund / Specialized Investment Fund investors. However, where applications are received by the mutual funds/ Specialized Investment Fund directly from the clients (i.e. not through any distributor), the IPV performed by the scheduled commercial banks can be relied on. The IPV carried out by any SEBI registered intermediary can be relied upon.

i. Investors should note that it is mandatory for all applicants (in the case of application in joint names, each of the applicants) to mention his/her Permanent Account Number (PAN) irrespective of the amount of purchase in the Application Form. Investors who do not have PAN, have to provide other approved proof of identity in lieu of PAN i.e. PAN-exempt KYC reference number (PEKRN) who can invest up to ₹50,000 per year per mutual fund. Where the applicant is a minor, and does not possess his / her own PAN/PEKRN, he / she shall quote the PAN/PEKRN of his/her father or mother or the guardian, as the case may be.

j. In the event of noncompliance of KYC requirements, the Trustee / AMC reserves the right to freeze the folio of the investor(s) and affect mandatory redemption of unit holdings of the investors at the applicable NAV, subject to payment of exit load, if any.

k. All investors (both individual and non-individual) can apply for KYC compliance. However, applicants should note that minors cannot apply for KYC compliance and any investment in the name of minors should be through a Guardian, who should be KYC compliant for the purpose of investing with a Mutual Fund/ Specialized Investment Fund. Also, applicants / unitholders intending to apply for Units / currently holding Units and operating their Specialized Investment Fund folios through a Power of Attorney (PoA) must ensure that the issuer of the PoA and the holder of the PoA must mention their KYC compliance status at the time of investment. PoA holders are not permitted to apply for KYC compliance on behalf of the issuer of the PoA. Separate procedures are prescribed for change in name, address and other KYC related details, should the applicant desire to change such information.

l. Financial transactions (including redemptions, switches and all types of systematic plans) and non-

financial requests will not be processed if the unitholders have not completed KYC requirements.

m. Unitholders are advised to use the applicable KYC Form for completing the KYC requirements and submit the form at the point of acceptance.

n. Further, upon updation of PAN details with the KRA (KRA-KYC) / CERSAI (CKYC), the unit holders are requested to intimate us / our Registrar and Transfer Agent their PAN information along with the folio details for updation in our records.

o. For applicants who subscribe to the Units through Stock Exchange facility, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee / AMC.

p. Units held in Electronic (Demat) mode, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee / AMC.

38. Update on Folios without PAN/PEKRN (PAN exempted KYC Reference Number)

SEBI vide its letter No. SEBI/HO/OW/IMD/PoD/2022/48112/1 dated September 12, 2022 has advised that no investments (Systematic transaction, Lumpsum, Redemption) shall be permitted in such folios wherein PAN/ PEKRN details are not available.

All such Non-compliant Non-PAN and Non-PEKRN folios shall be liable to be frozen from April 01, 2023. Further, IDCW will not be paid or reinvested for any IDCW declared by schemes of Mutual Fund and will be invested in Unclaimed Scheme and units shall be allotted in the Investor folio for the IDCW amount.

Unitholders whose folio(s) has/have been frozen due to the above requirement shall be able to (permit to) lodge grievance or avail service request only after furnishing the above details. Please note that the PAN / PEKRN (as may be applicable) needs to be provided in respect of all joint holders.

39. Change in Static Information

a. Requests for change in static information, viz. name, mobile number, email id, status, signature, bank account details, Income Distribution cum Capital Withdrawal sub-option, nomination, registration of Power of Attorney, Updation of Authorised Signatory List, etc. may be submitted to the AMC or its Registrar. Such changes will be effected within 5 Business Days of the valid signed request reaching the office of the Registrar at Hyderabad, and any interim financial transactions like purchase, redemption, switch, payment of Income Distribution cum Capital Withdrawal etc. will be effected with the previously registered details only. If any change in static information is submitted along with a financial transaction, the change may be handled separately, and the financial transaction may be processed with the previously registered details. Unit holders are therefore advised to provide requests for change in static information separately and not along with financial transactions. Investors holding units in demat mode should approach their respective Depository Participant for non-financial requests/ applications such as change of address, mobile number, email id, change of bank, etc.

b. Any change in Income Distribution cum Capital Withdrawal sub option due to additional investment or unit holder request will be applicable to the entire units in the Income Distribution cum Capital Withdrawal option of the investment strategy/plan concerned.

c. Unit Holders may write to the AMC or the Registrar to change the broker code of their transactions. Any such request will be handled on a prospective basis and the change in broker code will be effected within 11 business days from the date when the Registrar receives the request.

d. All non-financial requests are liable to be rejected if the KYC is not completed and updated for all holders in the folio.

Redemption and Switches

i. All allotment of units on account of purchases, switch ins will be provisional subject to realisation & reconciliation of funds & the AMC having been reasonably satisfied that the SIF has received the clear funds. Any redemption or switches in the interim is liable to be rejected at the sole discretion of the AMC. For more details, please refer the relevant ISID for details on redemption and switch.

ii. Redemption & switches will be rejected if the KYC is not completed and updated for all the holders in the folio.

iii. The AMC also has the right, at its sole discretion, to close a Unitholder's account by redemption of units in the account of unitholder, if the unitholder does not submit the requisite proof/documents/information required by the AMC or where the units are held by a unitholder in breach of any Regulation.

iv. Since a request for purchase is generally made in Rupee amounts and not in terms of number of Units of the Investment Strategy, a unit holder may be left with fractional Units. Fractional Units will be computed and accounted for up to three decimal places. However, fractional Units will, in no way, affect the unit holder's ability to redeem the Units, either in part or in full, standing to his/her/its credit.

B. Suspension of purchase and restriction on redemption of units

1. Suspension of purchase of units

Subject to the approval of the Boards of the AMC and the Trustee and subject to necessary communication to SEBI, determination of NAV of the units under any investment strategy of the Specialized Investment Fund may be temporarily suspended, leading to consequent suspension of purchase of units, in any of the following events:

a) When one or more stock exchanges or markets, which provide the basis of valuation for a substantial portion of the assets of the Investment Strategy(s), is/are closed, otherwise than for ordinary holidays.
b) When, as a result of political, economic or monetary events or any circumstance outside the control of the trustee and the AMC, disposal of the assets of the investment strategy is not reasonable, or would not reasonably be practicable without being detrimental to the interests of the unit holders.
c) In the event of a breakdown in the means of communication used for the valuation of investments of the investment strategy(s), without which the value of the securities of the investment strategy(s) cannot be accurately arrived at.
d) During periods of extreme volatility of markets, which in the opinion of the AMC, are prejudicial to the interests of the unit holders.
e) In the case of natural calamities, pandemic, strikes, riots, bandhs etc.
f) In the event of any force majeure or disaster that affects the normal functioning of the AMC or the Registrar or if the Trustees are of the opinion that the suitable investment opportunities are not available for deployment of funds.
g) If so directed by SEBI.
h) Additionally, the AMC reserves the right in its sole discretion to withdraw the facility of sale and switching option of units into and out of the investment strategy(s) (including any one Plan / option of the investment strategy), temporarily or indefinitely, if AMC views that changing the size of the corpus may prove detrimental to the existing unit holders of the investment strategy(s).

2. Restriction on redemption of units

Pursuant to clause 5.3 of SEBI Master Circular for Mutual Funds dated March 20, 2026 , the restriction on redemption may be imposed under following scenario that may lead to a systemic crisis or the efficient functioning of markets such as:-

a) **Liquidity issues** –Market at large becomes illiquid affecting almost all securities rather than any issuer specific security.
b) **Market failures, exchange closures** - Markets are affected by unexpected events which impact the functioning of exchanges or the regular course of transactions. Such unexpected events could also be related to political, economic, military, monetary or other emergencies.
c) **Operational issues** – when exceptional circumstances are caused by force majeure, unpredictable operational problems and technical failures (e.g. a black out).
d) Subject to the approval of the Boards of the AMC and the Trustee and subject to necessary communication to SEBI, restriction on redemption would be imposed; the following procedure shall be applied:

i. Restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period.
ii. No redemption requests upto INR 2 lakh shall be subject to such restriction.
iii. Where redemption requests are above INR 2 lakh, AMCs shall redeem the first INR 2 lakh without such restriction and remaining part over and above INR 2 lakh shall be subject to such restriction.

Suspension of Sale/Switches into the Investment Strategy under special circumstances

The AMC/Trustee reserves the right to temporarily suspend subscription in/switches into any investment strategy of the Specialized Investment Fund which invests overseas, if the limit prescribed by SEBI for overseas investments by all schemes of the Mutual fund/investment strategies is exceeded/expected to the exceeded.

Procedure for various facilities

Investors can request for Annual Report / Abridged Summary, Portfolio, Net Asset Value (NAV) through any of the following means.

I. **Request for Annual Report (AR)/Abridged Summary**

a) **Telephone:-** Give a call to our Contact Centre at 022 6295 5005
b) **Email**:- Send an email to help.investor@qsif.com

c) **Letter:-** Submit the letter to any of the AMC Offices or KFin Technologies Investor Service Centres.

II. **Request for Portfolio**

a) **Telephone:** - Give a call to our Contact Centre at 022 6295 5005
b) **Email:-** Send an email to help.investor@qsif.com
c) **Letter: -** Submit the letter to any of the AMC Offices or KFin Technologies Investor Service Centres.

III. **Request for Net Asset Value (NAV)**

a) **Telephone:** - Give a call to our Contact Centre at 022 6295 5005 or website www.qsif.com
b) **Email**:- Send an email to help.investor@qsif.com.

A. Special Products / Facilities offered by the Investment Strategies.

(i) *Systematic Investment Plan (SIP)*

Investors can benefit by investing specific Rupee amounts periodically, for a continuous period through SIP. SIP allows investors to invest a fixed amount of Rupees on every week, fortnight, month or quarter by purchasing Units of an Investment Strategy at the Purchase Price prevailing at such time. The minimum installment shall be 6 instalments. Investors can enroll themselves for SIP in the Investment Strategy by ticking the appropriate box in the application form and filling up the relevant SIP form. If start date for SIP period is not specified, SIP will be registered to start anytime from a period after five business days from the date of receipt of application based on the SIP date available / mentioned, subject to mandate being registered. If end date is not specified the SIP will be registered for 40 years from the start date or end date of mandate/tenure of the Investment Strategy, whichever is earlier. Further the end date shall be mandatory on mandate form.

Units will be allotted at the applicable NAV as on the SIP Date opted for by the investor. Where such SIP Date is not a Business Day, Units will be allotted at the applicable NAV of the immediately succeeding Business Day. Units get allotted as per the credit realization.

The AMC may change the terms and conditions for SIP from time to time, due to changing market and operational conditions. Investors are advised to check the latest terms and conditions from any of the offices of the AMC, before investing same is available on www.qsif.com.

(ii) *Systematic Withdrawal plan (SWP)*

A Unit Holder may, through SWP, receive regular payments by way of withdrawals from an Investment Strategy (in the said folio) on a monthly, quarterly basis with specific SWP dates and the request should be for at least 6 such withdrawals. A Unit holder may avail of SWP by ticking the appropriate box in the application form and filling up the SWP form, specifying therein the 'SWP Date' and period. To start an SWP, the unit holder should submit the SWP form atleast seven days prior to the first desired SWP date. To discontinue the SWP, the unit holder should provide atleast 30 days written notice to the Registrar/AMCs offices. A Unit Holder who opts for an SWP has the choice of withdrawing (i) a fixed amount or (ii) an amount equal to the periodic appreciation on his/her/its investment in the Investment Strategy from which the withdrawal is sought.

The clauses on SWP and STP will be subject to compliance with provisions mentioned under "Minimum investment threshold" as stated under Clause "Minimum threshold requirement and consequences of non- maintenance" of this ISID.

In case the SWP Date happens to be a Non-Business Day, the transaction will be processed on the immediately succeeding Business Day. On the other hand, the Specialized Investment Fund may terminate the SWP, if all the Units concerned are liquidated or withdrawn from the account or pledged or upon the Specialized Investment Fund's receipt of notification of death or incapacity of the Unit Holder. All terms and conditions for SWP, including Exit Load, if any, prevailing in the date of SWP enrolment/registration by the fund shall be levied in the Investment Strategy.

The AMC may change the terms and conditions for SWP facility from time to time, due to changing market and operational conditions. Investors are advised to check the latest terms and conditions from any of the offices of the AMC, before investing same is available on www.qsif.com.

(iii) ***Systematic Transfer Plan (STP)***

A Unit Holder may transfer, through STP, part of his/her/its investment in the Investment Strategy (in the said folio) to another Investment Strategy on a daily, weekly, fortnightly, monthly, quarterly basis with specific STP dates and the request should be for at least 6 such transfers. The transfer will be effected by way of a switch, i.e. redemption of Units from one Investment Strategy and investment of the proceeds thereof, in the other Investment Strategy, at the then prevailing terms of both Investment Strategies. Therefore, all provisions pertaining to Inter-Investment Strategy Switching will apply to an STP **(Please refer to "Switching" for provisions on switching)**. Also, all provisions pertaining to Entry and Exit Load in an STP transaction will be same as applicable for purchase or redemption of investment made through SIP. All transactions by way of STP shall, however, be subject to the terms (other than minimum application amount) of the target Investment Strategy.

All terms and conditions for STP, including Exit Load, if any, prevailing in the date of STP enrolment/registration by the fund shall be levied in the Investment Strategy.

A Unit Holder who opts for an STP has the choice of switching (i) A fixed amount or (ii) an amount equal to the periodic appreciation on his/her/its investment in the Investment Strategy from which the transfer is sought.

The AMC may change the terms and conditions for STP facility from time to time, due to changing market and operational conditions. Investors are advised to check the latest terms and conditions from any of the offices of the AMC, before investing same is available on

Daily STP facility

Under Daily STP, the Unit Holder can switch a fixed amount from any one Investment Strategy (Source Investment Strategy) to any other Investment Strategy (Target Investment Strategy) on a daily basis subject to exit load as applicable. The minimum period for Daily STP shall be 6 days and maximum for any period subject to the end period being year 2099. STP installment shall be processed only when it is a Business day for both source and target Investment Strategy. In case the start date is not mentioned, the Daily STP shall start from the 10th day from the date of submission of valid STP registration form. In case the end date is not mentioned, the STP shall be registered for a period of one year.

For general terms and conditions and more information, Unit holder(s) are requested to read Terms and Conditions available on www.qsif.com.

(iv) ***Switching***

A switch has the effect of redemption from one investment strategy/plan/option and a purchase in the other investment strategy/plan/ option to which the switching has been done. To effect a switch, a Unit Holder must provide clear instructions. Such instructions may be provided in writing or by completing the transaction slip/form attached to the account statement. The switch request can be made for an amount as stated in the respective ISID. A Unit Holder may request switch of a specified amount or a specified number of Units only. If the Unit Holder has specified both the amount (in Rs.) and the number of Units, switch-out of units will be carried out based on the number of units specified by the Unit Holder.

All allotments will be provisional, subject to realisation of payment instrument and subject to the AMC having been reasonably satisfied that the Specialized Investment Fund has received clear funds. Any redemption or switch out transaction in the interim is liable to be rejected at the sole discretion of the AMC. Investors may note that switch facility is currently not available for units held in demat mode and will be provided as and when enabled by stock exchange platforms and depositories as the units are held in demat account. Unit holders are requested to note that application for switch-out for units for which funds are not realized via purchase or switch-in in the Investment Strategy of the Fund shall be liable to be rejected. In other words, switch out of units will be processed only if the funds for such units are realized in the Investment Strategy by a way of payment instructions/transfer or switch-in funding process.

(a) Inter-Investment Strategy Switching

Unit Holders will have the option to switch all or part of their investment in the Investment Strategy, to any other Investment Strategy established by the Specialized Investment Fund, which is are available

for investment at that time. The switch will be affected by way of redemption of Units from an Investment Strategy and re-investment of the redemption proceeds in the other Investment Strategy selected by the Unit Holder at the prevailing terms of the Investment Strategy to which the switch is taking place.

The price at which the Units will be switched out of the Investment Strategy will be based on the Redemption Price on the Business Day of acceptance of switching request and the net proceeds will be invested in the other Investment Strategy at the prevailing Purchase Price for Units in that/those Investment Strategy.

(b) Inter-Plan Switching

Unit Holders will have the option to switch all or part of their investment(s) from one plan of an Investment Strategy to the other plan of that Investment Strategy. The switch will be effected by way of a redemption of Units of the relevant plan of an Investment Strategy as per terms and conditions of redemption and re-investment of the redemption proceeds in the other plan of the Investment Strategy selected by the Unit Holder on the prevailing terms of that Plan as a purchase as per purchase terms and conditions of purchase.

(c) Inter-Option Switching

Unit Holders have the option to switch all or part of their investments from one Option of an Investment Strategy /Plan to the other Option of the same Strategy/Plan.

The switch will be affected by way of redemption of Units of the relevant Option and reinvestment of the redemption proceeds in the other Option selected by the Unit Holder on the prevailing terms of that Investment strategy/Plan. The price at which the Units will be switched out will be at the Applicable NAV on the Business Day of acceptance of switching request and the net proceeds will be invested in the other Option at the Applicable NAV of that Option.

The AMC may change the terms and conditions for switching facility from time to time, due to changing market and operational conditions.

(v) ***Pledge of Units for Loans***

Units can be pledged by the Unit Holders as security for raising loans, subject to any rules/restrictions that the Trustee may prescribe from time to time.

For Units held in demat form, the rules of the respective DP will be applicable for pledge of the Units. Units held in demat form can be pledged by completing the requisite forms/formalities as may be required by the Depository. The pledge gets created in favour of the pledgee only when the pledgee's DP confirms the creation of pledge in the system.

In case of Units held in physical form, the Registrar will note and record such pledge. A standard form for this purpose is available at any of the official points of acceptance of transactions

(vi) ***OTM – One Time Mandate ('Facility')***

This Facility enables the Unit Holder/s of Specialized Investment Fund ('Fund') to transact with in a simple, convenient and paperless manner by submitting OTM - One Time Mandate registration form to the Fund which authorizes his/her bank to debit their account up to a certain specified limit per day, as and when they wish to transact with the Fund, without the need of submitting cheque or fund transfer letter with every transaction thereafter.

This Facility enables Unit holder(s) of the Fund to start Systematic Investment Plan (SIP) or invest lump sum amounts in any Investment Strategy of the Fund by sending instructions through Transaction forms, and online facility specified by the AMC. This Facility is only available to Unit holder(s) of the Fund who have been assigned a folio number by the AMC.

Unit Holder/s are requested to note that in line with the requirement of SEBI and AMFI Circulars on Two Factor Authentication[2FA], SMS based transaction facility and transaction through Call Centre for all forms of transaction, including but not limited to purchase, redemptions, switches, systematic registrations.

Unit Holder(s) are requested to note that the AMC reserves the right to amend the terms and conditions,

or modify, or discontinue the Facility for existing as well as prospective investors at anytime in future.

For general terms and conditions and more information, Unit holder(s) are requested to read Terms and Conditions, OTM - One Time Mandate registration form available at the Official Point of Acceptance of Transactions of AMC/RTA and also available on www.qsif.com.

(vii) *SIP Pause Facility*

SIP Pause facility gives option to pause the SIP for a period up to 3 months in a respective strategy.

The features, terms and conditions for availing of the SIP Pause facility are as follows:

1. SIP Pause request should be received at least 10 calendar days prior to the instalment date for the concerned SIP, which is required to be paused.

2. The Facility is applicable only for AMC initiated debit feeds i.e. ECS/NACH/Direct Debit, etc.

3. This Facility is available only for SIPs with Monthly and Quarterly frequencies except for SIPs registered through Mutual Fund Utility (MFU), MFSS system of NSE or any other platforms of the said stock exchange and Channel Partners or those who have standing instructions with Banks as the SIP are registered directly with them and not with the fund house.

4. The maximum number of instalments that can be paused using this facility are three (3) consecutive instalments for SIPs registered with Monthly frequency and one (1) for SIPs registered with Quarterly frequency. Thereafter, the balance SIP instalments (as originally registered) will automatically resume.

5. If SIP Pause period coincides with SIP Top Up period, SIP instalment amount post completion of SIP Pause period would be inclusive of SIP Top Up amount. For eg: SIP Instalment amount prior to Pause period is ₹ 2,000/- and the Top-Up amount is ₹ 1,000/-. If the Pause period is completed after date of Top-Up, then the SIP instalment amount post-completion of Pause period shall be ₹ 3,000/-

6. SIP Pause once registered cannot be cancelled.

7. Investors can opt for the Facility only after completion of minimum Six (6) instalments of the SIP.

(viii) *Voluntary Lock-in/ Debit freeze facility to Mutual Fund Folios for units held in demat and non-demat mode*

Pursuant to Clause 15.20 of the SEBI Master Circular for Mutual funds dated March 20, 2026, read with AMFI Best Practice Guidelines Circular No.124/ 2026-27 dated April 10, 2026, Investors are hereby informed that it has been decided to Introduce the facility that allows investors to voluntarily lock (debit freeze) their mutual fund folios w.e.f. April 30, 2026.

This facility ensures that no debit transactions or any other specified non-financial transactions in their mutual fund folios to prevent unauthorized or unintended activity. The lock will remain active until the investor chooses to unlock it.

Features:

Applicability	Available for all Resident and Non-Resident Individual investors
Who can Execute	The facility to lock / unlock will be available only to: • First / sole holder in the folio, held in single and anyone or survivor basis. • Minor account will be exercised by guardian till age of maturity and after obtaining maturity, lock/unlock will be exercised by the unit holder only.
Requirements	Folio should be KYC complied. (Registered / Validated.) • Folios should have valid Email ID and Mobile Number registered in India.
Options for locking / freezing	Lock any/ all of the following transactions in the folios selected for locking: • Lock only Debit transactions (investor initiated) • Lock debit transactions + non-financial transactions (investor initiated)
Period for locking	There is no specific period. The lock will remain "**until revoked**" by the Investor.

1. Process for locking/freezing the folio/s for units held in non-demat mode:

a) Investor(s) will log-in to MF Central portal https://www.mfcentral.com/ after completing all applicable log-in validation process which includes providing PAN + email ID / mobile number, OTP based authentication to the email ID/ mobile number.

b) On successful validation, investor will be provided with details of all his/her holdings viz., fund name, scheme, outstanding units and value of units (basis last available NAV) held in SoA form.

c) Investors will select the option to lock the transactions.

d) Investor will select the Fund Name and folios that he/ she chooses to lock.

e) Once selected, OTP would be sent to the registered mobile number / email ID and upon successful validation of OTP, MF Central will send the requests to the respective RTA who would lock the folio and send confirmation to investor.

f) Lock would be marked in the select folio(s) in RTA database instantly for holdings held in SoA form.

