

# STATEMENT OF ADDITIONAL INFORMATION (SAI)

Name of SIF	Mutual Fund	Mutual Fund Trustee Company	
Magnum SIF Offered by SBI Mutual Fund	SBI Mutual Fund ('SBI MF')	SBI Mutual Fund Trustee Company Private Limited ('Trustee Company') CIN: U65991MH2003PTC138496	SBI Funds Management Limited ('AMC') (A joint venture between SBI and AMUNDI) CIN: U65990MH1992PLC065289
Corporate Office	Corporate Office	Registered Office:	Registered Office:
9 <sup>th</sup> Floor, Crescenzo, C– 38 & 39, G Block, Bandra- Kurla, Complex, Bandra (East), Mumbai- 400051 https://www.sbimf.com/ magnumsif	9 <sup>th</sup> Floor, Crescenzo, C- 38 & 39, G Block, Bandra-Kurla, Complex, Bandra (East), Mumbai- 400051 www.sbimf.com	9 <sup>th</sup> Floor, Crescenzo, C– 38 & 39, G Block, Bandra-Kurla, Complex, Bandra (East), Mumbai- 400051 www.sbimf.com	9 <sup>th</sup> Floor, Crescenzo, C– 38 & 39, G Block, Bandra-Kurla, Complex, Bandra (East), Mumbai- 400051 www.sbimf.com

This Statement of Additional Information (SAI) contains details of Magnum SIF ('SIF') offered by SBI Mutual Fund (the "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).

This SAI is dated September 18, 2025.

#### I. INFORMATION ABOUT SPONSOR, AMC AND TRUSTEE COMPANIES

#### A. Constitution of the Mutual Fund

SBI Mutual Fund (the "Mutual Fund") has been constituted on June 29, 1987 as a Trust in accordance with the provisions of the Indian Trusts Act, 1882 (2 of 1882) with State Bank of India (SBI), as the Sponsor and SBI Mutual Fund Trustee Company Private Limited as the Trustee. The Trust Deed has been registered under the Indian Registration Act, 1908. The Mutual Fund was registered with SEBI on December 23, 1993 under Registration Code MF-009/93/3.

#### B. Constitution of the Specialized Investment Fund

Magnum SIF ('SIF') is offered by SBI Mutual Fund in terms of Regulation 49W(1) of SEBI (Mutual Funds) Regulations, 1996 ("SEBI Regulations") with SBI Mutual Fund Trustee Company Private Limited as the Trustee and SBI Funds Management Limited as the Asset Management Company (AMC). SBI Mutual Fund was granted approval to establish the SIF by SEBI on May 28, 2025.

#### C. Sponsor

SBI Mutual Fund is sponsored by State Bank of India, one of the largest public sector banks in India. The Sponsor is the Settlor of the Mutual Fund Trust. The Sponsor has entrusted a sum of Rs. 5 Lakhs to the Trustee as the initial contribution towards the corpus of the Mutual Fund.

The State Bank of India 'SBI' having its Corporate Office at State Bank Bhavan, Madame Cama Road, Mumbai - 400 021, is the largest public sector bank with 22937 branches in India and 244 foreign offices spread over 29 countries (as on March 31, 2025), the largest overseas network among all Indian banks.

SBI also has non-banking subsidiaries in India. Currently, State Bank of India holds 61.91% stake in SBI Funds Management Limited.

Financial Performance of the Sponsor (past three years):

Particulars	2025	2024	2023
Net Worth (Rs. Cr.)	3,89,071	3,24,715	2,76,563
Total Income (Rs. Cr.)	5,24,172	4,66,813	3,68,719
Net Profit/(Loss) (Rs. Cr.)	70.901	61,077	50,232
Assets Under Management (if applicable	NA	NA	NA

#### D. The Trustee

SBI Mutual Fund Trustee Company Private Limited (the "Trustee" or SBIMFTCPL), through its Board of Directors, shall discharge its obligations as Trustee of the Magnum SIF. The Trustee ensures that the transactions entered into by the AMC are in accordance with the SEBI Regulations, as amended from time to time 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.

The registered office of SBIMFTCPL is situated at 9th Floor, Crescenzo, C- 38 & 39, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai - 400 051. SBIMFTCPL is the Trustee to the

Mutual Fund vide the Restated and Amended Trust Deed dated December 29, 2004, to supervise the activities of the Mutual Fund.

# 1. Details of Trustee Directors:

Sr. No	Name	Age	Educational Qualifications	Brief Experience
1	Mr. Sunil Gulati (Independent Director)	66 years	B. Tech (IIT, Delhi); PGDM (IIM, Ahmedabad)	Mr. Sunil Gulati has over three decades of global experience in the banking industry across investment banking, corporate finance, relationship management, risk management and corporate strategy. In the last 18 years, Mr. Gulati was a key member of the management teams at RBL Bank Ltd (Chief Risk Officer), Yes Bank and ING Group, India. Mr. Gulati headed the GE Commercial Finance business for a short period. He was the head of the ING Barings business in India and was part of the core team that helped ING acquire a controlling stake in Vysya Bank. He was head of the Corporate and Investment Banking business at ING Vysya after the acquisition.
				Mr. Gulati also worked with Bank of America, where he initiated their investment banking efforts in India in 1997. Before that, he was based in Hong Kong with primary responsibilities for Bank of America investment banking activities in North Asia. Mr. Gulati also handled strategic and corporate M&A exercises for Bank of America, throughout the Asia-Pacific region, including the divestment of its subsidiaries and branches in Malaysia, Thailand and Australia. Mr. Gulati had also worked with Standard Chartered Merchant Bank and with the management consultancy division of A.F. Ferguson & Co. in India.
				Presently, Mr. Gulati is the Director of Merisis Advisors Pvt. Ltd., a boutique investment bank and a non-executive Director of Carefin Money Private Limited and is an Independent Director on the Boards of KMC Speciality Hospitals (India) Limited, Sri Kauvery Medical Care (India) Limited, Fedbank Financial Services Limited, Tapstart Capital Private Limited, Revgro Capital Private Limited, Arthan Finance Private Limited, Perfios Account Aggregation Services Private Limited.  Gulati holds an MBA from the Indian Institute of

Sr. No	Name	Age	Educational Qualifications	Brief Experience
				Electronics from the Indian Institute of Technology, Delhi in 1982.
2	Dr. Archana Hingorani (Independent Director)	60 years	PhD – Corporate Finance, MBA, BA – Economics	Dr. Archana Hingorani has over 30 years of experience in the asset management business. She has done her PhD in Corporate Finance and MBA from Katz Graduate School of Business – University of Pittsburg, USA and BA in Economics from St. Xaviers College, University of Mumbai. In her formative years, she helped create a new company and raise resources focused on oil exploration, a first for India. This laid the foundation for understanding private markets. She has rich experience in fund raising, investing, nurturing investments through four different economic cycles, carving exit paths, and spearheading ESG programs. Currently, she runs Siana Capital Management LLP, an asset management business focused on technology and impact investments. She also serves on the University of Pittsburgh's Chancellor's Global Advisory Council and the Advisory Board of Talent Nomics, a Washington based group focused on encouraging upward movement of women in the workforce, and Global Impact Initiative, an Australian firm focused on impact investments. In the recent past, she has also served on the Investment Commissions of the United Nations Environment Programme and has been recognized for leadership by Business World, Fortune India, and Asian Investor. She is a Visiting Distinguished Professor at the Katz Graduate School of Business, University of Pittsburgh, for Private Equity and Alternative Assets.
				Norton Limited, 5Paisa Capital Limited, Balaji Telefilms Limited, SIDBI Venture Capital Limited, The Phoenix Mills Limited, EMA Partners India Limited, Mafatlal Industries Limited and Zumutor Biologics Inc. USA. She is a Designated Partner of Siana Capital Management LLP and Raiin Resources LLP She was also instrumental in creating one of the earliest Trustee companies in 1996.
3	Mr. Achal Kumar Gupta (Associate Director)	72 years	Masters of Arts (M.A.), CAIIB	Mr. Achal Kumar Gupta has around 45 years of experience in the areas of Banking and Financial services. He has rich experience in diverse areas such as Credit Administration, Asset Management, Retail Banking, Branch Banking, Controller of Branches, Agricultural Banking, NRI Services etc.
				Mr. Gupta has served State Bank of India (SBI) group for more than 37 years and held several key positions in SBI group including an overseas assignment of 4 years at SBI, Bahrain (OBU).

Sr. No	Name	Age	Educational Qualifications	Brief Experience
				During his association with SBI, Mr. Gupta was deputed as Managing Director of SBI Funds Management Limited from May 2008 to January 2011. Prior to this, Mr. Gupta was the Chief Operating Officer of SBI Funds Management Limited since November 2005. He has also served as Managing Director of State Bank of Patiala from April 2012 to November 2013.
				Mr. Gupta has served as Deputy Managing Director of IFCI Ltd from December 2013 to December 2016. He was also on the Board of Association of Mutual Funds in India (AMFI) and served as independent / non-executive director on the Boards of The South Indian Bank Limited, Canara Robeco Asset Management Co. Ltd. and Capital India Finance Limited. He is an External Expert on Special Staff Accountability Committee (DMD Level Committee.
4	CA Amarjit Chopra (Independent Director)	73 Years	C.A., M. Com, B. Com (Hons), Delhi University	CA Amarjit Chopra is practicing the profession of Chartered Accountancy for the past 49 years with proven adroitness in varied areas. Mr. Chopra has specialization in Internal and Statutory Audits of Private and Public Sector enterprises, Banks and Insurance Companies including Company Law Matters, Accounting Standards and Audit and Assurance Standards. etc.
				Mr. Chopra was the President of Institute of Chartered Accountants of India for the year 2010-11. He was also the Vice-President of the Institute of Chartered Accountants of India (ICAI) for the year 2009-10. He had been associated with ICAI as Council Member for 15 years and also held the office of Chairman of Northern Indian Regional Council of ICAI (1986-89). He has also been on the various Committees/Bodies constituted by the ICAI, Government and other regulators. He was also nominated Chairman of National Advisory Committee on Accounting Standards (NACAS) by Govt. of India for four years (2014-2018).
				He has also been involved in training of Professionals/non-professionals in various training programs organized by Regulators (such as Comptroller & Auditor General of India, University of Petroleum and Energy), Bankers Training Colleges/professional bodies in and around India. He has also made significant contribution to the cause of accountancy profession through association with ICAI/Regulatory/Academic Forums.

Sr. No	Name	Age	Educational Qualifications	Brief Experience
				Trading Co. Ltd., ICAI Accounting Research Foundation and Maithon Power Limited, Seamac Limited. He is also a Designated Partner in G S A & Associates LLP. He has also served on the Boards of First India Life Insurance Co. Ltd, Urban Improvement Co Pvt Ltd, Garden Reach Shipbuilders and Engineers Limited, Roop Automotives Ltd., Rico Auto Industries Limited, Rico Investments Ltd, Confederation of Asia Pacific Accountant (CAPA) and South Asian Federation of Accountants (SAFA), Insurance Regulatory Development of Authority and nominated as a member to the Quality Review Board of Actuaries. On the Board of Governors of Management Développent Institute (Gurugram) as a Nominee of AICTE.
5	Mr. P.B. Santhanakrishnan (Associate Director)	73 years	B.Sc., F.C.A	Mr. P.B. Santhanakrishnan holds degree in Bachelor of Science and Chartered Accountancy. He is presently a senior partner of P. B. Vijayaraghavan & Co since 1979. He has an overall 45 years of experience in Statutory Audit of Public Sector Banks / undertakings / Charitable Institutions/ Educational Institutions and Non-profit Institutions. He has made numerous representations before SEBI, SAT, CBDT and ITAT on Corporate/Income Tax and FEMA matters.  He is a former member of the following institutions / bodies;  RBI Committee on RTGS (Real Time Gross Settlement)  Governing Board of PNB Institute of Information Technology, New Delhi.  Southern India Regional Council of Institute of Chartered Accountants of India (1982 – 1988)  Committee of Central Council of the Institute of Chartered Accountants of India.  Hony. Treasurer of Tamil Nadu Tennis Association  Madras Gymkhana Club  He was also on the boards of Oriental Bank of Commerce (2011 to 2014) and Can Fin Homes Ltd (2012 to 2016).  Presently, he is on the Boards of TamilNadu News Prints and Papers Limited and Indo-Australian Chamber of commerce.

Sr. No	Name	Age	Educational Qualifications	Brief Experience
6	Mr. Ashutosh Khajuria (Independent Director)	65 years	Bachelor of Science(B.Sc.); Bachelor of Laws(LL.B); Master of Arts in Economics; Certified Associate of Indian Institute of Bankers (CAIIB); Diploma in Treasury Investment & Risk Management (DTIRM).	Mr. Ashutosh Khajuria is a thought leader in Banking, Finance, and Risk with 43 years of experience in various executive roles in the banking sector. He has proven abilities in the areas of Treasury, Trade finance, Credit underwriting, monitoring and collections, and Risk management. A strategic leader with a proven track record of delivering transformational benefits through process centralization and automation. Recognized for strong regulatory engagement and industry representation.  Presently, Mr. Khajuria is advising Federal Bank on credit related matters. He has served Federal Bank as the Chief Mentor till May 2024 where he was overseeing the functions of Treasury, Credit Underwriting, Credit Monitoring, Credit Administration, Loans Collection & Recovery functions and ESG initiatives. He joined Federal Bank in June 2011 as President & Head of Treasury and was later entrusted with the additional responsibility of business development in the entire network of branches / offices. He ha served as an Executive Director on Federal Bank Board from January 2016 to April 2023. He has also been a Director on the Board of Fedbank Financial Services Limited, a non-banking financial subsidiary of Federal Bank from April 2020 till April 2024.  Prior to joining Federal Bank, Mr. Khajuria was associated with IDBI Bank as CGM and Head — Treasury from February 2009 to June 2011, United Phosphorus Limited as Corporate Treasurer from August 2008 to February 2009 and Edelweiss AMC as Head-Fixed Income from November 2007 to July 2008. He had also worked with State Bank of India from December 1983 till November 2007 covering the entire gamut of banking functions including Treasury, International Banking, Trade Finance, Corporate Banking and Branch Banking.  Mr. Khajuria is a Director on the Board of Kriti Nutrients Limited, Clearcorp Dealing Systems (India) Limited and Dhanlaxmi Bank Limited from November 2015 till May 2020, Fixed Income Money Market & Derivatives Association (FIMMDA) from September 2011 till February 2016.

# 2) Supervisory role of the Trustees

The Board of Directors of Trustee Company monitors the activities of the AMC. From time to time it seeks information from the AMC in the form of Performance Reports, Compliance Reports, etc. On a

quarterly basis, a review report is prepared by the AMC and the same is placed at the board meetings of the Trustee Company. Pursuant to SEBI master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, a quarterly report is shared by the AMC on its activities and the compliance with the SEBI Regulations and various circulars issued thereunder with Board of Directors of Trustee Company. Specific approval of the Trustees is also obtained on various important matters. The Audit Committee, comprising of 3 directors of the board of the Trustee Company which has been constituted pursuant to the SEBI master circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024 to, inter alia, review internal audit systems and reports from internal and concurrent auditors. The Committee is chaired by an Independent Director of the Company. In the last financial year 2024-25, the Board of Directors of Trustee Company met 8 times. There was one joint meeting of the Board of Directors of the AMC and Trustee Company held during the FY 2024-25.

### (3) Duties and Obligations of Trustees and Substantial Provisions of the Trust Deed:

The rights, duties and obligations of the Trustee including the following:

- To enter into an investment management agreement with the AMC with the prior approval of SEBI.
- 2) To ensure that the investment management agreement contains such clauses as are mentioned in the Fourth Schedule of SEBI (Mutual Fund) Regulations, 1996 and such other clauses as are necessary for the purpose of making investment.
- 3) The trustees shall have a right to obtain from the asset management company such information as is considered necessary by the trustees.
- 4) To approve the policy for empanelment of brokers by the AMC and ensure that the AMC has been diligent in empanelling the brokers, in monitoring securities transactions with brokers and avoiding undue concentration of business with any broker.
- 5) To ensure that the AMC has not given any undue or unfair advantage to any associates or dealt with any of the associates of the asset management company in any manner detrimental to the interest of the / Unit holders.
- 6) To ensure that the transactions entered into by the asset management company are in accordance with SEBI (Mutual Fund) Regulations, 1996 and the scheme.
- 7) To ensure that the AMC has been managing the mutual fund schemes independently of other activities and have taken adequate steps to ensure that the interests of investors of one scheme are not being compromised with those of any other scheme or of other activities of the asset management company.
- 8) To ensure that all activities of the AMC are in accordance with the provisions of SEBI (Mutual Fund) Regulations, 1996.
- 9) Where the Trustee have reason to believe that the conduct of business of the mutual fund is not in accordance with SEBI (Mutual Fund) Regulations, 1996 and the scheme they shall forthwith take such remedial steps as are necessary by them and shall immediately inform the SEBI of the violation and the action taken by them.
- 10) Trustees to file the details of his/her holdings in securities with the mutual fund on a quarterly basis.
- 11) To be accountable for, and be the custodian of, the funds and property of the respective schemes and to hold the same in trust or the benefit of the unit holders in accordance with SEBI (Mutual Fund) Regulations, 1996 and the provisions of trust deed.

- 12) To take steps to ensure that the transactions of the mutual fund are in accordance with the provisions of the trust deed.
- 13) To ensure that the income calculated by the AMC under sub-regulation (25) of regulation 25 of SEBI Mutual Funds regulations is in accordance with SEBI (Mutual Fund) Regulations, 1996 and the trust deed.
- 14) To obtain the consent of the Unit holders:
  - i. whenever required to do so by the SEBI in the interest of the Unit holders; or
  - ii. whenever required to do so on the requisition made by three fourths of the Unit holders of any Investment Strategy; or
  - iii. when the majority of the trustees decide to wind up a scheme in terms of clause (a) of sub regulation (2) of regulation 39 or prematurely redeem the units of a close ended Investment Strategy;
- 15) The trustees shall ensure that no change in the fundamental attributes of any scheme, the fees and expenses payable or any other change which would modify the scheme and affect the interest of the unit holders is carried out by the AMC, unless it complies with sub-regulation (26) of regulation 25 of SEBI Mutual Funds regulations.
- 16) To call for the details of transactions in securities by the key personnel of the AMC in his own name or on behalf of the AMC and shall report to the SEBI, as and when required.
- 17) To quarterly review all transactions carried out between the mutual fund, Asset Management Company and its associates.
- 18) To quarterly review the net worth of the AMC to ensure compliance with the threshold provided in clause (f) of sub-regulation (1) of regulation 21 of SEBI (Mutual Fund) Regulations, 1996 on a continuous basis.
- 19) To periodically review all service contracts such as custody arrangements, and satisfy itself that such contracts are executed in the interest of the Unit holders.
- 20) To ensure that there is no conflict of interest between the manner of deployment of its net worth by the AMC and the interest of the Unit holders.
- 21) To periodically review the investor complaints received and the redressal of the same by the AMC.
- 22) To abide by the Code of Conduct as specified in Part A of the fifth schedule of SEBI (Mutual Fund) Regulations, 1996.
- 23) To furnish to the SEBI on a half yearly basis:
  - i. a report on the activities of the SIF;
  - ii. a certificate stating that the Trustee have satisfied themselves that there have been no instances of self dealing or front running by any of the Trustee, directors and key personnel of the AMC;
  - iii. a certificate to the effect that the AMC has been managing the Investment Strategy independently of any other activities and in case any activities of the nature referred to in clause (b) of regulation 24 of SEBI (Mutual Fund) Regulations, 1996 have been undertaken by the AMC and has taken adequate steps to ensure that the interests of the Unit holders are protected.

- 24) The independent Trustee referred to in regulation 16 (5) shall give their comments on the report received from the AMC regarding the investments made by the schemes in the securities of group companies of the Sponsor.
- 25) To maintain arms' length relationship with other companies, or institutions or financial intermediaries or anybody corporate with which he may be associated.
- 26) To ensure that no Trustee shall participate in the meetings of the board of Trustee or Trustee Company when any decisions for investments in which he may be interested are taken.
- 27) To furnish to the board of Trustee or trustee company particulars of interest which he may have in any other company, or institution or financial intermediary or any corporate by virtue of his position as director, partner or with which he may be associated in any other capacity.
- 28) To appoint a custodian and shall be responsible for the supervision of its activities in relation to the mutual fund and shall enter into a custodian agreement with the custodian for this purpose.
- 29) To ensure that the removal of a Trustee in all cases would require the prior approval of SEBI.
- 30) To ensure that the Trustee may dismiss the AMC under the specific events only with the approval of SEBI and in accordance with the SEBI Regulations.
- 31) To forbid the acquisition of any asset out of the trust property which involves the assumption of any liability which is unlimited and shall not result in encumbrance of the trust property in any way.
- 32) To provide or cause to provide information to unitholders and SEBI as may be specified by SEBI.

As per the sub-regulation (25) of Regulation 18, the Trustee shall exercise due diligence as under:

#### A. General Due Diligence:

- a. The Trustee shall be discerning in the appointment of the directors on the Board of the asset management company.
- b. Trustee shall review the desirability of continuance of the asset management company if substantial irregularities are observed in any of the schemes and shall not allow the asset management company to float new schemes.
- c. 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.
- d. The trustee shall ensure that all service providers are holding appropriate registrations from the Board or concerned regulatory authority.
- e. The Trustee shall arrange for test checks of service contracts.
- f. Trustee shall immediately report to Board of any special developments in the mutual fund.

### B. Specific Due Diligence:

The Trustee shall:

- Obtain internal audit reports at regular intervals from independent auditors appointed by the Trustee.
- b. Obtain compliance certificates at regular intervals from the asset management company.
- c. Hold meeting of Trustees at frequent intervals.
- d. Consider the reports of the independent auditors and compliance reports of Asset Management Company at the meetings of Trustee for appropriate action.
- e. Maintain records of the decisions of the Trustee at their meetings and of the minutes of the meetings.

- f. Prescribe and adhere to a code of ethics by the Trustee, Asset Management Company and its personnel.
- g. Communicate in writing to the asset management company of the deficiencies and Checking on the rectification of deficiencies.

Notwithstanding the aforesaid, the Trustee shall not be held liable for acts done in good faith if they have exercised adequate due diligence honestly.

The independent Directors of the Trustee or AMC shall pay specific attention to the following, as may be applicable, namely:

- a. The Investment Management Agreement and the compensation paid under the agreement.
- b. Service contracts with associates whether the AMC has charged higher fees than outside contractors for the same services.
- c. Selection of the AMC's independent directors.
- d. Securities transactions involving associates to the extent such transactions are permitted.
- e. Selecting and nominating individuals to fill independent directors' vacancies.
- f. Code of ethics must be designed to prevent fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions.
- g. The reasonableness of fees paid to Sponsors, AMC and any others for services provided.
- h. Principal underwriting contracts and their renewals.
- i. Any service contract with the associates of the AMC.