1.1. Below transactions will be allowed only after unlocking the folio:

Financial Transactions	Non - Financial Transactions
• Redemption Change/ Addition of Bank Mandate	• Change/ Addition of Bank Mandate
• Registration of STP	• Change of Broker Code
• Registration of SWP	• Change of Email ID and/or Mobile Number
• Switches	• Nominee Registration/Cancellation
	• Change in IDCW option
	• Lien Marking
	• Change in Signature
	• Consolidation of folios
	• Transfer of units
	• Change of tax status

All other transactions, other than above, and existing registered SWP, STP (registered prior to locking of folios) will continue during the lock.

1.2. All non-investor-initiated transactions including updation of address as per KRA feed, IDCW payout/reinvestment etc. will continue during the lock period. Further, in case of request/orders received from Law Enforcement Authorities (LEAs) or Regulators, RTAs will take the action irrespective of locking of units.

2. Process for unlocking the folio/s for units held in non-demat mode:

a) Investor(s) will log-in to MF Central portal after completing all applicable log-in validation process which includes providing PAN + email ID/ mobile number, OTP based authentication to the email ID/ mobile number.

b) On successful validation, investor will be provided with details of all his holdings viz., fund name, scheme, outstanding units and value of units (basis last available NAV) held in SoA form.

c) Investors will select the option to unlock the transactions.

d) Investor will select the Fund Name and folios that he/ she chooses to unlock.

e) Two levels of authorization would be mandated:

• by sending different OTPs to the registered mobile number and email ID and both should get validated or

f) After successful validation, MF Central will send the request to the respective RTA who would unlock the folio(s) and send confirmation to investor.

3. Process for locking the folio/s held in demat mode:

In case of demat mode, MF Central will provide an option for the investor to lock holdings held in demat account by redirecting investors to online services offered by respective depositories.

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

I. Pursuant to Securities and Exchange Board in India (SEBI) circular no. CIR/IMD/DF/21/2012 dated September 13, 2012, Direct Plan was introduced for all open-ended funds with effect from Jan 01, 2013. Direct Plan is a separate plan for direct investments i.e. investments not routed through a distributor.

The below point summarizes the procedures which would be adopted while processing application form/transaction request by the AMC:

a. If the purchase application form carries ARN code and plan name specified as "Regular", then the transaction will be processed in the Regular Plan.
b. If the purchase application form carries ARN code as blank and plan name specifies as Regular, then the transaction will be processed in the Direct Plan.
c. If the purchase application form carries ARN code and plan name specified as "Direct", then the transaction will be processed in the Direct Plan.
d. If the purchase application form carries Direct and plan name specified as "Direct", then the transaction will be processed in the Direct Plan.
e. If the purchase application form carries DIRECT and plan name specified as "Regular" or not specified, then the transaction will be processed in the Direct Plan.

II. In case of scheme's plan option not specified, "Growth" will be the default option for processing of transaction.

III. In case of IDCW sub-option not specified, "Payout" will be default option for processing of transaction.
- For daily IDCW frequency, the default sub-option would be compulsorily "Reinvest".
- For weekly IDCW frequency, where the IDCW amount is above Rs. 10,000/-, sub-option "Payout" is applicable. Else the IDCW amount will be compulsorily reinvested.

B. Default scenarios available to the investors under plans/options of the Investment Strategy(s)

Default Plan would be as mentioned below:

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

In case of Investment Strategy's plan option not specified, "Growth" will be the default option for processing of transaction.

In case of IDCW sub-option not specified, "Reinvestment" will be default option for processing of transaction.

VII. RIGHTS OF UNITHOLDERS OF THE INVESTMENT STRATEGY

1. Unit holders have a proportionate right in the beneficial ownership of the assets of the Investment Strategy.

   When the SIF declares an Income Distribution cum Capital Withdrawal (IDCW) under an Investment Strategy, IDCW payments shall be completed to the Unit Holders within 7 working days from the record date of IDCW.

   Consolidated Account Statement ('CAS') at SIF level for each calendar month will be issued on or before 15th day of succeeding month to all unit holders having financial transactions and who have provided valid Permanent Account Number (PAN). For folios not included in the CAS, the AMC shall issue a monthly account statement to the unit holders, pursuant to any financial transaction done in such folios; the monthly statement will be send on or before 15th day of succeeding month. In case of a specific request received from the unit holders, the AMC shall provide the account statement to the unit holder within 5 business days from the receipt of such request. If a Unit holder so desires the SIF shall issue a Unit certificate (non- transferable) within 5 Business Days of the receipt of request for the certificate.

2. The SIF shall dispatch redemption or repurchase proceeds within 3 working days of accepting the valid redemption or repurchase request. Provided that, processing of redemption(s) in the SIF Investment Strategies shall be subject to appropriate notice period(s), if any, as may be implemented by the AMC, based on structure of the Investment Strategy and the liquidity risk associated with it**.**

3. The Trustee is bound to make such disclosures to the Unit holders as are essential in order to keep the unitholders informed about any information known to the Trustee which may have a material adverse bearing on their investments.

4. The appointment of the AMC for the SIF can be terminated by majority of the Directors of the Trustee Board or by 75% of the Unit holders of the investment strategy**.**

5. 75% of the Unit holders can pass a resolution to wind- up an Investment strategy.

6. The Trustee shall obtain the consent of the Unit holders:
- whenever required to do so by SEBI, in the interest of the Unit holders.
- whenever required to do so if a requisition is made by three- fourths of the Unit holders of the Investment strategy.
- when the majority of the trustees decide to wind up an investment strategy in terms of Regulation 36(2) (a) SEBI (Mutual Funds) Regulations, 2026 or prematurely redeem the units of a close ended investment strategy.
- when the majority of the trustees decide to wind up the Investment Strategy or prematurely redeem the units of an Investment Strategy.

7. The trustees shall ensure that no change in the fundamental attributes of any Investment strategy, the fees and expenses payable or any other change which would modify the Investment strategy and affect the interest of the unit holders is carried out by the asset management company, unless it complies with Regulation 22(9)(c) of SEBI (Mutual Funds) Regulations, 2026.

8. The Trustee shall ensure that no change in the fundamental attributes of any Investment strategy or the trust or fees and expenses payable or any other change which would modify the Investment strategy and affects the interest of Unit holders of the Investment Strategy, shall be carried out by the AMC, unless the AMC ensures compliance with requirements listed hereunder:

   (i) SEBI has reviewed and provided its comments on the proposal;
   (ii) a written communication about the proposed change is sent to each Unit holder and an advertisement is given in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where the Head Office of the quant Mutual Fund is situated; and
   (iii) the Unit holders are given an option to exit at the prevailing Net Asset Value without any Exit Load.

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

VIII. INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS

The investment valuation norms are as per Annexure-A.

The Valuation Policy is available on the website of the company at https://www.qsif.com/statutory-disclosures.

COMPUTATION OF NAV

A. Policy of computation of NAV

The first NAV will be calculated and announced not later than 5 business days from the date of allotment in the NFO. Thereafter NAV of the investment strategy shall be computed and declared on every business day. The NAV under the investment strategy would be rounded off to 4 decimals and Units will be allotted upto three decimal places as follows or such other formula as may be prescribed by SEBI from time to time:

$$\text{NAV (Rs.)} = \frac{\text{Market or Fair Value of Scheme's investments (+) Current Assets (-) Current Liabilities and Provision}}{\text{Number of units outstanding under the Scheme on the Valuation Day}}$$

NAV will be disclosed in the manner specified under SEBI (Mutual Funds) Regulations, 2026. NAV can also be viewed on www.qsif.com and www.amfiindia.com .The AMC shall update the NAVs on the website of Association of Mutual Funds in India - AMFI (www.amfiindia.com) and on www.qsif.com by 11.00 p.m. on every business day.

In case the investment strategy has taken exposure towards Exchange Traded Commodity Derivatives (ETCD), the NAVs of the investment strategy for those business days will be disclosed on the website of the AMFI (www.amfiindia.com) and on website of the SIF (www.qsif.com) by 9:00 a.m. of the following business day.

B. Policy for computation of NAV in foreign securities

In case the Investment Strategy has investments in foreign securities, the NAVs of the investment strategy for those business days will be computed by taking the same day price / valuation of the underlying overseas investments and the NAV will be disclosed on the website of the AMFI (www.amfiindia.com) and on the website of the Specialized Investment Fund (www.qsif.com) by 10:00 a.m. of the following business day. In case of non-availability of price/valuation for the underlying overseas investments before timeline, consequent to which there would be inability in capturing same day price/valuation for such underlying investments, then NAV of the investment strategy will be declared as and when the price/valuation for such underlying securities / Fund is available.

C. Procedure in case of delay in disclosure of NAV

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

IX. TAX & LEGAL & GENERAL INFORMATION

A. Taxation on investing in SIF

The information on taxation for units issued by the Investment Strategy(s) under Specialized Investment Fund may be related to taxation of Mutual Funds as mentioned below. It is advised that each unit holder should appropriately consult its tax consultant with respect to the specific tax implications arising out of their participation in the Investment Strategy.

Taxation on investing in Mutual Funds

The tax benefits set out in the SAI are for general purposes only and do not constitute tax advice. The tax information provided in the SAI does not purport to be a complete description of all potential tax costs, tax incidence and risks inherent in subscribing to the units of the Investment Strategy (ies) offered by quant Mutual Fund ("Fund"). Investors should be aware that the tax laws may change and there can be no guarantee that the current tax position as laid out hereunder may continue indefinitely. Accordingly, it is recommended that each unit holder should appropriately consult its tax consultant with respect to the specific tax implications arising out of their participation in the scheme. The tax information contained in SAI alone is not sufficient and should not be used for the development or implementation of an investment strategy or construed as investment advice. Investors alone shall be fully responsible/liable for any decision taken on the basis of this document. Neither the Mutual Fund nor the AMC nor any person connected with it accepts any liability arising from the use of this information. Investors should study this SAI carefully in its entirety and should not construe the contents as advice relating to taxation.

TAX IMPLICATIONS FOR THE FUND

The entire income of the Mutual Fund registered with the SEBI will be exempt from income-tax in accordance with the provisions of Schedule VII (Table: SI.No.20) of the Income-tax Act, 2025 (the Act). The Mutual Fund will receive all income without any deduction of tax at source as per provisions of section 393(5)(d) of the Act.

TAX IMPLICATIONS TO UNIT HOLDERS

Distribution of income by the Mutual Fund to the unit holders,

Any income distributed by mutual fund to unit holders is taxable in the hands of unit holders at the applicable rates from 01.04.2020 onwards. Any person responsible for paying to a resident any income distributed in respect of units of a Mutual Fund specified under Schedule VII (20), shall withhold tax at the rate of 10%.

In case of resident unit holders, no tax is required to be withheld if such dividend does not exceed Rs. 10,000 or not likely to exceed Rs. 10,000 in a financial year. Further, no tax is required to be withheld on capital gain.

In case of non-resident investors, the mutual fund is required to withhold taxes @20% plus applicable surcharge and cess at the time of credit / payment of distributed income to such investor.

Securities Transaction Tax

As per Chapter VII of the Finance (No. 2) Act, 2004 pertaining to STT, STT shall be payable in respect of sale / redemption of units of Equity-oriented funds at the following rates:

Sr. No.	Taxable Securities Transaction	Rate	Value	Payable by
1	Purchase of units of equity oriented mutual fund (delivery based) on recognized stock exchange	Nil	Not Applicable	Not Applicable
2	Sale of units of equity oriented mutual fund (delivery based) on recognized stock exchange	0.001 per cent	Value at which units sold	Seller
3	Sale of units of equity oriented mutual fund (non-delivery based)	0.025 per cent	Value at which units sold	Seller
4	Sale of a unit of an equity-oriented fund to the Mutual Fund	0.001 per cent	Value at which units sold	Seller

Gains on transfer / redemption of units

The tax implications on Mutual Funds are determined based on:
the type of Mutual Fund (classified based on the % holding in the equity shares of domestic companies); and
the holding period (from date of acquisition up to the date of the redemption/transfer).

In case of Equity-Oriented Mutual Funds [Subject to Securities Transaction Tax (STT)]:

An Equity-Oriented Fund ('Equity Fund') refers to a scheme of a Mutual Fund wherein minimum of 65% of the total proceeds of such fund are invested in the equity shares of domestic companies listed on a recognised stock exchange. A Fund of Fund (FOF) structure is treated as an Equity Fund if a minimum of 90% of the total proceeds of such fund are invested in the units of another fund and such other fund also invests a minimum of 90% of its total proceeds in the equity shares of domestic companies listed on a recognised stock exchange. The equity holding is computed with reference to the annual average of the monthly averages of the opening and closing figures.

CAPITAL GAINS ON EQUITY ORIENTED MUTUAL FUNDS

Type of Capital Gain	**Short Term Capital Gains**		**Long Term Capital Gains**	
Period of Holding	Up to 12 months		More than 12 months	
Status of Investor	**Income Tax Rate[5]**	**TDS [5 6]**	**Income Tax Rate[5]**	**TDS [5 6]**
(A) Resident	20%	NIL	12.50%[1]	NIL
(B) Non-Resident (other than FII)		20%		12.50 %
(C) Foreign Institutional Investor (FII)		NIL		NIL

Mutual fund schemes having less than 65% holding in listed equity shares of domestic companies shall be classified as Non-Equity Funds.

CAPITAL GAINS ON NON-EQUITY ORIENTED MUTUAL FUNDS

[I] FOR INVESTMENTS MADE ON OR AFTER APRIL 1, 2023

CONDITION – % of Debt Holding in MF	**MORE THAN 65% [2]**		**UP TO 65%**			
Type of Capital Gain	**Short Term Capital Gains**		**Short Term Capital Gains**		**Long Term Capital Gains**	
Period of Holding	Irrespective of Holding Period		Unlisted MF – Up to 24 months Listed MF – Up to 12 months		Unlisted MF – More than 24 months Listed MF – More than 12 months	
Status of Investor	Income Tax Rate[5]	TDS[5 6]	Income Tax Rate[5]	TDS[5 6]	Income Tax Rate[5]	TDS[5 6]
(A) Resident	Applicable Tax / Slab Rates[4]	NIL	Applicable Tax /Slab Rates [4]	NIL	12.50% [3]	NIL
(B) Non-Resident (other than FII)		30%		30%		12.50%
(C) Foreign Institutional Investor (FII)	30%	NIL	30%	NIL		NIL

[II] FOR INVESTMENTS MADE ON OR BEFORE MARCH 31, 2023

Type of Capital Gain	**Short Term Capital Gains**		**Long Term Capital Gains**	
Period of Holding	Unlisted MF – Up to 24 months Listed MF – Up to 12 months		Unlisted MF – More than 24 months Listed MF – More than 12 months	
Status of Investor	Income Tax Rate[5]	TDS[5 6]	Income Tax Rate[5]	TDS[5 6]
(A) Resident	Applicable Tax / Slab Rates [4]	NIL	12.50% [3]	NIL
(B) Non-Resident (other than FII)		30%		12.50% [3]
(C) Foreign Institutional Investor (FII)	30%	NIL		NIL

Notes:

1. Subject to payment of STT on transfer of units and long-term capital gains are computed without indexation & foreign exchange fluctuation benefit. Long Term Capital Gains on Equity-Oriented Funds are exempt from tax up to Rs.1,25,000 per year.
2. As per Section 76 of the Income-tax Act, 2025, capital gains arising on transfer or redemption or maturity of Specified Mutual Funds acquired on or after 1st April 2023 shall be treated as short term capital gains irrespective of holding period. A "Specified Mutual Fund" means:

(a) a Mutual Fund by whatever name called, which invests more than 65% of its total proceeds in debt and money market instruments; or
(b) a fund which invests 65% or more of its total proceeds in units of a fund referred to in (a).
The percentage of investment in debt and money market instruments or in units of a fund, as the case may be, in respect of the Specified Mutual Fund, shall be computed with reference to the annual average of the daily closing figures.
(c) Up to 31st March 2025, a "Specified Mutual Fund" means a Mutual Fund by whatever name called, where not more than 35% of its total proceeds is invested in the equity shares of domestic companies. The percentage of equity shareholding held in respect of the Specified Mutual Fund shall be computed with reference to the annual average of the daily closing figures. It is possible that an "equity-oriented fund" which invests in units of another equity fund instead of investing directly in equity shares of domestic company may be regarded as "specified mutual fund" and taxed accordingly.

3. Long Term Capital Gains are computed without indexation and foreign exchange fluctuation benefit.

4. **Applicable Tax / Slab Rates**

A. For Individuals / HUF / AOP / BOI / Artificial Juridical Persons

DEFAULT – NEW TAX REGIME
[Section 202]

TOTAL INCOME	TAX RATES [5]
Up to INR 4,00,000	NIL
INR 4,00,001 to INR 8,00,000	5%
INR 8,00,001 to INR 12,00,000	10%
INR 12,00,001 to INR 16,00,000	15%
INR 16,00,001 to INR 20,00,000	20%
INR 20,00,001 to INR 24,00,000	25%
INR 24,00,001 and above	30%

OPTIONAL – OLD TAX REGIME
(with specified exemptions & deductions)

TOTAL INCOME	TAX RATES [5]
Up to INR 2,50,000	NIL
INR 2,50,001 to INR 5,00,000	5%
INR 5,00,001 to INR 10,00,000	20%
INR 10,00,001 and above	30%

(i) Under the old tax regime, in the case of a resident individual of the age of 60 years or more but less than 80 years, the basic exemption limit is INR 300,000 and in the case of a resident individual of the age of 80 years or more, the basic exemption limit is INR 500,000

(ii) In cases where the taxable income, reduced by long term capital gains / short term capital gains, of a resident individual/HUF is below the basic exemption limit, the long-term capital gain / short-term capital gains will be reduced to the extent of this shortfall and only the balance is chargeable to income tax. The benefits of this provision are not available to non-resident individuals.

(iii) In case of a resident individual: (a) If opting to pay tax under the old tax regime, then rebate of up to Rs.12,500 is available if total income does not exceed Rs.5,00,000; (b) If total income is chargeable to tax under the default New Tax Regime u/s. 202, then rebate of up to Rs.60,000 is available if such total income does not exceed Rs.12,00,000. However, such rebate is not available with respect to tax on incomes chargeable at special rates.

B. For Domestic Companies

If availing specified exemptions / deductions **Optional Regime (Without specified Exemptions /deductions)**

	Turnover ≤ Rs. 400 Crore for FY 2023-24	**Turnover > Rs.400 Crore**	**Section 200 or 201**
Basic Tax Rate [5]	25%	30%	22%**
Minimum Alternate Tax (MAT) [5]	14%	14%	Not Applicable

*** As per Section 201, tax rate of 15% is applicable for new manufacturing domestic companies on income derived from or incidental to manufacturing or production of an article or thing and 22% is applicable on other incomes.*

C. For Foreign Companies – 35%

D. For Firms or Limited Liability Partnerships (LLP) – 30%

B. <u>Surcharge:</u>

If taxpayer (Individual/HUF/AOP/BOI/AJP) opts for Old Tax Regime, then Surcharge to be levied on basic tax at:

- 37% where specified income exceeds Rs.5 crore;
- 25% where specified income exceeds Rs.2 crore but does not exceed Rs.5 crore;
- 15% where total income exceeds Rs.1 crore but does not exceed Rs.2 crore; and
- 10% where total income exceeds Rs.50 lakhs but does not exceed Rs.1 crore.

If taxpayer (Individual/HUF/AOP/BOI/AJP) pays tax as per default New Tax Regime u/s. 115BAC(1A), then maximum rate of Surcharge will be 25% where income exceeds Rs.2 crore.

'Specified income' refers to total income excluding dividend income on shares, STCG on Equity Oriented Fund and LTCG on mutual fund units. Enhanced surcharge of 25% or 37%, as the case may be, will not apply in case of income by way of dividend or capital gains on securities covered under Section 196 (STCG on Equity Oriented Fund), Section 197 (LTCG on non- Equity Oriented Fund), Section 198 (LTCG on Equity Oriented Fund) & Section 210 (tax on income earned by FIIs).

In case of an AOP consisting of only companies as its members, the rate of surcharge shall not exceed 15%.

Surcharge for companies to be levied on basic tax:
Domestic Company: 12% where income exceeds Rs.10 crore and 7% where income exceeds Rs.1 crore but less than Rs.10 crore. If a domestic company opts for concessional tax regime u/s. 200/201: then flat rate of 10% on basic tax
Non-resident Company: 5% where income exceeds Rs.10 crore and 2% where income exceeds Rs.1 crore but less than Rs.10 crore

- Surcharge for firms / LLP to be levied on basic tax: 12% where income exceeds Rs.1 crore

Cess: Health & Education Cess @ 4% is applicable on aggregate of basic tax & surcharge.

C. <u>Tax Deduction at Source (TDS) or Withholding Tax:</u>

The Mutual Fund will pay/deduct taxes as per the applicable tax laws on the relevant date considering the provisions of the Income-tax Act,2025 read with the Income-tax Rules, 2026 and any circulars or notifications or directives or instructions issued thereunder. Please note that grant of DTAA benefit, if any, is subject to fulfilment of stipulated conditions under the provisions of the Income-tax Act, 2025 and the relevant DTAA as well as interpretation of relevant Article of such DTAA.

TDS on Income Distributions (IDCW Option):

- In case of non-resident investors (other than FII): As per provisions of Section 393, TDS is applicable on any income in respect of units of a Mutual Fund at lower of 20% or rate of income-

tax provided in the relevant DTAA (read with CBDT Circular no. 3/2022 dated 3rd February 2022), provided such investor furnishes valid Tax Residency Certificate (TRC) for concerned tax year along with Form 41 and other relevant documents.

- In case of FII: As per provisions of Section 393, TDS is applicable at lower of 20% or rate of income-tax provided in the relevant DTAA (read with CBDT Circular no. 3/2022 dated 3rd February 2022), provided such investor furnishes valid Tax Residency Certificate (TRC) for concerned tax year along with Form 41 and other relevant documents.