### 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 schemes vis-a-vis performance of peers or the appropriate benchmarks.
- c. The Trustees shall ensure that the AMCs have put in place adequate systems to prevent misselling 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.
- h. 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.
- j. 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.
- k. 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.
- m. The Trustees shall require the AMCs to furnish, in a true and fair manner, reports and alerts based on pre-decided parameters including but not limited to the areas specified as core responsibilities at para a to g above, for taking appropriate action.
- n. The Trustees shall periodically review the steps taken by AMCs for folios which do not contain all the Know Your Client (KYC) attributes / updated KYC attributes and ensure that the AMCs take remedial steps necessary for updating the KYC attributes especially pertaining to bank details, PAN, mobile phone number.
- The independent directors of the trustees or asset management company shall pay specific attention to the following, as may be applicable, namely:—
- a. the Investment Management Agreement and the compensation paid under the agreement,
- b. service contracts with associates whether the asset management company has charged higher fees than outside contractors for the same services,
- c. selections of the asset management company's independent directors,
- d. securities transactions involving 76[associates] to the extent such transactions are permitted,
- e. selecting and nominating individuals to fill independent directors vacancies,
- f. code of ethics must be designed to prevent fraudulent, deceptive or manipulative
- g. practices by insiders in connection with personal securities transactions.
- h. the reasonableness of fees paid to sponsors, asset management company and any others for services provided.
- i. principal underwriting contracts and their renewals,
- j. any service contract with the associates of the asset management company.

Notwithstanding the aforesaid, the trustees shall not be held liable for acts done in good faith if they have exercised adequate due diligence honestly.

### 4. Modifications to the Trust Deed

No amendments to the Trust Deed will be carried out without the prior approval of SEBI and the Unit holders' approval would be obtained where it affects the interests of the Unit holder.

### II. Asset Management Company (AMC)

SBI Funds Management Limited (SBIFML)' (previously known as SBI Funds Management Private Limited) was incorporated under the Companies Act, 1956 on February 17, 1992 as a private limited company, having its Registered Office at 9th Floor, Crescenzo, C-38 & 39, G Block, Bandra-Kurla

Complex, Bandra (East), Mumbai – 400051. SBIFML has been appointed as the Asset Management Company of the SBI Mutual Fund by the Trustee vide Investment Management Agreement (IMA) dated May 14, 1993 and also a supplemental IMA thereto on April 28, 2003 which was replaced by Restated and Amended Investment Management Agreement dated December 29, 2004. The same has been further replaced by the Restated and Amended Investment Management Agreement dated March 12, 2024 entered into between SBIMFTCPL and SBIFML.

SBIFMPL has been converted into Public Limited Company effective from December 16, 2021. Consequently, the name has been changed to "SBI Funds Management Limited" with effect from December 16, 2021.

As per the audited accounts on March 31, 2025, the authorized capital of the AMC was Rs. 52.50 crores, paid-up capital was Rs. 50.82 crores and the Networth of the AMC was Rs. 6,841.67 Crores. SBIFML is a joint venture between State Bank of India (SBI) and AMUNDI Asset Management (erstwhile Amundi S.A.), a leading European asset management company. A shareholder agreement in this regard has been entered on April 13, 2011 between SBI & AMUNDI Asset Management. Accordingly, SBI currently holds 61.91% stake in SBIFML and the 36.36% stake is held by AMUNDI Asset Management through a wholly owned subsidiary, Amundi India Holding. Initially this holding was held by Societe Generale Asset Management S.A. ("SGAM"), a subsidiary of Societe Generale S.A ("SG") which was transferred to Amundi in June 2011 with due approval of SEBI pursuant to SEBI (Mutual Funds) Regulations, 1996. AMUNDI Asset Management shall provide strategic support to the Company. SBI & AMUNDI Asset Management shall jointly develop the Company as an asset management company of international repute by adopting global best practices and maintaining international standards.

In terms of Investment Management Agreement, SBIFML has assumed the day to day investment management of the fund and in that capacity makes investment decisions and manages the SBI Mutual Fund schemes in accordance with the scheme objectives, Trust Deed, provisions of Investment Management Agreement and SEBI Regulations & Guidelines. SBIFML is also the AMC of Magnum SIF and will manage the Investment Strategies launched under Magnum SIF from time to time.

In addition to the investment management activity, SBI Funds Management Limited has also been granted a certificate of registration as a Portfolio Manager with Registration Code INP000000852.

Apart from this, SBI Funds Management Limited has received an 'In-principle' approval from SEBI for SBI Resurgent India Opportunities Fund (Offshore Fund) vide letter no. IMD/RK/53940/2005 dated November 16, 2005.

SBI Funds Management Limited is also acting as Investment Manager of SBI Alternative Equity Fund which is registered with SEBI vide SEBI Registration number: IN/AIF3/15-16/0177, as a category III Alternative Investment Fund and SBI Alternative Debt Fund which is registered with SEBI vide Registration number: IN/AIF2/18-19/0563 as a category II Alternative Investment Fund under SEBI (Alternative Investment Funds) Regulations, 2012.

SBI Funds Management Limited has also obtained approval for providing the management and advisory services to Category I foreign portfolio investors and Category II foreign portfolio investors through fund manager(s) managing the schemes of the SBI Mutual Fund as permitted under Regulation 24(b) of the SEBI (Mutual Funds) Regulations, 1996, as amended from time to time ("the Regulations"). While, undertaking the said Business Activity, the AMC shall ensure that (i) any conflict of interest with the activities of the Fund will be avoided; (ii) there exists a system to prohibit access to insider information as envisaged under the Regulations; and (iii) Interest of the Unit holder(s) of the Scheme of the Mutual Fund are protected at all times.

SEBI has granted no objection vide letter no. SEBI/HO/IMD/IMD-RAC-1/OW/2023/36315/1 dated September 04, 2023 under Regulations 24(b) of SEBI (Mutual Funds) Regulations, 1996 to AMC for setting up wholly owned subsidiary company in IFSC-GIFT City. The AMC has incorporated a wholly

owned subsidiary company in IFSC-GIFT City, viz. SBI Funds International (IFSC) Limited on February 07, 2024.

IFSCA has issued the Certificate of Registration dated June 27, 2024 bearing the registration no. IFSCA / FME/ III/ 2022-23/010 in the name of SBI Funds International (IFSC) Limited. SBI Funds International (IFSC) Ltd. has become operational with effect from August 12, 2024, and is acting as Fund Management Entity in Gift city.

The AMC certifies that there would be no conflict of interest between the Asset Management activity and these other activities.

# i) Details of AMC Directors:

Sr. No.	Name	Age	Educational Qualification	Experience
1	Mr, Challa Sreenivasulu Setty (Chairman & Associate Director)	59 years	B.Sc. (Agriculture), CAIIB	Mr. Challa Sreenivasulu Setty took over charge as Chairman of State Bank of India (SBI) on August 28, 2024. He joined the Board of SBI as Managing Director in January 2020 and headed Retail & Digital Banking vertical from year 2020 till 2022 and International Banking, Global Markets & Technology portfolio of the Bank thereafter. He has also been heading various task forces/committees formed by the Government of India. A Bachelor of Science in Agriculture and also, a Certified Associate of Indian Institute of Bankers, he started his career with SBI in 1988 as a Probationary Officer. Across a career spanning over three decades, he has rich experience in Corporate credit, Retail, Digital and International banking and banking in developed markets. Mr. Setty has held key assignments in State Bank of India in Stressed Assets Management, Corporate banking, Mid Corporate banking, global markets, technology and Syndications both in India and abroad.  Mr. Setty is also Director on the Board of SBI Capital Markets Limited, SBI Ventures Limited, State Bank Operations Support Services Private Limited, SBI Life Insurance Company Limited, SBI Cards & Payment Services Limited, SBI Foundation, Exirn Bank, Indian Bank's Association, National Credit Guarantee Trustee Company Limited, member of Institute of Banking Personnel Selection, National Institute of Bank Management, CII National Committee on Banking, Advisory Board for Financial Inclusion Fund, US-India CEO Forum and Insurance Advisory Committee.
2	Mr. Nand Kishore (Managing Director & CEO) (Associate)	59 years	B.A, CAIIB	Mr. Nand Kishore, Deputy Managing Director of State Bank of India (SBI), is on deputation to SBIFML since November 06, 2024. He took charge as Managing Director & CEO of SBIFML

Sr. No.	Name	Age	Educational Qualification	Experience
				w.e.f. November 23, 2024.  Mr. Kishore joined SBI as Probationary Officer in 1990 and has varied experience of 34 years in major banking verticals such as Branch Banking, International Operations, Treasury Operations and Investment Banking, Corporate Banking and Retail Operations of the Bank.
				Before his deputation to SBIFML, he was Deputy Managing Director (Global Markets) at SBI, Corporate Centre, Mumbai, where he was responsible for overseeing the bank's entire treasury operations.
				Other key assignments held by Mr. Kishore during the last 10 years with SBI are as under:  • Chief General Manager, Bengaluru Circle (May, 2021 to June, 2023)  • General Manager & Branch Head, Corporate Accounts Group, BKC, Mumbai (June 2019 to May 2021);  • Deputy General Manager (Interest Rate Markets) Global Markets Corporate Centre Mumbai (January, 2017 to June 2019)  • Deputy General Manager & Chief Operating Officer, Corporate Accounts Group, New Delhi (September, 2015 to January, 2017);  • Assistant General Manager, Treasury Management Group IBG Corporate Centre Mumbai (July, 2012 to September, 2015).  Currently he is serving as a Director on the Board of SBI Funds International (IFSC) Limited and SBI Foundation.
3	Mr. Ashwini Kumar Tewari (Associate Director)	57 years	Bachelor's Degree in Engineering (Electrical & Electronics),	Mr. Ashwini Kumar Tewari is a career banker and started his career in SBI in the year 1991 as a Probationary Officer and has spent more than three decades with the bank in India and abroad in various assignments.
			CAIIB, CFP, Certificate Course in Management from XLRI	Presently since 21.11.2023, he is the Managing Director (Corporate Banking and Subsidiaries) of State Bank of India and a Whole Time Director handling the portfolio of Large Corporate and Commercial Credit business of the Bank along with Associates & Subsidiaries of the Bank. This includes major non-bank business like Credit cards, Mutual Fund, Life & General Insurance, Capital Markets, Custodial Services etc. a nd serving on the boards of all these companies.
				Prior to this assignment, he was Managing Director (Risk, Compliance and Stressed Assets) since June 2022. There he was focusing on

Sr. No.	Name	Age	Educational Qualification	Experience
				driving Climate Risk Management in the bank and shaping the Stressed Assets Strategy of the bank. Earlier he was the Managing Director, handling International Banking, Information Technology and Non-Bank Subsidiaries of the Bank from January 2021. He was also involved in a big refresh in the technology space in SBI. Prior to becoming Managing Director at SBI, he served as Managing Director and CEO of SBI Cards and Payment Services Ltd where he oversaw key partnerships inked with GPay, PayTM, BPCL etc. and steered the company through the immediate aftermath of the Covid period.
				Earlier, he was the Country Head of the US Operations of State Bank of India from April 2017 to July 2020. Prior to that he was the Regional Head and General Manager, East Asia, for SBI, based in Hong Kong.
				Over the years, he held other leadership positions at State Bank of India, including, the Deputy General Manager (Operations & Information Systems) International Banking, Head of SBI's Cash Management, Regional Manager, Branch Head, among others.
				An Electrical Engineer by degree, he is a Certified Associate of Indian Institute of Bankers (CAIIB), Certified Financial Planner (CFP) and has done a Certificate Course in Management from XLRI
4.	Mr. Fathi Jerfel (Associate Director)	66 Year s	Engineering degree from Ecole Poly- technique, Engineering degree from the Institut Français du Petrole & Post graduate degree in Economics (Petroleum Management) from the University of Dijon	Amundi Asset Management and was in charge of investment solutions for Retail Network Division. He was a Head of Financial Engineering and Fixed Income (1986-2001) at Credit Lyonnais, he had joined Crédit Agricole Asset Management in 2002 as Head of Derivatives Arbitrage & Cumulative Research. In 2005, Mr. Jerfel was appointed as Chief Executive Officer of Crédit Agricole Structured Asset Management. Mr.
5	Mr. Olivier Mariee (Associate Director)	57 Year s	Master of Business Administration	Mr. Olivier Mariée is Head of Amundi International Partner and Joint Venture division at Amundi. Mr. Mariée joined Amundi in

Sr. No.	Name	Age	Educational Qualification	Experience
				September 2021 from Direct Assurance (AXA Group).
				He was CEO of CPR Asset Management – Paris Sept 2021 to Dec 2024. Having spent most of his career with the AXA Group, Mr. Olivier Mariée has in-depth knowledge of the asset and wealth management industry and its clients. He was CEO of Direct Assurance (AXA Group) since 2020. Prior to that, he was Sales Director at AXA France since 2017, where he was in charge of defining and implementing the distribution strategy, marketing strategy and sales promotion. He was also in charge of the sales teams of the Life business lines (Savings, Pensions, Provident, Health) and the distribution networks of AXA France.
				From 2012 to 2017, Mr. Olivier Mariée was CEO of AXA Wealth Management and Head of Life & Savings Business Lines at AXA France, during which he was actively involved in the creation and development of AXA Wealth Europe in Luxembourg.
				Prior to 2012, he was Marketing Director of the AXA Group, having held various senior positions in Japan and the UK since 1999.
				From 1997 to 1999, he was Head of Private Banking at AXA Investment Managers. He joined the AXA Group in 1992 as Sales Manager for AXA France's network of Provident & Wealth management agents.
				Mr. Olivier Mariée is a graduate of the Institut Supérieur de Gestion, a French business school.
6	Mr. Moiz Miyajiwala (Independent Director)	74 years	Chartered Accountant, Bachelor of General Law, Bachelor of Arts (Economics / Statistics)	Mr. Moiz Miyajiwala is a Chartered Accountant in practice (freelancing) with an all India ranking of 27. He has also completed his Bachelor of General Law from KC Law College, Mumbai
				Currently, Mr. Miyajiwala is an Independent Management Consultant. He has successfully reorganized Finance function of a Limited Liability Company, improved processes and helped in outsourcing/centralisation of some parts of the Finance function. He is on the Board of Anjuman-I-Islam (a Section 8 Non-Profit Company engaged in Educational and Charitable activities and Honorary Treasurer of the Trust), Transpact Enterprises Limited and Benares

Sr. No.	Name	Age	Educational Qualification	Experience
				Hotels Ltd., a publicly listed Company, where he chairs the Audit Risk Management Committee and Nomination and Remuneration Committee.  Previously, he had held the position of CFO and Executive Vice President (Finance) / Compliance Officer with Voltas Ltd, till 31st May 2011 where he was overall in charge of Finance / Accounts, Compliances, General Management, Strategic
				Management, IT, Legal, Strategic Planning, Investor Relations and was a member of Corporate Management Committee. He has also served as an Advisor to the Managing Director of Voltas Ltd. and Board member of various associate and Group Companies and advisory and/or supervisory role for Voltas Ltd. from 2011 to 2013. He has held various position in Voltas Ltd. since 1980.
				Mr. Miyajiwala was also a Partner of Dara Sorabji, Chartered Accountants, Mumbai, from 1978–1980, where he was responsible for Statutory Audits of Limited Companies, Trusts, Hospitals and Internal Audits & Taxation - direct and indirect.
				His major achievements include restructuring the businesses of Voltas Ltd. and its revival. He was also involved in restructuring finances of the Company for improving leverage, rating and costs.
				Mr. Miyajiwala is acknowledged as subject matter expert on Economic Data by Media. He has been awarded Prestigious 'Super Achievers Award by Indira Institute of Management Studies and featured as a 'Growth Manager' on the cover page of a prominent Business Magazine.
				Mr. Miyajiwala is a Director on the Board of PIEM Hotels Ltd, Benares Hotels Ltd, Oriental Hotels Ltd, OHL Internation, HK and Anjuman I Islam, Mumbai
7	Mrs. Sudha Krishnan (Independent Director)	64 years	Master's     Degree in     Public     Administratio     n, (George     Mason     University of     Virginia     USA);	Mrs. Sudha Krishnan joined the Indian Audit and Accounts Service (IAAS) in 1983 and retired on November 30, 2020 as Member Finance to the Space Commission and Atomic Energy Commission. As Member Finance, she served as the principal advisor to the Commission on financial business pertaining to the Departments of Space and Atomic Energy Commission.
			M.A. & B.A. in English Literature (University of	She has close to four decades of experience in public policy and finance. She has worked on secondment at the Ministry of Finance in different capacities where she has handled diverse

Sr. No.	Name	Age	Educational Qualification	Experience
			Delhi)	portfolios including World Bank projects, personnel matters of the Central Government and writing memoranda and reports for the Finance Minister on improving the overall effectiveness of Government spending. She has also served as Financial Adviser to the Ministry of Housing and Urban Poverty Alleviation. She has also served as Government Nominee Director on the Boards of many Government companies and banks.
				In her parent department namely, the office of Comptroller and Auditor General of India (CAG) (the Supreme Audit Institution of India), she led and coordinated the production of several audit reports including the audit of the Central Board of Direct Taxes. As Principal Director (International Cooperation), she was directly responsible for advising and implementing the CAG's international obligations both bilateral and multilateral. In her last assignment in the office of the CAG, she was responsible for developing and strengthening professional standards and practices in audit.
				Mrs. Krishnan is an Independent Director on the Board of, Graphite India Limited, National E Governance Services Limited and Highway Concessions One Private Ltd. She is also a member of Action for Ability Development and Inclusion (AADI), a registered society a Nominee member of Delhi Public School Society.
8	Mr. Shekhar Bhatnagar (Independent Director)	66 Year s	MBA (Finance) from Faculty of Management Studies, Delhi Junior Associate of IIBF (JAIIB)	Mr. Shekhar Bhatnagar has experience of 34 years working for Reserve Bank of India. He was Chief General Manager-in-charge, Foreign Exchange Department, Central Office Mumbai before superannuating from Reserve Bank of India.
			M.A. (History)	He has a vast experience as a Member in the capacity of Nominee Director on the Boards of both private and public sector commercial banks and has been a member of several subcommittees of the Board of Directors. He was involved in corporate governance in banks, in the formulation of guidelines/ action plans/framework in the areas of risk management and formulation of the turnaround strategy, risk assessment and risk mitigation strategies of weak banks, innovation of products for Payment Systems etc. He was involved in the process of implementation of BASEL II and III. He has an experience of monitoring the process of NPA management in commercial banks as part of the banking supervision process.

Sr. No.	Name	Age	Educational Qualification	Experience
				He was involved in regulation and supervision of credit lenders and investment vehicles in equity/ debt markets, Asset Reconstruction Companies and Mortgage guarantee companies, PPI, and aggregators in the payment space for non-banking finance intermediaries. He was the Country Head for Foreign exchange/ cross border transactions where he handled responsibilities of policy formulation, supervision, monitoring and compounding process and management of capital flows, both equity and debt.
				Presently, he is an Independent Consultant working with L&L Law Firm India as an Off Counsel on Foreign Exchange investment issues and Advisor to HDFC Bank and also an advisor at Chase India Advisors.
9	Dr. T. T. Ram Mohan (Independent Director)	69 years	B. Tech. (IIT-Bombay), PGDM (IIM Calcutta), Ph.D. (Stern School of Business, New York University)	Dr. T. T. Ram Mohan has wide-ranging experience in academics, policy-making, banking, management consulting and financial journalism. Presently, he is a Part-time Member at Prime Minister's Economic Advisory Council since October 2021.  Dr. Ram Mohan has held several other positions in the past as under:  Visiting Faculty - Indian Institute of Management, Ahmedabad, FY 2021-22  Professor, Finance & Economics - Indian Institute of Management, Ahmedabad - (October 1998-January 2021)  Visiting Faculty, Economics department - Stern School of Business, New York University (2001)  Head of Research - Birla Marlin Securities, Bombay (August 1995-December 1996)  Vice President, Equity Research - Bear Stearns, Hong Kong (May 1994-July 1995)  Head of Strategic Development - Standard Chartered Bank, Bombay (April 1993-February 1994)  Divisional Manager and Chief, Economics Division - Tata Economic Consultancy Services, Bombay (1982-84, 1989-93)  Contributing Editor (South Asia) - Financial Times International Reports (1986-94)  Economics Writer - India Abroad (New York) (1986-94)  New York Correspondent - The Economic

Sr. No.	Name	Age	Educational Qualification	Experience
				Times (1988-89)  Officer, Projects - Industrial Credit and Investment Corporation of India (ICICI) (1981-82)  Presently, Dr. Ram Mohan is a member of HR Advisory Board, Indian Overseas Bank
				He also has been a Director on the Boards of Royal Manor Hotels & Industries Ltd. (2003-05), Marwar Hotels Ltd. (2003-05), International Asset Reconstruction Company Ltd (2003-08), Rail Vikas Nigam Ltd (2005-08), Brics Securities Ltd (2004-13), Paterson Securities Pvt. Ltd. (2009-16), SBI Pension Funds Pvt. Ltd. (2007-14), GNFC Ltd. (2005-14), IndusInd Bank Ltd. (2006-14 and 2016-24), SBICAPS Securities Ltd (2014-19), Rural Electrification Corporation Ltd (2015-19) and Canara HSBC Life Insurance Company Ltd (2017-20).
				He was associated with many Committees of RBI and has been a member of Committee reviewing NPAs in power financing Companies, Ministry of Power, Government of India, member of Sub-Group of Finance Ministry on Expanding Institutional Finance for Infrastructure, 2020 and member of SEBI's Primary Market Advisory Committee.
10	Dr. Hemant Adarkar (Independent Director)	63 years	PhD in Physics from TIFR	Dr. Hemant Adarkar is a seasoned technology professional with over 29 years of experience spanning system development, architecture, technology consulting, product development, and outsourcing, primarily within the banking and financial services sector. Known for his ability to bridge the gap between business and technology teams, he has led several high-impact assignments. These include the design and implementation of a core banking solution for the largest cooperative bank in Asi a, core banking deploymen ts across urban cooperative banks, and the conceptualization of a payments bank in the UK.  Dr. Adarkar is currently working as Sr. Fellow (Research) at Artha Global. Prior to this, he worked as Interim Chief Information Officer at Aviva Life Insurance Company India Limited and Chief Technology Officer at Bank of Baroda Digital Venture and C-Fence Technology Private Limited.

Sr. No.	Name	Age	Educational Qualification	Experience
				<ul> <li>Dr. Adarkar is currently serving as a Director on the Board of following Companies:</li> <li>Financial Benchmarks India Private Limited as an Independent Director</li> <li>Godrej Housing Finance Limited as an Independent Director</li> <li>Dvara Kshetriya Gramin Financial Services Private Limited as an Independent Director</li> <li>Godrej Finance Limited as an Independent Director</li> <li>Zensung Software Private Limited as a Director</li> <li>National Commodity and Derivatives Exchange Limited as a Public Interest Director.</li> </ul>
11	Mr. Denys de Campigneulles (Alternate Director to Mr. Fathi Jerfel)	63 years	Institute of Investment Management & Research — IMRO — London, UK; Securities and Futures Commission - SFC - Hong Kong: Responsible Officer, Type 1: Dealing in Securities, Type 4: Advising in Securities, Type 9: Asset Management	

# ii) Duties and Obligation of the Asset Management Company:

Duties and obligation of the AMC as specified in the SEBI (Mutual Funds) Regulations, 1996 are as under:

- The asset management company shall take all reasonable steps and exercise due diligence to ensure that the investment of funds pertaining to any scheme is not contrary to the provisions of the regulations and the trust deed.
- 2) The asset management company shall exercise due diligence and care in all its investment decisions as would be exercised by other persons engaged in the same business.

- 2A) The asset management company shall obtain, wherever required under the regulations, prior inprinciple approval from the recognized stock exchange(s) where units are proposed to be listed.
- The asset management company shall be responsible for the acts of commissions or omissions by its employees or the persons whose services have been procured by the asset management company.
- 4) The asset management company shall submit to the trustees quarterly reports of each year on its activities and the compliance with these regulations.
- 5) The trustees at the request of the asset management company may terminate the assignment of the asset management company 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 asset management company.
- 6) Notwithstanding anything contained in any contract or agreement or termination, the asset management company or its directors or other officers shall not be absolved of liability to the mutual fund for their acts of commission or omissions, while holding such position or office.
- 6A) (a) The Chief Executive Officer of the asset management company 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 unit holders and shall also be responsible for the overall risk management function of the mutual fund.
  - (b) The Chief Executive Officer shall also ensure that the Asset Management Company has adequate systems in place to ensure that the Code of Conduct for Fund Managers and Dealers specified in PART B of the Fifth 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 Asset Management Company and Trustees.
- 6B) (a) The fund managers (whatever the designation may be) shall ensure that the funds of the schemes are invested to achieve the objectives of the scheme and in the interest of the unit holders.
  - (b) The Fund Managers (whatever be the designation) shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART B of the Fifth Schedule of Securities and Exchange Board of India (Mutual Funds) Regulations, 1996 and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any.

Explanation:- For the purposes of this sub-regulation, the phrase "Fund Managers" shall include Chief Investment Officer (whatever be the designation).

- 6C) (a) 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 scheme and in the best interest of all the unit holders.
  - (b) The Dealers (whatever be the designation) shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART B of the Fifth Schedule of the Securities and Exchange Board of India (Mutual Funds) Regulations, 1996 and submit a quarterly self-

certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any.

- 6D) The Board of directors of the asset management company shall ensure that all the activities of the asset management company are in accordance with the provisions of the regulations.
- 7) a. An asset management company shall not through any broker associated with the sponsor, purchase or sell securities, which is average of 5% or more of the aggregate purchases and sale of securities made by the mutual fund in all its schemes.

Provided that for the purpose of this sub-regulation, aggregate purchase and sale of securities shall exclude sale and distribution of units issued by the mutual fund.

Provided further that the aforesaid limit of 5% shall apply for a block of any three months.

b. An asset management company shall not purchase or sell securities through any broker [other than a broker referred to in clause (a) of sub-regulation (7)] which is average of 5% or more of the aggregate purchases and sale of securities made by the mutual fund in all its schemes, unless the asset management company has recorded in writing the justification for exceeding the limit of 5% and reports of all such investments are sent to the trustees on a quarterly basis.

Provided that the aforesaid limit shall apply for a block of three months.

8) An asset management company shall not utilise the services of the sponsor or any of its associates, employees or their relatives, for the purpose of any securities transaction and distribution and sale of securities:

Provided that an asset management company may utilize such services if disclosure to that effect is made to the unit holders and the brokerage or commission paid is also disclosed in the half yearly annual accounts of the mutual fund.

Provided further that the mutual funds shall disclose at the time of declaring half-yearly and yearly results:

- Any underwriting obligations undertaken by the schemes of the mutual funds with respect to issue of securities associate companies,
- ii) Devolvement, if any,
- iii) Subscription by the schemes in the issues lead managed by associate companies
- iv) Subscription to any issue of equity or debt on private placement basis where the sponsor or its associate companies have acted as arranger or manager.
- 9) The asset management company shall file with the trustees the details of transactions in securities by the key personnel of the asset management company in their own name or on behalf of the asset management company and shall also report to the SEBI, as and when required by the SEBI.
- 10) In case the asset management company enters into any securities transactions with any of its associates a report to that effect shall be sent to the trustees at its next meeting.
- 11) In case any company has invested more than 5 per cent of the net asset value of a scheme, the investment made by that scheme or by any other scheme of the same mutual fund in that company or its subsidiaries shall be brought to the notice of the trustees by the asset management company and be disclosed in the half yearly and annual accounts of the respective schemes with justification for such investment provided the latter investment has been made within one year of the date of the former investment calculated on either side.

- 12) The asset management company shall file with the Trustee and the SEBI -
  - (a) Detailed bio-data of all its directors along with their interest in other companies within fifteen days of their appointment; and
  - (b) Any change in the interests of directors every six months.
  - (c) A quarterly report to the trustees giving details and adequate justification about the purchase and sale of the securities of the group companies of the sponsor or the asset management company as the case may be, by the mutual fund during the said quarter.
- 13) Each director of the Asset Management Company shall file the details of his transactions of dealing in securities with the trustees on a quarterly basis in accordance with the guidelines issued by the SEBI.
- 14) The asset management company shall not appoint any person as key personnel who has been found guilty of any economic offence or involved in violation of securities laws.
- 15) The asset management company shall appoint registrars and share transfer agents who are registered with the 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 scheme and for rates higher than the competitive market rates, prior approval of the trustees shall be obtained and reasons for charging higher rates shall be disclosed in the annual accounts.
- 16) The asset management company shall abide by the Code of Conduct as specified in Part A of the Fifth Schedule.
- (16A) The asset management company shall invest such amounts in such schemes of the mutual fund, based on the risks associated with the schemes, as may be specified by the SEBI from time to time
- (16B) The asset management company shall invest a percentage of the remuneration of such employees as specified by the Board in units of mutual fund schemes based on the designation or roles of the designated employees in the manner as may be specified by SEBI.
- 17) The asset management company shall not invest in any of its scheme, unless full disclosure of its intention to invest has been made in the offer documents, in case of schemes launched after the notification of Securities and Exchange Board of India (Mutual Funds) (Amendment) Regulations, 2011:
  - Provided that an asset management company shall not be entitled to charge any fee on its investment in that scheme.
- 18) The asset management company shall not carry out its operations including trading desk, unit holder servicing and investment operations outside the territory of India.
- 19) The asset management company shall compute and carry out valuation of investments made by its scheme(s) in accordance with the investment valuation norms specified in Eighth Schedule, and shall publish the same.
- 20) The asset management company and the sponsor of the mutual fund shall be liable to compensate the affected investors and/or the scheme for any unfair treatment to any investor as a result of inappropriate valuation.
- 21) The asset management company shall report and disclose all the transactions in debt and money market securities, including inter scheme transfers, as may be specified by the SEBI.

- 22) The board of directors of the asset management company shall exercise due diligence as follows:
- (a) The board of directors of the asset management company shall ensure before the launch of any scheme that the asset management company has-
  - (i) systems in place for its back office, dealing room and accounting;
  - (ii) appointed all key personnel including fund manager(s) for the scheme(s) and submitted their bio-data which shall contain the educational qualifications and past experience in the securities market with the Trustees, within fifteen days of their appointment;
  - (iii) appointed auditors to audit its accounts;
  - (iv) appointed a compliance officer who shall be responsible for monitoring the compliance of the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by the Board or the Central Government and for redressal of investors grievances;
  - (v) appointed a registrar to an issue and share transfer agent registered under the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and laid down parameters for their supervision;
  - (vi) prepared a compliance manual and designed internal control mechanisms including internal audit systems;
  - (vii) specified norms for empanelment of brokers and marketing agents;
  - (viii) obtained, wherever required under these regulations, prior in principle approval from the recognized stock exchange(s) where units are proposed to be listed.
  - (b) The board of directors of the asset management company shall ensure that -
  - (i) the asset management company has been diligent in empanelling the brokers, in monitoring securities transactions with brokers and avoiding undue concentration of business with specific brokers:
  - (ii) the asset management company has not given any undue or unfair advantage to any associate or dealt with any of the associate of the asset management company in any manner detrimental to interest of the unit holders:
  - (iii) the transactions entered into by the asset management company are in accordance with these regulations and the respective schemes;
  - (iv) the transactions of the mutual fund are in accordance with the provisions of the trust deed;
  - (v) the networth of the asset management company are reviewed on a quarterly basis to ensure compliance with the threshold provided in clause (f) of subregulation (1) of regulation 21 on a continuous basis;
  - (vi) all service contracts including custody arrangements of the assets and transfer agency of the securities are executed in the interest of the unit holders:
  - (vii) there is no conflict of interest between the manner of deployment of the networth of the asset management company and the interest of the unit holders;
  - (viii) the investor complaints received are periodically reviewed and redressed;
  - (ix) all service providers are holding appropriate registrations with the Board or with the concerned regulatory authority;
  - (x) any special developments in the mutual fund are immediately reported to the trustees;
  - (xi) there has been exercise of due diligence on the reports submitted by the asset management company to the trustees;
  - (xii) there has been exercise of due diligence on such matters as may be specified by the SEBI from time to time.
- (23) The compliance officer appointed under sub-clause (iv) of clause (a) of sub-regulation (22) shall independently and immediately report to the Board any noncompliance observed by him.
- (24) The asset management company shall constitute a Unit Holder Protection Committee in the form and manner and with a mandate as may be specified by the SEBI.
- (25) The asset management company shall be responsible for calculation of 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 of the mutual fund, in accordance with these regulations and the trust deed.

- (26) The asset management company shall ensure that no change in the fundamental attributes of any scheme or the trust, fees and expenses payable or any other change which would modify the scheme and affect the interest of unit holders, shall be carried out unless,—
  - (i) a written communication about the proposed change is sent to each unit holder and an advertisement is issued in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of region where the Head Office of the mutual fund is situated; and
  - (ii) the unit holders are given an option to exit at the prevailing Net Asset Value without any exit load.
- (27) The asset management company shall put in place an institutional mechanism, as may be specified by the Board, 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 asset management company shall be responsible and accountable for implementation of such an institutional mechanism for deterrence of potential market abuse, including frontrunning and fraudulent transactions in securities.
- (29) The asset management company 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) An asset management company shall ensure compliance with the Investor Charter specified by the Board from time to time.
- (31) The asset management company shall conduct stress testing for such schemes as specified by the Board and disclose the results of the stress testing in the form and manner, as may be specified by SEBI.

### Information on Key Personnel:

The day-to-day operations of the AMC for Mutual Fund are looked after by experienced and qualified professionals, consisting of senior officials on deputation from the State Bank of India and AMUNDI as well as directly recruited officials of the AMC. All the key personnel are based at the registered office of the AMC.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
Mr. Nand Kishore	59 Years	Managing Director & CEO	B.A, CAIIB	34 years	Mr. Nand Kishore, Deputy Managing Director of State Bank of India (SBI), is on deputation to SBIFML since November 06, 2024. He took charge as Managing Director & CEO of SBIFML w.e.f. November 23, 2024.  Mr. Kishore joined SBI as Probationary Officer in 1990 and has varied experience of 34 years in major banking

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
				Experience	verticals such as Branch Banking, International Operations, Treasury Operations and Investment Banking, Corporate Banking and Retail Operations of the Bank.
					Before his deputation to SBIFML, he was Deputy Managing Director (Global Markets) at SBI, Corporate Centre, Mumbai, where he was responsible for overseeing the bank's entire treasury operations.
					Other key assignments held by Mr. Kishore during the last 10 years with SBI are as under:  Chief General Manager, Bengaluru Circle (May, 2021 to June, 2023)  General Manager & Branch Head, Corporate Accounts Group, BKC, Mumbai (June 2019 to May 2021);  Deputy General Manager (Interest Rate Markets) Global Markets Corporate Centre Mumbai (January, 2017 to June 2019)  Deputy General Manager & Chief Operating Officer, Corporate Accounts Group, New Delhi (September, 2015 to January, 2017);  Assistant General Manager, Treasury Management Group IBG Corporate Centre Mumbai (July, 2012 to September, 2015).
Mr. D. P. Singh	64 years	Deputy Managing Director and Joint CEO	M.Com., P. G. Diploma in Personnel Management & Industrial Relations (DPMIR) & CAIIB	33 years	Mr. D. P. Singh has over 33 years of experience in the Banking and Financial Services industry. As DMD & Joint CEO of SBI Funds Management Limited (SBIFML), he oversees the strategic direction of the organisation across product development, sales, marketing, PR, customer service, and

Name	Age	Designation	Educational	Total No. of	Brief Experience
			Qualification	years of Experience	
					human resources. Over the last
					two decades, he has held
					many senior leadership roles and led the company's
					consistent growth in several
					parameters including AUM,
					market share and profits and
					has been instrumental in
					expanding SBI Mutual Fund's reach in
					oth urban and rural areas.
					He joined SBIFML in 1998 and held various positions over the
					years including stints as Zonal
					Head - North, Chief Business
					Officer (CBO) before being
					elevated to Deputy Managing
					Director in 2022. He was re- designated as Dy. Managing
					Director & Jt. CEO in
					September 2023. His tenure
					saw SBIFML grow at a
					remarkable pace and emerge
					as market leaders in the asset management industry in India.
					Under his leadership, SBIFML
					launched several innovative
					solutions for investors,
					developed an
					enhanced focus on customer centricity and increased market
					penetration.
					Prior to joining SBIFML, he
					was associated with the State
					Bank of India where he
					handled various assignments in Retail Banking, Corporate
					Credit, and Information
					Technology. He holds a
					Master's in Commerce, and a
					Post Graduate Diploma in
					Personnel Management & Industrial Relations. He is also
					a Certified Associate of Indian
					Institute of Bankers (CAIIB). He
					is an avid reader, loves
					economics and enjoys dabbling
					in discussions on politics,
					current affairs, and public relations.
					Currently he is serving as a
					Director on the Board of
					SBICAP Securities Limited and
					Association of Mutual Funds in
			20	l	India.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
Mr. Denys de Campigneulles	63 years	(Deputy Chief Executive Officer)	Institute of Investment Management & Research – IMRO – London, UK; Securities and Futures Commission - SFC - Hong Kong: Responsible Officer, Type 1: Dealing in Securities, Type 4: Advising in Securities, Type 9: Asset Management	37 years	Mr. Denys de Campigneulles has been deputed from Amundi Group as Deputy Chief Executive Officer of SBI Funds Management Limited w.e.f. March 07, 2020. Mr. de Campigneulles has over 37 years of extensive experience in financial services.  Prior to joining SBI Funds Management Limited as Deputy Chief Executive Officer, Mr. de Campigneulles worked as CIO with LCL Bank Paris France. Prior to working as CIO with LCL Bank Paris France, Mr. de Campigneulles worked from 2009 to 2016 as Head of Fixed Income Business Department & Investment Specialists with AMUNDI Paris France. He worked from 2005-2009 as Deputy Chief Executive Officer Asia with AMUNDI Hong Kong. He also held the position of CIO from 2002 – 2005 with NH-CA ASSET MANAGEMENT, SEOUL. From 1994 to 2002 he held various position in London and Paris for Global Fixed Income Management Department. Between 1988 to 1994, he worked with BANQUE BRUXELLES LAMBERT (PARIS). From 1986 to 1988, he worked for CREDIT LYONNAIS (PARIS).
Mr. Rajeev Radhakrishnan	49 years	Chief Investment Officer - Fixed Income	B.E (Production). MMS (Finance), C.F.A. (USA)	22 years	Total experience of 22 years in funds management. Around 16 years in Fixed Income funds management and dealing. Previously he was associated UTI Asset Management Company Ltd. as Co - Fund Manager  Past experiences:  SBI Funds Management Limited - (From June 09, 2008 onwards)  Co - Fund Manager - UTI Asset Management

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					Company Limited (June 2001-2008)
Mr. Rama lyer Srinivasan	55 years	Chief Investment Officer - Equity	M.Com & MFM	32 years	Having experience of more than 32 years in the area of financial services. Prior to joining SBI Funds Management Limited Mr. Srinivasan was with Future Capital Holding, asset management and financial services entity of the Future Group, where he worked as Head - Portfolio Management and was responsible for Portfolio Management & Equity Research. Before that he worked with many organizations viz: Principal PNB AMC; Imperial Investment Advisor; Indosuez W.I. Carr Securities; Inquire (Indian Equity Research); Sunidhi Consultancy (Research unit); Capital Market Publishers etc.
Mr. Ramakrishna Balasubramaniam	60 years	Chief Operating Officer	Chartered Accountant, Grad (CWA), B. Com	36 years	Mr. Ramakrishna Balasubramanian joined SBIFML in September 2024 as Chief Operating Officer (Designate). He took charge as Chief Operating Officer of SBIFML with effect from November 01, 2024. He has more than 36 years of varied experience in the fields of Finance, Operations, Compliance, Risk & Controls, Information Technology, Products & Strategic Businesses (ETF & International Businesses).  Prior to joining SBIFML, Mr. Ramakrishna was associated with ICICI Prudential Asset Management Company Limited from September 2004 to April 2024 responsible for various functions during his stint with the Company. He has last served as Chief Financial Officer at ICICI Prudential Asset Management Company Limited, where he was

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
				Exponence	responsible for overseeing the Finance, Operations and Information Technology functions.
					Prior to that, he was also associated with Marico Industries, ITC Agro Tech (now known as Agrotech Foods Limited), Dalmia Industries Limited and Union Carbide India Limited (now known as Eveready Industries India Limited).
Ms. Vinaya Datar	53 years	Chief Compliance Officer & Company Secretary	B.Sc., C.S., L.L.B.	30 years	Having overall experience of more than 30 years including over 24 years in the field of financial services. She has extensively worked in the areas of Compliance, Secretarial, and Legal.
					Prior to this assignment, she was Assistant Vice President - Compliance with Mirae Asset Global Investments (India) Pvt. Ltd. She has also been previously associated with Reliance Capital Asset Management Ltd, IL&FS Limited and UTI Infrastructure & Services Limited.
Mr. R. S. Srinivas Jain	51 years	Chief of Strategy, Digital & Technology	B.Com	31 years	Experience of over 31 years in Financial Services industry, including over 24 years in asset management companies. Assignment during the past years:
					Associated with SBIFML since May 2001. His last assignment was as Regional head, South, SBI Funds Management Pvt. Ltd. Before joining to SBI Funds Management P. Ltd, he has been associated with Birla Sunlife AMC, Investment India Pvt. Ltd. Kotak Securities etc.
Ms. Aparna Nirgude	54 years	Chief Risk Officer	B.Com, MBA	28 years	Experience of over 28 years in the mutual fund industry in the area of equity research and funds management.
					Assignment during the last few

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					years:  • Associated with SBIFML since June 1993. March 2005 onwards - Chief Risk Officer  • February 2005 - March 2005 - Vice President (Investment Risk & Monitoring)  • August 2000 - February 2005 - Head of Research  • July 1998 - August 2000 - Equity dealer  • September 1994 - June 1998 - Portfolio Manager
Mr. Inderjeet Ghuliani	57 years	Chief Financial Officer	B. Com, CA, CMA, CAIIB	30 years	Mr. Inderjeet Ghuliani joined SBIFML in June 2008 and is involved in company accounts, financial management, taxation and administration activities.  He has over 30 years of experience in the area of financial services. Prior to joining SBIFML, he was associated with entities like JCT Ltd, Crompton Grieves Ltd, Bank of India, UTI Bank, State Bank of Bikaner and Jaipur and Small Industrial Development Bank of India wherein he primarily handled activities pertaining to finance and accounts department.
Mr. C A Santosh	52 years	Investor Relations Officer	B.Sc. (Botany)	29 years	Mr. C A Santosh has more than 29 years of experience in Customer Service and is associated with SBIFML since December 2007 in various capacities including Head – Customer Service and Zonal Customer Service Manager (West and Mumbai Zones). Prior to SBIFML, Mr. C A Santosh was associated with Kotak Mahindra Bank as Chief Manager – Customer Contact Center and was responsible for running the Contact Center Operations and handling query/request/complains of

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
				•	customers. He was also associated with ICICI Bank, KLM/Northwest Airlines and Jet Airways.
Mr. Gaurav Mehta	43 years	Head – SIF Equity	PGDM, IIM Lucknow, B.Tech IIT Bombay, CFA Charter holder, CFA Institute USA	19 years	Mr. Gaurav Mehta is Head – SIF Equity of SBI Funds Management Limited (SBIFML). Gaurav has over 19 years of experience in Indian financial markets. He joined SBIFML in November 2018 as an Equity Analyst and was appointed as Fund Manager for schemes of SBI Mutual Fund. He was later appointed as CIO – Alternatives Equity of SBIFML in October 2021. Before joining SBIFML, he worked with Ambit Investment Advisors as a Portfolio Manager. Prior to that, he was an equity research analyst for Institutional equities at Ambit Capital. Gaurav began his career with Edelweiss Capital in May 2006.
Mr. Neeraj Kumar	57 years	Dealer (Equity) & Fund Manager	B Com (H), CA	27 years	Mr. Kumar has 27 years experience in equity dealing, equity research & Finance & Accounts Dept.  Assignment during the past years:
					<ul> <li>Equity Dealer - SBI Funds Management Limited - from 26/10/2006 till date</li> <li>Equity Dealer, Equity Research Analyst - Life Insurance Corporation of India- September 1996 to October 2006</li> </ul>
Mr. Raviprakash Sharma	47 years	Chief Dealer (Equity) & Fund Manager	B.Com, C.A., C.F.A (USA)	26 years	Mr. Sharma has over 26 years of experience in Indian capital markets spanning across Equity as well as Fixed Income segments. Prior to joining SBI Funds Management Limited in January 2011, Mr. Sharma was associated with HDFC Asset Management Limited as Sr. Manager in the portfolio management services division.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
				Experience	In his earlier assignments he has also worked with Citigroup Wealth Advisors India Pvt. Ltd. (Financial Advisor), Kotak Securities Ltd. (Non-Discretionary PMS) as well as with Birla Sun Life Securities Ltd. (Fixed Income Segment).
Mr. Tanmaya Desai	43 years	Fund Manager	B.E (Electronics), MBA (Finance), C.F.A(USA)	20 years	Mr. Desai has close to 20 years of work experience with over 13 years of experience in Indian capital markets. Past Experience:  • From May 2008 till date - as Research Analyst - Investments with SBI Funds Management Limited.  • From August 2004 to June 2006 - as Lecturer, Electronics Department with D J Sanghvi College of Engineering, Mumbai.  • From September 2003 – April 2004 – as Software Engineer with PATNI COMPUTER SYSTEMS LTD, Mumbai.
Mr. Ruchit Mehta	44 years	Head of Research	B.Com, MSc Finance. CFA Charter holder	20 years	Ruchit has over 20 years experience in the industry as an analyst and over 12 years as a fund manager. Ruchit is currently the Head of Research at SBI Funds Management Ltd. Associated with SBI Funds Management Ltd since April 2010.  • May 2006 – March 2010: AVP & Assistant Fund Manager, HSBC Asset Management Pvt. Ltd.  • July 2004 – May 2006: Analyst, ASK Raymond James & Associates Pvt. Ltd.  • Feb 2004 – July 2004: Associate, Prabhudas Lilladher Pvt. Ltd.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
Ms. Nidhi Chawla	41 years	Fund Manager	BBS, MBE, CFA (USA)	17 years	Ms. Nidhi has over 17 years experience in Mutual Fund Industry. She joined SBI Funds Management Limited in May 2007. She has been working as an equity research analyst covering various sectors including Real Estate, Infrastructure and Construction.
Mr. Saurabh Pant	42 years	Fund Manager	B.Com, MBE, C.F.A(USA) Level III candidate	18 years	<ul> <li>Mr. Saurabh has over 18 years experience in Indian capital markets in the capacity of research analyst and fund management. Currently he is the Fund Manager.</li> <li>From May 2007 to June 2011- as Research Analyst with SBI Funds Management Ltd.</li> </ul>
Mr. Dinesh Balachandran	47 years	Head – Investments	B. Tech (IIT-B), M. S. (MIT, USA), CFA Charter holder	23 years	Mr. Dinesh has over 23 years of experience in the industry primarily as Research Analyst. Currently he is Head – Investments and the Fund Manager. Dinesh is responsible for overseeing holistic investment strategies, with a focus on Research, Equity Funds and Fixed Income Funds.
					Past Experiences:  Mar 2012 – till date: Joined as Senior Credit Analyst, SBI Funds Management Limited  Aug 2004 – Dec 2011: Research Analyst, Fidelity Investments, USA  Sep 2001 – July 2004: Research Associate, Fidelity Investments, USA
Mr. Lokesh Mallya	46 years	Fund Manager & Credit Analyst	MBA, CFA, FRM	18 years	Lokesh Mallya joined SBIFML in October 2014 as Credit Analyst. He has over 18 years of experience in research in the Indian fixed income market and fund management. Prior to joining SBIFML, Mr. Mallya was working with Birla SunLife Asset Management Company Limited as Fund Manager