TDS on Capital Gains: Tax will be deducted on Short-term/Long-term capital gains at the tax rates (plus applicable Surcharge and Health and Education Cess) specified in the Finance Act 2026 at the time of redemption of units in case of non-resident investors (other than FIIs) only.

TDS at higher rates: In case PAN is not furnished or PAN is inoperative, then TDS as per Section 397 of the Income-tax Act, 2025 would apply (higher of specified rate or rates in force or 20%), subject to Rule 217 of the Income-tax Rules, 2026.

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

Particulars	**Section 86**
Eligible persons	Individuals and HUFs
Asset to be purchased to claim exemption	One residential house in India
Time limit for purchase from date of sale of MF units	Purchase: 1 year backward / 2 years forward & Construction: 3 years forward
Amount Exempted	Capital gains proportionate to the investment made from the sale proceeds (subject to other conditions of owning / purchasing the residential house mentioned in the section)
Lock-in period	3 years
Maximum deduction	INR 10 crores

E. LOSSES UNDER THE HEAD 'CAPITAL GAINS'

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

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

F. BONUS STRIPPING

As per section 179(9) of the Act, units purchased within a period of 3 months prior to record date of entitlement of bonus and sold within a period of 9 months after such date, the loss arising on the transfer of original units shall be ignored for the purpose of computing the income chargeable to tax. The amount of loss ignored shall be deemed to be the cost of purchase / acquisition of the bonus units.

G. Religious and Charitable Trust

Investments in units of the Mutual Fund will rank as an eligible form of investment under section 350 of the Act read with Schedule XVI (Sl. No. 13), for Religious and Charitable Trusts.

H. Deduction from Total Income

Under Section 123, Schedule XV of the Act, an assessee, being an individual or HUF, is eligible to claim a deduction of upto an aggregate of Rs. 1,50,000 on account of sums paid as subscription to units of an Equity Linked Savings Scheme ("ELSS") under old tax regime. The expression, "ELSS" refers to a scheme issued in terms of the Equity Linked Savings Scheme, 2005, as notified by the Central Board of Direct Taxes ("CBDT"), Ministry of Finance, vide notification dated November 3, 2005 as amended vide notification dated December 13, 2005.

B. Legal Information

1. Nomination Facility

In terms of Regulation 27 of the SEBI (Mutual Funds) Regulations, 2026, the unit holders have an option for making nomination

(a) *Who can nominate/be nominees?*

Individuals, on their own behalf, singly or jointly can nominate.

Following is an illustrative list of the categories of investors who cannot nominate:

i) company
ii) body corporate
iii) PSU
iv) AOP, BOI
v) society
vi) trust (other than religious or charitable trust)
vii) partnership firm
viii) karta of HUF
ix) bank
x) FII/Foreign Portfolio Investors (FPI)
xi) holder of POA

A minor can be nominated and in that event, the name and address of the guardian of the minor nominee shall be provided by the Unit holder. Nomination can also be in favour of the Central Government, State Government, a local authority, any person designated by virtue of his office or a religious or charitable trust. For nomination to a religious or charitable trust, the investor should attach a proof or certificate that the trust being nominated is religious or charitable trust. The Nominee shall not be a trust, other than a religious or charitable trust, society, body corporate, partnership firm, Karta of Hindu Undivided Family or a Power of Attorney holder. A non-resident Indian can be a Nominee subject to the exchange controls in force, from time to time.

(b) *How to Nominate**?***

A Unit holder can, at the time an application is made, or by subsequently writing to an ISCs, request for a nomination form in order to nominate not more than three individuals, to receive the units upon his/her death, subject to completion of the necessary formalities. If the Units are held jointly, all joint unit holders will be required to sign the nomination form irrespective of the mode of holding being 'Anyone or Survivor' or 'Joint'. Nomination form cannot be signed by Power of attorney (PoA) holders. Every new nomination for a folio/account will overwrite the existing nomination.

Investors may please note that nomination is mandatory for folios held in the name of a single individual. Nomination cannot be made in a folio held 'on behalf of a minor'. Further, investors who do not wish to nominate are required to confirm at the time of making an application of their non-intention to nominate i.e. to submit opt-out declaration form signed by all holders.

Investors shall indicate clearly the percentage of allocation/share in favour of each of the nominees against their names, and such allocation/ share shall be in whole numbers without any decimals. In the event of the investor not indicating the percentage of allocation/share for each of the nominees, the AMC shall settle the claim equally amongst all the nominees.

(c) *Effects of nomination/cancellation of nomination*

Nomination in respect of units stands rescinded upon redemption of units. Cancellation of nomination can be made only by those individuals who hold units on their own behalf, singly or jointly, and who made the original nomination. On cancellation, the nomination shall stand rescinded and the AMC/Mutual Fund/ Specialized Investment Fund shall not be under any obligation to transfer the units in favour of any of the nominees. Transfer of units/payment to a nominee of the sums shall be valid and effectual against any demand made upon the Trust/AMC, and shall discharge the Trust/AMC of all liability towards the estate of the deceased unit holder and his/her successors and legal heirs, executors and administrators.

- Legal heir(s) of nominee shall not be eligible to inherit the assets of the investor, if the nominee predeceases the investor.
- The nominees(s) shall receive the assets of deceased sole account / sole holder(s) as trustee on behalf of legal heir(s) of deceased holder(s) thereby effecting due discharge of the AMC.

If the Mutual Fund, Specialized Investment Fund or the AMC or the Trustee were to incur or suffer any claim, demand, liabilities, proceedings or if any actions are filed or made or initiated against any of them in respect of or in connection with the nomination, they shall be entitled to be indemnified absolutely for any loss, expenses, costs, and charges that any of them may suffer or incur absolutely from the investor's estate.

2. KYC Requirements and Requirements of Prevention of Money Laundering Act

Please refer to point "Note on and Prevention of Money Laundering and Know Your Client ('KYC') Requirements" under section "How to Apply".

3. **Transfer of Units**

Units of the Investment Strategy(s) held in physical form shall be non-transferable, except investor can gift through online mode. Further units of the Investment Strategy(s) of the Specialized Investment Fund held in demat form are freely transferable (in terms of Regulation 35 of SEBI (Mutual Funds) Regulations ,2026) from one demat account to another demat account.

4. **Transmission**

If a person becomes a holder of the Units consequent to operation of law or upon enforcement of a pledge, the Specialized Investment Fund will, subject to production of satisfactory evidence, effect the transfer, if the transferee is otherwise eligible to hold the Units. Similarly, in cases of transfers taking place consequent to death, insolvency etc., the transferee's name will be recorded by the Specialized Investment Fund subject to production of satisfactory evidence and completion of formalities as specified by the AMC.

On death of the single or all the Unitholder(s), Units can be transmitted in favour of the registered nominee or the legal heirs, as the case may be, after completion of necessary formalities to the satisfaction of the AMC/Trustee. All restrictions and limitations specified herein including those relating to lock-in period and lien/pledge will be binding also on the legal heirs, successors, pledgees of the Unitholder(s).

1. Deletion of names of the deceased unit holders in case of death of 2nd and/or 3rd Holder

i) Request Form (Form T1) from surviving unitholder(s) requesting for Deletion of Name of Deceased 2nd and/or 3rd Holder.

ii) Death Certificate in original or photocopy of the death certificate self-attested and attested by a notary public/gazette officer in original. Fresh Bank Mandate Form along with cancelled cheque of the new bank account (only if there is a change in existing bank mandate)

iii) Fresh Nomination Form (or Nomination Opt-out form) in case there is no nomination or a change in existing nomination is desired by the surviving unit holders.

iv) KYC Acknowledgment or KYC Form of the surviving unit holder(s), *if not KYC compliant*. Transmission will be completed only once the status of the KYC is "KYC complied".

v) Additional documentation required:

ID proof [PAN/Redacted Aadhaar/Voter ID / Passport or any other valid Officially Valid Document (OVD) as per PMLA guidelines] of the deceased person attested by the claimant(s), duly notarized or originals can be shown at the AMC branches and Original Seen and verified (OSV) seal attested by them.

2. Transmission of Units to surviving unit holder(s) in case of death of the 1st holder

i) Transmission Request Form (Form T2) for Transmission of Units to the surviving unitholder/s.

ii) Death Certificate of the deceased unitholder(s) in original OR photocopy of the death certificate self-attested and attested by a notary public/gazette officer in original Self-attested copy of PAN Card of the Surviving Joint Holder(s) (*if PAN is not provided already*)

Cancelled cheque of the new first unitholder, with the claimant's name pre-printed **OR**

Recent Bank Statement/Passbook (not more than 3 months old) of the new first holder.

iii) KYC Acknowledgment OR KYC Form of the surviving unit holder(s), if not KYC compliant.

iv) Transmission will be completed only once the status of the KYC is “KYC complied”.

v) Additional documentation required:

ID proof [PAN/Redacted Aadhaar/Voter ID / Passport or any other OVD as per PMLA guidelines] of the deceased person attested by the claimant(s), duly notarized or originals can be shown at the AMC branches and OSV seal attested by them.

3. Transmission of Units to the registered Nominee/s in case of death of sole or all unitholders

i) Transmission Request Form (Form T3) for Transmission of Units in favour of the Nominee(s).

ii) Death Certificate of the deceased unitholder(s) in original OR photocopy of the death certificate self-attested and attested by a notary public/gazette officer in original Copy of Birth Certificate, in case the Nominee is a minor.

iii) Self-attested copy of PAN Card of the Nominee(s) / Guardian (in case the Nominee is a minor)

iv) KYC Acknowledgment OR KYC Form of the Nominee(s) / Guardian (where Nominee is a Minor). Transmission will be completed only once the status of the KYC is “KYC complied”. cancelled cheque with the Nominee’s name pre-printed OR copy of the Nominee’s recent Bank Statement/Passbook (which is not more than 3 months old).

v) If the transmission amount is upto ₹ 5 Lakh, Nominee’s signature attested by the Bank Manager as per Annexure-I(a). In case the Nominee is a minor, signature of the guardian (as per the bank account of the Minor or the joint account of the minor with the guardian) shall be attested.

vi) If the transmission amount is for more than ₹ 5 Lakh, as an operational risk mitigation measure, signature of the Nominee shall be attested by a Notary Public or a Judicial Magistrate First Class (JMFC) with seal and date in the space provided for signature attestation in the TRF itself below the signature of the claimant.

vii) Additional documentation required:

ID proof [PAN/Redacted Aadhaar/Voter ID / Passport or any other valid OVD as per PMLA guidelines] of the deceased person attested by the claimant(s), duly notarized or originals can be shown at the AMC branches and OSV seal attested by them.

4. Transmission of Units to the claimant/s on death of the Sole unitholder or All unitholders, where there is NO nomination has been registered

i) Transmission Request Form (Form T3) for Transmission of Units to the claimant.

ii) Death Certificate of the deceased unitholder(s) in original OR photocopy of the death certificate self-attested and attested by a notary public/gazette officer in original copy of Birth Certificate in case the claimant is a minor.

iii) Self-attested copy of PAN card of the claimant / guardian (in case the claimant is a minor).

iv) KYC Acknowledgment OR KYC Form of the claimant / guardian (in case the claimant is a minor). Transmission will be completed only after the KYC status is updated as “KYC complied”.

v) Cancelled cheque with the claimant’s name pre-printed OR copy of the claimant’s recent Bank Statement/Passbook (which is not more than 3 months old).

vi) Additional documentation required:

ID proof [PAN/Redacted Aadhaar/Voter ID / Passport or any other valid OVD as per PMLA

guidelines] of the deceased person attested by the claimant(s), duly notarized or originals can be shown at the AMC branches and OSV seal attested by them.

IF THE TRANSMISSION AMOUNT IS UP TO ₹ 5 LAKH

a) Bank Attestation of signature of the claimant by the Bank Manager as per Annexure-I(a). In case the claimant is a minor, the signature of the guardian (as per the bank account of the minor or the joint account of the minor with the Guardian) shall be attested.

b) Any appropriate document evidencing relationship of the claimant/s with the deceased unitholder/s.

c) Bond of Indemnity as per Annexure-II → to be furnished by Legal Heirs for Transmission of Units without production of Legal Representation.

5. Provided that in case the legal heir(s)/claimant(s) is submitting the Succession Certificate or Probate of Will or Letter of Administration or appropriate Court order wherein the claimant is named as a beneficiary, an affidavit as per Annexure-III from such **legal** heir/claimant(s) alone would be sufficient, i.e., Bond of Indemnity is not required.

d) Individual Affidavit to be given by **each** legal heir as per Annexure-III

e) NOC from other legal heirs as per Annexure – IV, where applicable

IF THE TRANSMISSION AMOUNT IS MORE THAN ₹ 5 LAKH

a) Signature of the claimant duly attested by a Notary Public or a JMFC with seal and date in the space provided for signature attestation in the Form T3 itself below the signature of the claimant. In case the claimant is a minor, the signature of the guardian (as per the bank account of the minor or the joint account of the minor with the guardian) shall be attested

b) Individual affidavits to be given **each** legal heir as per Annexure-III

c) (i) Where transmission value at the PAN-level is more than ₹5 lakh, but less than ₹10 lakhs, any one of the documents mentioned below

Notarised copy of Registered Will along with a Notarized indemnity bond from the claimant (appropriate beneficiary of the will) to whom the securities are to be transmitted, as per the format specified.

OR

Legal Heirship Certificate or its equivalent, along with:

(i) a Notarized indemnity bond from the legal heir(s) / claimant(s) to whom the securities are to be transmitted, as per the format specified provided and

(ii) No Objection Certificate from all the non-claimants (i.e., remaining legal heirs), duly attested by a Notary Public, JFMC or by a Gazetted Officer as per the format specified.

(ii) Where transmission value at the PAN-level is more than ₹10 lakhs, any one of the documents mentioned below

Notarised copy of Probated Will; OR

Succession Certificate issued by a competent court, **OR**

Letter of Administration or court decree, in case of Intestate Succession

d) Identity proof (e.g., copy of PAN card, redacted Aadhaar card, passport) of all legal heirs signing the NOC/affidavit other than claimant/s (i.e., legal heirs other than the claimant mentioned in Probate or Letters of Administration or Succession Certificate).

5. Change of Karta upon death of the Karta of Hindu Undivided Family (HUF)

If the case of a HUF, the property of the HUF is managed by the Karta and the HUF does not come to an end in the event of death of the Karta. In such a case, the members of the HUF will need to appoint a new Karta, who needs to submit following documents for transmission:

i) Request Form (Form T4) for change of Karta upon demise of the registered Karta.

ii) Death Certificate of the deceased Karta in original OR photocopy of the death certificate self-attested and attested by a notary public/gazette officer in original.

iii) Bank's letter certifying that the signature and details of the new Karta have been updated in the bank account of the HUF & attesting the signature of the new Karta as per Annexure-1(b).

iv) KYC acknowledgment OR KYC form of the new Karta and the HUF, if not KYC-compliant. Transmission will be completed only after the KYC status is updated as "KYC complied".

v) Indemnity Bond as per Annexure V signed by all surviving coparceners (including the new Karta).

vi) Any appropriate document evidencing relationship of the new Karta and the other coparceners with the deceased Karta.

Additional documentation required:

a) ID proof [PAN/Redacted Aadhaar/Voter ID / Passport or any other valid OVD as per PMLA guidelines] of the deceased Karta attested by the new Karta , duly notarized or originals to be shown at the AMC branches.

b) If the transmission amount is for more than ₹ 5 lakh, the signature of the new Karta) shall be attested by a Notary Public or a JMFC in the space provided for signature attestation in the TRF itself below the signature of the claimant.

6. Transmission of Units to the claimant/s upon death of the Karta of HUF, where there is no surviving co-parcener or the HUF has been dissolved/partitioned after demise of the Karta

i) Transmission Request Form (Form T5) for Transmission of Units to the Claimant.

ii) Death certificate of the deceased Karta in original OR photocopy thereof attested by a notary public/gazette officer in original copy of birth certificate.

iii) Self -attested copy of PAN Card of the claimant(s) / guardian (in case the claimant is a minor).

iv) KYC acknowledgment or KYC form of the claimant(s) /guardian (in case the claimant is a minor). Transmission will be completed only after the status of the KYC is updated as "KYC complied".

v) Cancelled cheque with the claimant's name pre-printed thereon OR copy of the claimant's recent bank statement/passbook which is not more than 3 months old.

vi) If the transmission amount is upto ₹ 5 lakh, attestation of the signature of the claimant by bank manager as per Annexure-I(a). In case the claimant is a minor, the signature of the guardian (as per the minor's bank account / minors joint account with the guardian) shall be attested.

If the transmission amount is for more than ₹ 5 lakh, the signature of the claimant shall be attested by a Notary Public or a JMFC in the space provided for signature attestation in the TRF itself below the signature of the claimant.

vii) Bond of Indemnity to be furnished by the Claimant as per Annexure-VI

viii) If the HUF has been dissolved/partitioned by the surviving members after demise of the Karta, the transmission of units shall be processed on the basis of any of the following documents:

a) Notarized copy of Settlement Deed, OR

b) Notarized copy of Deed of Partition, OR

c) Notarized copy of Decree of the relevant competent Court.

Additional documentation required:

ID proof [PAN/Redacted Aadhaar/Voter ID / Passport or any other valid OVD as per PMLA guidelines] of the deceased person attested by the claimant(s), duly notarized or originals can be shown at the AMC branches and Original Seen & Verified stamp attested by them.

- ASK Asset Management Private Limited will not accept any "Transmission-cum-Redemption" requests. The request for redemption of Units will be accepted only after processing the request for transmission of Units with proper documentation.

- The AMC will implement image-based processing wherever the claimant is a nominee or a joint holder in the investor folio.

- The AMC will have a dedicated, Central Help Desk and a webpage carrying relevant information and instructions in order to provide assistance on the transmission process.

- The AMC will adopt a common Transmission Request Form and NOC form. All such forms and formats will be made available on the website of the AMC, RTA and AMFI.

- The AMC will implement a uniform process for treatment of unclaimed funds to be transferred to the claimant including the unclaimed IDCW.

- The AMC will not accept requests for redemption from a claimant pending completion of the transmission of units in his /her favour.

- The Stamp duty payable by the claimant with respect to the indemnity bond and affidavit, will be in accordance with the stamp duty prescribed by law.

- For list of documents required for transmission of units, investors are required to refer website of the Fund www.askmutualfund.com.

"On Behalf of Minor" Accounts

A. In the case of investments made "on behalf of minor", investors may please note the following:

a. The minor shall be the first and the sole holder in the account. There shall not be any joint holder where minor is the first holder.
b. Guardian can be either natural guardian (i.e. father or mother) or a court appointed legal guardian
c. It is mandatory for guardian to submit documentary evidence confirming the relationship status.
d. It is mandatory for the minor to have a bank account in his own name singly or jointly with the Guardian. The investment amount has to be from the minor's bank account or parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian.
e. It is mandatory to provide minor's date of birth in application form along with any of following supporting documents:

- Birth certificate of the minor, or
- School leaving certificate / Mark sheet issued by Higher Secondary Board of respective states, ICSE, CBSE etc., or
- Passport of the minor, or
- Any other suitable proof evidencing the date of birth of the minor.

B. Minor attaining majority – Status Change

a. The AMC/Registrar shall send advance notice at the registered correspondence address, advising the minor and guardian to submit prescribed documents, in order to effect change of status from 'minor' to 'major'.
b. In case the requisite documents to change the status are not received by the date when the minor attains the age of majority, no transactions (financial and non-financial) including fresh registration of Systematic Investment Plan ('SIP'), Systematic Transfer Plan ('STP') and Systematic Withdrawal Plan ('SWP') will be permitted after the date of minor attaining the age of majority.
c. Existing SIPs, SWPs and STPs registered prior to the minor attaining the age of majority, will be continued to be processed till the time an instruction from the major to terminate the standing instruction is received by the AMC/Registrar along with the prescribed documents.
d. New SIPs, SWPs and STPs will be registered upto the date of the minor attaining the age of majority.
e. List of standard documents to change account status from minor to major:

- Service Request form, duly filled and containing details like name of major, folio numbers, etc.;
- New Bank mandate where account changed from minor to major;
- Signature attestation of the major by a manager of a scheduled bank / Bank Certificate/Letter;
- KYC acknowledgement of the major.

C. ***Change in Guardian***

Guardian can be changed in a folio held "on behalf of minor", either due to mutual consent or demise of the existing guardian. However, the new guardian can only be either a natural guardian (i.e. father or mother) or a court appointed legal guardian. New guardian should submit documentary evidence confirming the relationship with the minor, bank attestation attesting his/her signature and KYC acknowledgement.

D. Process for Investments made in the name of a Minor through a Guardian –

1. **F**or all fresh purchases including Lumpsum, new Systematic Investment Plan (SIP) registrations in the name of minor will be accepted only from the bank account of minor or parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian.
2. Existing unitholders/guardians with folios in the name of minor, should ensure to update a bank account in the name of minor (or a joint account of the minor with the guardian only) as a payout bank in the folio, before placing any redemption in such folio.
3. In case of any redemption received in the folio of a minor where the bank account of the minor is not updated, such redemption will be rejected.

Upon the minor attaining the status of major, the minor in whose name the investment was made is required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new account.

5. Duration of the Investment Strategies

The duration of open-ended Investment Strategies is perpetual while that of the close-ended Investment Strategies is as mentioned in the relevant ISID. However, in terms of the Regulations, open-ended Investment Strategies may be wound up anytime, and close-ended Investment Strategy may be wound up at any time prior to the maturity date, after repaying the amount due to the unit holders under the following circumstances:

1. On happening of any event, which in the opinion of the Trustee, requires the Investment Strategy concerned to be wound up, OR
2. If 75% of the unit holders of the Investment Strategy concerned pass a resolution that the Investment Strategy be wound up, OR
3. If SEBI so directs in the interests of unit holders.

In addition to the above, an open-ended Investment Strategies may also be wound up if the Investment Strategy/investment Plan fails to fulfill the condition of a minimum of 20 investors on an ongoing basis for each calendar quarter.

Further, an average AUM of Rs. 20 crore on half yearly rolling basis has to be maintained for all open ended debt oriented Investment Strategies. In case of breach of this provisions, the AMC shall scale up the AUM of such Investment Strategy within prescribed period so as to comply with the provisions, failing which the provisions of Regulation 39(2)(c) of the Regulations related to winding up of Investment Strategy would become applicable.

6. Procedure and Manner of Winding Up

The Trustee shall call a meeting of the unit holders to approve by simple majority of the unit holders present and voting at the meeting for authorising the Trustee or any other person to take steps for winding up of the Investment Strategy concerned.