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					(Sept 2009-Sept 2014) and as Credit Analyst (July 2006-Aug 2009).
Ms. Mansi Sajeja	43 years	Fund Manager	Post Graduate Diploma in Business Management, CFA	17 years	Mansi Sajeja joined SBIFML in September 2009 as Credit Analyst. Prior to joining SBIFML, Mansi was Rating Analyst at ICRA Limited from March 2006 to September 2009.
Ms. Ranjana Gupta	54 years	Dealer and Fund Manager	B. Com.	29 years	Ranjana Gupta joined SBIFML in 2008 as Fixed Income Dealer and has over 29 years of experience in capital market. Prior to joining SBIFML, Ranjana was heading the broking activities at Twentyfirst Century Shares and Securities Ltd from May 1995 to February 2008. She started her career as a dealer in 1995 with OTCEI (Over the Counter Exchange of India). Ranjana is a Commerce graduate from Mumbai University.
Mr. Harsh Sethi	45 years	Equity Dealer & Fund Manager	B. Com (Hons.), CA, CS	20 years	Harsh Sethi joined SBIFML in May 2007 as Product Manager and was responsible for product development and management. Prior to joining SBIFML, he was working with J. P. Mangal & Co. as Senior Assistant from March 2005 to March 2007 handling Audit & Taxation. Currently he is Equity Dealer and Fund Manager.
Mr. Mohit Jain	36 years	(Fund Manager & Credit Analyst)	B.E (Engineering) , CFA	13 years	Mr. Mohit Jain joined SBI Funds Management Limited (SBIFML) in May 2015 as Credit Analyst and has over 12 years of experience in the area of financial services. Prior to joining SBIFML, Mr. Jain was working with Crisil Limited as Research Analyst (Jan 2012-Apr 2015).
Mr. Rohit Shimpi	45 years	Fund Manager	B. Com, PGDBM, CFA Charter holder	22 years	Rohit Shimpi, Fund Manager, Portfolio Management Services (PMS) of SBI Funds Management Limited (SBIFML) has been transferred to Mutual Fund Department w.e.f.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					November 01, 2018 and is responsible for fund management and advisory services. Rohit joined SBIFML in 2006 as Equity Analyst. He had also been managing our Offshore Fund between March 2011-October 2015. Rohit then moved to PMS division of SBIFML as Fund Manager in October 2015. Before joining SBIFML, he had worked with SGA News Ltd (Television 18 Group) as a Research Analyst for the firm's flagship financial news channel, CNBC TV18. Prior to that, he was a researcher with JP Morgan's offshore research centre. Rohit started his career as a management trainee with HDFC Standard Life Insurance.
Ms. Valsa Shobby	54 years	Debt Dealer	B.A., LLB., MBA	22 years	Ms. Valsa Shobby has been associated with SBI Funds Management Limited since July 1996. Currently, she is Debt Dealer handling Daily Liquidity management, debt dealing and deal settlements. She is part of the Investments team since September 2003.
Mr. Milind Agrawal	39 years	Fund Manager	B. Tech. – Mechanical Engineering (Nirma University); PGDM– Finance (MDI, Gurgaon; CFA Charter holder, CFA Institute, USA.	16 years	Milind joined SBI Funds Management Limited in May 2018 as an Equity Research Analyst. He has an experience of over 16 years, of which more than 14 years have been in the Financial services industry. Before joining SBIFML, he had worked with Goldman Sachs Services Pvt. Ltd. as an Equity Research Analyst for 6 years. Prior to that he has experience working in the FX Consulting and IT space.
Mr. Raj Gandhi	44 years	Fund Manager	CFA — CFA Institute, USA, Diploma in Business Finance — ICFAI University, Master in	18 years	Raj Gandhi joined SBIFML in October 2017 and focusses on tracking commodities and related sectors such as Energy, Metals (including precious metals). Prior to joining SBIFML, he was working with Sundaram Mutual Fund. Previously, he worked

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
			Management Studies - Finance from K. J Somaiya, Mumbai		with Principal PNB asset management company, Deutsche and UTI securities. Entire cumulative work experience of 18 years is centred around tracking commodities and related sectors. Raj holds a Masters in Finance from KJ Somaiya Institute of Management. Raj is also a Charter holder of the CFA Institute, USA.
Mr. Viral Chhadva	42 years	Equity Dealer	CFA Charter Holder from CFA Institute, USA, Master's in Financial Management (MFM) from Jamnalal Bajaj Institute of Management Studies (JBIMS)	19 years	Mr. Viral Chhadva (Equity Dealer) joined SBIFML in December 2020. He has over 19 years of experience in financial services sector.  Prior to joining SBIFML, he was previously associated with IIFL Securities Limited (June 2008 till December 2020) and ICICI Securities Limited (June 2006 till June 2008) wherein he primarily handled execution of trades into Direct Market Access, Exchange Traded Funds and Derivatives.
Mr. Sanjay Pugaonkar	50 years	Chief Information Security Officer (CISO)	Chief Information Security Officer (CISO)	22 years	Mr. Sanjay Pugaonkar joined SBIFML in May 2020. He has over 22 years of experience in the areas of IT and Information/ Cyber Security.  Prior to joining SBIFML, he was previously associated with Tata AIA Life Insurance Co. Ltd (December 2010 till May 2020) as CISO wherein he primarily handled Information Security's GRC (Governance, Risk and Compliance). He also has experience of working across fast pacing industries like BFSI, Manufacturing, and Service providers.
Mr. Ardhendu Bhattacharya	40 years	Fixed Income Dealer & Fund Manager	PGDM-Goa Institute of Management	15 years	Mr. Ardhendu Bhattacharya (Fixed Income Dealer & Fund Manaer) joined SBIFML in April 2019. He has over 15 years of experience in finance sector.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					Prior to joining SBIFML, he was previously associated with following entities.
					ICICI Bank Limited (June 2014 – April 2019) - Primarily involved in trading in money markets and short term corporate bonds
					Citibank N.A. ( April 2010 – June 2013) - Principally handled currency and trade sales
Mr. Bhavin Vithlani	45 years	Fund Manager	B. Com, MMS (Finance)	21 years	Mr. Bhavin Vithlani joined SBIFML in October 2018 as an Equity Research Analyst. He has over 21 years of experience in the finance sector.
					Prior to joining SBIFML, he was previously associated with following entities (assignments held during last 10 years):  Axis Capital Limited (Erstwhile ENAM Securities Private Limited) (March 2006 – September 2018) - Primarily involved in equity research for Industrial and Power Sectors.
					Tower Capital & Securities Private Limited (October 2004 – March 2006) - Primarily involved in equity research for Industrial Sectors.
Ms. Vandana Soni	38 years	Fund Manager	МВА	11 years	Ms. Vandna Soni joined SBIFML in December 2021 as Equity Research Analyst and has been involved in tracking of commodities and related sectors such as Cement, Metal, Oil and Gas. She has overall 11 years of experience in the area of financial services.
					Prior to joining SBIFML, she was associated with following entities wherein she was primarily involved in equity research of different sectors:  • SBICAP Securities Limited

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
				ZXPONONO	<ul> <li>(April 2019 to December 2021)</li> <li>Antique Stock Broking (October 2018 to April 2019)</li> <li>CRISIL GR&amp;A (January 2014 to September 2018)</li> </ul>
Mr. Vivek Gedda	41 years	Fund Manager	B.Tech, MSc, MBA	15 years	Mr. Vivek Gedda joined SBIFML in February 2022 as an Analyst and has been involved in research of IT and auto sector stocks. He has an overall 15 years of experience in the area of financial services.
					Prior to joining SBIFML, he was associated with following entities wherein he was primarily involved in equity research of IT and auto sectors:
					HSBC Securities and Capital Markets India Limited (April 2015 - February 2022)
Mr. Ashit Desai	44 years	Fund Manager	B.Com, PGDM, FRM	19 years	HSBC Electronic Data Processing India Private Limited (February 2011 - March 2015)  Mr. Ashil Desai joined SBIFML in April 2022 as an Analyst and has been involved in research of consumer sector stocks. He has an overall 19 years of experience in the area of financial services.
					Prior to joining SBIFML, he was associated with following entities wherein he was primarily involved in equity research of consumer sector-:
					Emkay Global Financial Services Limited (March 2018 - April 2022)
					SBICAPS Securities Ltd (June 2015 - February 2018)
					Batlivala & Karani Securities Ltd (April 2006 - June 2015)

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
Mr. Akash Shah	37 years	Equity Dealer	MMS (Finance), B.E (Computers)	13 years	Mr. Akash Shah joined SBIFML as Equity Dealer on January 28, 2025. He has over 13 years of experience in equity dealing.  Prior to joining SBIFML, he was associated with the following entities:  • Axis Asset Management Limited (October 2022 - January 2025) as Equity Dealer  • Max Life Insurance (November 2017 - September 2022) as Equity Dealer  • SBI Life Insurance Company Ltd (May 2012 - November 2017) as Equity Dealer
Mr. Anup Upadhyay	41 years	Fund Manager	B. Tech.(Hons); PGDM	14 years	Mr. Anup Upadhyay joined SBIFML in November 2024. He has earlier worked with SBIFML from May 2007 till December 2021 in the roles of Head of Research, Fund Manager and Equity Analyst. He has more than 14 years of experience in financial services.
Mr. Sudhir Agrawal	42 years	Fund Manager	M.Com., PGDBA, CFA	19 years	Mr. Sudhir Agrawal joined SBIFML on May 05, 2025. He has an overall 19 years of experience in the area of financial services.  Prior to joining SBIFML, he was associated with following entities wherein he was primarily involved in Fund Management / Financial analysis:  UTI Asset Management Company Limited  (July 2009 to April 2025)  Tata Asset Management Company Limited  (November 2007 to June 2009)  Transparent Value LLC  (January 2006 to October 2007)

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					CARE Limited     (May 2005 to December 2005)
Ms. Aakansha Khorjuwekar	34 years	Equity Dealer	Master of Management Studies (Finance), Bachelor of Information Technology	9 years	Ms. Aakansha Khorjuwekar joined SBIFML in March 2019 as a Business Analyst. She has more than 9 years of experience, out of which more than 7 years in financial services.
					Prior to the current role as an equity dealer, Aakansha was managing various IT applications of investments and operations team related to research, trade life cycle, and ETF transaction processing at SBIFML from March 2019 to July 2024.
					Prior to that, she was associated with the following entities:
					Credence Analytics (I) Pvt. Ltd. – Business Analyst (June 2016 to February 2019)
					LTIMindtree Limited – Software Development (June 2011 to October 2013)
Mr. Jignesh Shah	51 years	Dealer – Fixed Income & Fund Manager	B. Com., CFA	25 years	Mr. Jignesh Shah joined SBIFML on June 24, 2025. He has an overall 25 years of experience in the area of financial services.
					Prior to joining SBIFML, he was associated with following entities wherein he was primarily involved in Dealing and Fund Management / Financial analysis:
					<ul> <li>A. K. Stockmart Pvt. Ltd. (Feb 2023 – June 2025)</li> <li>Incred Capital Wealth Portfolio Managers Pvt. Ltd. (March 2020 -</li> </ul>

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Brief Experience
					Feb 2023)  Trust Financial Consultancy Services Pvt. Ltd. (Jan 2017 – Feb 2020)  LKP Securities Pvt. Ltd. (Feb 2016 – Dec 2016).
Mr. Harshit Anand	28 years	Dealer - Fixed Income	BBA in Accounts & Finance and Internation al Business, Post Graduate Diploma in Banking & Finance, MBA in Banking & Finance, CFA - Level 2	5 years	Mr. Harshit Anand joined SBIFML as Fixed Income Dealer on July 02, 2025. He has over 5 years of experience in fixed income dealings.  Prior to joining SBIFML, he was associated with the following entities:  • GROWW Asset Management Limited (July 2024 – June 2025) as Debt Dealer  • The South Indian Bank Ltd. (Oct 2020 to July 2024) as Fixed Income Dealer and (Oct 2019 to Sep 2020) as Forex Operations Officer.
Mr. Sankalp Anil Jain	34 years	Dealer - Fixed Income	Chartered Accountant (CA) and Chartered Financial Analyst (CFA)	9 years	Mr. Sankalp Anil Jain joined SBIFML on September 14, 2016. He has an overall 9 years of experience in the area of fundamental credit research.

# (iv) Research Team

The Research Team at SBIFML consists of following persons:

- 1. Ruchit Mehta Head Research, has total work experience of 20 years
- 2. Tanmaya Desai Research & Fund Manager, has total work experience of over 17 years
- 3. Nidhi Chawla Research & Fund Manager, has total work experience of 19 years
- 4. Lokesh Mallya Research & Fund Manager, has total work experience of 19 years
- 5. Mohit Jain Analyst, has total work experience of 12 years
- 6. Adesh Sharma Analyst, has total work experience of 17 years.
- 7. Prashanth Sridhar Analyst, has total work experience of 7 years.
- 8. Namrata Mital Economist, has total work experience of 12 years
- 9. Sukanya Ghosh Quantitative Research Analyst, has total work experience of 19 years.

- 10. Raj Gandhi Analyst, has total work experience of 19 years.
- 11. Milind Agrawal Research & Fund Manager, has total work experience of 12 years.
- 12. Amit Bohara Analyst, has total work experience of 8 years.
- 13. Bhavin Vithlani Analyst, has total work experience of 22 years.
- 14. Rajesh Disale Analyst, has total work experience of 8 years.
- 15. Priyanka Dhingra Analyst, has total work experience of 15 years.
- 16. Monica Bhaskar- Analyst, has total work experience of 10 years
- 17. Aniket Pradeep Mittal Analyst, has total work experience of 11 years
- 18. Vandna Soni- Analyst, has total work experience of 16 years
- 19. Nityasurya Chandru- Analyst, has total work experience of 4 years
- 20. Vivek Gedda– Analyst, has total work experience of 15 years
- 21. Ashit Desai- Analyst, has total work experience of 20 years
- 22. Varnika Khemani Junior Economist, has total experience of 3 year
- 23. Pradeep Kumar Kesavan Analyst, has total experience of 20 years
- 24. Arshad Perwez Analyst, has total experience of 18 years
- 25. Arjun N Analyst, has total experience of 9 years
- 26. Drushti Vishram Sawant Analyst, has total experience of 2 year
- 27. Prasad Padala Analyst, has total experience of 15 years
- 28. Pradyuun Igatpurikar Analyst Technology, has total experience of 1 year
- 29. Ramesh Tupe Analyst Data, has total experience of 20 years
- 30. Vilton Gomes Analyst, has total experience of 1 year

#### (v) Procedures followed for Investment decisions

The investment policy manual defines the broad guidelines for investments by various funds. Fund managers invest based on the offer document limits, regulatory limits and internal guidelines as set out in the Investment policy manual. Fund managers take input from the research team. The Head of Research will be heading the research team and will be responsible for the research output and performance. The transactions relating to the investments will be carried out by Debt and Equity Dealers. The processes and risks in the Investment activities will be monitored through the Risk team and a senior functionary reporting to the deputy CEO. Investment committee is playing the role of governance and supervisory body for all investment related activities. The committee will hold a meeting on a periodic basis for a detailed review of portfolio holdings, scheme performance and investment strategy and also to ensure adherence to all internal processes. The risk origination for the investments is done based on the guidelines issued by SEBI and Board of Trustees. Concurrent auditors periodically check the limits and their reports are placed before the Audit Committee, which is comprised of the independent Directors and Trustees.

## III. Service providers

# 1. Custodian

SBI-SG Global Securities Services Pvt. Ltd. (SEBI Registration Number: IN/CUS/022), Registered Office: "B Wing", Jeevan Seva, Annexe Building, Ground Floor, S.V. Road, Santacruz (West), Mumbai – 400054.

## 2. Registrar & Transfer agent

The AMC has appointed M/s Computer Age Management Services Limited (SEBI Registration Number: INR 000002813) situated at Rayala Towers, Tower 2, 7th floor, 158, Anna Salai, Chennai – 600002 Tamil Nadu (having Registered Office: New No.10, Old NO.178, M.G.R. Salai, Nungambakkam, Chennai- 600 034, India) as Registrars & Transfer Agents.

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

# 3. Statutory auditor

The AMC has appointed M/s Chokshi & Chokshi LLP, situated at 15/17, Raghavji B Bldg, Ground Floor, Raghavji Road Gowalia Tank, Off Kemps Corner, Mumbai 400 036 as the Statutory Auditor.

The AMC reserves the right to change the Auditor at any time with the approval of the Board of Directors of Trustee and AMC.

## 4. Legal counsel

Based on the issue on hand, the AMC appoints appropriate legal counsel on a case to case basis.

#### 5. Fund Accountant

SBI-SG Global Securities Services Pvt. Ltd.,

Registered & Corporate Office: "B Wing", "Jeevan Seva" Annexe Bldg., Ground Floor, S.V. Road, Santacruz (W), Mumbai – 400054.

#### 6. Collecting Bankers (For New Fund Offers)

Name of Bank	Registered Office Address
State Bank of India	
	State Bank Bhavan, Corporate Centre, Madame Cama Road, Nariman Point, Mumbai, Maharashtra 400021.
HDFC Bank Limited.	HDFC Bank House, Senapati Bapat Marg, Lower Parel (West), Mumbai – 400 013.

The above list is indicative and not exhaustive. The AMC reserves the right to change / modify the list of collecting Bankers.

# IV. Condensed financial information (CFI) for all the Investment Strategies launched by SIF during the last three fiscal years (excluding redeemed Investment Strategies):

Presently, this disclosure is not applicable.

#### V. RISK FACTORS

- 1. Standard Risk Factors
- a. Standard Risk Factors for investments in SIF
- a) SIFs and securities investments are subject to market risks and there is no assurance or guarantee that the SIF's objective will be achieved.

- b) As the price / value / interest rates of the securities in which the Investment Strategy invests fluctuates, the value of your investment in the Investment Strategy may go up or down
- c) Past performance of the Sponsor / AMC / Mutual Fund / SIF or its affiliates does not guarantee the future performance of the Investment Strategy of the SIF.
- d) State Bank of India, the sponsor of SBI Mutual Fund, is not responsible or liable for any loss resulting from the operation of the Magnum SIF beyond the initial contribution made by it of an amount of Rs. 5 lakhs towards setting up of SBI Mutual Fund.
- e) The name of the Investment Strategy does not in any manner, indicate either the quality of the Investment Strategy or its future prospects and returns
- f) The NAV of the Investment Strategy's Units may be affected by change in the general market conditions, factors and forces affecting capital markets in particular, level of interest rates, various market related factors and trading volumes
- g) The Investment Strategy launched by SIF is not a guaranteed or assured return scheme
- h) Investment in units of Investment Strategy involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.

# b. Risks associated with different derivative strategies

- a) 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. Investors should understand that 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 but are not limited to the risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices. There may be a cost attached to selling or buying futures or other derivative instrument. Further there could be an element of settlement risk, which could be different from the risk in settling physical shares. The possible lack of a liquid secondary market for a futures contract or listed option may result in inability to close futures or listed option positions prior to their maturity date.
- b) Derivatives, being leveraged instruments, can lead to both amplified gains and heightened losses. While they can be used to enhance portfolio efficiency or manage risk, their application involves a higher degree of complexity. The effectiveness of derivative strategies depends on accurate assessment of market conditions and timely execution. However, identifying and implementing such strategies involves uncertainty and there is no assurance that these strategies will consistently generate positive outcomes.
- c) The risks associated with derivatives may be different from, or potentially greater than, those associated with direct investments in equities or other traditional securities. Investors should be aware that such instruments can increase the volatility of the portfolio under certain market conditions. The Investment Strategy will be predominantly actively managed, with the use of derivatives forming an integral part of the investment and risk management process.
- d) No assurance can be given that the fund manager will be able to identify or execute such strategies.
- e) 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.
- f) Covered call strategies offer limited downside protection and cap upside gains. Risks include poor execution due to low option liquidity, difficulty rolling positions in volatile markets, margin calls if using leverage, and forced stock sale if assigned near expiry.
- g) Unhedged naked option positions carry unlimited risk and no downside protection.

# c. Other risk factors (viz. Swing pricing, investment in CDMDF, LRM etc.) - NA

#### 2. Special Considerations

(i) Termination of the Investment Strategy

The Trustees reserve the right to terminate the Investment Strategies at any time. Regulation 39(2) of the SEBI Regulations prescribes the provisions for winding up.

- (a) on the happening of any event which, in the opinion of the Trustees, requires the Investment Strategy to be wound up; or
- (b) if 75% of the Unit holders of an Investment Strategy pass a resolution that the Investment Strategy be wound up; or
- (c) if SEBI so directs in the interest of the unit holders.

Where an Investment Strategy is wound up under the above Regulation, the trustees shall give notice within one day, disclosing the circumstances leading to the winding up of the Investment Strategy,:

- (a) to SEBI; and
- (b) in two daily newspapers having circulation all over India & a vernacular newspaper circulating at the place where the mutual fund is formed.

Provided that where an Investment Strategy is to be wound up under clause (a) of sub-regulation (2), the trustees shall obtain consent of the unit holders participating in the voting by simple majority on the basis of one vote per unit and publish the results of voting within forty five days from the publication of notice under sub-regulation (3) of regulation 39.

Provided further that in case the trustees fail to obtain the required consent of the unitholders under clause (a) of sub-regulation (2), the schemes shall be reopened for business activities from the second business day after publication of results of the voting

In case of termination of the Investment Strategy, Regulation 41 of the SEBI (Mutual Funds) Regulations, 1996 shall apply.