The Trustee or the person authorised as above, shall dispose off the assets of the Investment Strategy concerned in the best interest of the unit holders of the Investment Strategy.

The proceeds of sale realised in pursuance of the above shall be first utilised towards discharge of such liabilities as are due and payable under the Investment Strategy, and after meeting the expenses connected with such winding up, the balance shall be paid to the unit holders in proportion to their respective interest in the assets of the Investment Strategy, as on the date when decision for winding up was taken.

On completion of the winding up, the Trustee shall forward to SEBI and unit holders a report on the winding up, detailing, the circumstances leading to the winding up, the steps taken for disposal of the assets of the Investment Strategy before winding up, net assets available for distribution to the unit holders and a Certificate from the auditors of the Mutual Fund/ Specialized Investment Fund.

Notwithstanding anything contained herein above, the provisions of the Regulations in respect of disclosures of half-yearly reports and annual reports shall continue to be applicable until winding up is completed or the Investment Strategy concerned ceases to exist.

After the receipt of the report referred to above, under "Procedure and Manner of Winding Up", if SEBI is satisfied that all measures for winding up of the Investment Strategy concerned have been complied with, the Investment Strategy shall cease to exist.

The aforesaid provisions pertaining to "Procedure and Manner of Winding Up" shall apply in respect of each individual Investment Strategy and to the extent possible shall apply mutatis mutandis to each Investment Plan.

7. Pledge of Units for Loans

Units can be pledged by the Unit Holders as security for raising loans, subject to any rules/restrictions that the Trustee may prescribe from time to time.

Disbursement of such loans will be at the entire discretion of the bank/financial institution/NBFC or any other body concerned and the Mutual Fund/ Specialized Investment Fund/ AMC assumes no responsibility thereof. The Pledgor will not be able to redeem Units that are pledged until the entity to which the Units are pledged provides written authorisation to the Mutual Fund/ Specialized Investment Fund that the pledge/lien charge may be removed. As long as Units are pledged, the Pledgee will have complete authority to redeem such Units. In case the units pledged are of close ended Investment Strategy and if the units are under pledge at the time of maturity of the Investment Strategy, then the AMC reserves the right to pay the maturity amount to the person / bank / financial institution/non-banking finance companies (NBFCs)/any other body in whose favour the lien has been marked. An intimation of such payment will be sent to the investor. The AMC thereafter shall not be responsible for any claims made by the investor/third party on account of such payments.

For Units held in demat form, the rules of the respective Depository Participants ('DP') will be applicable for pledge of the Units. Units held in demat form can be pledged by completing the requisite forms/formalities as may be required by the Depository. The pledge gets created in favour of the pledgee only when the pledgee's DP confirms the creation of pledge in the system. In case of Units held in physical form, the Registrar will note and record such pledge. A standard form for this purpose is available at any of the official points of acceptance of transactions and on www.qsif.com.

8. **Compliance under Foreign Account Tax Compliance Act /Common Reporting Standard requirements:**

Foreign Account Tax Compliance Act: The Government of India and US Government have signed an Inter-Governmental Agreement (IGA) on July 9, 2015, to implement FATCA. Pursuant to the reporting requirements mandated under FATCA, the AMC would be required, from time to time:

1. To undertake necessary due diligence process by collecting information/documentary evidence about US/Non-US status of the investors/unit holders and identify US reportable accounts; and
2. To disclose/report information about the holdings, investments returns pertaining to US reportable accounts to the specified US agencies and/or such Indian authorities as may be specified under FATCA guidelines or under any other guidelines issued by Indian Regulatory Authorities such as SEBI, Income Tax etc. (collectively referred to as 'the Guidelines').

FATCA due diligence will be applicable at each investor/unit holder (including joint holders) level and on being identified as reportable person/specified US person, all folios/accounts will be reported including their identity, direct or indirect beneficiaries, beneficial owners and controlling persons. Further, in case of folio(s)/account(s) with joint holder(s), the entire account value of the investment portfolio will be attributable under each such reportable person. Investor(s)/Unitholder(s) will, therefore, be required to comply with the request of the AMC/the Fund to furnish such information, in a timely manner as may be required by the AMC/the Fund to comply with the due diligence/reporting requirements stated under IGA and/or the Guidelines issued from time to time.

With respect to individuals, the US reportable accounts would cover those with US citizenship or US residency. With respect to entities, FATCA requires reporting in relation to specified US persons (Eg. US partnerships, private corporations) as well as passive Non-financial foreign entities (NFFEs) in which controlling interest is held by specified US person.The identification of US person will be based on one or more of the following "US indicia" –

• Identification of account holder as a US citizen or resident;
• Unambiguous indication of a US place of birth;
• Current US mailing or residence address (including a US post office box)
• Current US telephone number;
• Standing instructions to transfer funds to an account maintained in USA;
• Current effective power of attorney or signing authority granted to a person with a US address; or
• An "in-care of" or "hold mail" address that is the sole address that the Indian Financial Institution **has on the file for the account holder.**

Common Reporting Standard –

On similar lines as FATCA, the Organization of Economic Development (OECD), along with the G20 countries, of which India is a member, has released a "Standard for Automatic Exchange of Financial Account Information in Tax Matters", requiring cooperation amongst tax authorities. The G20 and OECD countries have together developed a Common Reporting Standard (CRS) on Automatic Exchange of Information (AEOI).

The CRS on AEOI was presented to G20 Leaders in Brisbane on 16th November 2014. On June 3, 2015, India has joined the Multilateral Competent Authority Agreement (MCAA) on AEOI. The CRS on AEOI requires the financial institutions of the "source" jurisdiction to collect and report information to their tax authorities about account holders "resident" in other countries, such information having to be transmitted "automatically" annually. The information to be exchanged relates not only to individuals, but also to shell companies and trusts having beneficial ownership or interest on the "resident" countries.

Appropriate rules have been notified to implement CRS and FATCA. In view of India's commitment to implement the CRS on AEOI and also the IGA with USA, and with a view to provide information to other countries, necessary legislative changes have been made through Finance (No. 2) Act, 2014, by amending section 285BA of the Income Tax Act, 1961. Income tax Rules, 1962 were amended vide notification No. 62 of 2015 dated 7th August, 2015 by inserting Rules 114F to 114H and Form 61B to provide a legal basis for the Reporting Financial Institutions (RFIs) for maintaining and reporting information about the Reportable Account.
FATCA/ CRS provisions are relevant not only at on-boarding stage of investor(s)/Unitholder(s) but also throughout the life cycle of investment with the AMC. In view of this, Investors should immediately intimate to the AMC, in case of any change in their status with respect to FATCA/ CRS related declaration provided by them previously.

The AMC / Trustee reserves the right to reject any application or redeem the units held directly or beneficially in case the applicant/investor(s) fails to furnish the relevant information and/or documentation in accordance with the FATCA/ CRS provisions, notified.

Investors(s)/Unitholder(s) should consult their own tax advisors to understand the implications of FATCA/ CRS provisions/requirements.

9. Ultimate Beneficial Ownership

Pursuant to SEBI Master Circular dated June 6, 2024 on 'Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) / Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under', as amended from time to time, investors (other than Individuals) are required to provide details of 'Ultimate Beneficial Owner(s) (UBO).

A 'Beneficial owner' is defined as a 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. In this regard, all categories of

investors (including all new / existing investors / unitholders) (except individuals, companies listed on a stock exchange or majority-owned subsidiary of such companies) are mandatorily required to provide beneficial ownership details for all investments. Failing which, the Fund/AMC reserves the right to reject applications / subscription requests / additional subscription requests (including switches) / restrict further investments or seek additional information from investors who have not provided the requisite information on beneficial ownership.

I. Applicability:

1. Providing information about beneficial ownership will be applicable to the subscriptions received from all categories of investors except Individuals and a Company listed on a stock exchange or is a majority owned subsidiary of such a Company.
2. In case the investor or the owner of the controlling interest is an entity listed on a stock exchange in India, or it is an entity resident in jurisdictions notified by the Central Government and listed on stock exchanges in such jurisdictions notified by the Central Government, or it is a subsidiary of such listed entities, the details of shareholders or beneficial owners are not required to be provided.
3. In case of any change in the beneficial ownership, the investor should immediately intimate the AMC / its Registrar / KRA, as may be applicable, about such changes.

II. Identification Process:

(A) For Investors other than Individuals or Trusts:

(i) If the investor is an unlisted company, partnership firm or unincorporated association / body of individuals, the beneficial owners are the natural person/s who is/are acting alone or together, or through one or more juridical person and exercising control through ownership or who ultimately has a controlling ownership interest.

(ii) Controlling ownership interest means ownership of / entitlement to:

a. more than 10% of shares or capital or profits of the juridical person, where juridical person is a company.

b. more than 10% of the capital or profits of the juridical person, where the juridical person is a partnership firm; or

c. more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.

(iii) In cases, where there exists doubt 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 details should be provided of the natural person who is exercising control over the juridical person through other means (i.e. control exercised through voting rights, agreement, arrangements or in any other manner).

(iv) In case no natural person is identified under any of the above criteria, the person who holds the position of senior managing official shall be provided.

(B) For Investor which is a Trust:
In case of a Trust, the settler of the trust, the trustee, the protector and the beneficiaries with 10% or more interest in the trust or any other natural person exercising ultimate effective control over the trust through a chain of control or ownership shall be considered as beneficial owner.

(C) For Foreign Investors:

The Know Your Client requirements in case of foreign investors viz. Foreign Portfolio Investors (FPIs), Sub accounts and identification of beneficial ownership of the investor shall be as specified in SEBI regulations.

The AMC/ Trustee reserves the right to reject application forms submitted without disclosing necessary information as prescribed under the aforesaid laws/ rules/ regulations.

10. **Investors' Personal Information**

Investor/s should be aware and agrees that the AMC and its Registrar reserve the right to disclose the

investor and transactions details to third parties viz. Distributors registered with AMFI, SEBI Registered Investment Advisors (RIA), SEBI Registered Portfolio Managers, Stock Brokers and any other entity (from whom applications / transactions of investors are received), banks, payment aggregators, printers, mailing agencies and any other entity for the purpose of compliance with legal and regulatory requirements or for complying with anti-money laundering requirements. In case of any specific consent request received from the investor to provide data feed to the Registered Investment Advisor, SEBI Registered Portfolio Managers, Stock Brokers, AMC will overwrite the existing RIA/PMRN/Stock Broker code in the folio, if the code mentioned in the request is different from the code registered in the folio.

11. **Acts done in good faith**

Any act, thing or deed done in good faith in pursuance of or with reference to the information provided in the application or other communications received from the investor/ unit holder will constitute good and full discharge of the obligation of the Fund, Trustee and the AMC.

In cases of copies of the documents / other details such as list of authorized signatories, that are submitted by a limited company, body corporate, registered society, trust or partnership, if the same are not specifically authenticated to be certified true copies but are attached to the application form and / or submitted to the Fund, the onus for authentication of the documents so submitted shall be on such investors and the AMC/Fund will accept and act on these in good faith wherever the documents are not expressly authenticated. Submission of these documents / details by such investors shall be full and final proof of the corporate investor's authority to invest and the AMC/Fund shall not be liable under any circumstances for any defects in the documents so submitted.

In cases where there is a change in the name of such investor, such a change will be effected by the AMC/Fund only upon receiving the duly certified copy of the revised Certificate of Incorporation issued by the relevant Registrar of Companies / registering authority. In cases where the changed PAN Number reflecting the name change is not submitted, such transactions accompanied by duly certified copy of the revised Certificate of Incorporation with a copy of the Old Pan Card and confirmation of application made for new PAN Card will be required as a documentary proof.

12. **Power to make rules**

Subject to the prior approval of SEBI, if required, the Trustee may, from time to time, prescribe such terms and make such rules for the purpose of giving effect to the provisions of the Investment Strategies with power to the AMC to add to, alter or amend all or any of the terms and rules that may be framed from time to time.

13. **Power to remove difficulties**

If any difficulty arises in giving effect to the provisions of the Investment Strategies, the Trustee may do anything not inconsistent with such provisions, which appear to them to be necessary, desirable or expedient, for the purpose of removing the difficulty.

C. General Information

1. Inter- Investment Strategy transfer of investments:

Transfers of investments from one Investment Strategy to another Investment Strategy in the same SIF shall be allowed only if -

(a) such transfers are done at the prevailing market price for quoted instruments on spot basis.

Explanation: "spot basis" shall have same meaning as specified by stock exchange for spot transactions.

(b) the securities so transferred shall be in conformity with the investment objective of the Investment Strategy to which such transfer has been made.

2. Aggregate investment in the Investment Strategy under the following categories:

In accordance with Paragraph 6.8 on 'Scheme Related Disclosures' of SEBI Master Circular for Mutual Funds dated March 20, 2026, please find below the aggregate investment in the respective Investment

Strategy by Board of Directors of quant Money Managers Limited (AMC) and key personnel as on May 31, 2026:

Name of Investment Strategy	**Aggregate amount invested in the Investment Strategy as on May 31, 2026 (market value in Rs.)**		
	AMC's Board of Directors	Key personnel (excluding Fund Manager)	Fund Manager
qsif Active Asset Allocator Long-Short Fund	-	31244869.23	-
qsif Equity Ex-Top 100 Long-Short Fund	2208.90	1813.70	1011463.74
qsif Equity Long-Short Fund	1038097.11	5891.50	2084138.19
qsif Hybrid Long-Short Fund	1757.36	1469.42	1045102.94
qsif Sector Rotation Long-Short Fund	-	40278853.76	-

3. Dematerialisation and Rematerialisation procedures

Investors subscribing for the Units (other than by way of switch-in) may opt to hold Units in dematerialized mode by filling and providing details of their demat account in the specified application form. Units shall be allotted in physical form by default, unless the investors intimate their intention of holding Units in demat form by filling in the specified application form. This option shall be available in accordance with the other relevant provisions prescribed in the ISID and in terms of guidelines / procedural requirements as laid by the depositories (NSDL/CDSL) from time to time.

Investors intending to hold the Units in Demat form are required to have a beneficiary account with the Depository Participant (DP) registered with NSDL/CDSL and will be required to indicate in the specified application form, the DP's name, DP ID number and the beneficiary account number of the Unit holder with the DP. In case the Demat account details are not provided, or the details are incomplete or the details do not match with the records as per Depository(ies), Units will be allotted in physical form. The sequence of names/pattern of holding as mentioned in the application form must be same as that in the demat account. Units shall be credited to the investors' demat account only after the funds are credited into the Investment Strategy(s) account to the satisfaction of the AMC.

In case of credit of Units to depository account, applicants' details like the mode of holding, bank account, correspondence address, payment bank, nomination etc. will be considered as appearing in the depository account for various purposes. For any subsequent change in static information like address, bank details, nomination etc. investors should approach their respective depository.

If the demat account details do not match with applicants' name and order, units will be allotted the in physical form. Bank details in such cases shall be captured from the payment instrument provided by the investor. No further transactions shall be permitted in such folio till the KYC related documents or a valid depository account details are provided.

In case, the Unit holder desires to hold the Units in a Dematerialized/Rematerialized form at a later date, the request for conversion of units held in non-demat form into Demat (electronic) form or vice-versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. Rematerialization of Units will be in accordance with the provisions of SEBI (Depositories & Participants) Regulations, 2018 as may be amended from time. The asset management company shall issue units in dematerialized form to a unit holder in an Investment Strategy within two working days of the receipt of request from the unit holder.

Units held in demat form will be transferable subject to the other relevant provisions prescribed in this ISID and in accordance with provisions of Depositories Act, 1996 and the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 as may be amended from time to time.

4. Applications Supported by Blocked Amount (ASBA) facility

ASBA is an application containing an authorization to a Self -Certified Syndicate Bank (SCSB) to block the application money in the bank account maintained with the SCSB, for subscribing to a New Fund Offer.

The list of Banks that have been notified by SEBI to act as a SCSB for the ASBA process as provided on www.sebi.gov.in. It shall co-exist with the existing process, wherein cheques/ demand drafts are used as a mode of payment. Please refer ASBA application form for detailed instructions. Investors intending to apply through ASBA will be required to submit ASBA form to their respective banks, which in turn will block the amount in their account as per authority contained in the ASBA form. ASBA form should not be submitted at location other than SCSB as it will not be processed. For details on ASBA process please refer the ASBA application form.

5. Portfolio Turnover Details

Portfolio turnover is defined as lesser of purchases and sales as a percentage of the average corpus of the investment strategy during a specified period of time. Portfolio turnover in the investment strategy will be a function of market opportunities.. It is expected that there would be a number of subscriptions and repurchases on a daily basis. Consequently, it is difficult to estimate with any reasonable measure of accuracy, the likely turnover in the portfolio. There may be an increase in transaction cost such as brokerage paid, if trading is done frequently. However, the cost would be negligible as compared to the total expenses of the investment strategy. Frequent trading may increase the profits which will offset the increase in costs. The AMC will endeavour to optimise portfolio turnover to optimise risk adjusted return keeping in mind the cost associated with it. A high portfolio turnover rate is not necessarily a drag on portfolio performance and may be representative of arbitrage opportunities that exist for securities held in the portfolio rather than an indication of change in AMC's view on a security etc. However, the AMC will take advantage of the opportunities that present themselves from time to time because of the inefficiencies in the securities markets

6. Unclaimed Redemption/IDCW Amount

As per para 15.5 of SEBI Master Circular for Mutual Funds dated March 20, 2026, the unclaimed redemption and dividend amounts, that are currently allowed to be deployed only in call money market or money market instruments, shall also be allowed to be invested in a separate plan of Overnight scheme / Liquid scheme/ Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts.

Provided that such schemes where the unclaimed redemption and dividend amounts are deployed shall be only those Overnight scheme/ Liquid scheme / Money Market Mutual Fund schemes which are placed in A-1 cell (Relatively Low Interest Rate Risk and Relatively Low Credit Risk) of Potential Risk Class matrix.

AMCs shall not be permitted to charge any exit load in this plan and TER (Total Expense Ratio) of such plan shall be capped as per the TER of direct plan of such scheme or at 50 bps, whichever is lower.

Further, for the Unclaimed redemption and dividend amounts deployed by Mutual Funds in Call Money Market or Money Market instruments, the investment management and advisory fee charged by the AMC for managing unclaimed amounts shall not exceed 50 basis points. Investors who claim the unclaimed amounts during a period of three years from the due date shall be paid initial unclaimed amount along with the income earned on its deployment. Investors, who claim these amounts after 3 years, shall be paid initial unclaimed amount along with the income earned on its deployment till the end of the third year. After the third year, the income earned on such unclaimed amounts shall be used for the purpose of investor education.

Investors can trace their inactive and unclaimed Mutual Fund folios where no transaction/s (financial and non-financial) have taken place in the last 10 years but unit balance is available through MITRA (Mutual Fund Investment Tracing and Retrieval Assistant) service platform

D. Associate Transactions

i. *Any underwriting obligations undertaken by the Investment strategies of SIF with respect to issues of associate companies, devolvement if any, of such commitments: Not applicable*
ii. *Subscription by the Investment strategies in issues lead managed by associate companies: Not applicable*
iii. *Brokerage paid to associates/related parties/group companies of Sponsor/AMC: Not applicable*

iv. *Commission paid to Sponsor or its associates /employees or their relatives of the AMC:*

Name of associate /related parties/group companies of Sponsor/AMC	Nature of Association / Nature of relation	Period covered	Business given (Rs. Cr. & % of total business received by the fund)	Commission paid (Rs.Cr. & % of total commission paid by the fund)
quant Finvest Private Limited	Group Co.	April 01, 2025 to March 31, 2026	NIL	NIL
quant Finvest Private Limited	Group Co.	April 01, 2024 to March 31, 2025	NA	NA
quant Finvest Private Limited	Group Co.	April 01, 2023 to March 31, 2024	NA	NA

The AMC, on behalf of the SIF, may utilise the services of Sponsors, group companies and any other subsidiary or associate company of the Sponsors established or to be established at a later date, in case such a company (including their employees or relatives) is in a position to provide the requisite services to the AMC. The AMC will conduct its business with the aforesaid companies (including their employees or relatives) on commercial terms and on arms-length basis and at a mutually agreed terms and conditions to the extent and limits permitted under the SEBI Regulations. Appropriate disclosures, wherever required, shall be made by the AMC.

The AMC will, before investing in the securities of the group companies of the Sponsor, evaluate such investments, the criteria for the evaluation being the same as is applied to other similar investments to be made under the Investment Strategy. Investments by the Investment Strategy in the securities of the group companies will be subject to the limits under the Regulations

(a) No Investment Strategy shall make any investment in - any unlisted security of an associate or group company of the sponsor; or - any security issued by way of private placement by an associate or group company of the sponsor; or - the listed securities of group companies of the sponsor which is in excess of 25% of the net assets.

(b) in case any Investment strategies of SIF invest more than 25% of its net assets in group companies, this shall be disclosed.

(c) Names of associates of the Sponsor or the Asset Management Company with which the SIF proposes to have dealings, transactions and those whose services may be used for marketing and distributing the Investment strategy and the commissions that may be paid to them: **Not applicable.**

E. Documents Available for Inspection

The following documents will be available for inspection at the office of quant Mutual Fund at 6th Floor, Sea Breeze buiding, Appasaheb Marathe Marg, Prabhadevi, Mumbai-400025, Maharashtra, India during business hours on any day (excluding Saturdays, Sundays and public holidays):

- Memorandum and Articles of Association of the AMC
- Investment Management Agreement
- Trust Deed and amendments thereto, if any
- Mutual Fund Registration Certificate
- No objection from SEBI to establish SIF
- Agreement between the Mutual Fund and the Custodian

- Agreement with Registrar and Share Transfer Agents
- Consent of Auditors to act in the said capacity
- Consent of Legal Advisors to act in the said capacity
- Securities and Exchange Board of India (Mutual Funds) Regulations, 2026 and amendments from time to time thereto.
- Indian Trusts Act, 1882.