- (ii) The Trustees, AMC, Fund, their directors or their employees shall not be liable for any tax consequences that may arise in the event that the scheme is wound up for the reasons and in the manner provided under the ISID & SAI.
- (iii) Redemption by the Unit Holder due to change in the fundamental attributes of the Scheme or due to any other reasons may entail tax consequences. The Trustees, AMC, Fund, their directors or their employees shall not be liable for any tax consequences that may arise.
- (iv) The tax benefits described in Statement of Additional Information (SAI) are as available under the present taxation laws and are available subject to relevant condition. The information given is included only for general purpose and is based on advice received by the AMC regarding the law and practice currently in force in India and the investors and Unit Holders should be aware that the relevant fiscal rules or their interpretation may change. As in the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of the investment in the Scheme will endure indefinitely. In view of the individual nature of tax consequences, each investor / Unit Holder is advised to consult his/her/its own professional tax advisor

- (v) The Mutual 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 scheme, availability of distributable profits and computed in accordance with SEBI (MF) Regulations.
- (vi) No person has been authorized to issue any advertisement or to give any information or to make any representations other than that contained in the ISID. Circulars in connection with this offering not authorized by the Mutual Fund and any information or representations not contained herein must not be relied upon as having been authorized by the Mutual Fund.
- (vii) In addition to the investment management activity, SBI Funds Management Limited has also been granted a certificate of registration as a Portfolio Manager with Registration Code INP00000852.

Apart from this, SBI Funds Management Limited has received an 'In-principle' approval from SEBI for SBI Resurgent India Opportunities Fund (Offshore Fund) vide letter no. IMD/RK/53940/2005 dated November 16, 2005.

SBI Funds Management Limited is also acting as Investment Manager of SBI Alternative Equity Fund which is registered with SEBI vide SEBI Registration number: IN/AIF3/15-16/0177, as a category III Alternative Investment Fund and SBI Alternative Debt Fund which is registered with SEBI vide Registration number: IN/AIF2/18-19/0563 as a category II Alternative Investment Fund under SEBI (Alternative Investment Funds) Regulations, 2012. Further, Corporate Debt Market Development Fund (CDMDF) is registered with SEBI as an AIF under AIF regulations vide registration number IN/AIFC/23-24/1317. SBI Funds Management Limited is the Investment Manager and Sponsor of CDMDF.

SBI Funds Management Limited has also obtained approval for providing the management and advisory services to Category I foreign portfolio investors and Category II foreign portfolio investors through fund manager(s) managing the schemes of the SBI Mutual Fund as permitted under Regulation 24(b) of the SEBI (Mutual Funds) Regulations, 1996, as amended from time to time ("the Regulations"). While, undertaking the said Business Activity, the AMC shall ensure that (i) any conflict of interest with the activities of the Fund will be avoided; (ii) there exists a system to prohibit access to insider information as envisaged under the Regulations; and (iii) Interest of the Unit holder(s) of the Scheme of the Mutual Fund are protected at all times.

SEBI has granted no objection vide letter no. SEBI/HO/IMD/IMD-RAC-1/OW/2023/36315/1 dated September 04, 2023 under Regulations 24(b) of SEBI (Mutual Funds) Regulations, 1996 to AMC for setting up wholly owned subsidiary company in IFSC-GIFT City. The AMC has incorporated a wholly owned subsidiary company in IFSC-GIFT City, viz. SBI Funds International (IFSC) Limited on February 07, 2024.

IFSCA has issued the Certificate of Registration dated June 27, 2024 bearing the registration no. IFSCA / FME/ III/ 2022-23/010 in the name of SBI Funds International (IFSC) Limited. SBI Funds International (IFSC) Ltd. has become operational with effect from August 12, 2024, and is acting as Fund Management Entity in Gift city.

The AMC certifies that there would be no conflict of interest between the Asset Management activity and these other activities.

(viii) Investors should study the Investment Strategy Information Document and the Statement of Additional Information carefully in its entirety and should not construe the contents thereof as advice 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

#### VI. HOW TO APPLY?

- (1) For Open Ended / Interval Investment Strategy, investors can subscribe for the units of the Investment Strategy either during the NFO of the Investment Strategy or during the continuous offer, when the Investment Strategy re-opens for purchase and sale on an ongoing basis Also, the units of interval investment strategies of SIF shall be mandatorily listed for buying and selling on recognized stock exchange(s) under SEBI circular no. SEBI/HO/IMD-PoD-1/P/CIR/2025/26 dated February 27,2025.
- (2) For Close Ended Investment Strategy, investors can subscribe for the units only during the NFO period. However, the units of all close ended Investment Strategy are required mandatorily to be listed under SEBI circular no. SEBI/HO/IMD-PoD-1/P/CIR/2025/26 dated February 27,2025 on recognized stock exchange. Unit holders holding the units by way of an account statement (physical form) will not be able to redeem their units during the tenor of the Investment Strategy and there will be redemption by the fund on the maturity of the Investment Strategy. However, the units held in dematerialized form can be traded on the Stock Exchange.

## 1. Important instructions:

- a. New investors can purchase units by submitting duly completed application form, subject to KYC requirements and other required documents. Once the new folio is created in SIF, such unit holders may use transaction Slip, or Common Transaction Form. Application forms or common transaction formswill be available at the official points of acceptance of transactions (OPAT) of the AMC during the business hours or the same will also be available with the eligible distributors of SIF and can also be downloaded from the website of the SIF, https://www.sbimf.com/magnumsif
- b. The duly completed Applications form / transaction slip / common transaction form as the case may be, complete in all respects together with necessary remittance may be submitted at any OPAT of the AMC or Corporate Office of SIF. The personnel at the official point of acceptance of transaction will time stamp, and return the acknowledgement slip in the application form. The application shall be subject to verification.

#### c. Transactions through electronic mode

The AMC may (at its sole discretion and without being obliged in any manner to do so and without being responsible and/or liable in any manner whatsoever) allow transactions in units by electronic mode (web/electronic transactions) including transactions through the various web sites with which the AMC would have an arrangement from time to time. Subject to the investor fulfilling certain terms and conditions as stipulated by the AMC from time to time, the AMC, SIF, Registrar or any other agent or representative of the AMC, SIF or the Registrar may accept transactions through any electronic mode including web transactions as may be permitted by SEBI or other regulatory authorities from time to time.

Unit Holders can also subscribe, redeem and switch (within SIF Investment Strategy), their units held in the Investment Strategy, in accordance with the terms and conditions of this Document, and also submit other service requests to the SIF through the website of the SIF.

The website of AMC/SIF will thus, be designated as an official point of acceptance of transactions for the Investment Strategy.

Unit Holders may note that transactions will be accepted/executed in accordance with and subject to the terms and conditions prescribed in this Document, and the terms and conditions of the facility as stipulated by the SIF/AMC from time to time, which include obtaining a Personal Identification Number ("PIN") and completing the requisite documentation.

d. Acceptance of financial transactions through email in respect of non-individual investors

As per AMFI Best Practice Guidelines No. 118/2024-25 dated January 31, 2025 regarding the acceptance of financial transactions via email from non-individual investors with effect from May 01, 2025, the following process shall be adhered to:

- Submission of Transactions via Email: Non-individual investors seeking to utilize this
  facility must submit a Board Resolution or Authority Letter, listing authorized officials along
  with their designations and official email IDs. The letter must explicitly confirm that financial
  instructions sent via email are binding on the entity.
- 2. Emailing the Transaction Form with Wet Signatures: Scanned copies of transaction request letters, duly signed in wet ink by authorized signatories, may be submitted via email.
- 3. Such requests shall be accepted only if the sender's email ID belongs to the entity's official domain and is copied (CC) to the authorized officials' registered email IDs.
- 4. Financial Transactions Submitted by Registered MFDs or Third Parties: Signed Financial transaction form or request letter, bearing wet signatures of authorized signatories, may be submitted via email by a registered eligible Distributor of the entity or a third party. The third party must possess an authorization letter from the non-individual unit holder, permitting the MFD or representative to submit scanned copies of signed transaction forms or requests on their behalf. Additionally, such email submission must be copied to the non-individual investor's registered email ID.

Terms and Conditions for Transacting via Electronic Mail:

- Investors must be aware of the risks involved in transacting through email, including those arising from electronic transmission failures, unauthorized access, or miscommunication.
- ii. The Asset Management Company (AMC) and Registrar & Transfer Agent (RTA) shall not be liable for any financial transaction that is either not received due to technical or transmission issues or is incomplete, and hence not processed.
- iii. Entities utilizing this facility must ensure adequate security measures to protect email communications, including encryption, access controls, and authentication mechanisms.
- iv. The entity availing this facility must maintain records of email-based financial transactions as per applicable laws and regulations.
- Any addition or deletion of authorized signatories must follow the prescribed procedure and be notified to the AMC through official documentation.
- vi. The non-individual investor must explicitly authorize the AMC/RTA to accept and process any email transmission from the registered email ID, including emails sent by a registered Distributor or a third party authorized by the investor to submit scanned transaction requests on their behalf.
- vii. Changes in bank details or addition of a bank account, change in registered email ID or contact details of an entity shall only be permitted through the prescribed service request form, duly signed by authorized signatories with wet signatures.
- viii. For the purpose of determining cut-off time of a transaction as prescribed by SEBI and as mentioned in this Document, the time of transaction as generated by the

webserver, shall be reckoned, and the transaction shall be processed accordingly. The webserver time shall be final and binding.

e. The application amount in cheque shall be payable to (Please see the Investment Strategy Information Document / Key Information Memorandum & Application Form of the respective Investment Strategy). The Cheques should be payable at the Centre where the application is lodged. No outstation cheques or stock invests will be accepted.

In case of subscription and redemption of units, Two-Factor Authentication (for online transactions) and signature method (for offline transactions) shall be used for authentication. One of the Factors for such Two-Factor Authentication for non-demat transaction shall be a One-Time Password sent to the unit holder at his/her email/ phone number registered with the AMC/RT. In case of demat transaction, process of Two-Factor authentication as laid down by the Depositories shall be followed. In case of mandates/systematic transactions the requirement of Two-Factor Authentication shall be applicable only at the time of registration of mandate/systematic transactions.

#### f. Bank Account Number:

Investors are advised to fill up the details of their bank account numbers on the application form in the space provided. In order to protect the interest of the Unit holders from fraudulent encashment of cheques, SEBI has made it mandatory for investors in mutual funds to state their bank account numbers in their applications.

g. Registration Of Bank Mandate For New Folio Creation

Investor are requested to note that, it is mandatory to submit any one of the following documents in case the pay-out bank account details (i.e. bank account for receipt of redemption / IDCW proceeds) mentioned in the application form is different from pay-in bank details (i.e., bank account from which subscription payment is being made):

- ✓ Original Cancelled cheque with first unit holder name and bank account number printed on the face of the cheque (or)
- ✓ Bank passbook or bank statement (with current entries not older than 3 months) containing the first unit holder name, bank mandate information and bank account number (or)
- ✓ A letter from bank on its letter head duly signed by bank manager/authorized personnel with bank seal, name, designation and employee number confirming the investor details and bank mandate information.

The above documents shall be submitted in original. If copies are furnished, the same must be submitted at any of the Official Point of Acceptance of the AMC where they will be verified with the original documents to the satisfaction of the Fund. The original documents will be returned across the counter to the applicant after due verification. In case the original of any document is not produced for verification, then the copies should be attested by the bank manager/authorized personnel by affixing the bank seal and mentioning the name, designation and employee code.

In the case of online transactions using the penny drop service, bank account validation is carried out. If there is a mismatch in the account holder's name, investors are requested to upload a copy of a cancelled cheque. The Registrar and Transfer Agent (RTA) will then verify

the submitted details. Based on the verification, the transaction will either be accepted or rejected.

The AMC/Trustee reserves the right to amend the aforesaid requirements.

# h. Registration of multiple bank accounts:

The AMC also provides a facility to the investors to register multiple bank accounts. Investor can register up to 5 bank accounts in case of individuals /HUFs, and up to 10 in other cases. Investor may choose one of the registered bank accounts as default bank account for the credit of redemption / IDCW proceeds. In case of existing investors, their existing bank mandate registered with the AMC / RTA, and in case of new investors, their bank account details as mentioned in the application form shall be treated as default bank account for payout, if they have not specifically designated a default bank account. Investors may change the same in writing, using the Multiple Bank Account Registration Form. By registering multiple bank accounts, investors can use any of the registered bank accounts to receive IDCW / redemption proceeds. These account details will be used by the AMC/ R&T for verification of instrument used for subscription to ensure that third party payments are not used for SIF subscription, except where permitted. Investors are requested to avail the facility of registering multiple bank accounts by filling in the Application Form for Registration of Multiple Bank Accounts available at the nearest Official Point of Acceptance of Transactions (OPAT) of the AMC or the same can be downloaded from our website <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a>.

In case the application for subscription does not comply with the above provisions, the AMC retains the sole and absolute discretion to reject / not to process such application and refund the subscription money and shall not be liable for any such rejection.

For registration of Multiple bank account investors are requested to submit

(i)proof of any one of the existing bank account(s) in the folio(s) AND

- (ii) Proof of all the new bank account(s) to be registered in the folio(s) along with the Multiple Bank Accounts Registration form. Investors can submit any one of the following document/s as supporting document/s for a bank account:
  - 1. A "CANCELLED" original cheque leaf (where the first holder's / investor's name and bank account number is printed on the face of the cheque)
  - 2. A copy of the bank pass book or bank statement (with entries not older than 3 months) wherein the first holder's / investor's name, bank a/c no & bank branch is clearly legible.
  - 3. A letter from the investor's bank on their letter head certifying the investor's bank account information viz. account holder's name and address, bank account number, bank branch, account type, MICR & IFSC code. The letter should be certified by an authorized official of the bank with his/her full signature, name, designation and bank seal.

Investors may produce photocopies of the above mentioned document/s along with the original document/s at any of the OPAT of the AMC for verification. The photocopies of such document/s will be verified with the original document/s to the satisfaction of the AMC / SIF and the original document/s will be returned to investors. In case the original of any document/s is not made available for verification, then the photocopies thereof duly attested by an authorized official of the bank clearly mentioning the name & designation with bank seal shall be accepted.

i. Updation / Change in the Bank mandate:

Investors request for change in bank mandate shall be carried out subject to adherence with following procedures:

- Unit holders will be required to submit a valid request for a change in bank account details
  along with a cancelled original cheque leaf of the new bank account as well as the bank
  account currently registered with the Mutual Fund. Unitholders should without fail cancel the
  cheque and write 'Cancelled' on the face of it to prevent any possible misuse.
- In case of non-availability of any of these documents, a copy of the bank pass book or a statement of bank account having the name and address of the account holder and account number.
- j. Registration / Change in Bank Account Details (CoB)

For registration of an investor's bank account details at the time of investment and/or registering of new/changed bank account details submitted either separately or together with any financial and/or non-financial transaction the documents as detailed below will need to be submitted by the investors alongwith the relevant application form / transaction slip / letter for processing of the COB requests:

- A cheque leaf (with the first holder's/applicant's name printed therein) of the new bank account with the words "CANCELLED" written in bold letters across the face of the cheque OR
- 2. Attested/Notarized photocopy of a blank cheque leaf (with the first holder's/ applicant's name printed therein) of the new bank mandate.
- 3. In case the first holder's / investor's name is not printed on the face of the cheque or if the new bank account does not provide a cheque book facility then such investors should furnish an attested / Notarized copy of the relevant page of the Pass Book of such bank account wherein the first holder's/investor's name and address is clearly legible.
- k. In case of Change of Address

Address to be updated in the KYC records and the details will be fetched from the respective KRA and updated in the folio .

1) In case of KYC complied folios, investors are requested to submit the supporting documents as specified by KYC Registration Agency (KRA) / Regulators from time to time.

Copies of all the documents submitted by the applicants/clients should be self-attested and accompanied by originals for verification. In case the original of any document is not produced for verification, then the copies should be properly attested / verified by entities authorized for attesting/verification of the documents.

In case, any request for Change in Bank Account Details or Change of address does not comply with the above requirements, the AMC retains the sole and absolute discretion to reject / not to process such request

2) In case of KYC non-complied folios: Following documents as detailed below will be required to be submitted for processing of the Change of Address requests. However, it is advisable to these investors to complete the KYC process.:

# i. <u>List of documents for Proof of Identity (POI)</u>

In case Permanent Account number (PAN) is already updated in the folio, only PAN card copy will be accepted as a proof of identity.

In case PAN is not updated in the folio, any of the following documents shall be submitted:

- PAN card with Photograph;
- Unique Identification Number (UID) / Passport / Voter ID / Driving License;
- Identity cards issued with Photo by: State / Central Government and its Depts, Statutory / Regulatory Authorities, Scheduled Commercial Banks etc.
- Aadhaar Letter issued by Unique Identification Authority of India (UIDAI).

#### List of documents for Proof of New Address (POA)

- Passport / Voter ID / Ration Card / Registered Lease or Sale Agreement of Residence / Driving License
- Utility bills like Telephone (land line), Electricity or Gas bill Not more than 3 months old
- Bank Account Statement / Passbook Not more than 3 months old
- Proof of Address issued by: State / Central Government and its Depts, Bank Managers
  of Scheduled Commercial Banks / Scheduled Co-Operative Bank / Multinational
  Foreign Banks Aadhaar Letter issued by Unique Identification Authority of India
  (UIDAI).

(Please note that the list of documents for Proof of Identity (POI) and Proof of New Address (POA) should be in conformity with SEBI circular no. MIRSD/SE/Cir-21/2011 dated October 5, 2011.)

I. SEBI has also made it mandatory for investors to mention their Permanent Account Number (PAN) / transacting in the units of Magnum SIF, irrespective of the amount of transaction. Submission of copy of PAN card is mandatory for all categories of investors (including NRIs, Guardian of a minor) for transacting in units of Investment Strategy of Magnum SIF. Attestation can be done by distributors / AMC staff etc. Submission of copy of PAN card by Guardian of a minor is mandatory for investments by minor whether copy of PAN of minor is provided or not.
-. The verification of PAN would be carried out with the Income tax database. In case of failure, communication would be sent to the customers to provide the correct PAN details or

communication from Income Tax authorities evidencing the validity of PAN. Such folios would be blocked for additional purchases and future SIP registrations till receipt of the above documents and verification with original. In case of web-based transactions, investors would be allowed to transact subject to PAN validation. Pursuant to implementation of Know Your Customer (KYC) norms under Prevention of Money Laundering Act, 2002 (PMLA) and in accordance with AMFI circular 35/MEM-COR/62/10-11 dated October 07, 2010 and communication under reference 35/MEM-COR/81/10-11 dated December 23, 2010, KYC Compliance has been made mandatory for all individual investor effective January 1, 2011, irrespective of the amount of investment.

m. Please refer to 'Legal Section' of the SAI.

It is mandatory to complete the KYC requirements for all unit holders, including for all joint holders and the guardian in case of folio of a minor investor. Accordingly, financial transactions (including purchases, redemptions, switches and all types of systematic plans) and nonfinancial requests will not be processed if the unit holders have not completed KYC requirements. Unit holders are advised to use the applicable CKYC & KYC Form for completing the KYC requirements and submit the form at the point of acceptance. Further, upon updation of PAN details with the KRA, the unit holders are requested to intimate us/our Registrar and Transfer Agent i.e. Computer Age Management Services Limited, their PAN information along with the folio details for updation in our records.

- n. Investors desirous of receiving the allotment of units in dematerialized ("demat") form will have to provide their demat account details in the application form.
- o. Investors are advised to retain the acknowledgement slip signed/ stamped by the collection centre where they submit the application.

# p. Applications Supported by Blocked Amount (ASBA) facility

In respect of New Fund Offer (NFO), 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)/Plan(s) of the Investment Strategy in the ASBA Application Form and following the procedure as prescribed in the form.

ASBA facility shall be provided to investors as a supplementary facility in addition to existing facility through cheques/s or any other mode of electronic payment for subscribing to the units of Investment Strategy during the New Fund Offer period. Please note that ASBA facility is purely optional and not mandatory.

ASBA is an application containing an authorization given by the Investor to block application money in his specified bank account towards the subscription of Units offered during the NFO of the Investment Strategy. If an investor is applying through ASBA facility, the application money towards the subscription of Units shall be debited from his specified bank account only if his/her application is selected for allotment of Units.

To avail of the ASBA Facility, an investor must be holding a Bank account with Self Certified Syndicate Bank (SCSB). SCSB means a banker to an issue registered with the SEBI, which offers the facility of ASBA. ASBA applications can be accepted only by SCSBs at their

designated branches, whose names appear on the list of SCSBs displayed in SEBI's website (http://www.sebi.gov.in/pmd/scsb.pdf).

The SCSB shall then block the application money in the bank account specified in the ASBA, on the basis of an authorization to this effect given by the account holder in the ASBA. The application money shall remain blocked in the bank account till the allotment of the issue or till withdrawal/rejection of the application, as the case may be. ASBA facility will be available to all the category of investors mentioned under "Who can invest" Section of the respective SID. An investor, who is eligible for ASBA facility, has the option of making application through ASBA or through the existing facility of applying with cheque / as mentioned in the ISID.

Investors should note that ASBA facility shall be made available to investors only for subscribing to the units of Investment Strategy during the New Fund Offer period.

#### SALIENT FEATURES OF ASBA FACILITY:

- a. An ASBA investor shall submit a duly filled up **ASBA Application form, physically or electronically**, to the SCSB with whom the bank accounts to be blocked, is maintained.
- (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 Investment Strategy of SIF authorising SCSB to block the application money in a bank account.
- b. Investors shall correctly mention the Bank Account number in the ASBA Application Form and ensure that funds equal to the application amount are available in the bank account maintained with the SCSB before submitting the same to the designated branch.
- c. Upon submission of an ASBA Form with the SCSB, whether in physical or electronic mode, investor shall be deemed to have agreed to block the entire application amount specified and authorized the Designated Branch to block such amount in the Bank Account.
- d. On the basis of an authorization given by the account holder in the ASBA application, the SCSB shall block the application money in the Bank Account specified in the ASBA application. The application money shall remain blocked in the Bank Account (till receipt of instructions for enabling allotment or till rejection as the case maybe).
- e. If the Bank Account specified in the ASBA application does not have sufficient credit balance to meet the application money, the ASBA application shall be rejected by the SCSB.
- f. The ASBA Form should not be accompanied by cheque, or any mode of payment other than authorisation to block application amount in the Bank Account.
- g. All grievances relating to the ASBA facility may be addressed to the AMC / Registrar to the Issue, with a copy to the SCSB, giving full details such as name, address of the applicant,

application amount blocked on application, bank account number and the Designated Branch or the collection centre of the SCSB where the ASBA Form was submitted by the Investor.

 ASBA facility extended to investors shall operate in accordance with the SEBI guidelines in force from time to time.

# q. Restriction on acceptance of Third-party payments

The AMC will not accept subscriptions with Third-Party payments except in the following exceptional situations:

- 1) Payment in respect of investments for minor investors from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian
- 2) Custodian on behalf of an FII or a client

"Third Party Payment" means payment made through an instrument issued from a bank account other than that of the first named applicant / investor mentioned in the application form. In case of payment instruments issued from a joint bank account, the first named applicant / investor must be one of the joint holders of the bank account from which the payment instrument is issued. Investors submitting their applications through the above mentioned 'exceptional cases' are required to comply with the following,

without which applications for subscriptions for units will be rejected / not processed / refunded.

- a) Mandatory KYC for Investor and the person making the payment.
- b) Declaration by the investor and person making the payment giving details of the bank account from which the payment is being made and the relationship with the beneficiary.
- c) Verifying the source of funds to ensure that funds have come from the drawers account only.
- d) The AMC shall adopt the following procedures to ascertain whether payments are third party payments and investors are therefore required to comply with the requirement mentioned herein below:

# Instructions / Guidelines for Third-Party payments:

- An investor at the time of his/her purchase of units must provide the details of his pay-in bank account (i.e. account from which a subscription payment is made) and his pay-out bank account (i.e. account into which IDCW / redemption proceeds are to be paid).
  - Please refer the paragraph of "multiple bank accounts" facility available to the investors to register multiple bank accounts.
- A pre-funded instrument issued by the bank against cash shall not be accepted for investments
- 3) If payment is made by RTGS, NEFT, Bank transfer, etc., an acknowledged copy of the instruction to the bank stating the bank account number from which the amount has been debited, must accompany the purchase application.