F. Investor Grievances Redressal Mechanism

Investors may contact any of the Investor Service Centers (ISCs) of the AMC for any queries / clarifications, may call on 022-6295 5005, e-mail: help.investor@qsif.in. Investors can also post their grievances/feedback/suggestions on our website www.qsif.com Investors can also raise any complaints or grievances on "SCORES Platform" of SEBI at https://scores.sebi.gov.in/ or on "Online Dispute Resolution Portal" (ODR) at https://smartodr.in/login. With respect to transactions through BSE and/or NSE, the investors/Unit Holders should approach either the stock broker or the investor grievance cell of the respective stock exchange. Investors may contact the customer care of MFUI on 022 6134 4316 (during the business hours on all days except Sunday and Public Holidays) or send an email to clientservices@mfuindia.com for any service required or for resolution of their grievances for their transactions with MFUI.

The status of investor complaints received and redressed during the last three fiscal years is as under:

Financial Year	Carried forward from previous year	Received during the year	Resolved during the year	Pending at the end of the year
2025-26	0	0	0	0
2024-25	NA	NA	NA	NA
2023-24	NA	NA	NA	NA

The Investment Strategy wise complaints received, redressed and pending from April 1, 2025 to July 31, 2026 is as follows:

Name of Investment Strategy	Received	Resolved	Pending
qsif Equity Long- Short Fund	0	0	0
qsif Hybrid Long- Short Fund	0	0	0
qsif Ex Top 100 Long-Short Fund	0	0	0
qsif Active Asset Allocator Long-Short Fund	0	0	0
qsif Sector Rotation Long-Short Fund	0	0	0
Total	**0**	**0**	**0**

G. Information pertaining to Investments by the Investment Strategies of SIF

1.Derivative strategies

Investments in derivatives shall be undertaken in accordance with the SEBI (Mutual Funds) Regulations, 2026 read with ,SEBI Master Circular for Mutual Funds dated March 20, 2026, as amended from time to time.

Investment in Derivatives
As part of the Fund Management process, the investment strategies may use derivative instruments such as Index futures and options, Stock futures and options, Exchange-traded debt derivatives, Interest rate futures (IRFs), Interest rate swaps (IRS), Forward rate agreements (FRAs), Options on debt instruments, Exchange-trade commodity derivatives, any other derivatives permitted by SEBI in future.

Equity Derivatives
The Investment Strategies may use various equity derivatives from time to time, as would be available and permitted by SEBI, in an attempt to protect the value of the portfolio and enhance unitholder's

interest. Accordingly, the Investment Strategies may use derivative instruments for hedging, portfolio rebalancing and for taking directional (long and short) exposures to the extent permissible and consistent with ISID.

Exposure and Leverage Framework

The cumulative gross exposure through equity, debt, derivatives, repo transactions and such other securities/instruments as may be permitted by SEBI from time to time shall not exceed 100% of the net assets of the Investment Strategy. The SIF framework does not permit leverage. Derivatives may not be used to create structural or economic leverage beyond NAV. Positions that meet SEBI's hedging definition may be excluded from gross exposure. Exposure in cash or cash equivalents with residual maturity of less than 91 days Unhedged short exposures shall be permitted only through exchange-traded derivatives, capped at 25% of net assets and short selling in the cash market is not permitted.

Exposure computation methodology:

Long Future = Futures Price × Lot Size × Number of Contracts
Short Future = Futures Price × Lot Size × Number of Contracts
Option Bought = Option Premium Paid × Lot Size × Number of Contracts
Option Sold = Market Price of Underlying × Lot Size × Number of Contracts

Offsetting of Transactions (illustrative list)

Sr. No.	Position 1	Position 2	Offsetting Allowed?	Net Exposure Considered
1	Equity Long	Futures Short	Yes	Equity Long only
2	Equity/Futures Long	Call Option Short	Yes	Equity/Futures Long only
3	Equity/Futures Long	Put Option Long	Yes	Equity/Futures Long only
4	Futures Short	Call Option Long	Yes	Futures Short only
5	Futures Short	Put Option Short	Yes	Futures Short only
6	Call Option Long	Call Option Short	Yes	Call Option Short only
7	Put Option Long	Put Option Short	Yes	Put Option Short only
8	Equity Long	Futures Long	No	Equity Long + Futures Long
9	Equity/Futures Long	Call Option Long	No	Equity/Futures Long + Call Long
10	Equity/Futures Long	Put Option Short	No	Equity/Futures Long + Put Short
11	Futures Short	Call Option Short	No	Futures Short + Call Short
12	Futures Short	Put Option Long	No	Futures Short + Put Long
13	Call Option Long	Put Option Short	No	Call Long + Put Short
14	Call Option Short	Put Option Long	No	Call Short + Put Long

Illustrative Equity Derivative Strategies

a) **Unhedged directional long and short using index and / or stock futures**

Index futures: Index futures are instruments designed to give exposure to the equity markets indices. The Stock Exchange, Mumbai (BSE) and The National Stock Exchange (NSE) have trading in index futures of different maturities. The pricing of an index future is the function of the underlying index and short-term interest rates. Index futures are cash settled there is no delivery of the underlying.

Stock futures: A futures contract on a stock gives its owner the right and obligation to buy or sell stocks. Single Stock Futures in India are physically settled; there is delivery of the underlying stocks on the expiration date. A purchase or sale of futures on a security gives the trader essentially the same price exposure as a purchase or sale of the security itself. In this regard, trading stock futures is no different from trading the security itself.

Unhedged directional exposure: It means that there is no corresponding opposite position to offset impact of any price changes. Whenever price changes, there will be a direct impact on the value of the portfolio.

Long and Short: When it is expected that the underlying price will rise in future, a long exposure is created to benefit from rising prices. When it is expected that the price of the underlying will fall in future,

a short exposure is created to benefit from the fall in prices. SIFs are permitted to have unhedged short exposure to the extent of 25% of the net assets of the investment strategy which may include unhedged short futures position.

Example using hypothetical figures
Unhedged Long Position (Index Futures):
Consider a scenario where the Nifty 50 index is trading at 24,000. If it is expected that the index will appreciate on the back of strong corporate earnings, the Investment Manager may take a long position in Nifty futures. Should the index rise to 24,800 at the time of expiry, the futures position would generate gains commensurate with the increase in the index level, adjusted for the contract size. Conversely, if the index were to decline, the position would incur a corresponding loss. Since there is no offsetting position to mitigate this risk, the exposure remains unhedged and directional.

Unhedged Short Position (Stock Futures):
Assume Reliance Industries Limited is trading at ₹3,000 in the cash market and its one-month futures contract is priced at ₹3,020. If it is anticipated that the price of the stock will decline due to sector-specific concerns, the Investment Manager may take a short position in Reliance stock futures equivalent to 1,000 shares. If the stock price falls to ₹2,900 at expiry, the short futures position would generate a profit of ₹120,000 (₹120 × 1,000). However, if the stock price rises, the position would result in a loss. In the absence of a corresponding hedge, this exposure constitutes an unhedged directional short position.

Please note that the above examples are given for illustration purposes only. Some assumptions have been made for the sake of simplicity. Certain factors like margins and other related costs have been ignored. The risks associated with stock futures are similar to those associated with equity investments. Additional risks could be on account of illiquidity and potential mis-pricing of the futures.

b) **Unhedged directional long and short using index and / or stock options**

An option gives a person the right but not an obligation to buy or sell something. An option is a contract between two parties wherein the buyer receives a privilege for which he pays a fee (premium) and the seller accepts an obligation for which he receives a fee. The premium is the price negotiated and set when the option is bought or sold. A person who buys an option is said to be long in the option. A person who sells (or writes) an option is said to be short in the option.

Options are of two types:

Call Options: Call options are financial contracts that give the buyer the right, but not the obligation, to buy a stock or index, at a specified price within a specific period. A call seller must sell the asset if the buyer exercises the call.
A call buyer profits when the underlying asset increases in price. Asset prices can increase for several reasons, including positive company news and during acquisitions. The seller profits from the premium if the price drops below the strike price at expiration because the buyer typically will not exercise the option.

A long call option is the standard call option in which the buyer has the right, but not the obligation, to buy a stock / index at a strike price in the future. The advantage of a long call is that it allows the buyer to plan ahead to purchase a stock / index at a cheaper price.

A short call option also known as call writing is the opposite of a long call option. In a short call option, the seller promises to sell their shares at a fixed strike price in the future. Short call options are mainly used for covered calls by the option seller, or call options in which the seller already owns the underlying stock for their options. Selling an option without owning the underlying is known as naked short call.

Put Options: Put options are financial contracts that give the buyer the right, but not the obligation, to sell a stock or index, at a specified price within a specific period. A put buyer profits when the underlying asset decreases in price. Asset prices can decrease for several reasons including negative company news or commentary. The seller profits from the premium if the price increases above the strike at expiration because the buyer typically will not exercise the option. Investment managers often use put options in a risk management strategy known as a protective put, a form of investment insurance or hedge to ensure that losses in the underlying asset do not exceed a certain amount.

A long put is when a put option is bought and a premium (the price of an option contract) is paid for the

right to sell a stock / index at the strike price. This can be a good strategy if it is expected the price of the stock / index will go down in the future, because it can be sold at the higher strike price to make a profit. However, if the stock price goes up instead, the premium paid for the option is lost.

A short put also known as put writing is when a put option is sold and a premium is received for giving someone else the right to sell a stock / index at the strike price. This can be a good strategy if it is expected the price of the stock / index is going to go up or stay the same, because you get to keep the premium as profit. However, if the stock price goes down below the strike price, a loss will be incurred.

Example using hypothetical figures:

Unhedged Long Position (Call Option on Index):

Assume the Nifty 50 index is trading at 24,000. If it is expected that the index will appreciate, the Investment Manager may purchase a Nifty 25,000 Call Option expiring in one month by paying a premium of ₹200.

If, at expiry, the index closes at 25,500, the option will be exercised and the position will yield a gain of 500 points less the premium paid (i.e., 500 – 200 = 300 points).

Conversely, if the index closes below 25,000, the option will expire worthless and the premium paid will be the loss incurred.

Since there is no corresponding hedge, this constitutes an unhedged directional long position.

Unhedged Short Position (Put Option on Stock):

Assume Infosys Limited is trading at ₹1,500, and the one-month Infosys 1,400 Put Option is priced at a premium of ₹20. If it is anticipated that the price of Infosys will remain stable or rise, the Investment Manager may sell (write) the put option and receive the premium of ₹20 per share.

If, at expiry, the stock remains above ₹1,400, the option expires worthless and the premium received represents the profit.

However, if the stock declines to ₹1,300, the option buyer may exercise the contract, obligating the seller to purchase Infosys at ₹1,400. This results in a notional loss of ₹100 per share, net of the ₹20 premium received.

In the absence of any offsetting position, this exposure is an unhedged directional short position.

SIFs are permitted to have 25% short exposure, which may include naked call writing or put buying.

Option contracts are classified into two styles:

(a) European Style

In a European option, the holder of the option can only exercise his right on the date of expiration only.

(b) American Style

In an American option, the holder can exercise his right anytime between the purchase date and the expiration date.

In India, options contracts on indices are European style and cash settled whereas, option contracts on individual securities are European style and physically settled

c) **Index/ Stock spot – Index/ Stock Futures (Stock Arbitrage):**

This strategy is employed when the price of the future is trading at a premium to the price of its underlying in spot market. The Investment Strategy shall buy the stock in spot market and endeavor to simultaneously sell the future at a premium on a quantity neutral basis.

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

This convergence helps the Investment Strategy to generate the arbitrage return locked in earlier.

On or before the date of expiry, if the price differential between the spot and futures position of the subsequent month maturity still remains attractive, the Investment Strategy may rollover the futures position and hold onto the position in the spot market. In case such an opportunity is not available, the Investment Strategy would liquidate the spot position and settle the futures position simultaneously.

Rolling over of the futures transaction means unwinding the short position in the futures of the current month and simultaneously shorting futures of the subsequent month maturity, and holding onto the spot position.

Example using hypothetical figures:

The Investment Strategy holds shares of XYZ Ltd., the current price of which is Rs. 500 per share. The Investment Strategy sells one month futures on the shares of XYZ Ltd. at the rate of Rs. 540.

If the price of the stock falls, the Fund will suffer losses on the stock position held. However, in such a scenario, there will be a profit on the short futures position.

At the end of the period, the price of the stock falls to Rs. 450 and this fall in the price of the stock results in a fall in the price of futures to Rs. 470. There will be a loss of Rs. 50 per share (Rs. 500 - Rs. 450) on the holding of the stock, which will be offset by the profits of Rs. 70 (Rs. 540 - Rs. 470) made on the short futures position.

Please note that the above example is given for illustration purposes only. Some assumptions have been made for the sake of simplicity. Certain factors like margins and other related costs have been ignored. The risks associated with stock futures are similar to those associated with equity investments. Additional risks could be on account of illiquidity and potential mis-pricing of the futures.

d) **Index Arbitrage:**

The Nifty 50 index derives its value from fifty constituent stocks; the constituent stocks (in their respective weights) can be used to create a synthetic index matching the Nifty Index. Also, theoretically, the fair value of a future is equal to the spot price plus the cost of carry.

Theoretically, therefore, the pricing of Nifty Index futures should be equal to the pricing of the synthetic index created by futures on the underlying stocks.

Due to market imperfections, the index futures may not exactly correspond to the synthetic index futures. The Nifty Index futures normally trades at a discount to the synthetic Index due to large volumes of stock hedging being done using the Nifty Index futures giving rise to arbitrage opportunities.

One instance in which an index arbitrage opportunity exists is when Index future is trading at a discount to the index (spot) and the futures of the constituent stocks are trading at a cumulative premium.

The investment manager shall endeavour to capture such arbitrage opportunities by taking long positions in the Nifty Index futures and short positions in the synthetic index (constituent stock futures). Based on the opportunity, the reverse position can also be initiated.

e) **Portfolio Hedging:**

This strategy will be adopted:

(i) If in an already invested portfolio of an Investment Strategy, the Investment manager is expecting a market correction, the Investment manager may sell Index Futures or buy index puts to insulate the portfolio from the market related risks.

(ii) Hedging may also be undertaken at the stock level. For instance, if the portfolio has a substantial holding in a particular stock and the Investment Manager expects near-term weakness in that stock, the Manager may sell Stock Futures or purchase Stock Put Options to reduce the downside risk associated with that holding.

Illustrative Fixed Income Derivatives Strategies

a) Interest Rate Swap (IRS)

Any swap is effectively an exchange of one set of cash-flows for another considered to be of equal value. If the exchange of cash flows is linked to interest rates, it becomes an interest rate swap.

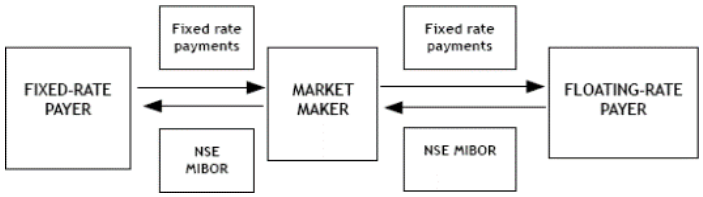
An interest rate swap is an agreement between two parties to exchange future payment streams based on a notional amount. Only the interest on the notional amount is swapped, and the principal amount is never exchanged.

In a typical interest rate swap, one party agrees to pay a fixed rate over the term of the agreement and to receive a variable or floating rate of interest. The counterparty receives a stream of fixed rate payments at regular intervals as described in the agreement and pays the floating rate of interest. A fixed/ floating interest rate swap is characterized by:

1. Fixed interest rate;

2. Variable or floating interest rate, which is periodically reset;
3. Notional principal amount upon which total interest payments are based; and
4. The terms of the agreement, including a schedule of interest rate reset dates, payment dates and termination date.

The primary reason for engaging in an interest rate swap is to hedge the interest rate exposure. An illustration could be an institution having long-term fixed rate assets (longer tenor securities receiving fixed rate) in a rising interest rate environment; it can hedge the interest rate exposure by purchasing an interest rate swap where the institution receives floating interest rate and pays fixed rate. In this case, an interest rate swap is likely to reduce the duration and interest rate volatility of the fund.



Example using hypothetical figures:

Terms:

Fixed Interest Rate : 8.50% p.a.
Variable Interest Rate : NSE Over-Night MIBOR reset daily and compounded daily
Notional Principal Amount : Rs.100 Crore
Period of Agreement : 1 year Payment Frequency : Semi-annual

Now, suppose the six-month period from the effective date of the swap to the first payment date comprises 182 days and the daily compounded NSE Over-Night MIBOR is 8.15% p.a. on the first payment date, then the fixed and variable rate payment on the first payment date would be as follows:

Fixed rate payment:
Rs. 4,23,83,562 = (Rs.100,00,00,000) x (8.50%) x (182 Days / 365 Days)

Variable rate payment:
Rs. 4,06,38,356 = (Rs.100,00,00,000) x (8.15%) x (182 Days / 365 Days)
Often, a swap agreement will call for only the exchange of net amount between the counterparties. In the above example, the fixed- rate payer will pay the variable-rate payer a net amount of Rs. 17,45,205 = Rs. 4,23,83,562 - Rs. 4,06,38,356.
The second and final payment will depend on the daily NSE MIBOR compounded daily for the remaining 183 days. The fixed rate payment will also change to reflect the change in holding period from 182 days to 183 days.

b) Forward Rate Agreement (FRA)

An FRA is an off balance sheet agreement to pay or receive on an agreed future date, the difference between an agreed interest rate and the interest rate actually prevailing on that future date, calculated on an agreed notional principal amount. It is settled against the actual interest rate prevailing at the beginning of the period to which it relates rather than paid as a gross amount.
FRAs are purchased to hedge the interest rate risk; an investor facing uncertainty of the interest rate movements can fix the interest costs by purchasing an FRA.

An FRA is referred to by the beginning and end dates of the period covered. Thus a 5x8 FRA is one that covers a 3-month period beginning in 5-months and ending in 8-months. FRAs are purchased to hedge the interest rate risk; an investor facing uncertainty of the interest rate movements can fix the interest costs by purchasing an FRA.

An illustration could be a corporation having floating rate debt linked to an index such as say, 3-Month MIBOR. If the existing interest cost is at 8% on Rs.100 Crore for the next three months, the corporation can purchase a 3x6 FRA @ 8.1% on Rs.100 Crore and fix the interest cost for the 3-6 months period. If the actual 3-Month MIBOR after 3-months is at 8.25%, the corporation has saved 15 bps in interest cost. As the settlement is done at the beginning of the period, the savings in interest expense are discounted to a present value using a 3-month rate to calculate the actual settlement amount.

The flows for the institution will be, as follows:
Interest Savings = Rs. 100 Crore * 15 bps * 92/365
(assuming 92 days in the 3 month FRA period and 365 days in the conventional year) = Rs.3,78,082.19
Settlement Amount = Rs.3,78,082.19/ (1+8.25%*92/365)
Please note that the above examples are hypothetical in nature and the figures are assumed.

c) Interest Rate Futures

An Interest Rate Futures ('IRF') contract is "an agreement to buy or sell a debt instrument at a specified future date at a price that is fixed today." The underlying security for Interest Rate Futures is either Government Bond or T-Bill. Interest Rate Futures are Exchange traded and standardized contracts based on 6 year, 10 year and 13 year Government of India Security and 91-day Government of India Treasury Bill (91DTB). These future contracts are cash settled. These instruments can be used for hedging interest rate exposure.

Hedging using IRFs: For example, assume a portfolio has Rs. 100 crores of Government security 7.59% GOI 2026 with face value Rs. 100/-. The bond is currently trading in market at 105.00.

The futures on 7.59% GOI 2026, expiring on 26th October 2018 is trading on exchange at 105.10.

Instead of exiting the cash position, the fund manager can decide to hedge the position by selling the same quantity in futures. Since one contract of IRF has a notional of Rs. 2 lakhs, in this example the fund manager sells Rs. 100 crores/2 lakhs = 5000 contracts, to hedge his position.

At maturity, the settlement price of the futures will be almost same as closing price of the underlying security.

At maturity of the Interest Rate Futures

Case 1: At maturity Bonds close higher than the price at which fund manager hedged the position, but below the futures price at which he hedged

Closing price of Bonds on day of maturity of futures = 105.05 Settlement price of futures = 105.05

MTM gain on the underlying bond = (105.05-105.00) * 100 crores / 100 (i.e. face value of bond) = Rs. 5,00,000

The profit on the futures leg is = 5000*2lakhs *(105.10-105.05)/ 100 (i.e. face value of bond) = Rs 5,00,000 Overall profit to the fund= Rs 10,00,000

Case 2: At maturity bonds close higher than the level at which futures were sold

In case, the closing price of bonds on the day of maturity of futures = 105.20, Settlement price of futures = 105.20

The MTM gain on bonds = (105.20-105.00) * 100 crores /100 (i.e. face value of bond) = Rs. 20,00,000

Loss on futures leg = 5000*2 lakhs * (105.10-105.20) /100 (i.e. face value of bond) = (Rs 10,00,000)

Total Profit to the fund = Rs 10,00,000

Case 3: At maturity bonds sells off from levels were hedges were initiated

In case, the closing price of bonds on the day of maturity of futures = 104.80, Settlement price of futures = 104.80

The MTM loss on bonds = (104.80-105.00) * 100 crores= (Rs. 20,00,000)

Profit on futures leg = 5000*2 lacs * (105.10-104.80) = Rs 30,00,000

Total Profit to the fund = Rs 10,00,000

Unhedged directional exposure using IRFs:

Long Position (Bullish on Bonds / Bearish on Interest Rates):

Assume a 10-year Government of India Security Futures contract is trading at ₹102.50. If the Investment Manager expects interest rates to decline, bond prices are likely to rise. Accordingly, the Manager may take a long position in the IRF. If, at expiry, the futures price increases to ₹104.00, the position will generate a profit of ₹1.50 per unit of the contract. Conversely, if interest rates rise and the futures price declines, the position will incur a loss.

Short Position (Bearish on Bonds / Bullish on Interest Rates):

Assume the same 10-year Government of India Security Futures contract is trading at ₹102.50. If the Investment Manager expects interest rates to rise, bond prices are likely to fall. In this scenario, the Manager may take a short position in the IRF. If, at expiry, the futures price declines to ₹101.00, the position will generate a profit of ₹1.50 per unit of the contract. However, if interest rates fall and futures prices rise, the position will result in a loss.

In both cases, the exposure is unhedged and directional, as the performance of the position is directly dependent on the movement of interest rates through their impact on Government Securities prices.

EXCHANGE TRADED COMMODITY DERIVATIVES

Investment Strategy may take exposure to ETCDs to take exposure to various commodities or to hedge existing commodity exposure subject to SEBI regulations

Illustration on Exchange Traded Commodity Derivatives (ETCDs):

1) Commodity Futures

Trade date	21-Dec
Expiry	05-Feb
Current market price/ 10gm	₹ 45,000
Lot size in gms	1000
Lot value / contract value	₹ 45,00,000
Margin	5%
Margin Value	₹ 2,25,000
Trade / position	Buy Commodity
Quantity	1 lot
Buy price per 10 gm	₹ 45,000
Sell trade date	30-Jan
Sell price per 10 gm	₹ 50,000
Gain/Loss per 10 gm	₹ 5,000
Gain/ Loss per Lot or contract value	₹ 5,00,000

2) Commodity Options

Trade date	21-Dec
Expiry	29-Jan
Corresponding futures contract	05-Feb
Current future price/ 10 gm	₹ 45,000
Strike Price	₹ 45,000
Call option premium per / 10 gm	₹ 500
Trade / position	Buy strike 45,000 CE
Quantity	1 kg
Buy price per 10 gm	₹ 500
Sell trade date	20-Jan
Futures price on 20-Jan per 10 gm	₹ 48,000
45000 strike CE price on 20-Jan per 10 gm	₹ 3,500
Gain/Loss per 10 gm	₹ 3,000
Gain/ Loss per Lot or contract value	₹ 3,00,000

Position Limits

The position limits for trading in derivatives by Specialized Investment Funds specified by clause 8.6 of SEBI Master Circular for Mutual Funds dated March 20,2026 are as follows:

i. *Position limit for the Specialized Investment Fund in index options contracts:*

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

ii. *Position limit for the Specialized Investment Fund in index futures contracts:*

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

iii. *Additional position limit for hedging:*

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

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

iv. Position limit for the Specialized Investment Fund for stock based derivative contracts:

The combined futures and options position limit shall be 20% of the applicable Market Wide Position Limit (MWPL).

v. *Position limit for the Investment Strategy:*

The position limits for the Investment Strategy and disclosure requirements are as follows:

a. The gross open position across all derivative contracts on a particular underlying stock of an Investment Strategy of a Fund shall not exceed the higher of 1% of free float market capitalization (in terms of number of shares).

Or

5% of the open interest in the derivative contracts on a particular underlying stock (in terms of number of contracts).

b. This position limit shall be applicable on the combined position in all derivative contracts on an underlying stock at a Stock Exchange.
c. For index based contracts, the Specialized Investment Fund shall disclose the total open interest held by its Investment Strategy or all Investment Strategies put together in a particular underlying index, if such open interest equals to or exceeds 15% of the open interest of all derivative contracts on that underlying index.

As and when SEBI notifies amended limits in position limits for exchange traded derivative contracts in future, the aforesaid position limits, to the extent relevant, shall be read as if they were substituted with the SEBI amended limits.

2. Swing Pricing

Not applicable currently, as qsif does not have any open-ended debt investment strategies.

However, the AMC/Trustee reserves the right to introduce such strategies at its discretion in the future

3. Provisions on creation of Segregated portfolio/Side pocketing

Creation of segregated portfolio shall be subject to guidelines specified by SEBI from time to time and includes the following:

1. Segregated portfolio may be created, in case of a credit event at issuer level i.e. downgrade in credit rating by a SEBI registered Credit Rating Agency (CRA), as under:
   a. Downgrade of a debt or money market instrument to 'below investment grade', or
   b. Subsequent downgrades of the said instruments from 'below investment grade', or
   c. Similar such downgrades of a loan rating

   In case of unrated debt or money market instruments of an issuer that does not have any outstanding rated debt or money market instruments, actual default of either the interest or principal amount by the issuer of such instruments shall be considered as a Credit Event for creation of Segregated Portfolio.

2. In case of difference in rating by multiple CRAs, the most conservative rating shall be considered. Creation of segregated portfolio shall be based on issuer level credit events as mentioned above and implemented at the ISIN level.

3. Creation of segregated portfolio is optional and is at the discretion of the AMC. It shall be created only if the Investment Strategy Information Document (ISID) of the investment strategy has provisions for segregated portfolio with adequate disclosures.

Process for Creation of Segregated Portfolio:

1. On the date of credit event, AMC should decide on creation of segregated portfolio. Once AMC decides to segregate portfolio, it should:
   a. seek approval of trustees prior to creation of the segregated portfolio.
   b. immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors. The Fund will also disclose that the segregation shall be subject to Trustee approval. Additionally, the said press release will be prominently disclosed on the website of the AMC.
   c. ensure that till the time the trustee approval is received, which in no case shall exceed 1 business day from the day of credit event, the subscription and redemption in the investment strategy will be suspended for processing with respect to creation of units and payment on redemptions.

2. Once Trustee approval is received by the AMC:
   a. Segregated portfolio will be effective from the day of credit event
   b. AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information will also be submitted to SEBI.
   c. An e-mail or SMS will be sent to all unit holders of the concerned investment strategy.
   d. The NAV of both segregated and main portfolios will be disclosed from the day of the credit event.
   e. All existing investors in the investment strategy as on the day of the credit event will be allotted equal number of units in the segregated portfolio as held in the main portfolio.
   f. No redemption and subscription will be allowed in the segregated portfolio. However, upon recovery of any money from segregated portfolio, it will be immediately distributed to the investors in proportion to their holding in the segregated portfolio.
   g. AMC should enable listing of units of segregated portfolio on the recognized stock exchange within 10 working days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests
   h. All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as per the existing SEBI circular on applicability of NAV as under:
      Upon trustees' approval to create a segregated portfolio –
      • Investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio.
      • Investors subscribing to the investment strategy will be allotted units only in the main portfolio based on its NAV. After creation of segregated portfolio, investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio. Further investors subscribing to the investment strategy will be allotted units only in the main portfolio based on its NAV.

3. If the trustees do not approve the proposal to segregate portfolio, AMC will issue a press release immediately informing investors of the same and subscription and redemption applications will be

processed based on the NAV of total portfolio.

4. Notwithstanding the decision to segregate the debt and money market instrument, the valuation shall take into account the credit event and the portfolio shall be valued based on the principles of fair valuation (i.e. realizable value of the assets) in terms of the relevant provisions of SEBI (Mutual Funds) Regulations, 2026 and Circular(s) issued thereunder.

TER for the Segregated Portfolio

1) AMC will not charge investment and advisory fees on the segregated portfolio. However, TER (excluding the investment and advisory fees) can be charged, on a pro-rata basis only upon recovery of the investments in segregated portfolio.
2) The TER so levied shall not exceed the simple average of such expenses (excluding the investment and advisory fees) charged on daily basis on the main portfolio (in % terms) during the period for which the segregated portfolio was in existence. In addition to the TER mentioned above, the legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio as mentioned below.
3) The legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio in proportion to the amount of recovery. However, the same shall be within the maximum TER limit as applicable to the main portfolio. The legal charges in excess of the TER limits, if any, shall be borne by the AMC.
4) The costs related to segregated portfolio shall in no case be charged to the main portfolio.

Explanations:

1) The term 'segregated portfolio' means a portfolio, comprising of debt or money market instrument affected by a credit event that has been segregated in a SIF investment strategy.
2) The term 'main portfolio' means the investment strategy portfolio excluding the segregated portfolio.
3) The term 'total portfolio' means the investment strategy portfolio including the securities affected by the credit event.

Disclosure Requirements:

In order to enable the existing as well as the prospective investors to take informed decision, the following shall be adhered to:

a. A statement of holding indicating the units held by the investors in the segregated portfolio along with the NAV of both segregated portfolio and main portfolio as on the day of the credit event shall be communicated to the investors within 5 working days of creation of the segregated portfolio.
b. Adequate disclosure of the segregated portfolio shall appear in all investment strategy related documents, in monthly and half-yearly portfolio disclosures and in the annual report of the Specialized Investment Fund and the investment strategy.
c. The Net Asset Value (NAV) of the segregated portfolio shall be declared on daily basis.
d. The information regarding number of segregated portfolios created in a investment strategy shall appear prominently under the name of the investment strategy at all relevant places such as SID, KIM-cum-Application Form, advertisement, AMC and AMFI websites, etc.
e. The investment strategy performance required to be disclosed at various places shall include the impact of creation of segregated portfolio. The investment strategy performance shall clearly reflect the fall in NAV to the extent of the portfolio segregated due to the credit event and the said fall in NAV along with recovery (ies), if any, shall be disclosed as a footnote to the investment strategy performance.
f. The disclosures at paragraph (d) and (e) above regarding the segregated portfolio shall be carried out for a period of at least 3 years after the investments in segregated portfolio are fully recovered/ written-off.
g. The investors of the segregated portfolio shall be duly informed of the recovery proceedings of the investments of the segregated portfolio. Status update may be provided to the investors at the time of recovery and also at the time of writing- off of the segregated securities.

Monitoring by Trustees:

a. In order to ensure timely recovery of investments of the segregated portfolio, trustees shall ensure that:

i. The AMC puts in sincere efforts to recover the investments of the segregated portfolio.
ii. Upon recovery of money, whether partial or full, it shall be immediately distributed to the investors in proportion to their holding in the segregated portfolio. Any recovery of amount of the security in the

segregated portfolio even after the write off shall be distributed to the investors of the segregated portfolio.

iii. An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated portfolio is placed in every trustee meeting till the investments are fully recovered/ written-off.

iv. The trustees shall monitor the compliance of this circular and disclose in the half-yearly trustee reports filed with SEBI, the compliance in respect of every segregated portfolio created.

b. In order to avoid mis-use of segregated portfolio, trustees shall ensure to have a mechanism in place to negatively impact the performance incentives of Fund Managers, Chief Investment Officers (CIOs), etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of the AMC, including claw back of such amount to the segregated portfolio of the investment strategy.

Risks associated with segregated portfolio

1) Investor holding units of segregated portfolio may not able to liquidate their holding till the time recovery of money from the issuer.
2) Security comprises of segregated portfolio may not realise any value.
3) Listing of units of segregated portfolio in recognised stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units in the stock market. Further trading price of units on the stock market may be significantly lower than the prevailing NAV.

Illustration of Segregated Portfolio

Portfolio Date	31-Mar-19
Downgrade Event Date	31-Mar-19
7.65% C Ltd from Downgrade Security	AA+ to B
Valuation Marked Down	25%

Mr. X is holding 1000 Units of the investment strategy, amounting to (1000*15.0574) Rs.15057.40

Portfolio prior to downgrade on the date of Credit Event

Security	Rating	Type of the Security	Quantity	Price Per Unit	Market Value (Rs. In lacs)	% Net Assets
7.80% A FINANCE LTD	CRISIL AAA	NCD	3,200,000	102.812	3,289.98	20.764
7.70 % B LTD	CRISIL AAA	NCD	3,230,000	98.5139	3,182.00	20.082
7.65 % C Ltd	CRISIL AAA	NCD	3,200,000	98.457	3,150.62	19.884
D Ltd (15/May/2019)	ICRA A1+	CP	3,200,000	98.3641	3,147.65	19.865
7.65 % E LTD	CRISIL AA	NCD	3,000,000	98.6757	2,960.27	18.683
Cash / Cash Equivalents					114.47	0.722

Net Assets	15,845
Unit Capital (no of units)	1,000
NAV Per Unit	15.8450

Segregated Portfolio after segregation (before mark-down of security)

Security	Rating	Type of the Security	Quantity	Price Per Unit	Market Value (Rs. In lacs)	% Net Assets
7.65 % C Ltd	CRISIL AAA	NCD	3,200,000	98.457	3,150.62	100.000

Net Assets	3,150.62

Unit Capital (no of units)	1,000
NAV Per Unit	3.1506

Segregated Portfolio after segregation (after mark-down of security)*

Security	Rating	Type of the Security	Quantity	Price Per Unit	Market Value (Rs. In lacs)	% Net Assets
7.65 % C Ltd	CRISIL AAA	NCD	3,200,000	73.843	2,362.98	100.000

Net Assets	2,362.98
Unit Capital (no of units)	1,000
NAV Per Unit	2.3630

Main Portfolio after segregation

Security	Rating	Type of the Security	Quantity	Price Per Unit	Market Value (Rs. In lacs)	% Net Assets
7.80% A FINANCE LTD	CRISIL AAA	NCD	3,200,000	102.812	3,289.98	25.917
7.70 % B LTD	CRISIL AAA	NCD	3,230,000	98.5139	3,182.00	25.066
D Ltd (15/May/2019)	ICRA A1+	CP	3,200,000	98.3641	3,147.65	24.796
7.65 % E LTD	CRISIL AA	NCD	3,000,000	98.6757	2,960.27	23.320
Cash / Cash Equivalents					114.47	0.902

Net Assets	12,694
Unit Capital (no of units)	1,000
NAV Per Unit	12.6944

* On the date of credit event i.e. on 31st March 2019, NCD of C Ltd (7.65%) will be segregated as separate portfolio and further it is assumed to be marked down by 25% on the date post segregation, before marking down the security was valued at Rs.98.4570 per unit.

Value of Holding of Mr. X after creation of Segregated Portfolio

Particulars	Segregated Portfolio	Main Portfolio	Total Value
No of units	1000	1000	
NAV	2.3630	12.6944	
Total value	2363.00	12694.40	15057.40

4. Short selling / stock lending

The investment strategy may engage in short selling in accordance with framework relating to Short Selling specified by SEBI. Short Selling means selling stock which the seller does not own at the time of trade.

Subject to the SEBI Regulations as applicable from time to time, Specialized Investment Fund may, engage in Stock Lending. Stock Lending means the lending of stock to another person or entity for a fixed period of time, at a negotiated compensation. The securities lent will be returned by the borrower on the expiry of the stipulated period.

Investors are requested to refer to asset allocation specified in the ISID of respective investment strategy to know if the investment strategy is going to engage in short selling or participate in securities lending activities.

H. Transaction Charges and Stamp Duty

Transaction Charges

Not Applicable

Stamp Duty

Investors / Unit Holders of all the investment strategy(s) of qsif (offered by quant Mutual Fund) are advised to take note that, pursuant to notification no. S.O. 4419(E) dated December 10, 2019 read with notification no. S.O. 115(E) dated January 08, 2020 and notification no. S.O. 1226(E) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of Notification dated February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India on the Finance Act, 2019, applicable stamp duty @ 0.005% of the transaction value would be levied on mutual fund/ Specialized Investment Fund investment transactions with effect from July 1, 2020. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchases, switch-ins, SIP/STP installments, (including reinvestment of IDCW) to the unit holders would be reduced to that extent.

X. Disclosures and Reports by The Fund

1. Account Statement/Consolidated Account Statement:

The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 business days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or mobile number (whether units are held in demat mode or in account statement form).

A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 15th of the succeeding month.

Half-yearly CAS shall be issued at the end of every six months (i.e. September/ March) on or before 21st day of succeeding month, to all investors providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form across demat accounts, if applicable.

2. Half Yearly Disclosures/Portfolio Disclosures/Financial Results

The SIF shall disclose portfolio (along with ISIN), including derivative instruments, as on the last day of every alternate month (i.e. as on the end of May, July, September, November, January and March) for all its investment strategies (including debt based investment strategies) on the respective AMC SIF website http://qsif.com/statutory-disclosures and on the website of AMFI within 10 days from the close of such month in a user friendly and downloadable spreadsheet format. All other provisions regarding portfolio disclosure applicable to Mutual Fund schemes, shall also be applicable to the investment strategies under the SIF.

AMC shall declare on their website the hosting of the alternate month statement of its investment strategies portfolio on their website and on the website of AMFI.

In case of unitholder whose email addresses are registered with the Fund, the portfolios disclosed as above shall be sent to the unitholders via email. The unitholders whose e-mail address are not registered with the Fund are requested to update / provide their email address to the Fund for updating the database. Investors may also place a specific request through modes such as SMS, telephone, email or written request (letter) for a physical or electronic copy of the statement of investment strategy portfolio.

3. Half Yearly Results

The Specialized Investment Fund shall within one month from the close of each half year, that is on 31st March and on 30th September, host a soft copy of its unaudited financial results on the AMC SIF website http://qsif.com/statutory-disclosures and AMFI https://www.amfiindia.com/sif.

Written communication (including digital modes such as email/SMS etc.) shall be sent to unitholders by the asset management company about the availability of financial results.

4. Annual Report

The investment strategy wise annual report, in machine readable format, shall be hosted on the website of the AMCs and on the website of AMFI. The AMCs shall display the link prominently on their websites and make the physical copies available to the unit holders, at their registered offices at all times. The websites of the AMCs shall also be linked with AMFI website so that the investors and analyst(s) can access the annual reports of all specialized investment fund at one place. AMCs shall send an email/SMS to all unitholders regarding the hosting of investment strategy wise annual report on AMC SIF website http://qsif.com/statutory-disclosures and on the website of AMFI https://www.amfiindia.com/sif.

AMCs shall e-mail the investment strategy wise annual reports or abridged summary thereof, in machine readable formats, to all such unit holders, whose email addresses are registered with the Specialized Investment Fund, within 4 months from the date of closure of the relevant financial year. The said communication shall also include details of modes such as SMS, telephone, email or written request (letter), etc. through which unit holders can submit a request for a physical copy of the investment strategy wise annual report or abridged summary thereof.

AMC shall provide physical copy of the abridged summary of the Annual Report without any cost, if a request through any mode is received from a unitholder. The full annual report shall be available for inspection at the Head Office of the Specialized Investment Fund and a copy shall be made available to the Unit holders on request on payment of nominal fees.

Notwithstanding anything contained in this Statement of Additional Information, the provisions of the SEBI (Mutual Funds) Regulations, 2026 and the guidelines thereunder shall be applicable.

Annexure – A

INVESTMENT VALUATION NORMS

A. Objective

The investment Valuation Policy aims to provide broad valuation guidelines / methodologies to be followed for valuing each type of securities / assets held by the mutual fund schemes. The assets held by the mutual funds will be consistently valued according to the established valuation policies and procedures. The policies will also describe the process to deal with exceptional events where market quotations are no longer reliable for a particular security.

Investment in new type of securities shall be made only after the valuation guidelines for such securities are established and approved by the Board of the Asset Management Company (AMC).

Any introduction / modification / changes in the Valuation Policy for a new or an existing asset type shall be approved by the Valuation Committee and incorporated thereafter in the Valuation Policy.

The valuation of investments shall be based on the principle of fair valuation i.e. valuation shall be reflective of the realizable value of the securities / assets.

If established valuation policies and procedures do not result in fair / appropriate valuation, the AMC may deviate from the established valuation policies and procedures in order to value the assets / securities at fair value. Any deviation from the disclosed valuation policy and procedures may be made with appropriate reporting to Board of Trustees and the Board of AMC and appropriate disclosure to investors.

In case of any conflict between the Principles of Fair Valuation and the established Valuation Policies and Procedures, the Principles of Fair Valuation will prevail.

This policy should be read in conjunction with the SEBI Regulations, the SEBI Master Circular for Mutual Funds, and any other guidelines or circulars issued by AMFI, SEBI, or other competent authorities from time to time.

This policy will apply to mutual funds and SIF unless otherwise stated by SEBI Regulations, SEBI Circulars and/or any other guidelines or circulars issued by AMFI, SEBI.

B. Valuation Committee

All decisions pertaining to valuation, in conformity with the policy guidelines, shall be taken by the Valuation Committee. The constitution of the Valuation Committee is as under:

Constitution:

The Valuation Committee will comprise of the following members:

- Chief Investment Officer
- Chief Financial Officer
- Money Managers
- Compliance Officer
- Head of Operations

Frequency of Valuation committee meeting:

The Valuation Committee shall meet on a quarterly basis or more often, if required in order to deliberate on specific proposals.

Functions of the Valuation Committee:

- to provide guidelines on valuation within the regulatory framework,
- to decide on specific cases as may be referred to the Committee,
- to appoint/recommend the appointment of third party agencies for valuation,

- to evaluate the performance of such agencies on a periodic basis,
- to review the valuation policy
- to detect and prevent incorrect valuation,
- to address areas of conflict of interest and thereafter recommend changes if any in policy/methodology.
- to review the systems and practices of valuation of securities and state that they found that the valuation is fair and in compliance with their valuation policy and the regulatory requirements specified by SEBI

C. Periodic Review

Review by Valuation Committee: The policy shall be reviewed annually or more frequently, if required, by the Valuation Committee either due to change in Regulations or business environment to ensure the appropriateness and accuracy of the methodologies used and its effective implementation in valuing the securities / assets.

Review by the Board of Trustee and the Board of AMC: The Board of Trustee and the Board of AMC shall be updated about the review of valuation policy by the Valuation Committee along with the changes / development in the valuation policies The Policy will be reviewed at least once annually. Further it will be placed before the Board of Directors of the AMC & Trustee for approval on an annual basis.

D. Record Keeping

Valuation Policy should be updated in Scheme Information Document (SID) / Statement of Additional Information (SAI), on the website of AMC / mutual fund and at any other places as prescribed by the SEBI regulations and guidelines to ensure transparency of valuation norms adopted by AMC.

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

Above records will be preserved in accordance with the norms prescribed by the SEBI regulations and guidelines.

Following SEBI Circulars / Guidelines / Amendment Regulations are taken into account for valuation purpose

The following are the guiding circulars / schedules/guidelines/amendments for framing the Valuation Policy.