4) If payment is made through net banking, the AMC will endeavour to obtain the details of the bank account debited from the payment gateway service provider and match the same with the registered pay-in accounts. In case it is found that the payment is not made from a registered bank account or from an account not belonging to the first named unit holder, the AMC shall reject the transaction with due intimation to the investor.

# Safe mode of writing cheque:

In order to prevent frauds and misuse of payment instruments, investors are requested to make the payment instrument i.e. cheque, favouring as under:

1. " XYZ Scheme A/c - Permanent Account Number". For example: "Magnum Hybrid Long Short Fund A/c- ABCDE3456F"

OR

2. " XYZ Scheme A/c - First Investor Name". For example: " Magnum Hybrid Long Short Fund A/c – Ashok Kumar"

## A. Special Products / Facilities offered by the AMC / Investment Strategies:

#### The Investment Strategy offers following facilities on an ongoing basis:

#### 1. Systematic Investment Plan

For investors, the fund offers a Systematic Investment Plan (SIP) at all our Official point of acceptance of SBI MF's locations. Under this Facility, an investor can invest a fixed amount per frequency. This facility will help the investor to average out their cost of investment over a period of six months or one year and thus overcome the short-term fluctuations in the market.

SIP can be registered by the existing investor who has 'Minimum Investment Threshold' of Rs.10 Lakhs.

The Investment Strategy offers Daily, weekly, Monthly, Quarterly, Semi-Annual & Annual Systematic Investment Plan.

# a) Terms and conditions for Daily SIP are as follows:

- a. Minimum Investment Amount: INR 10000 and multiples of INR 1 thereafter. Minimum number of instalments would be 12.
- Investors enrolling for Daily SIP should select "As & when presented" as payment frequency in the OTM.

# b) Terms & conditions for Monthly, Quarterly, Semi-Annual and Annual Systematic investment plan are as follows:

- a. Monthly Minimum Rs. 10000 & in multiples of Re. 1 thereafter for minimum 12 months
- b. Quarterly Minimum Rs. 10000 & in multiples of Re. 1 thereafter for minimum 1 year
- c. Semi-annual and Annual Systematic Investment Plan Minimum amount of investment will be Rs. 60,000 and in multiples of Re.1 Minimum number of installments will be 2

## c) Weekly Systematic Investment Plan

The terms & conditions for the weekly SIP are as follows:

- a. Minimum amount for weekly SIP:
  - Rs. 10000 and in multiples of Re.1 thereafter with minimum number of 12 installments.
- b. Date based feature Weekly SIP will be done on 1st, 8th, 15th & 22nd of the month
- c. In case the date of SIP falls on a Non-Business Day, then the immediate following Business Day will be considered for the purpose of transfer.
- d. In Day based feature, investors may select any Day of the Week viz. Monday/ Tuesday/ Wednesday/ Thursday/ Friday on which Weekly SIP/STP/SWP instalment shall be processed and in case any of these days is a non-business day then the immediate next business day will be considered for processing.
- e. In case investor selects Weekly frequency and also selects both Day based and Date -based Weekly SIP, default will be considered as 'Day based Weekly SIP.
- f. In case investor selects Weekly frequency and does not select Day based or Date -based Weekly SIP, default will be considered as 'Day based Weekly SIP.
- g. If investor selects Day based Weekly SIP but does not mention 'Day' on which the Weekly SIP instalment to be processed, then 'Wednesday' will be considered as the default Day.
- h. In case start date is mentioned but end date is not mentioned, the application will be registered for perpetual period.

Default option between Daily, weekly, monthly, quarterly, semi-annual and annual SIP will be Monthly.

The Trustees / AMC reserve the right to modify or discontinue this facility at any time in future on prospective basis.

#### d) Any Day SIP' Facility

Under 'Any Day SIP facility', investor can register SIP for any day for the frequencies i.e. Monthly, Quarterly, Semi-Annual and Annual through electronic mode like OTM / Debit Mandate. Accordingly, under 'Any Day SIP facility', investors can select any date from 1st to 30th of a month as SIP date (for February, the last business day would be considered if SIP date selected is 29th & 30th of a month). Default SIP date will be 10th. In case the SIP due date is a Non Business Day, then the immediate following Business Day will be considered for SIP processing.

The AMC provides SIP debit facility through NACH participating banks and select direct debit banks

Completed application form, SIP debit mandate form and the first cheque should be submitted at least 20 days before the transaction date. Investors should mandatorily give a cheque for the first transaction drawn on the same bank account.

The application form, mandate form along with the cancelled cheque / photocopy of the cheque should be sent to Official point of acceptance of SBI MF.

Existing investors are required to submit only the SIP Debit mandate form indicating the existing folio number and the investment details as in the SIP debit form along with the first cheque and the Cancelled cheque / Photocopy of the cheque.

# 2. Systematic Withdrawal Plan

Under SWP, a minimum amount of Rs.1,00,000/- can be withdrawn every month or quarter or weekly or half yearly or on an annual basis by indicating in the application form or by issuing

advance instructions to the Registrar at any time. Investors may indicate the month and year from which SWP should commence along with the frequency. SWP can be processed on any day of the month in case of all the other frequencies other than weekly SWP and 1st / 8th / 15th / 22nd of every month in case of Weekly SWP (date based feature) and payment would be credited to the registered bank mandate account of the investor through Direct Credit or cheques would be issued. In case any of these days is a nonbusiness day then the immediately next business day will be considered.

If no date is mentioned, 10th will be considered as the default date.

In Day based feature, investors may select Monday/ Thursday on which Weekly SWP instalment shall be processed.

In case investor selects Weekly frequency and also selects both Day based and Date -based Weekly SWP, default will be considered as 'Day based Weekly SWP'.

In case investor selects Weekly frequency and does not select Day based or Date -based Weekly SWP, default will be considered as 'Day based Weekly SWP'.

If investor selects Day based Weekly SWP but does not mention 'Day' on which the Weekly SWP instalment to be processed, then 'Monday will be considered as the default Day.

If no frequency mentioned, 'Monthly' will be considered as the default frequency. If 'End date' not mentioned, the same will be considered as 'Perpetual'.

SWP entails redemption of certain number of Unit that represents the amount withdrawn. Thus it will be treated as capital gains for tax purposes. The complete application form for enrolment / termination for SWP should be submitted, at least 10 days prior to the desired commencement/ termination date.

SWP transaction will be processed on the following Monday or Thursday of the SWP date opted by the investor, as the redemption is allowed only on Monday and Thursday.

Note: If Monday / Thursday falls on non-business day, then the next business day's NAV would be considered for transaction processing.

Any Day SWP' Facility - Under 'Any Day SWP facility', investor can register SWP for any day for the frequencies i.e. Monthly, Quarterly, Semi-Annual and Annual. Accordingly, under 'Any Day SWP facility', investors can select any date from 1st to 30th of a month as SWP date (for February, the last business day would be considered if SWP date selected is 29th & 30th of a month). In case the SWP due date is a Non Business Day, then the immediate following Business Day will be considered for SWP processing. For weekly frequency, SWP will continue to remain available only on 1st / 8th / 15th / 22nd of every month.

#### Switchover facility

Unit holders under the Investment Strategy will have the facility of switchover between the two Options in the Investment Strategy at NAV. Switchovers would be at par with redemption from the outgoing option/Plan/scheme and would attract the applicable tax provisions and load at the time of switchover.

Switch requests received after Thursday 3.00 PM till Monday 3.00 PM would be considered for processing with Monday NAV, and switch requests received after Monday 3.00 PM till Thursday 3.00 PM would be processed with Thursday NAV.

Note: If Monday / Thursday falls on non-business day, then the next business day's NAV would be considered for transaction processing.

# SIP Pause facility

Under SIP pause facility, the investor shall have option to discontinue their SIP temporarily for specific number of instalments. The terms and conditions of SIP Pause facility shall be as follows:

- Investors can pause their SIP at any time by filling SIP pause form and submitting the same at any branch of SBIMF/CAMS. Pause request should be received 15 days prior to the subsequent SIP date.
- 2. SIP Pause facility is available for SIP registration with Weekly, Monthly, Quarterly, Semi-Annual, and Annual frequency.
- 3. SIP shall restart immediately after the completion of Pause period.
- 4. SIP Pause facility will allow investor to 'Pause' their existing SIP during the tenure of SIP across all frequencies for a period upto one year. The actual number of instalments that will get paused will be as per the SIP frequency.
- 5. Investors can avail this facility multiple times in the tenure of the existing SIP.
- 6. SIP Pause facility will not be available for the SIPs sourced/registered through MFU, Exchange & Channel platforms as the mandate is registered by them.
- 7. In case of multiple SIPs registered in a Investment Strategy, SIP Pause facility will be made applicable only for those SIP instalments whose SIP date, frequency, amount and Investment Strategy /Plan is specified in the form. Further for different or multiple SIP mandate in the same Investment Strategy, separate SIP Pause Forms are required to be submitted for each SIP mandate.
- 8. The AMC reserves the right to terminate this facility or modify the conditions of the SIP Pause facility at its discretion.
- 9. In case of discrepancies in the information provided in the SIP Pause Form and the details registered with the AMC, the details registered with the AMC shall be considered for processing or in case of ambiguity in the SIP Pause Form, the AMC reserves the right to reject the SIP Pause Form.
- 10. Investor cannot cancel the SIP Pause once registered.

The Trustees / AMC reserves the right to modify or discontinue any facility at any time in future on prospective basis.

## Who Can Invest:

Prospective investors are advised to satisfy themselves that they are not prohibited by any law governing such entity and any Indian law from investing in the Investment Strategy and are authorized to purchase units of Investment Strategy under the SIF as per their respective constitutions, charter documents, corporate / other authorisations and relevant statutory provisions.

The following is an indicative list of persons who are generally eligible and may apply for subscription to the Units of the Investment Strategy under the SIF:

- Indian resident adult individuals, either singly or jointly (not exceeding three);
- Minor through parent / lawful guardian; (please see the note below)
- Companies, bodies corporate, public sector undertakings, association of persons or bodies of individuals and societies registered under the Societies Registration Act, 1860;
- Religious and Charitable Trusts, Wakfs or endowments of private trusts (subject to receipt of necessary approvals as required) and Private Trusts authorised to invest in mutual fund schemes under their trust deeds;
- Partnership Firms constituted under the Partnership Act, 1932;
- A Hindu Undivided Family (HUF) through its Karta;
- Banks (including Co-operative Banks and Regional Rural Banks) and Financial Institutions;
- Non-Resident Indians (NRIs) / Persons of Indian Origin (PIO) on full repatriation basis or on non-repatriation basis.
- Prospective investors are advised to note that the ISID / SAI does not constitute distribution, an offer to buy or sell or solicitation of an offer to buy or sell Units of the SIF in any jurisdiction

in which such distribution, sale or offer is not authorized as per applicable law. Any investor by making investment in Magnum SIF confirms that he is an eligible investor to make such investment(s) and confirms that such investment(s) has been made in accordance with applicable law:

- Foreign Portfolio Investor
- Army, Air Force, Navy and other para-military funds and eligible institutions;
- Scientific and Industrial Research Organisations;
- Provident / Pension / Gratuity and such other Funds as and when permitted to invest;
- International Multilateral Agencies approved by the Government of India / RBI; and
- The Trustee, AMC or Sponsor or their associates (if eligible and permitted under prevailing laws).
- A Mutual Fund through its schemes, including Fund of Funds schemes.
- Such other individuals, entities etc. as may be decided by the SIF / Trustees from time to time, so long as wherever applicable they are in conformity with applicable laws / Regulations

Note: Following is the process for investments made in the name of a Minor through a Guardian

- Payment for investment by means of Cheque or any other mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian.
- SIF will send an intimation to Unit holders advising the minor (on attaining majority) to submit an application form along with prescribed documents to change the status of the account from 'minor' to 'major'.
- All transactions / standing instructions / systematic transactions etc. will be suspended i.e. the Folio will be frozen for operation by the guardian from the date of beneficiary child completing 18 years of age, till the status of the minor is changed to major. Upon the minor attaining the status of major, the minor in whose name the investment was made, shall be required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new bank account.
- No investments (lumpsum/SIP/ switch in/ STP in etc.) in the Investment Strategy would be allowed once the minor attains majority i.e. 18 years of age.

## Notes:

- Non Resident Indians and Persons of Indian Origin residing abroad (NRIs) / Foreign Portfolio Investors (FPIs) have been granted a general permission by Reserve Bank of India [Schedule 5 of the Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulations, 2000 for investing in / redeeming units of the mutual funds subject to conditions set out in the aforesaid regulations.
- 2. In case of application under a Power of Attorney or by a limited company or a corporate body or an eligible institution or a registered society or a trust fund, the original Power of Attorney or a certified true copy duly notarised or the relevant resolution or authority to make the application as the case may be, or duly notarised copy thereof, alongwith a certified copy of the Memorandum and Articles of Association and/or bye-laws and / or trust deed and / or partnership deed and Certificate of Registration should be submitted. The officials should sign the application under their official designation. A list of specimen signatures of the authorised officials, duly certified / attested should also be attached to the Application Form. In case of a Trust / Fund it shall submit a resolution from the Trustee(s) authorizing such purchases. Applications not complying with the above are liable to be rejected.

Returned cheques are liable not to be presented again for collection, and the accompanying application forms are liable to be rejected.

#### Who cannot invest:

It should be noted that the following entities cannot invest in the Investment Strategy:

- 1. Any individual who is a Foreign National, except for Non –Resident Indians and Persons of Indian Origin (who are not residents of United States of America or Canada), provided such Foreign National has procured all the relevant regulatory approvals applicable and has complied with all applicable laws, including but not limited to and pertaining to anti money laundering, know your customer (KYC), income tax, foreign exchange management (the Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder), in the sole discretion and to the sole satisfaction of SBI Funds Management Limited. SBI Funds Management Limited in its capacity as an asset manager to the Magnum SIF reserves the right to amend/terminate this facility at any time, keeping in view business/operational exigencies.
- 2. Overseas Corporate Bodies (OCBs) shall not be allowed to invest in the Investment Strategy. These would be firms and societies which are held directly or indirectly but ultimately to the extent of at least 60% by NRIs and trusts in which at least 60% of the beneficial interest is similarly held irrevocably by such persons (OCBs)
- 3. Residents of United States of America and Canada.
- 4. Such other persons as may be specified by AMC from time to time

SBIMFTCPL reserves the right to include / exclude new / existing categories of investors to invest in the Investment Strategy from time to time, subject to SEBI Regulations and other prevailing statutory regulations, if any.

Subject to the Regulations, any application for Units may be accepted or rejected in the sole and absolute discretion of the Trustee. For example, the Trustee may reject any application for the Purchase of Units if the application is invalid or incomplete or if, in its opinion, increasing the size of any or all of the Investment Strategy 's Unit capital is not in the general interest of the Unit holders, or if the Trustee for any other reason does not believe that it would be in the best interest of the Investment Strategy or its Unit holders to accept such an application.

The AMC / Trustee may need to obtain from the investor verification of identity or such other details relating to a subscription for Units as may be required under any applicable law, which may result in delay in processing the application. Applications not complete in any respect are liable to be rejected.

## Joint Applicants

In the event an account has more than one registered owner, the first-named holder shall receive the Account Statements, all notices and correspondence with respect to the Account, as well as the proceeds of any redemption requests or IDCWs or other distributions. In addition, such Unit holders shall have the voting rights, as permitted, associated with such units, as per the applicable guidelines. Applicants can specify the 'mode of holding' in the application form as 'Joint' or 'Any one or Survivor'. In the case of holding specified as 'Joint', Redemptions would have to be signed by all joint holders in the same order as registered with the SIF. However, in cases of holding specified as 'Anyone or Survivor', any one of the Unit holders will have the power to make Redemption requests, without it being necessary for all the Unit holders to sign. However, in all cases, the proceeds of the Redemption will be paid only to the first-named holder. The SIF/AMC shall have no liability in this regard to any other Unitholder other than the first named holder of Units.

Investors are also requested to note that when subscription for mutual fund units are remitted through joint bank accounts of investors, the default option for applying for mutual funds unit should be in the joint names of all the account holders of the bank account

# B. Default scenarios available to the investors under Growth / dividend plans of the Investment Strategies.

The Investment Strategy to be launched under SIF would have two plans viz. Regular plan & Direct plan.

#### Direct Plan:

Direct Plan is only for investors who purchase /subscribe Units in a Investment Strategy directly with the Mutual Fund or through Registered Investment Advisor (RIA) and is not available for investors who route their investments through a Distributor. All the features of the Direct Plan under Investment Strategy like the investment objective, asset allocation pattern, investment strategy, risk factors, facilities offered, load structure etc. will be the same except for a lower expense ratio as detailed in **Section - Annual Recurring Expenses** of the ISID. Brokerage/Commission paid to distributors will not be paid / charged under the Direct Plan. Both the plans shall have a common portfolio.

**Eligible investors:** All categories of investors as permitted under the Investment Strategy Information Document of the Investment Strategy are eligible to subscribe under Direct Plan

**Modes for applying:** Investments under Direct Plan can be made through various modes offered by the SIF for investing directly with the SIF.

#### How to apply:

- Investors desirous of subscribing under Direct Plan of a Investment Strategy will have to ensure to indicate "Direct Plan" against the Investment Strategy name in the application form.
- Investors should also indicate "Direct" in the ARN column of the application form.

#### Regular Plan:

This plan is intended for investors who wish to route their investments through a distributor registered with AMFI. The distributor, including their employees, must have successfully completed the National Institute of Securities Markets (NISM) Series-XIII: Common Derivatives Certification Examination.

In case of Regular and Direct plan the default plan under following scenarios will be:

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

In cases of wrong/ invalid/ incomplete ARN codes mentioned on the application form, the application shall be processed under Direct Plan.

Both plans provide two options for investment – Growth Option and Income Distribution cum capital withdrawal (IDCW) Option. Under the IDCW option, facility for Payout of Income Distribution cum capital withdrawal option (IDCW Payout), Reinvestment of Income Distribution cum capital

withdrawal option (IDCW Re-investment) is available. Between "Growth" or "IDCW" option, the default will be treated as "Growth". In "IDCW" option between "IDCW Payout" or "IDCW Reinvestment" or the default will be treated as "IDCW Reinvestment".

Investor can select only one option either IDCW payout or IDCW Reinvestment or in IDCW plan at a Investment Strategy and folio level. Any subsequent request for change in IDCW option viz. IDCW Payout to IDCW Reinvestment or or vice-versa would be processed at the Folio / Investment Strategy level and not at individual transaction level. Accordingly, any change in IDCW option (payout / reinvestment) will reflect for all the units held under the Investment Strategy / folio.

Note - If the payable IDCW amount is less than or equal to Rs. 150/-, the same will be compulsorily reinvested in the respective Investment Strategy (s)/Plan(s)/Option(s) irrespective of the IDCW facility selected by investor. If the IDCW amount payable is greater than Rs. 150/- then it will be either reinvested or paid as per the mandate selected by the investor

#### 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 a scheme in terms of clause (a) of sub regulation (2) of regulation 39 of SEBI (Mutual Funds) Regulations, 1996 or prematurely redeem the units of a close ended scheme.

- 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 sub-regulation (26) of regulation 25 of SEBI (Mutual Funds) Regulations, 1996.
- 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 SBI 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.
- 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.

# Annual Report/ Abridged summary:

Investment Strategy wise Annual Report or an abridged summary thereof shall be provided to all unitholders within four months from the date of closure of the relevant accounts year i.e. 31st March each year as follows:

- 1. The Investment Strategy wise annual report / abridged summary thereof shall be hosted on website of the Fund i.e., <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a>. The physical copy of the Investment Strategy -wise annual report or abridged summary shall be made available to the unitholders at the registered office of the AMC at all times.
- 2. The Investment Strategy annual report or an abridged summary thereof shall be emailed to those unitholders whose email addresses are registered with the Fund.
- 3. The AMC shall publish an advertisement on annual basis, in the all India edition of at least two daily newspapers, one each in English and Hindi; disclosing the hosting of the Investment Strategy wise annual report on its website viz. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and on the website of AMFI i.e. <a href="https://www.amfiindia.com">www.amfiindia.com</a> and the modes through which a written request can be submitted by the unitholder for obtaining a physical or electronic copy of the Investment Strategy -wise annual report or abridged summary.
- 4. The AMC shall provide physical copy of the abridged summary of the Annual report, without charging any cost, on receipt of a specific request from the unitholder.

### Defective applications liable for rejection

Applications not complete in any respect are liable to be rejected.

#### **Employee Unique identity Number:**

Pursuant to Securities and Exchange Board of India (SEBI) master circular numberSEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, investor/s shall have the provision in the application / transaction form to specify the Employee unique identity number (EUIN) of the employee/relationship manager/sales person (sales person) of the distributor interacting with the investor/s for the sale of SIF products, along with the Association of Mutual Fund in India (AMFI) Registration Number (ARN) of the distributor. The distributor, including their employees, must have successfully completed the National Institute of Securities Markets (NISM) Series-XIII: Common Derivatives Certification Examination.

Investors are hereby requested to note the following with respect to EUIN:

- 1. AMFI has allotted EUIN to all the sales person of AMFI registered distributors.
- 2. Investor/s shall specify the valid ARN code, and the valid EUIN of the 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.
- 3. Individual ARN holders including senior citizens distributing mutual fund products are also required to obtain and quote EUIN in the Application Form.

Hence, if your investments are routed through a distributor please ensure that the EUIN is correctly filled up in the Application Form. However, if your distributor has not given you any advice pertaining to the investment, the EUIN box may be left blank. In this case, you are required to provide a duly signed declaration to this effect that EUIN space has been left blank as the transaction is an 'execution only' transaction, as given in the Form.

Investors are requested to use the new application /transaction forms which have space for sub-broker ARN code and EUIN.

# Option to hold units in Demat form

Pursuant to SEBI master circular No.SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the unit holders who wish to hold the units in the demat form, should mention the demat account details of the first holder in the application form while subscribing for units and submit other necessary documents. In case if the demat details are not mentioned or details mentioned are incorrect, then the units will be issued in physical form. Investors may use the forms available at the branches for providing demat details, while subscription.

Investors are requested to note that holding of units through Demat Option is also available under all open-ended equity and debt schemes wherein SIP facility is available. The units will be allotted based on the applicable NAV as per the ISID and will be credited to investors' demat account on weekly basis upon realization of funds. The option to hold the units in demat form shall not be available for daily/weekly/fortnightly IDCW options.

Unitholders who intend to avail of the facility to trade in units in demat mode are required to have a demat account.

The investors shall note that for holding the units in demat form, the provisions laid in the Investment Strategy Information Document (ISID) of respective Investment Strategy and

guidelines/procedural requirements as laid by the Depositories (NSDL/CDSL) shall be applicable.

In case the unit holder wishes to convert the units held in non-demat mode to demat mode or vice versa at a later date, such request along with the necessary form should be submitted to their Depository Participant(s).