1. EIGHTH SCHEDULE OF SEBI (MUTUAL FUNDS) REGULATIONS,1996 as amended
2. Circular No. MFD/CIR/010/024/2000 dated 17-01-2000 inter-alia on Valuation committee)
3. Circular No. MFD/CIR/6/73/2000 dated 27-07-2000
4. Circular No. MFD/CIR/8/92/2000 dated 18-09-2000
5. Circular No. MFD/CIR/8(a)/104/2000 dated 03-10-2000
6. Circular No. MFD/CIR/14/088/2001 dated 28-03-2001
7. Circular No. MFD/CIR/14/442/2002 dated 20-02-2002
8. Circular No. MFD/CIR/03/526/2002 dated 09-05- 2002
9. Circular No. MFD/CIR No .23/066/2003 dated 07-03-2003
10. Circular No. MFD/CIR No.9/141601/08 dated 18-10-2008
11. Circular No. MFD/CIR No.2/166256/2009 dated 12-06-2009
12. Circular No. IMD/CIR No.16/193388/2010 dated 02-02-2010
13. Circular No. IMD/DF/4/2010 dated 21-06-2010
14. SEBI MUTUAL FUNDS (AMENDMENT) (REGULATIONS),2012 dated 21-02-2012
15. Circular No. IMD/DF/6/2012 dated 28-02-2012

16. AMFI Best Practice Guidelines Circular No.135/BP/29/2012-13 dated 15th May 2012
17. AMFI Best Practice Guidelines Circular No.35P/MEM-COR/3/12-13 dated 30th May 2012
18. Circular No. SEBI/HO/IMD/DF4/CIR/P/2019/41 dated March 22, 2019
19. Circular No. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019
20. Circular No. SEBI/HO/IMD/DF3/CIR/P/2020/47 dated March 23, 2020
21. Circular No. SEBI/HO/IMD/DF3/CIR/P/2020/76 dated April 30, 2020
22. AMFI Best Practice Guidelines Circular No. 135/BP/83/2019-20 dated November 18, 2019
23. Circular No. SEBI/HO/IMD/DF4/CIR/P/2021/032 dated March 10, 2021
24. Circular No. SEBI/HO/IMD/DF4/CIR/P/2021/034 dated March 22, 2021
25. Circular No. SEBI/HO/IMD/DF4/P/CIR/2021/593 Dated July 09, 2021
26. Master Circular for Mutual Funds issued by SEBI

1. Definitions

1.1. Traded Equity Securities

An equity and / or equity related securities (such as preference shares, convertible debentures, equity warrants etc.) would be considered as traded if:

a) The security is traded on any stock exchange within a period of 30 days prior to the date of valuation and if:

b) the aggregate value of trade during such period is more than Rs. 5,00,000; or

c) the total volume of trade during such period is more than 50,000 shares.

1.2. Thinly Traded Equity Securities

An equity and / or equity related securities (such as preference shares, convertible debentures, equity warrants etc.) would be considered as thinly traded if in a previous calendar month:

a) the aggregate value of trade in such security is less than Rs. 5,00,000; and

b) the total volume of trade in such security is less than 50,000 shares, on recognised stock exchange(s) in India.

For example, if the volume of trade is 1,00,000 and value is Rs.4,00,000, the shares do not qualify as thinly traded. Also, if the volume traded is 40,000, but the value of trades is Rs.6,00,000, the shares do not qualify as thinly traded.

1.3. Non-Traded Equity Securities

When a security (other than money market and debt securities) is not traded on any stock exchange for a period of thirty days prior to the valuation date, the scrip shall be treated as a non-traded security.

1.4. Traded Money Market and Debt Securities

A money market or debt security shall be considered as traded when, on the date of valuation, there are trades (in marketable lots) in that security on any recognized Stock Exchange or there are trades reported (in marketable lots) on the trade reporting platform of recognized stock exchanges or The Clearing Corporation of India Ltd. (CCIL). In this regard, the marketable lots shall be defined by AMFI, in consultation with SEBI.

Currently, marketable lot as defined by AMFI is as follow:

Parameter	Minimum Volume criteria for marketable lot

Primary	Rs. 25 crores for both Bonds/NCD/CP/CD and other money market instruments
Secondary	Rs. 25 crores for CP/CD, T-Bills and other money market instruments
Secondary	Rs. 5 crores for Bonds/NCD/G-Secs

1.5. **Non-Traded Money Market and Debt Securities**

A money market or debt security shall be considered as non-traded when, on the date of valuation, there are no trades (in marketable lots) in such security on any recognized Stock Exchange or no trades (in marketable lots) have been reported on any of the aforementioned trade reporting platforms.

1.6. **Below Investment Grade Securities**

A money market or debt security shall be classified as "below investment grade" if the long term rating of the security issued by a SEBI registered Credit Rating Agency (CRA) is below BBB- or if the short term rating of the security is below A3.

1.7. **Default Securities**

A money market or debt security shall be classified as "Default" if the interest and / or principal amount has not been received, on the day such amount was due or when such security has been downgraded to "Default" grade by a CRA.

Any extension in the maturity of a money market or debt security shall result in the security being treated as "Default", for the purpose of valuation.

If the maturity date of a money market or debt security is shortened and then subsequently extended, the security shall be treated as "Default" for the purpose of valuation.

1.8. **Unlisted Securities**

If on a valuation date a security is not listed on any of the stock exchanges, it would be considered as unlisted security.

1.9. **Recognized Stock Exchange**

National Stock Exchange of India Ltd. (NSE) and BSE Ltd (formerly known as "Bombay Stock Exchange") (BSE) would be considered as recognized stock exchanges in India.

1.10. **Principal Stock Exchange**

National Stock Exchange of India Ltd. (NSE) would be considered as principal stock exchange.

1.11. **Secondary Stock Exchange**

BSE Ltd (formerly known as "Bombay Stock Exchange") (BSE) would be considered as secondary stock exchange.

2. Valuation of Equity and Equity related Instrument

2.1 Valuation of Equity Shares

a) **Traded Securities**

i) On a valuation day, traded securities are to be valued at the last quoted closing price on the principal stock exchange.

ii) When on a particular valuation day, a security has not been traded on the principal stock exchange; the value at which it is traded on secondary stock exchange may be used.

iii) When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the principal stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date.

iv) On a valuation day, ETFs and Index Funds are to be valued at the last quoted closing price on the stock exchange of the underlying index.

b) **Thinly Traded / Non-Traded Securities**

Thinly Traded / Non-Traded securities are valued in "good faith" on the basis of the valuation principles laid down below:

i) Based on the latest available Balance Sheet, Net Worth shall be calculated as follows:

ii) Net Worth per share = [share capital + reserves (excluding revaluation reserves) – Miscellaneous expenditure and Debit Balance in P&L A/c] Divided by Number of Paid up Shares.

iii) Average capitalisation rate (P/E ratio) for the industry based on either NSE or BSE data shall be taken and discounted by 75% i.e. only 25% of the industry average P/E shall be taken as Capitalization rate (P/E ratio). Earnings per share of the latest audited annual accounts will be consistently considered for this purpose.

iv) The value as per the Net Worth value per share and the Capital Earning value calculated as above shall be averaged and further discounted by 10% for illiquidity so as to arrive at the fair value per share.

c) **Unlisted Securities**

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

i) Based on the latest available Audited Balance Sheet, Net Worth shall be calculated as lower of (1) and (2) below:

1. Net Worth per share = [share capital + free reserves (excluding revaluation reserves)

- Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by Number of Paid up Shares.

2. After taking into account the outstanding warrants and options, Net Worth per share shall again be calculated and shall be = [share capital + consideration on exercise of Option/Warrants received/receivable by the Company + free reserves (excluding revaluation reserves) - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by Number of Paid up Shares plus Number of Shares that would be obtained on conversion/exercise of Outstanding Warrants and Options.

3. The lower of (1) and (2) above shall be used for calculation of Net Worth per share and for further calculation in (iii) below.

ii) Average capitalisation rate (P/E ratio) for the industry based upon either NSE or BSE data shall be taken and discounted by 75% i.e. only 25% of the Industry average P/E shall be taken as capitalisation rate (P/E ratio). Earnings per share of the latest audited annual accounts will be considered for this purpose.

iii) The value as per the Net Worth value per share and the Capital Earning value calculated as above shall be averaged and further discounted by 15% for illiquidity so as to arrive at the fair value per share.

The above valuation methodology for Thinly Traded, Non-Traded and Unlisted Securities shall be subject to the following conditions:

- If the latest Balance Sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero.

- If the Net Worth of company is negative, the shares of such companies shall be valued at zero.

- In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalised earning.
- In case an individual security accounts for more than 5% of the total assets of the scheme, an independent valuer shall be appointed for the valuation of the said security. To determine if a security accounts for more than 5% of the total assets of the scheme, it shall be valued by the procedure above and the proportion which it bears to the total net assets of the scheme to which it belongs will be compared on the date of valuation.
- At the discretion of the AMC and with the approval of the Trustees, an unlisted equity share may be valued at a price lower than the value derived using the aforesaid methodology.

2.2 Valuation of Partly Paid-up Equity Shares

a) Traded Securities

In case the partly paid-up equity shares are traded separately they would be valued as per the valuation guidelines applicable to any other equity shares.

b) **Thinly Traded / Non-Traded / Unlisted Securities**

i) The partly paid-up equity shares will be valued at lower of the following two prices:

- Value of the underlying fully paid-up equity shares as reduced by the amount of balance call money payable.
- Value of the partly paid-up equity shares, if traded on the valuation day. If not traded on any stock exchange on a particular valuation day, the value at which it was traded on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date

ii) Valuation guidelines related to equity shares would be applicable for the valuation of underlying fully paid-up equity shares.

iii) In case the trade price of the partly paid-up equity shares were not available for last 30 days or in case of unlisted partly paid-up equity shares, it will be valued at the value of the underlying fully paid-up equity share as reduced by the amount of balance call money payable.

c) Suspended from trading on account of corporate actions

In case the partly paid-up equity shares are suspended from trading on account of corporate actions like call money raised by the Company etc., it will be valued at the value of the underlying fully paid-up equity share as reduced by the amount of balance call money payable.

2.3 Valuation of Compulsorily Convertible Debentures

a) **Traded Securities**

In case Compulsorily Convertible Debenture (CCD) are qualified as traded then they would be valued as per the valuation guidelines applicable to equity shares i.e. valued on closing traded price similar to equity shares. The value of CCD so derived, shall be treated as dirty price of the CCD and accordingly valuation will be done.

b) **Thinly Traded / Non-Traded / Unlisted Securities**

The non-convertible and convertible components will be valued separately:

i) Non-convertible component of CCD will be valued on the same basis as would be applicable to debt instrument.

ii) Convertible component of CCD would be valued at the value of the equity share which would be obtained on conversion, further appropriate discount for illiquidity should be applied. The illiquidity percentage will be decided by the Valuation Committee on a case-to-case basis. Valuation guidelines related to equity shares would be applicable for the valuation of underlying equity shares.

c) If security level valuation (SLV) price of CCD is provided by the valuation agencies, appointed by AMFI, then the same will be used for valuation.

d) The Valuation Committee may in specific cases decide to use a different method for valuation of CCD by assigning reasons thereof.

2.4 Valuation of Warrants

a) **Traded Securities**

In case the warrants are traded separately they would be valued as per the valuation guidelines applicable to equity shares.

b) **Thinly Traded / Non-Traded / Unlisted Securities**

i) In respect of warrants to subscribe for equity shares attached to instruments, the warrants would be valued at the value of the equity share which would be obtained on exercise of the warrant as reduced by the amount which would be payable on exercise of the warrant.

ii) Valuation guidelines related to equity shares would be applicable for the valuation of underlying equity shares.

iii) An appropriate discount for non-tradability of the equity shares shall be deducted to account for the period which must elapse before the warrant can be exercised.

2.5 Valuation of Preference Shares

a) **Traded Securities**

In case the preference shares are qualified as traded then they would be valued as per the valuation guidelines applicable to equity shares.

b) Thinly Traded / Non-Traded / Unlisted Securities

i) The non-convertible preference share will be valued at the present value of all the future expected dividend payments and the maturity value, discounted at the expected return on preference shares. The valuation committee will decide upon variables like expected future dividend, expected rate of return etc. on a case-to-case basis depending on the terms of issue of the preference shares.

ii) Convertible Preference shares would be valued at the value of the equity share which would be obtained on conversion, further appropriate discount for illiquidity should be applied. The illiquidity percentage will be decided by the Valuation Committee on a case- to-case basis. Valuation guidelines related to equity shares would be applicable for the valuation of underlying equity shares.

c) If security level valuation (SLV) price of Preference shares is provided by the valuation agencies, appointed by AMFI, then the same will be used for valuation.

d) **The valuation committee may in specific cases decide to use a different method for valuation of preference shares by assigning reasons therefor.**

2.6 Valuation of Rights

i) Until, rights are traded, the value of “rights” shares should be calculated as per the formula below:

a.1) $Vr = n / m * (Pex – Pof)$,

Where,

Vr = Value of rights

n = no. of rights offered

m = no. of original shares held

Pex = Ex – Rights Price

Pof = Rights Offer Price

a.2) Ex-right price of underlying security will be considered separately for each valuation day.

a.3) In case the Offer price is higher than the Ex-right price then the rights would be valued at Zero.

a.4) If the rights are on non-traded shares or unlisted shares then the rights would be valued at Zero.

ii) Where it is decided not to subscribe to the rights but to renounce them and renunciations are being traded, the rights can be valued at the renunciation value.

iii) Where it is decided to subscribe the rights, renunciation value might not be appropriate. Hence in such cases valuation of rights entitlement will be done as per the formula stated in clause (a.1) to (a.4) above.

iv) Valuation guidelines related to equity shares would be applicable from the date rights are subscribed.

2.7 Valuation of QIP (Qualified Institutional Placement – Equity Shares)

The equity shares allotted through QIP process should be considered on the same lines as the existing listed equity shares and hence should be valued at the market/traded price of the existing listed equity shares.

2.8 Valuation of Initial Public Offering (IPO) Allotment and Private Placement / Pre-IPO Allotment

Such shares shall be classified as “to be listed” / “awaiting listing” These share will be valued at:

a) cost of acquisition, in case acquired other than IPO route;

b) allotment price, in case allotted under IPO; till the listing of shares.

If such shares do not get listed on recognised stock exchange within 60 days of such allotment, shares so acquired will be valued as per the fair value guidelines applicable for unlisted shares.

2.9 Valuation of Suspended Security

i) In case trading in an equity security is suspended upto 30 days, then the last traded price would be considered for valuation of that security.

ii) If an equity security is suspended for more than 30 days, then the fair valuation of Thinly Traded / Non-Traded Security as above would be applied.

2.10 Valuation of Illiquid Security

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

b) Mutual Funds shall disclose as on March 31 and September 30 the scheme wise total illiquid securities in value and percentage of the net assets while disclosing Half Yearly Portfolios to the unit holders. In the list of investments, an asterisk mark shall be given against all such investments which are recognised as illiquid securities.

c) Mutual Funds shall not be allowed to transfer illiquid securities among their schemes.

Following assets will be valued at cost plus accruals basis:

a) Bank Fixed Deposits

b) TREPS / Reverse Repo (including Corporate Bond Repo) with tenor up to 30 days

For Reverse Repo with residual maturity of over 30 days Valued at average of security level prices obtained from valuation agencies appointed by AMFI. In case security level prices given by valuation agencies are not available for a new Reverse Repo (which is currently not held by any Mutual Fund), then such security may be valued at purchase yield/price on the date of allotment / purchase.

3. Corporate Action

3.1. De-merger, Merger, Amalgamation and Scheme of Arrangement

On corporate action, above valuation guidelines may be difficult to adopt due to non-availability of the Balance Sheet of the restructured entities in public domain or the resultant securities come up for listing after few days while the valuation required to be carried out effective on the date of the corporate action itself. Besides, in such case there are generally no comparative parameters readily available for carrying out the valuation exercise. Following broad valuation guidelines would be used for the valuation of securities resulting from the corporate actions:

a) De-Merger
   i) In case shares of both the companies (De-merged Company and Resulting Companies) are traded immediately on de-merger, both the shares would be valued at respective traded prices.
   ii) ii) In case there is only one Resulting Company along with the De-merged Company and such Resulting Company is unlisted / non-traded:

   Traded shares of De-merged Company will be valued at traded price and the shares of Resulting Company will be valued by residual price methodology which would be the closing value of the shares of De-merged Company on the day before the de-merger less opening value of the shares of De-merged Company immediately post de-merger.

   If value of the shares of De-merged Company is equal or in excess of the value of pre de-merger shares, then the shares of Resulting Company will be valued at Zero.

   iii) In case there are more than one Resulting Companies along with the De-merged Company and all or some Resulting Companies are unlisted / non-traded:

   The shares of Resulting Companies will be valued by residual price methodology as explained in point (ii) above. The residual value will be allocated into Resulting Companies in the ratio provided as a part of scheme of arrangement or such other ratio as decided by the Valuation Committee. If one of the Resulting Companies is listed / traded, the residual value of unlisted

   / non-traded Resulting Companies would be further determined by reducing the traded value of listed Resulting Companies from the residual value computed as above.

   iv) In case shares of both the companies (De-merged Company and Resulting Companies) are not traded on de-merger:

   The traded value of the De-merged Company on the day before the de-merger will be allocated between De-merged Company and Resulting Companies in the ratio provided as a part of scheme of arrangement or such other ratio as decided by the Valuation Committee.

   v) Cost allocation would be done proportionate to the derived value of the resultant scrips or other appropriate basis to be decided on case to case basis depending on the terms of de-merger.
   vi) The valuation committee may in specific cases decide to use a different method for valuation by assigning reasons therefor.

b) Merger

In case of merger, if the shares of the merged entity are not listed / traded, then valuation of the merged entity will be decided on case to case basis depending on the terms of merger and may be valued at previous day closing price of the respective companies prior to merger.

3.2. Buy-back of Securities

If a company offers to buy-back hundred percent of the shares tendered then shares will be valued at the price of buy-back and ignoring the market price. Else, market price of the shares will be considered for valuation till formal confirmation of acceptance of shares tendered under the buy- back schemes. Quantum of shares accepted under buy-back will be accounted as a sale trade.

3.3. Stock Split/ Face value change

In case of stock split, the face value of a stock is reduced and proportionately number of shares is increased. The valuation price will be derived on the basis of the closing price before the ex-date and adjusted in proportion of stock split, till the new stock split shares are listed and traded on a stock exchange. The cost of one share will be proportionately adjusted in line with stock split change, to derive the new cost of share. On stock split/face value change, in case the company specifies any regulations/ method for cost bifurcation or valuation the same will be adopted.

4. Valuation of Futures and Options

i) On the valuation day, settlement price will be considered for valuation.
ii) If the settlement price is not available, then closing price for the security will be considered for the valuation.
iii) In case of Futures MTM is computed on daily basis.
iv) MTM Gain/Loss = Current day settlement/Closing price- Previous day settlement/Closing price (If scrip is purchased first time then it is a Current day settlement / Closing price- Weighted Average Price (WAP)).
v) MTM is computed on scrip wise and series wise.

5. Valuation of Securities Lent under Securities Lending Scheme

The valuation of securities lent under Securities Lending Scheme shall be valued as per the valuation guideline of the respective security as mentioned in this document. The lending fees received for the securities lent out would be accrued in a proportionate manner till maturity of the contract.

6. Valuation of Indian Depositories Receipts (IDR)

Valuation of IDRs listed on the India Stock Exchange would follow the valuation guidelines adopted for the Listed Indian Equity Shares. In case the IDRs are classified as thinly traded / non-traded, the criteria, as laid above for Listed Indian Equity Shares shall be applied taking into consideration the relevant Company's Balance Sheet.

7. Valuation of American Depository Receipt (ADR), Global Depository Receipt (GDR) and all Overseas Securities

a) **Traded Securities**
   i) Traded foreign securities will be valued at latest available closing price of the stock exchange on which the security is traded.
   ii) In case the security is traded on more than one stock exchange, the security will be valued at the latest available closing price of the principal stock exchange. Principal stock exchange will be decided by the AMC at the time of purchase of securities and the reason for the selection will be recorded in writing. Any subsequent change in principal stock exchange selected for valuation will be necessarily backed by reasons for such change being recorded in writing by the AMC and approved by the Valuation Committee.
   iii) When on a particular valuation day, a security has not been traded on the principal stock exchange; the value at which it is traded on secondary stock exchange may be used.
   iv) When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the principal stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date.

v) The price in local currency would be obtained and the closing RBI reference rate would be used to calculate the closing price in INR. If the security is listed in currency for which RBI reference rate is not available, the exchange rate available on Bloomberg/Reuter's would be considered. In case the direct exchange rates are not available on Bloomberg/Reuter's, then cross currency with USD would be considered and converted as per INR/USD RBI reference rate.

b) Non-Traded Securities

A non-traded foreign security will be valued by the AMC using the principles of fair valuation after considering relevant factors on case to case basis.

In case of any extra-ordinary event in other markets post the closure of the relevant markets, the AMC will value the security at suitable fair value as determined by the Valuation Committee.

8. Valuation of Infrastructure Investment Trust (InvITs) & Real Estate Investment Trust (ReITs)

a) Traded / Thinly Traded Securities

i) On a valuation day, units of InvIT/ReITs are to be valued at the last quoted closing price on the principal stock exchange.

ii) When on a particular valuation day, units of InvIT/ReITs has not been traded on the principal stock exchange; the value at which it is traded on secondary stock exchange may be used.

iii) When units of InvIT/ReITs is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the principal stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date.

b) Unlisted Securities / Non-Traded for last 30 days

i) Where units of InvIT and ReIT are unlisted or not traded on any stock exchange for continuous period of 30 days than the valuation for such units of InvIT and ReIT will be determined based on the latest NAV declared by Investment managers of the trust or at price provided by independent valuation agency(ies), as the case may be. The selection of the independent valuation agency(ies) will be approved by the Valuation Committee.

ii) Where the valuation of units of InvIT and ReIT is not available from any independent valuation agency (ies), the valuation will be determined by the Fund Manager on the principles of fair valuation.

9. Valuation of Money Market and Debt Securities

9.1. Valuation of Money Market and Debt Securities (other than government securities)

Money Market and Debt Securities are mainly classified into following 2 categories:

i) Coupon bearing securities like Non-Convertible Debentures (NCD), Bonds, etc.
ii) Discounted securities like Zero Coupon Bonds (ZCB), Commercial Papers (CP), Certificate of Deposits (CD), Bills Purchased under Rediscounting Scheme (BRDS), Discounted Securitised Debt / Pass Through Certificate (PTC) etc.

All money market and debt securities including floating rate securities, irrespective of residual maturity shall be valued at average of security level prices obtained from valuation agencies appointed by AMFI (currently, CRISIL and ICRA).

In case security level prices given by valuation agencies are not available for a new security (which is currently not held by any Mutual Fund), then such security may be valued at purchase yield on the date of allotment / purchase.

9.2. Valuation of securities with Put/Call Options

The option embedded securities would be valued as follows:

a) Securities with Call Option:

The securities with call option shall be values at the lower of the value as obtained by valuing the security to final maturity and valuing the security to call option.

In case there are multiple call options, the lowest value obtained by valuing to the various call dates and valuing to the maturity date is to be taken as the value of the instrument.

b) Securities with Put Option:

The securities with put option shall be values at the higher of the value as obtained by valuing the security to final maturity and valuing the security to put option.

In case there are multiple put options, the highest value obtained by valuing to the various put dates and valuing to the maturity date is to be taken as the value of the instrument.

c) Securities with both Put and Call Option:

Only securities with put / call options on the same day and having the same put and call option price, shall be deemed to mature on such put / call date and shall be valued accordingly. In all other cases, the cash flow of each put / call option shall be evaluated and the security shall be valued on the following basis:

i) Identify a 'Put Trigger Date', a date on which 'price to put option' is the highest when compared with price to other put options and maturity price.

ii) Identify a 'Call Trigger Date', a date on which 'price to call option' is the lowest when compared with price to other call options and maturity price.

iii) In case no Put Trigger Date or Call Trigger Date ('Trigger Date") is available, then valuation would be done to maturity price. In case one Trigger Date is available, then valuation would be done as to the said Trigger Date. In case both Trigger Dates are available, then valuation would be done to the earliest date.

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

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

f) Any put option inserted subsequent to the issuance of the security shall not be considered for the purpose of valuation and original terms of the issue will be considered for valuation.

9.3. Government Securities

Government Securities includes:

i) Central Government Securities (G-Sec)

ii) State Government Securities / State Development Loans (SDL)

iii) Treasury Bills (T-Bills)

iv) Cash Management Bills (CMB)

Irrespective of the residual maturity, Government Securities (including T-bills) shall be valued at average of security level prices obtained from valuation agencies appointed by AMFI.

In case security level prices given by valuation agencies are not available for a new security (which is currently not held by any Mutual Fund), then such security may be valued at purchase yield on the date of allotment / purchase.

9.4. Valuation of market linked debentures and all OTC derivatives including Interest Rate Swaps (IRS)/ Forward Rate Agreements (FRA)

Irrespective of the residual maturity, valued at average of security level prices obtained from valuation agencies appointed by AMFI.

9.5. Valuation Policy on Interest Rate Futures (IRF)

The Interest Rate Futures (IRF) would be valued at the daily settlement price of the exchange.

9.6. Treatment of Upfront Fees on Trades

a) Upfront fees on all trades (including primary market trades), by whatever name and manner called, would be considered by the valuation agencies for the purpose of valuation of security.

b) Details of such upfront fees should be shared by the AMC on the trade date to the valuation agencies as part of the trade reporting to enable them to arrive at the fair valuation for that date.

c) For the purpose of accounting, such upfront fees should be reduced from the cost of the investment in the scheme that made the investment.

d) In case upfront fees are received across multiple schemes, the such upfront fees should be shared on a pro-rata basis across such schemes.

9.7. Use of Own Trade for Valuation

Mutual Fund's own trades shall not be used for valuation of debt and money market securities and for Inter-Scheme Transfers.

9.8. Waterfall approach for valuation of Money Market and Debt Securities

As per SEBI guidelines on valuation of money market and debt securities, a waterfall approach shall be followed by the valuation agencies for arriving at security level pricing.

AMFI, in consultation with SEBI, has issued detailed guidelines on waterfall approach for valuation of money market and debt securities. The broad principles of the said waterfall approach, for arriving at the security level prices are as follow:

a) All traded securities shall be valued on the basis of traded yields, subject to identification of outlier trades by the valuation agencies.

b) Volume Weighted Average Yield (VWAY) for trades in the last one hour of trading shall be used as the basis for valuation of Government Securities (including T-bills). Valuation of all other money market and debt securities (including Government securities not traded in last one hour) shall be done on the basis of VWAY of all trades during the day.

c) In case of any exceptional events on a day, only VWAY of trades post such event may be considered for valuation. Further, all exceptional events along-with valuation carried out on such dates shall be documented with adequate justification. The following events would be considered as exceptional events:

   i. Monetary / Credit Policy

   ii. Union Budget

   iii. Government Borrowing / Auction Day

   iv. Material Statements on Sovereign Rating

   v. Issuer or Sector Specific events which have a material impact on yields

   vi. Central Government Election Days

   vii. Quarter end days

   viii. In addition to the above, valuation agencies may determine any other event as an exceptional event.

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

e) Considering the importance of polling in valuation process, detailed guidelines has also been issued by AMFI on polling by valuation agencies and on the responsibilities of Mutual Funds in polling process, as part of the aforesaid waterfall approach.

9.9. Deviation from valuation guidelines

a) As per the Principles of Fair Valuation specified in Eighth Schedule of SEBI (Mutual Funds) Regulations, 1996, AMCs are responsible for true and fairness of valuation and correct NAV. Considering the same, in case an AMC decides to deviate from the valuation price given by the valuation agencies, the detailed rationale for each instance of deviation shall be recorded by the AMC.

b) The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued vis-a-vis the price as per the valuation agencies and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.

c) The rationale for deviation along-with details as mentioned under paragraph (b) above shall be disclosed immediately and prominently, under a separate head on the website of AMC.

d) Further, while disclosing the total number of instances of deviation in the monthly and half- yearly portfolio statements, AMCs shall also provide the exact link to their website for accessing the information mentioned at paragraph (C) above.

9.10. Valuation of money market and debt securities which are rated "Below Investment Grade" or "Default"

a) All money market and debt securities which are rated below investment grade shall be valued at the price provided by valuation agencies as appointed by AMFI.

b) Till such time the valuation agencies compute the valuation of money market and debt securities classified as below investment grade, such securities shall be valued on the basis of indicative haircuts provided by these agencies as listed in the Table below. These indicative haircuts shall be applied on the date of credit event i.e. migration of the security to sub- investment grade and shall continue till the valuation agencies compute the valuation price of such securities.

Trade Price for valuation

c) In case of trades during the interim period between date of credit event and receipt of valuation price from valuation agencies, AMC shall consider such traded price for valuation if it is lower than the price post standard haircut. The said traded price shall be considered for valuation till the valuation price is determined by the valuation agencies.

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

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

f) AMC right to deviate from the indicative haircut and/or the valuation price provided by the valuation agencies

g) AMC may deviate from the indicative haircuts and/or the valuation price for money market and debt securities rated below investment grade provided by the valuation agencies subject to the following:

i. The detailed rationale for deviation from the price post haircuts or the price provided by the valuation agencies shall be recorded by the AMC.

ii. The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued vis-a-vis the price post

haircuts or the average of the price provided by the valuation agencies (as applicable) and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees

iii. The rationale for deviation along-with details as mentioned at para above shall also be disclosed to investors. In this regard, AMC shall immediately disclose instances of deviations under a separate head on their website. Further, the total number of such instances shall also be disclosed in the monthly and half-yearly portfolio statements for the relevant period along-with an exact link to the website wherein the details of all such instances of deviation are available.

Treatment of accrued interest and future interest accrual

h) The indicative haircut that has been applied to the principal should be applied to any accrued interest.

i) In case of securities classified as below investment grade but not default, interest accrual may continue with the same haircut applied to the principal. In case of securities classified as default, no further interest accrual shall be made.

i) In case the valuation agencies has adopted conservative rating (say "D" rating) than the rating given by the Credit Rating Agency (say "C" rating) for valuation of security, the rating adopted by the valuation agencies (i.e. "D" rating) shall be considered for the purpose of accrued interest and future interest accrual.

ii) Treatment of any future recovery in terms of principal or interest

iii) Any recovery shall first be adjusted against the outstanding interest recognized in the NAV and any balance shall be adjusted against the value of principal recognized in the NAV.

iv) Any recovery in excess of the carried value (i.e. the value recognized in NAV) should then be applied first towards amount of interest written off and then towards amount of principal written off.

v) Disclosure in portfolio statement

j) An asterisk mark / suitable mark should be given against money market and debt securities which are rated "Below Investment Grade" or "Default".

k) If a security is in default beyond its maturity date, then disclosure to this effect shall be provided. Such disclosure shall include details of the security including ISIN, name of security, value of the security considered under net receivables (i.e. value recognized in NAV in absolute terms and as % to NAV) and total amount (including principal and interest) that is due to the scheme on that investment. Further, this disclosure shall continue till the value of the security recognized in the NAV is received or for a period of 3 years from the date of maturity of security, whichever is later.

Haircut Table:

Standard haircut for sub-investment grade debt securities provided by valuation agencies and finalized by the AMFI Valuation Committee are as follow:

1. Haircuts for senior, secured securities

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

2. Haircuts on subordinated and unsecured (or both) securities

Rating/ Sector	Infrastructure, Real Estate, Hotels, Loan against shares and Hospitals	Other Manufacturing and Financial Institutions	Trading, Gems & Jewellery and Others
BB	25%	25%	25%
B	50%	50%	50%
C	70%	70%	70%
D	100%	100%	100%

10. Inter-Scheme Transfers (IST)

As per the regulations of SEBI contained in the seventh schedule of the SEBI (Mutual Funds) Regulations 1996, transfer of investments from one scheme to another scheme in the same mutual fund shall be allowed only if:

a) Such transfers are done at the prevailing market price for quoted instruments on spot basis;

b) The securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.

Equity Securities:

Money Market and Debt Securities:

a) IST of any money market or debt security (irrespective of maturity) will be done at an average of the prices provided by the valuation agencies, if prices from the valuation agencies are received within the pre-agreed turn-around-time (TAT).

b) If price from only one valuation agency is received within the agreed TAT, that price may be used for IST pricing.

c) If prices are not received from any of the valuation agencies within the agreed TAT, Valuation Committee will determine the price for the IST as per the available information, in accordance with Clause 3 (a) of Seventh Schedule of SEBI (Mutual Funds) Regulations, 1996.

11. Valuation of Mutual Fund Units / Alternative Investment Fund (AIF) Units (including units of ETF)

11.2 Domestic Mutual Fund Units / AIF Units

i) Mutual Fund units / AIF units listed and traded on exchange (NSE or BSE) on valuation date would be valued at closing traded price as on the valuation date.

ii) Unlisted Mutual Fund units / AIF units or Mutual Fund units / AIF units listed but not traded on valuation date would be valued at the last available NAV as per AMFI website or any other appropriate source.

Overseas Mutual Fund Units

i) Overseas Mutual Fund units listed and traded on exchange on valuation date would be valued at closing traded price as on the valuation date.

ii) Overseas Mutual Fund units listed but not traded on valuation date would be valued at lower of their last available NAV as on the valuation date and previous day closing traded price. If Overseas Mutual Fund units are not traded for more than 1 day, would be valued at their last available NAV as on the valuation date

iii) Unlisted Overseas Mutual Fund units would be valued at their last available NAV as on the valuation date.

iv) The price in local currency would be obtained and the closing RBI reference rate would be used to calculate the closing price in INR. If the NAV of overseas mutual fund units is reported in currency for which RBI reference rate is not available, the exchange rate available on

Bloomberg/Reuter's would be considered. In case the direct exchange rates are not available on Bloomberg/Reuter's, then cross currency with USD would be considered and converted as per INR/USD RBI reference rate.

12. Valuation of Tri-Party Repo (TREPS)

a) TREPS with residual maturity of over 30 days

Valued at average of security level prices obtained from valuation agencies appointed by AMFI.

In case security level prices given by valuation agencies are not available for a new TREPS (which is currently not held by any Mutual Fund), then such TREPS may be valued at purchase yield on the date of purchase.

b) TREPS with residual maturity of upto 30 days

Valued at cost plus accrual basis.

Whenever a security moves from 31 days residual maturity to 30 days residual maturity, the price as on 31st day would be used for amortization from 30th day

13. Valuation of Reverse Repo (including Corporate Reverse Repo)

a) Reverse Repo with residual maturity of over 30 days

Valued at average of security level prices obtained from valuation agencies appointed by AMFI.

In case security level prices given by valuation agencies are not available for a new Reverse Repo (which is currently not held by any Mutual Fund), then such Reverse Repo may be valued at purchase yield on the date of purchase.

b) Reverse Repo with residual maturity of upto 30 days

Valued at cost plus accrual basis.

Whenever a security moves from 31 days residual maturity to 30 days residual maturity, the price as on 31st day would be used for amortization from 30th day.

Note: Collateral securities received under Reverse Repo lending will not be considered for valuation. Only the interest income earned would be considered for NAV calculation.

14. Valuation of Fixed Deposits

Fixed Deposits will be valued at cost. Interest on Fixed Deposits will be accrued daily.

15. Valuation of Gold

Gold held by a gold exchange traded fund scheme shall be valued at the AM fixing price of London Bullion Market Association (LBMA) in US dollars per troy ounce for gold having a fineness of 995.0 parts per thousand, subject to the following:

a) adjustment for conversion to metric measure as per standard conversion rates;

b) adjustment for conversion of US dollars into Indian rupees as per the RBI reference rate; and

c) In addition of:

i) transportation and other charges that may be normally incurred in bringing such gold from London to the place where it is actually stored on behalf of the mutual fund; and

ii) notional customs duty and other applicable taxes and levies, except to the extent set off is available, that may be normally incurred to bring the gold from the London to the place where it is actually stored on behalf of the mutual fund;

Provided that the adjustment under clause (c)(i) above may be made on the basis of a notional premium that is usually charged for delivery of gold to the place where it is stored on behalf of the mutual fund;

Provided further that where the gold held by a gold exchange traded fund scheme has a greater fineness, the relevant LBMA prices of AM fixing shall be taken as the reference price under this sub- paragraph.

If the gold acquired by the gold exchange traded fund scheme is not in the form of standard bars, it shall be assayed and converted into standard bars which comply with the good delivery norms of the LBMA and thereafter valued in terms of above subparagraph.

If on any day the LBMA AM fixing or RBI reference rate is not available due to holiday, then the immediately previous day's prices are applied for the purpose of calculating the value of gold.

Premium or discount may be applied to the valuation price arrived as per above methodology to ensure it reflects the fair value/spot price of Gold in the Domestic market.

The Valuation Committee may in specific cases decide to use a different method for valuation of Gold by assigning reasons thereof.

16. Valuation of Gold deposited under Gold Deposit Scheme (GDS)

In case Fund invest in Gold Deposit Scheme (GDS) of banks, having gold held by Fund as underlying, the valuation of such gold would follow the same principles as provided for valuation of physical gold as stated in the Valuation Policy.

Interest received on such GDS shall be accrued in proportionate manner till the maturity of the deposits.

Valuation of Silver

Silver held by the Scheme shall be valued at the AM fixing price of London Bullion Market Association (LBMA) in US dollars per troy ounce for silver having a fineness of 999.0 parts per thousand, subject to the following:

a) adjustment for conversion to metric measure as per standard conversion rates;

b) adjustment for conversion of US dollars into Indian rupees as per the RBI reference rate; and

c) In addition of:

i) transportation and other charges that may be normally incurred in bringing such silver from London to the place where it is actually stored on behalf of the mutual fund; and

ii) notional customs duty and other applicable taxes and levies, except to the extent set off is available, that may be normally incurred to bring the silver from the London to the place where it is actually stored on behalf of the mutual fund;

Provided that the adjustment under clause (c)(i) above may be made on the basis of a notional premium that is usually charged for delivery of silver to the place where it is stored on behalf of the mutual fund;

Provided further that where the silver held by a scheme has a greater fineness, the relevant LBMA prices of AM fixing shall be taken as the reference price under this sub-paragraph.

If on any day the LBMA AM fixing or RBI reference rate is not available due to holiday, then the immediately previous day's prices are applied for the purpose of calculating the value of silver

Premium or discount may be applied to the valuation price arrived as per above methodology to ensure it reflects the fair value/spot price of Silver in the Domestic market.

The Valuation Committee may in specific cases decide to use a different method for valuation of silver by assigning reasons thereof.

17. Abnormal situations & market disruptions

In normal situations the valuation methods detailed above shall be used. However, in abnormal market conditions, due to lack of market trading or otherwise it may not be possible to obtain fair valuation using 'normal' means. In such situations, the 'realizable value' may be substantially different from the benchmark-based prices obtained.

The following occurrences would normally be considered as abnormal situations:

- Major Policy announcements by Central Government, State Government, SEBI or RBI.
- Geo-political situations (Natural disasters, terror attacks, public disturbances, riots, wars) that may force the market to function abnormally.
- Absence in trading in specific securities or equivalent.
- Significant volatility in capital markets.
- Significant illiquidity in fixed income markets.
- Global events like Sovereign bankruptcy, corporate bankruptcy, closure of stock markets, disruptive political scenario that may impact the markets.
- Events which lead to lack of availability of accurate information to value a security.
- Technological breakdown in trading systems.
- Errors and omissions with respect to transaction processing.
- Large redemptions in the fund.
- Quarter-ending & tax-related liquidity tightness.

The events mentioned above are only indicative and may not reflect all possible exceptional events or circumstances. In case of any exceptional circumstances, the Valuation Committee may assess the situation and decide on the valuation methods and document the same as detailed above in clause "Deviation from Valuation Guideline".

18. Treatment and disposal of illiquid securities or securities classified as default at the time of maturity / closure of schemes

In case of close-ended schemes, some of the investments made by Mutual Funds may become default at the time of maturity of schemes. Further, at the time of winding up of a scheme, some of the investments made by Mutual Funds may become default or illiquid. In due course of time i.e. after the maturity or winding up of the schemes, such investments may be realised by the Mutual Funds. Such amount will be distributed to the concerned investors, if it is substantial. In case the amount is not substantial, it will be used for the purpose of investor education. The decision as to the determination of substantial amount shall be taken by the Trustees of Mutual Funds after considering the relevant factors including number of investors, amount recovered, cost of transferring funds to investors among others.

19. Valuation of securities not covered under the current Valuation Policy

In case of security/ies purchased by the fund does not fall within the current framework of the valuation of securities then the same shall be reported immediately to AMFI. Further, at the time of investment AMC shall ensure that the total exposure in such securities does not exceed 5% of the total AUM of the scheme.

Polling - Fixed Income Valuation

Introduction

The policy should be read in conjunction with the SEBI Regulations, the SEBI Master Circular for Mutual Funds, and any other guidelines or circulars issued by AMFI, SEBI, or other competent authorities from time to time. This policy will apply to mutual funds and SIF unless otherwise stated by SEBI Regulations, SEBI Circulars and/or any other guidelines or circulars issued by AMFI, SEBI.

Background:

Pursuant to SEBI circular no.102 dated 24-09-2019, AMFI had issued AMFI Best Practice circular no. 83 dated 18-Nov-2019 on polling by valuation agencies and responsibilities of Mutual Funds in polling process in consultation with SEBI. Considering the importance of polling in the valuation process, SEBI has reviewed the existing process followed for polling by the valuation agencies and noted that there is a need for strengthening the governance framework for polling and for ensuring transparency of polling process. SEBI observed that while the polls are at present sought through worksheet via emails, the polling process should ideally be fully automated without any manual intervention, and should have proper audit trail available for inspection, so as to ensure robust polling process from quality and governance standpoint.

Objective

This Policy on Governance of the Polling Process is prepared in accordance with SEBI Circular SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019, and AMFI Best Practices Guidelines Circular No. 83/2019-20 dated November 18, 2019. The objective is to ensure the integrity, transparency, and consistency in the valuation of fixed income securities, based on fair market principles.

Scope

This policy applies to all fixed income securities for which valuation agencies seek polling inputs and which fall within the investment universe of the AMC. The AMC does not invest in securities rated below AA- (long-term rating), and hence such securities are outside the scope of polling participation.

- Participate in the polling process conducted by SEBI-approved valuation agencies (such as CRISIL, ICRA) whenever the valuation agencies seek participation and ensure timely submission of polls
- Provide justifications for polling outlier if any.
- Ensure that the polling is not used to influence the market price or levels inappropriately. Any conflict of interest in a personal or professional capacity has to be disclosed.
- The polling participant (Nominated person) will be responsible to comply with the polling requirement and process enlisted in this policy and will also be personally liable for any misuse of the polling process.

Roles and Responsibilities of Persons Participating in the Polling

The AMC follows a maker-checker framework for polling submissions:

Role	Maker	Checker
Level 1	Dealer	Fund Manager(s)
Level 2	Fund Manager	Chief Investment Officer

The Dealer (or in their absence, the Fund Manager) shall submit polling inputs to SEBI-approved valuation agencies (e.g., CRISIL, ICRA) through their designated electronic platforms.

- Prior to submitting a poll, the designated poll submitter shall ensure there is no personal or conflict of interest in the security being polled. If any conflict exists, the CIO shall nominate an alternate official to participate.
- All polling submissions must reflect genuine market levels and prevailing conditions on a best effort basis. Polling shall not be used to influence valuation levels or misrepresent market prices.
- Post submission, the dealer or fund manager shall report polling activity to the Valuation Committee on a quarterly basis in the prescribed format.

Polling Process

- All polling is conducted entirely through electronic interfaces provided by the respective valuation agencies. Manual or telephonic submissions are not used.
- Polling inputs are derived based on:
  - Actual market quotes (of same security across different time buckets/ related or similar security in same time buckets/ spreads over GSec etc)
  - Bloomberg / Reuters for quotes/trades.
  - Recent trades (of same security across different time buckets/ related or similar security in same time buckets/ spreads over GSec etc), on FTRAC/CBRICS/BSE Trading platform.
  - Internal assessments aligned with the AMC's Valuation Policy
  - On the basis of latest FIMMDA valuation spread matrix for Bonds/PSU/NBFC.
- In the event of non-participation, the reason must be recorded. Securities outside the AMC's investment universe (i.e., rated below AA-) shall be an acceptable reason for non-participation.
- Poll submissions will be provided on a best effort basis depending on the available market information at the time of submission of responses. As the poll provider(s) will apply judgment the responses will be exposed to subjectivity. The techniques of extrapolation and interpolation of the available data may also be used for the submissions.
- If there any outlier vs the median provided by the external valuation agency (Crisil & Icra) the basis point thresholds for identification of such outliers will be as per AMFI best practice guideline.

Conflict of Interest

Nominated person must act professionally, with fairness, integrity, equity, probity, honesty, transparency and diligence. At any time, nominated person may identify a situation which may appear to generate a conflict of interest between them or the Company and the issuer or other market participants. It is his duty to inform the Compliance Function, to ensure that the latter is always involved in the management of the aforementioned situation. The AMC has in place a conflict of interest policy that provides for appropriate procedure to detect and manage conflict.

Reporting and Review

Polling activity and related observations shall be reported quarterly to the Board of the AMC and the Trustees in their subsequent meetings for review and oversight.

Maintenance and Preservation of Records

All polling data—including basis of submission (market quotes, trades, or judgment)—shall be

maintained in a structured format for a period of eight years. A clear audit trail for each poll submission shall be preserved for review by internal and external auditors or regulators.

Annual Review

The Policy will be reviewed and placed before the Board of Directors of the AMC & Trustee for approval on an annual basis.