Units held in demat form will be freely transferable, subject to the applicable regulations and the guidelines as may be amended from time to time.

<u>NOTE</u> - Investors transacting through MFSS / BSE StAR MF Platform under the electronic order collection system for schemes which are unlisted and Stock Exchange(s) for the listed schemes will have to comply with norms / rules as prescribed by the Stock Exchange(s).

# Implementation of the Prevention of Money-laundering (Maintenance of Records) Second Amendment Rules, 2017 with respect to seeding of Aadhaar number:

The Ministry of Finance (Department of Revenue) in consultation with the Reserve Bank of India has made certain amendments to the Prevention of Money-laundering (Maintenance of Records) Rules, 2005, namely, the Prevention of Money-laundering (Maintenance of Records) Second Amendment Rules, 2017. These Rules have come into force with effect from June 1, 2017. These Rules, inter alia, make it mandatory for investors to submit Aadhaar number issued by the Unique Identification Authority of India (UIDAI) in respect of their investments.

Accordingly, investors are requested to note the following requirements in relation to submission of Aadhaar number and other prescribed details to SBI Mutual Fund ("the Fund"/its Registrar and Transfer Agent viz. Computer Age Management Services Ltd. / SBI Funds Management Limited ("the AMC"):

i. Where the investor is an individual, who is eligible to be enrolled for Aadhaar number, the investor is required to submit the Aadhaar number issued by UIDAI. Where the Aadhaar number has not been assigned to an investor, the investor is required to submit proof of application of enrolment for Aadhaar. If such an individual investor is not eligible to be enrolled for Aadhaar number, and in case the Permanent Account Number (PAN) is not submitted, the investor shall submit one certified copy of an officially valid document containing details of his identity and address and one recent photograph along with such other details as may be required by the Fund.

The investor is required to submit PAN as defined in the Income Tax Rules, 1962.

ii. Where the investor is a non-individual, apart from the constitution documents, Aadhaar numbers and PANs as defined in Income-tax Rules, 1962 of managers, officers or employees or persons holding an attorney to transact on the investor's behalf is required to be submitted. Where an Aadhaar number has not been assigned, proof of application towards enrolment for Aadhaar is required to be submitted and in case PAN is not submitted an officially valid document is required to be submitted. If a person holding an authority to transact on behalf of such an entity is not eligible to be enrolled for Aadhaar and does not submit the PAN, certified copy of an officially valid document containing details of identity, address, photograph and such other documents as prescribed by AMC / the Fund is required to be submitted.

Where the investors who are individuals or in the case of investors who are non-individuals, managers, officers or employees or persons holding an attorney to transact on the investor's behalf, as the case may be, do not have an Aadhaar number, the proof of enrolment for Aadhaar can be submitted. However, in such cases, the Aadhaar number shall be required to be provided for eventual authentication within the prescribed timeframe of 6 months, failing which the account / folio shall cease to be operational.

Further, as per PML notification dated March 31, 2018 issued by Department of Revenue, Ministry of Finance pursuant to the interim order dated March 13, 2018 of Hon'ble Supreme Court, the Central Government has extended the date of submission of Aadhaar Number, and Permanent Account Number or Form 60 till a date to be notified subsequent to pronouncement of final judgment in W.P. (C) 494/2012 etc.

Further, pursuant to the notification on Prevention of Money-laundering (Maintenance of Records) Amendment Rules, 2019 dated February 14, 2019, Aadhaar can be accepted as a valid document for proof of address or proof of identity, provided the investor redact or blackout his Aadhaar number while submitting the aplications for investments and SEBI circular SEBI/HO/MIRSD/DOP/CIR/P/2019/123 dated November 05, 2019 has stated that entities in the securities market, as may be notified by the Central Government, shall be allowed to undertake Aadhaar Authentication under section 11A of the PMLA.

At present, SBIFML has rendered the services of an RTA for Aadhaar authentication services of UIDAI under section 11A of the Prevention of Money-laundering Act, 2002.

SEBI vide its circular dated April 24, 2020, has laid down the guidelines for performing online KYC. Accordingly, Online KYC process for establishing account-based relationship with the Investor, KYC can be completed through online / App based KYC, in-person verification through video, online submission of Officially Valid Document (OVD) / other documents under e-Sign.

SBIFML shall obtain the express consent of the investor before undertaking online KYC. The fund shall follow the following guidelines in respect of online KYC on accordance with SEBI Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2020/73 dated April 24, 2020. —

The aforesaid guidelines will be subject to change as per the directives issued by the concerned regulatory/government authority from time to time.

It may be noted that the requirement of submitting Form 60 as prescribed in the aforesaid notification is not applicable for investment in mutual fund units.

## VIII. INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS

The AMC has in place investment Valuation Policy for valuation of investments made by the scheme(s) of SBI Mutual Fund in accordance with the investment valuation norms specified in the Eighth Schedule of SEBI (Mutual Funds) Regulations, 1996. The policy is also applicable to the Investment Strategies of the Magnum SIF.

The investment Valuation Policy aims to provide broad valuation guidelines / methodologies to be followed for valuing each type of securities / assets held by the Investment Strategy. The assets held by the Investment Strategy 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.

## A. 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 Operating Officer
- Chief Investment Officer
- Chief Risk Officer
- Head Compliance & Company Secretary
- Head Operations
- Fund Managers
- Designated Officers from Risk, Investments, Compliance and 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

## **B.** 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 an Independent Auditor:** The valuation policies and procedures shall be regularly reviewed (at least once in a Financials Year) by an independent auditor to ensure their continued appropriateness.

**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 and by an Independent Auditor along with the changes / development in the valuation policies at least once in a Financials Year.

# C. 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 the physical papers.

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
- 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
- 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

- On a valuation day, traded securities are to be valued at the last quoted closing price on the principal stock exchange.
- 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:

Based on the latest available Balance Sheet, Net Worth shall be calculated as follows:

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.

- ii) 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.
- 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 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:
  - 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
  - 3.
  - 4. rrants and Options.
  - 5. 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

 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 Shares acquired / allotted with lock-in period

In case of shares under lock-in for more than 3 months:

- (a) from the date of purchase, in case of shares already listed on the date of purchase;
- (b) from the date of IPO allotment, in case of shares acquired under Private Placement or under Pre-IPO:

The shares would be valued as per the valuation guidelines applicable to Traded and Thinly Traded / Non-Traded equity shares, further appropriate discount for illiquidity may be applied by Valuation Committee on case to case basis.

## 2.10 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.

## 2.11 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.

# 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

- 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) 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 demerger 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.

- 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 exdate 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

 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 C.
- iii)
- iv) mittee.
- v) 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.
- vi) 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.
- vii) 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

- 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 price provided by an independent valuation agency(ies) or at latest NAV declared by Investment managers of the trust, 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:

- 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

- 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:

- 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 halfyearly portfolio statements, AMCs shall also provide the exact link to their website for accessing the information mentioned at paragraph (C) above.

# 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.

# AMC right to deviate from the indicative haircut and/or the valuation price provided by the valuation agencies

- f) 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:
  - 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

- g) The indicative haircut that has been applied to the principal should be applied to any accrued interest.
- h) 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.

## Treatment of any future recovery in terms of principal or interest

- j) 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.
- k) 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.

# Disclosure in portfolio statement

- I) An asterisk mark / suitable mark should be given against money market and debt securities which are rated "Below Investment Grade" or "Default".
- m) 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%
В	25%	40%	50%
С	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%
В	50%	50%	50%
С	70%	70%	70%
D	100%	100%	100%

# 11. 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:**

Inter-scheme transfer of equity securities would be effected at the prevailing spot market price of the security at the time the transfer is effected.

For this purpose, at the time of effecting the inter-scheme transfer, a record of the prices for the security quoted in the relative stock exchange (i.e. NSE/BSE) or Bloomberg Terminal in which it is traded or reported would be obtained, which would indicate the date, time and the currently quoted price. The price given in the quotation of the stock exchange would be the effective price for the inter-scheme transfer.

## 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.

# 12. Valuation of Mutual Fund Units / Alternative Investment Fund (AIF) Units (including units of ETF)

## 12.1 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.

#### 12.2 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.

## 13. 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

## 14. 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.

# 15. Valuation of Fixed Deposits

Fixed Deposits will be valued at cost. Interest on Fixed Deposits will be accrued daily.

#### 16. 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;
- 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.

## 17. 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.

#### 18. 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;
- 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.

## 19. 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".

# 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

ill 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.

## 21. 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.

## IX. 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. Subsequently, the 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:

Market or Fair Value of Investment Strategy's investments + Current Assets - Current Liabilities and Provision

NAV = -----No of Units outstanding under Investment Strategy on the Valuation Date

IAV/ will be displaced as preseribed under CERI (Mutual Funds) Regulations, 1000, NAV/ can a

NAV will be disclosed as prescribed under SEBI (Mutual Funds) Regulations, 1996. NAV can also be viewed on Website <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and www.amfiindia.com.

The AMC shall update the NAVs on the website of Association of Mutual Funds in India - AMFI (<a href="www.amfiindia.com">www.amfiindia.com</a>) and website of the Fund i.e. on <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> by 11.00 p.m. on business day basis.

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

Further, as per SEBI Regulations, the repurchase price shall not be lower than 95% of the NAV

## B. Policy for computation of NAV in foreign securities

Whenever the Investment Strategy also invests in foreign securities, the NAVs of Investment Strategy for those business days will be disclosed on our website <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> on the website of AMFI by 10:00 a.m. of the following business day in line with Paragraph 8.2 of SEBI Master Circular for Mutual Funds dated June 27, 2024. In case of non-availability of price/valuation for the underlying overseas investments before aforementioned 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/Funds 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 Fund shall issue a press release providing reasons and explaining when the Fund would be able to publish the NAVs.

# X. TAX & LEGAL & GENERAL INFORMATION

## A. Taxation on investing in SIF

This section shall disclose the applicable tax provisions for Mutual Fund and for investments in Specialised Investment Fund (SIF) Investment Strategy.

## Tax treatment for Investors (unit holders) and the Mutual Fund

The taxability of any income of a mutual fund and income from investments in Specialised Investment Fund (SIF) in the hands of the investors (unitholders) is subject to the provisions of the Indian Income-tax Act, 1961, the Income-tax Rules, 1962 and the circulars and notifications issued thereunder. The information provided below summarizes the tax implications of various incomes in the hands of the investors (unit holders) as well as the Mutual Fund, as amended vide

Finance Act 2025 presently in force in India as at the date of this document. Special reference needs to be made in respect of provisions related to tax on income distributions from mutual funds, capital gains, business income and all other relevant provisions of the Income-tax Act, 1961. Provisions related to tax deduction at source ("TDS") shall also apply, wherever applicable.

#### Note:

The tax benefits described in this document are available under the present taxation laws and are subject to fulfillment of stipulated conditions. The information given is included only for general purpose and is based on the law and practice currently in force in India. Investors should be aware that the relevant fiscal rules or their interpretation may change. In view of the individual nature of tax implications, each investor is advised to consult his/her own tax advisor to understand the tax implications arising out of their transactions.

## FOR SBI MUTUAL FUND:

## 1. Registered with SEBI

SBI Mutual Fund ("SBI MF") is registered with Securities and Exchange Board of India (SEBI) and is as such eligible for benefits u/s. 10(23D) of the Income-tax Act, 1961. Accordingly, the entire income of SBI MF is exempt from income-tax.

## 2. No tax deducted at source (TDS) on receipt of income

SBI MF will receive all its income without deduction of tax at source as per provisions of Section 196 of the Income-tax Act, 1961.

## 3. Goods and Service Tax (GST)

The services provided by mutual fund agent/distributor to a mutual fund or asset management company, are taxable under forward charge. Accordingly, GST in respect of mutual fund agents and mutual fund distributor's services shall be paid by the agent or, as the case may be, by the distributor being service providers. Under the current applicable GST regime, the rate of GST is 18%.

## FOR INVESTORS (UNIT HOLDERS):

## 1. INCOME DISTRIBUTION IN RESPECT OF UNITS

With effect from April 1, 2020, income distributed by a mutual fund in respect of units of SIF is taxable in the hands of the unitholders at normal tax rates (plus applicable surcharge and cess\$).

In case of resident unitholders, the standard rate of TDS is 10% on income distributed in excess of Rs.10,000 by a mutual fund.

In case of non-resident unitholders, TDS is applicable at lower of 20%\$ or rate of income-tax provided in relevant Double Taxation Avoidance Agreement ('DTAA') read with CBDT Circular no. 3/2022 dated 3rd February 2022, provided such investor furnishes valid Tax Residency Certificate (TRC) for concerned FY. Please note that grant of DTAA benefit, if any, is subject to fulfilment of stipulated conditions under the provisions of the Income-tax Act, 1961 and the relevant DTAA as well as interpretation of relevant Article of such DTAA.

In case PAN is not furnished or PAN is inoperative, then TDS as per Section 206AA of the Income-tax Act, 1961 would apply (higher of specified rate or rates in force or 20%), subject to Rule 37BC of the Income-tax Rules, 1962. In case unitholder has PAN Exempted KYC Reference Number ('PEKRN'), this would be considered as 'PAN not available' and TDS would apply at higher rates as per Section 206AA of the Income-tax Act, 1961.

(\$) Refer Point no.3 below for rates of Surcharge & Health & Education Cess

# 2. CAPITAL GAINS

The tax implications on SIF are determined based on:

- i. the type of SIF (equity, debt or hybrid); and
- ii. the holding period (from date of acquisition up to the date of the redemption/transfer)

Sr. No.	Asset Class	Period of Holding to qualify as Long Term	Long Term Capital Gains	Short Term Capital Gains	
(A)	Equity Oriented Investment Strategies (Invest in Equity & Equity related instruments) *			uity related	
	Equity Long-Short Fund (>/= 80%)		12.50% <sup>\$ #</sup> on gains exceeding Rs.1,25,000 in a		
	Equity Ex-Top 100 Long-Short Fund (>/= 65%)	More than 12 months	year (without indexation	20%\$#	
	Sector Rotation Long-Short Fund (>/= 80%)		benefit)		
(B)	Debt Oriented Investment Strategies (Invest in Debt Instruments)**				
	Debt Long-Short Fund & Sectoral Debt Long-Short Fund	Deemed Short Term irrespective of holding period	Not Applicable	Slab Rates <sup>\$#</sup>	
(C)	Hybrid Investment Strategies				
	Active Asset Allocator Long-Short Fund & Hybrid Long-Short Fund				
	(i) if >/= 65% is invested in listed domestic equities	More than 12 months	12.50% <sup>\$ #</sup> on gains exceeding Rs.1,25,000 in a year (without indexation benefit)	20%\$#	
	(ii) if > 65% is invested in debt instruments	Deemed Short Term irrespective of holding period	Not Applicable	Slab Rates <sup>\$#</sup>	
	(iii) if < 65% is invested in listed domestic equities and debt instruments	More than 24 months	12.50% \$ #  (Without indexation and foreign exchange fluctuation benefit)	Slab Rates <sup>\$#</sup>	

<sup>(\*)</sup> An Equity-Oriented Fund ('Equity Fund') refers to a scheme of a Mutual Fund wherein a 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 units of another fund which is traded on a recognised stock exchange 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.

- (\*\*) Specified Mutual Funds: As per Section 50AA of the Income-tax Act, 1961, investments in Specified Mutual Funds on or after April 1, 2023 shall be deemed to be short term capital assets irrespective of holding period. From 1st April 2025 onwards, 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.
- (\$) Refer Point no.3 below for rates of Surcharge & Health & Education Cess
- (#) 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 2025 at the time of redemption of units in case of Non-Resident investors (other than FIIs) only. Please note that grant of DTAA benefit, if any, is subject to fulfilment of stipulated conditions under the provisions of the Income-tax Act, 1961 and the relevant DTAA as well as interpretation of relevant Article of such DTAA.

## 3. SURCHARGE AND HEALTH & EDUCATION CESS:

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 Funds and LTCG on mutual fund/SIF 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 111A (STCG on Equity-oriented Funds), Section 112 (LTCG on non-Equity Funds), Section 112A (LTCG on Equity-oriented Funds) & Section 115AD (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 firms and companies to be levied on basic tax:

- Partnership Firms: 12% where income exceeds Rs.1 crore
- Domestic Company: 12% where income exceeds Rs.10 crore and 7% where income exceeds Rs.1 crore but less than Rs.10 crore. If domestic company opts for concessional tax regime u/s. 115BAA/115BAB: 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

Health & Education Cess at the rate of 4% is applicable on aggregate of basic tax & surcharge.

Please note that surcharge and cess shall be applied on basic tax while deducting TDS, if any, on income of non-resident investors only.

## 4. LOSSES UNDER THE HEAD 'CAPITAL GAINS'

Losses incurred under the head "Capital gains" during the year cannot be set off against income under other heads of income. Long-term capital loss cannot be set off against any income other than income from long-term capital gain. However, short-term capital loss can be set off against long-term or short-term capital gain.

If loss under the head "Capital gains" incurred during a year cannot be adjusted in the same year, then unadjusted capital loss can be carried forward to next year. In the subsequent year(s), such loss can be adjusted only against income chargeable to tax under the head "Capital gains", however, long-term capital loss can be adjusted only against long-term capital gains. Short-term capital loss can be adjusted against long-term capital gains as well as short-term capital gains. Such loss can be carried forward for eight years immediately succeeding the year in which the loss is incurred. Such loss can be carried forward only if the income-tax return of the year in which loss is incurred is furnished on or before the due date of furnishing such income-tax return, as prescribed under section 139(1) of the Income-Tax Act, 1961.

## 5. SECURITIES TRANSACTION TAX (STT)

STT is applicable only in respect of sale / redemption of units of Equity-oriented funds on a recognised stock exchange at the following rates:

Particulars	Rates	Payable by
Purchase of units of equity-oriented mutual fund (delivery based)	NIL	Not Applicable
Sale of units of equity-oriented mutual fund (delivery based)	0.001%	Seller
Sale of units of equity-oriented mutual fund (non-delivery based)	0.025%	Seller
Sale of units of equity-oriented fund to the Mutual Fund	0.001%	Seller

#### 6. BONUS STRIPPING

Where any person buys or acquires any units of a mutual fund within a period of three months prior to the record date (i.e., the date that may be fixed by a Mutual Fund for the purposes of entitlement of the holder of the units to receive dividend, income or additional units without any consideration) and such person is allotted additional units (without any payment) on the basis of holding of the aforesaid units on the record date, and if such person sells or transfers all or any of the original units within a period of nine months after the record date while continuing to hold all or any of the additional units, then any loss arising to him on account of such purchase and sale of all or any of the units would be ignored for the purpose of computing his income chargeable to tax. Further, the loss so ignored would be deemed to be the cost of acquisition of such additional units as are held by him on the date of sale or transfer of original units.

## 7. EXEMPTION AVAILABLE FROM CAPITAL GAIN TAX IN CERTAIN CIRCUMSTANCES

 Investors can claim exemption from long-term capital gains under Section 54F by making specified investment in a residential house property as per the conditions specified therein.

- Transfer of units upon consolidation of two or more schemes of Equity Funds or two or more schemes of a fund other than Equity Fund in accordance with SEBI (Mutual Funds) Regulations, 1996 is exempt from capital gains.
- Transfer of units upon consolidation of plans within mutual fund schemes in accordance with SEBI (Mutual Funds) Regulations, 1996 is exempt from capital gains.

# 8. RECEIPT OF MUTUAL FUND / SIF UNITS WITHOUT CONSIDERATION OR FOR INADEQUATE CONSIDERATION:

As per Section 56(2)(x) of the Income-tax Act, 1961, any sum of money or movable property or immovable property received by any person without consideration or for inadequate consideration is chargeable to tax if it exceeds Rs.50,000. The following amount is chargeable to tax in case a person receives units of a Mutual Fund/SIF without consideration or for inadequate consideration:

- Without consideration where the aggregate fair market value (FMV) of the units exceeds Rs.50,000: the whole of the aggregate FMV of such units is taxable
- ii. Inadequate consideration which is less than the aggregate FMV of the units by an amount exceeding Rs.50,000: the aggregate FMV of the units as exceeds such consideration

## 9. INVESTMENTS BY CHARITABLE AND RELIGIOUS TRUSTS

Units of a Mutual Fund Scheme referred to in Section 10(23D) of the Income-tax Act, 1961 constitute an eligible avenue for investment by charitable or religious trusts as per Rule 17C of the Income-tax Rules, 1962 read with Section 11(5)(xii) of the Income-tax Act, 1961.

Investors are requested to note that the tax position prevailing at the time of investment may change in future due to statutory amendment(s). The Mutual Fund will pay/deduct taxes as per the applicable tax laws on the relevant date. Additional tax liability, if any, imposed on investors due to such changes in the tax structure, shall be borne solely by the investors and not by the AMC or Trustee.

## B. Legal Information.

## a) Nomination Facility

The SEBI (Mutual Funds) Regulations, 1996, provides that the SIF shall provide for nomination facility to the unit holders to nominate a person in whose favour the units shall be transmitted in the event of death of the unitholder. Further, SEBI vide its master circular dated SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024 provides that

- 1. As per guidelines, Nomination/Opt-out is mandatory for New Individual investors subscribing to units (New Folios created) w.e.f. 1<sup>st</sup> October 2022, irrespective of holding in the Folio i.e. Single Holding / Joint holding / Either or Survivor. A revised guidelines on Nomination vide circular SEBI/HO/OIAE/OIAE\_IAD-3/P/ON/2025/01650 dated 10<sup>th</sup> January, 2025 was issued by SEBI and further amendments to this circular vide circular SEBI/HO/OIAE/OIAE\_IAD-3/P/ON/2025/0027 dated February 28, 2025 and SEBI/HO/OIAE/OIAE\_IAD-3/P/CIR/2025/110 dated July 30, 2025. Further, certain provisions of the Circular are applicable from December 15, 2025.
- 2. In case of physical application, the forms should carry the wet signature of all the unit holder(s). In case of online application, instead of wet signature(s) of all the unit holder(s), the same should be validated using e-sign facility or two factor authentication (2FA) / OTP.

- 3. Nomination shall be mandatory for single holding only. The requirement of nomination shall be optional for jointly held accounts / folios.
- 4. In case the investor specifies multiple nominees, then he / she shall also specify the percentage share for each nominee. In absence of such specification, the regulated entity shall apportionment the assets equally among all the nominees. In case of demise of the investor and any one of the nominees, the regulated entities shall distribute the assets pro rata to the remaining nominees
- 5. Investor/s shall have the option to specify guardian/s when nominee/s is /are minor/s
- 6. In absence of nomination, the regulated entity shall transmit the assets in the account / folio to either the legal heir(s) or legal representative(s) of the holders as per the rules of intestate succession or as per the Will of the latter, as the case may be, after following the prescribed procedure
- 8. Investors shall mandatorily provide the following personal identifiers;
  - a) any one of the following personal identifiers of the nominee PAN or Driving Licence number or last 4 digits of Aadhaar (only the document number is required to be provided, not the document)
  - b) full contact details of nominee(s) such residential address, e-mail address, telephone / mobile number
  - c) relationship of nominee(s) with the investor
  - d) Date of birth of nominee(s) (if nominee is a minor)

In accordance, with the same, the AMC provide an option to the Unitholder to nominate the persons in whom all the Units held by the Unitholder shall vest in the event of his death. Where the Units are held by more than one person jointly, all the joint Unitholders may together nominate a person by signing the nomination form indicating the name of the person in whom all the rights in the Units shall vest in the event of death of all the joint Unitholders.

- ✓ Nomination facility is available only for individuals applying on their own behalf.
- ✓ Non-individuals including society, trust, body corporate, partnership firm, Karta of HUF cannot nominate.
- ✓ A minor can be nominated and, in that event, the name, address and signature of the guardian of such minor nominee shall be provided.
- ✓ 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.
- ✓ The Nominee shall not be a trust (other than a religious or charitable trust), society, body corporate, partnership firm, Karta of HUF or a PoA holder. A non-resident Indian can be a Nominee subject to the exchange control regulations in force from time to time.
- ✓ Nomination in respect of the units stands rescinded upon the transfer of units. Transfer of units in favour of a Nominee shall be valid discharge by the AMC against the legal heir.
- ✓ The cancellation of nomination can be made only by Unitholders on their own behalf, singly or
  jointly, and who have made the original nomination. On cancellation of the nomination, the
  nomination shall stand rescinded, and the AMC shall be under no obligation to transfer the
  units in the Nominee's favour.
- ✓ PoA Holders cannot execute a nomination request, it has to be executed by the Applicant(s)/Unitholder(s)
- ✓ A non-resident Indian can be a Nominee subject to the exchange controls in force, from time to time.

As per AMFI letter 35/MEM-COR/57/07-08 dated January 03, 2008, applicants can make multiple nominations to the maximum of three. Applicants may change their nomination at any time during the currency of the Investment Strategy. In case of multiple nominations, applicants must clearly specify the percentage of units in favour of each nominee. In case the applicants do not specify the percentage of units for each nominee, units will be distributed equally among all the

nominees. Please note that such allocation/share should be in whole numbers without any decimals making a total of 100 percent.

Where the units of the Investment Strategy are issued in electronic form in the depository account of the unit holder, the nomination registered with the Depository will be applicable to the units of the Investment Strategy. Such nomination including any variation, cancellation or substitution of Nominee(s) shall be governed by the rules and bye-laws of the Depository. Transmission / Payment, if any to the nominee of the sums shall discharge the Fund from all liability towards the estate of the deceased unit holder and his/her legal successors/legal heirs.

The nomination facility extended under the Investment Strategy is in accordance with SEBI regulations and subject to other applicable laws. The single / joint / surviving Unitholders can subsequently write to the OPAT of SBI MF requesting for a Nomination Form in order to nominate any person to receive the Units upon his / her / their death, subject to completion of necessary formalities. Further, if either the Mutual Fund or the AMC incur any loss whatsoever arising out of any litigation or harm that it may suffer in relation to the nomination, they will be entitled to be indemnified absolutely from the deceased Unitholders' estate. Upon the demise of the Unitholder, the Units would be transmitted in favour of the Nominee subject to the Nominee executing suitable indemnities in favour of the SIF and the AMC and necessary documentation to the satisfaction of the SIF. Investors / Unitholders are advised to read the instructions carefully before nominating. The SIF can call for such documents from the Nominee as deemed necessary. 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.

# b) PROCESSES REGARDING INVESTMENTS MADE ON BEHALF OF MINORS, REGISTRATION OF NOMINEE AND TRANSMISSION OF UNITS

AMFI Best Practice Guidelines recommended a standardized procedure in case of investments made on behalf of Minors, minors attaining majority, change in guardian, Nomination facility and Transmission facility.

## • Investment on behalf of Minor:

- ✓ Minor has to be the first and sole holder in a folio.
- ✓ In folios where Unit holder is a Minor, there can be no Joint Holders or nominees.
- ✓ Guardian to the minor should be either a natural (father or mother) or a court-appointed legal guardian. The supporting documents reflecting the date of birth of minor and the relationship / Status with the guardian should mandatorily accompanied by application form. In case of court appointed legal guardian supporting documentary evidence shall be required.
- ✓ Supporting documentary evidence confirming the Date of birth of minor such as Birth Certificate, School leaving certificate, Passport to be provided mandatorily while opening the folio on behalf of a minor.
  - Any other suitable proof evidencing the date of birth of the minor.
- ✓ Payment for investment by any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian.
- ✓ Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor, i.e. the account the minor may hold with the parent/legal guardian after completing all KYC formalities.

# Minor attaining majority – Status Change:

In case of a minor investor attaining the age of majority (i.e. completes 18 years of age), the AMC / Registrar will send an intimation to Unit holders advising the minor (on attaining majority) to submit an applica

- ion form along with prescribed documents to change the status of the account from 'minor' to 'major'.
- All transactions / standing instructions / systematic transactions etc. will be suspended i.e. the Folio will be frozen for operation by the guardian from the date of beneficiary child complet
- ng 18 years of age, till the status of the minor is changed to major. Upon the minor attaining the status of major, the minor in whose name the investment was made, shall be required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new bank account.
- No investments (lumpsum/SIP/ switch in/ STP in etc.) in the scheme would be allowed once the minor attains majority i.e. 18 years of age unless the required documents are provided and status is update

# • Change in Guardian:

✓ In case there is a change in guardian of the minor either due to mutual consent or demise of the old guardian, the new guardian must be either a natural guardian (mother/father) or court appointed guardian and such guardian will have to provide valid prescribed document/s prior to registering the guardianship including Know Your Customer (KYC) related evidence and bank attestation of his/her signature from the Branch Manager of the bank with whom his/her name is registered as the guardian of the minor.

## Transmission:

- ✓ In case of transmission of units (i.e. where the sole/ first unitholder or any of the joint unitholders/ all unitholders have deceased, the claimant/s have to submit requisite valid documents for the transmission of units in his/her name. Please refer to the para of Transmission for the requirement of various documents that needs to be submitted under different transmission scenarios.
- ✓ In the event of transmission of units in favor of a minor, the guardian (father/mother/court appointed guardian) must submit prescribed documents including PAN, KYC, banker's attestation of his/her signature, indemnity as per prescribed format etc.

## c) REQUIREMENTS UNDER PREVENTION OF MONEY LAUNDERING:

In terms of the Prevention of Money Laundering Act, 2002, the Rules issued there under as amended by Prevention of Money-laundering (Maintenance of Records) Amendment Rules, 2023 and the guidelines/circulars issued by SEBI regarding the Anti Money Laundering (AML Laws) from time to time, all SEBI registered intermediaries including Mutual Funds, are required to formulate and implement a client identification programme, verify and maintain the record of identity and address(s) of the investors.

The AMC has adopted certain policies to ensure KYC, PML and SEBI Requirements, considered appropriate for its line of business, being committed to prevent money launderers using SBI MF / SIF as a vehicle for any such illegal activity. Accordingly, the AMC may seek information or obtain and retain documentation used to establish Customers' identity. It may re-verify identity and obtain any missing or additional information for this purpose.

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

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

- (i) after due diligence, the investor / Unit Holder / a person making the payment on behalf of the investor does not fulfill the requirements of the KYC as determined by the AMC or the AMC believes that the transaction is suspicious in nature as regards money laundering.
- (ii) the AMC determines in its sole discretion that the application does not or will not comply with any applicable laws or regulations.

In this regard the AMC reserves the right to reject any application and affect a mandatory Redemption of Units. .

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

The investor(s) should ensure that the amount invested in the Investment Strategy of Magnum SIF 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.

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 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 Mutual Fund, AMC, Trustee Company and its Directors, employees and agents shall not be liable in any manner for any claims arising whatsoever on account of freezing of folio(s) / rejection of any application / allotment of units and/or reporting the same to appropriate authorities.

## d) KNOW YOUR CUSTOMER (KYC) COMPLIANCE REQUIREMENTS

Investors may note that in terms of the Prevention of Money Laundering Act, 2002 ('PMLA'), the Rules issued there under and the guidelines/ circulars issued by SEBI regarding Anti Money Laundering, all intermediaries, including mutual funds, have to formulate and implement a client identification programme as well as verify and maintain records of the identity and address(es) of investors.

Pursuant to implementation of Know Your Customer (KYC) norms under Prevention of Money Laundering Act, 2002 (PMLA) through CDSL Ventures Limited (CVL) and in accordance with AMFI circular 35/MEM-COR/62/10-11 dated October 07, 2010, KYC Compliance has been made mandatory to all investors, (including Power of Attorney holders and guardian in case of a minor) intending to invest any amounts in units of the Mutual Fund / SIF effective January 1, 2011 (the "Effective Date"), irrespective of the amount of investment.

Notwithstanding the above, investor residing in State of Sikkim are exempted for the requirement of PAN.

For investors based in State of Sikkim the following documents are required:

- a. Proof of address of Sikkim state and application form should mention the same address.
- b. Address proof shall be self-attested by the investor / attested by the ARN holder mentioning the ARN number or attested by any competent authority.

In accordance with SEBI Circular No. MIRSD/SE/Cir-21/2011 dated October 5, 2011 regarding uniformity in the Know Your Customer (KYC) process in the securities market and SEBI Circular No. MIRSD/ Cir-26/ 2011 dated December 23, 2011 regarding requirement of In-person verification of investors and SEBI (KYC Registration Agency) Regulations, 2011, following process is applicable:

- Investors are requested to use the common KYC Application Form with specified documents and carry out the KYC process including In-Person Verification (IPV) with any SEBI registered intermediaries including mutual funds. The common KYC Application Forms are also available on our website <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a>.
- The Fund shall perform the initial KYC of its new investors and may undertake enhanced KYC
  measures commensurate with the risk profile of its investors. The AMC shall upload the details of
  the investors on the system of the KYC Registration Agency (KRA). KRA shall send a letter to the
  investor within 10 working days of the receipt of the initial/updated KYC documents from the
  Mutual Fund, confirming the details thereof.
- It is mandatory for intermediaries including mutual funds to carry out In-Person Verification (IPV) of
  its new investors. The IPV carried out by any SEBI registered intermediary can be relied upon by
  the SIF. SBI Funds Management Limited (AMC) or NISM/AMFI certified distributors who are KYD
  compliant are authorized to undertake the IPV for investors. Further, in case of any applications
  received directly (i.e. without being routed through the distributors) from the investors, the AMC
  may rely upon the IPV (on the KYC Application Form) performed by the scheduled commercial
  banks.
- Once the investor has done KYC with a SEBI registered intermediary, the investor need not undergo the same process again with another intermediary including mutual funds. However, the AMC reserves the right to carry out fresh KYC of the investor.
- AMC reserves right to reject application forms for transactions in units of the Fund not accompanied by letter/ acknowledgement issued by KRA. The KYC compliance status will be validated with the records of the KRA before allotting units.
- Existing KYC compliant investors of the Mutual Fund can continue to invest as per the current practice. However, existing investors are also urged to comply with the new KYC requirements including IPV as mandated by SEBI.
- In this regard, all categories of investors who wish to make an investment in the units of SIF will be required to submit the KYC form along with the prescribed documents at any of the OPAT of SBIMF or such other offices as may be notified by SBIMF from time to time to comply with KYC norms.
- Investor should enclose the KYC acknowledgement letter with the investment application. Existing KYC compliant investors of can continue to invest as per the current practice.

Investors are advised to comply with the KYC Guidelines issued by SEBI and AMFI from time to time.

## Central KYC Records Registry (CKYCR) Process

SEBI vide circular no. CIR/MIRSD/66/2016 dated July 21, 2016 and circular no. CIR/MIRSD/120 /2016 dated November 10, 2016, has intimated about operationalization of Central KYC Records Registry (CKYCR). Further, AMFI vide circular dated December 22, 2016 has prescribed new CKYC forms which shall be applicable for prospective investors.

Accordingly, with effect from February 1, 2017, any new individual investor who has not done KYC under KRA regime shall fill the new CKYC form. In case any such new individual investor uses the old KYC form, he/she shall provide additional/missing information by filling the Supplementary CKYC form or the new CKYC form.

Existing investors who are registered or verified in the KRA system can continue making investments without any additional documentation. However, for any modification to their existing records, they need to fill up the CKYC form. The aforesaid forms are available on the website of the Fund viz. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and for completion of CKYC process, the investors are required to

visit the nearest Point of Service or Point of Acceptance of transactions of the Fund. The KYC requirements shall be governed by SEBI Circulars/ notifications and AMFI Guidelines which may change from time to time.

Further, in terms of the SEBI circular no. SEBI/HO/MIRSD/DOP/CIR/P/2021/31 dated March 10, 2021, Central KYC Records Registry (CKYCR) has been extended to Legal Entities (LE) as well in addition to individual investor.

Accordingly, any new Legal Entity who has not done KYC under KRA regime shall fill the new CKYC application form as applicable to the Legal Entity / Other than Individuals.

Existing investors who are registered or verified in the KRA system can continue making investments without any additional documentation. However, for any modification to their existing records, they need to fill up the CKYC form. The aforesaid forms are available on the website of SBI Mutual Fund (the Fund) viz. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and for completion of CKYC process, the investors are required to visit the nearest Point of Service or Point of Acceptance of transactions of the Fund. The KYC requirements shall be governed by SEBI Circulars/ notifications and AMFI Guidelines which may change from time to time.

Where an investor, for the purpose of establishing an account based relationship, submits a KYC Identifier, with an explicit consent to download records from CKYCR, then the KYC records will be retrieved online from CKYCR using the KYC Identifier and the investor will not be required to submit the same KYC records or information or any other additional identification documents or details, unless there is a change in the information of the investor as existing in the records of CKYCR.

Thus, it is mandatory to complete the KYC requirements for all unit holders, including for all joint holders and the guardian in case of folio of a minor investor. Accordingly, financial transactions (including purchases, redemptions, switches and all types of systematic plans) and non-financial requests will not be processed if the unit holders have not completed KYC requirements. Unit holders are advised to use the applicable CKYC & KYC Form for completing the KYC requirements and submit the form at the point of acceptance. Further, upon updation of PAN details with the KRA, the unit holders are requested to intimate us/our Registrar and Transfer Agent i.e. Computer Age Management Services Limited, their PAN information along with the folio details for updation in our records.

## e) Ultimate Beneficial Owner

Pursuant to Prevention of Money Laundering Act, 2002 (PMLA) and Rules framed there under as amended by Prevention of Money-laundering (Maintenance of Records) Amendment Rules, 2023, Section 11 of SEBI Master Circular dated February 03, 2023, on AML and CFT guidelines have listed the guidelines for identification of ultimate beneficial owner. These guidelines are amended via Notification dated March 07, 2023 from Ministry of Finance have been outlined below

As per these guidelines UBO means 'Natural Person', or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement.

#### I. Client 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.

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

- b. more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership.
- 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:

Registered intermediaries dealing with foreign investors' may be guided by SEBI Master Circular SEBI/HO/AFD-2/CIR/P/2022/175 dated December 19,2022 and amendments thereto, if any, for the purpose of identification of beneficial ownership of the client.

For further details on UBO, Investors are requested to refer to the 'Declaration for UBO' available on website of the Fund <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a>

The provisions relating to UBO are not applicable where the investor or the owner of the controlling interest is a company listed on a stock exchange or is a majority-owned subsidiary of such a company. The AMC/ Trustee reserves the right to reject application forms submitted without disclosing necessary information as prescribed under the aforesaid laws/ rules/ regulations.

Investors are requested to promptly inform the AMC if the information provided undergoes any change in future.

## f) DURATION OF THE INVESTMENT STRATEGY:

The duration of the Open ended Investment Strategy / Interval Investment Strategy is perpetual. In case of Close ended Investment Strategy, duration is limited and will be specified in the ISID of the respective Investment Strategy. However, in terms of the Regulations, open-ended / interval Investment Strategies may be wound up anytime, and close-ended scheme may be wound up at any time prior to the maturity date, after repaying the amount due to the unit holders.

## g) WINDING UP OF THE INVESTMENT STRATEGY:

A. An Investment Strategy of a SIF is to be wound up, , -

- 1) on the happening of any event which, in the opinion of the trustees, requires the Investment Strategy to be wound up; or
- 2) if seventy five per cent of the unit holders of an Investment Strategy pass a resolution that the Investment Strategy be wound up; or
- 3) if the SEBI so directs in the interest of the unit-holders.
- B. Where an Investment Strategy is to be wound up, the trustees shall give notice within one day disclosing the circumstances leading to the winding up of the Investment Strategy: -
  - (a) to SEBI: and

(b) in two daily newspapers having circulation all over India & a vernacular newspaper circulating at the place where the SIF is formed.

Provided that where an Investment Strategy is to be wound up under clause (a) of sub-regulation (2), the trustees shall obtain consent of the unit holders participating in the voting by simple majority on the basis of one vote per unit and publish the results of voting within forty-five days from the publication of notice under sub-regulation (3) of regulation 39.

Provided further that in case the trustees fail to obtain the required consent of the unitholders under clause (a) of sub-regulation (2), the schemes shall be reopened for business activities from the second business day after publication of results of the voting.

## · Effect of winding up

On and from the date of the publication of notice under clause (b) of sub-regulation (3) of regulation 39, the trustee or the asset management company as the case may be, shall-

- (a) Cease to carry on any business activities in respect of the scheme so wound up;
- (b) Cease to create or cancel units in the scheme;
- (c) Cease to issue or redeem units in the scheme.

## Procedure and manner of Winding Up:

- a) The Trustee shall call a meeting of the Unitholders to consider and pass necessary resolutions by simple majority of the Unitholders present and voting at the meeting for authorizing the Trustee or any other person to take steps for winding up the Scheme.
  - Provided that a meeting of the unit holders shall not be necessary if the scheme is wound up at the end of maturity period of the Investment Strategy.
- b) The Trustee or the person authorized as above, shall dispose off the assets of the Investment Strategy concerned in the best interest of the Unitholders of that Investment Strategy.
- c) The proceeds of the sale made in pursuance of the above, shall, in the first instance, be utilized towards discharge of such liabilities as are properly due under the Investment Strategy and after making appropriate provision for meeting the expenses connected with such winding up, the balance shall be paid to the Unitholders in proportion to their respective interests in the assets of the Scheme as on the date when the decision for the winding up was taken.
- d) On completion of the winding up, the Trustee shall forward to the Board and the Unitholders, a report on the winding up containing particulars such as circumstances leading to the winding up, steps taken for the disposal of the assets of the Fund before winding up, expenses of the Fund for winding up, net assets available for distribution to the Unitholders and a certificate from the Auditors of the Scheme concerned.
- e) Notwithstanding anything contained herein, the provisions of the Regulations in respect of the disclosure of half-yearly reports and annual reports shall continue to apply until winding up is completed or the scheme ceases to exist.

## h) TRANSFER & TRANSMISSION

# A) Transfer of Units

Transfer of units: AMFI had vide its circular no. 135/BP/ 116 /2024-25 dated August 14, 2024, enabled transfer of units held in SOA mode for select scenarios under Phase I and another circular no.

135/BP/ 119 /2025-26 dated May 08, 2026, under Phase II. Under these circular, now transfer of units in SOA (non-demat) mode is enabled for the following scenarios in Phase I and II:

Phase I: 1) Enable the surviving joint holder to add name(s) in the folio upon demise of a unitholder 2) Facilitate transfer of units by the nominee of a deceased unitholder to the legal heirs post the transmission of units in the name of the nominee 3) Enable addition of the name of a parent / guardian, sibling, etc. as joint holder(s) in the folio, when a minor unitholder becomes a major and changes the status from a minor to a major.

Phase II: 4) Transfer to siblings. 5) Gifting of units. 6) Transfer of units to a third party. 7) Addition/Deletion of unit holders

The facility for transfer of units held in SoA mode will be available under all mutual fund schemes, except ETFs. The facility for transfer of units held in SoA mode will be available only through online mode via the transaction portals of the RTAs and the MF Central.

Further for units of the Investment Strategy held in electronic (demat) form, the Units will be transferable (in terms of SEBI master circular numberSEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024) and will be subject to the transmission facility in accordance with the provisions of SEBI (Depositories and Participants) Regulations, 1996 as may be amended from time to time.

The list the documents required for transmission under various scenarios is explained in the following paragraphs:

## B) Transmission:

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

- Request Form (Form T1) from surviving unitholder(s) requesting for Deletion of Name of Deceased 2<sup>nd</sup> and/or 3<sup>rd</sup> 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 Reguest 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)
  - iii. 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.
- KYC Acknowledgment OR KYC Form of the surviving unit holder(s), if not KYC compliant.
- v. Transmission will be completed only once the status of the KYC is "KYC complied".
- vi. 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. <u>Transmission of Units to the registered Nominee/s in case of death of sole or</u> all unitholders

- 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. <u>Transmission of Units to the claimant/s on death of the Sole unitholder or ALL unitholders, where there is NO nomination has been registered</u>

- 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.

# A. 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 the 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. 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.

# B. 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:
  - Notarized 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 KYCcompliant. 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:

7. 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.

# 8. Additional Guidelines / Risk Mitigation Measures

- a. In case of death of the 1<sup>st</sup> holder, if there are two surviving joint holders, the surviving 2<sup>nd</sup> holder shall be treated as the new primary / 1<sup>st</sup> holder. Self-attested copy of PAN card of claimant(s) is mandatory and Name(s) as per PAN card should match with claimant's name(s). Additionally, AMC/ RTA to validate such PAN independently with Income Tax database to check the validity of PAN, status and name, including PAN-Aadhaar linking.
- b. In case the claimant is a resident of Sikkim state, appropriate Id. proof should be obtained in lieu of PAN card and the AMC/RTA may rely on the said document for processing the claim.
- c. KYC status of the claimant(s) should be 'Verified' / 'Complied'. Else, the original KYC form duly filled, supported by the documentary proof should be obtained. If Aadhaar is provided as OVD, transmission request shall be processed only after KYC status is updated in KRA system as valid.

- d. If the death certificate is issued through online mode, AMC/ RTA to validate the same through online mode wherever possible and have access to the relevant site.
- e. ID proof (PAN/Redacted Aadhaar/Voter ID/Passport or any other valid OVD as per PMLA guidelines] of the deceased person should be obtained along with the transmission request (as a risk mitigation measure).
- f. If the claimant produces the original document for verification at front office of AMC branch, the AMC official shall verify the original thereof and affix the 'Original Seen & Verified' stamp suitably.
- g. If the original is not produced for verification, the photocopies of the supporting documents submitted for transmission of units, such as the death certificate of the deceased, birth certificate of the minor, Probate of Will, Succession Certificate, Letter of Administration etc. shall be duly attested by a Notary Public or a Gazette Officer.
- h. Apart from the name of the deceased, any one other factor (such as Father's name / Spouse's Name, Address] as per the death certificate should match with the records available in the respective folio(s) or as per KYC records of the deceased person / claimant(s). If there is any mismatch, the claimant should be advised to substantiate with suitable evidence.
- i. Bank mandate information provided at the time of transmission should mandatorily subjected to 'penny drop' validation [IMPS] in addition to the documentary proof submitted and the name should match as per the bank records vs. folio records. If the name is not matching or name not found as part of the penny drop reverse feed, suitable notification should be sent to the claimant to establish further documentary evidence / proof, post confirmation from them and evidence is found to be satisfactory, then transmission process can be allowed.
- j. There should be a cooling off period of 10 business days between the date of transmission of units and subsequent redemption as being done for change of bank mandate.
- k. Suitable communication should be sent to the registered (existing) address as well [if different from the claimant's address] as a fraud prevention measure.
- Where the units are to be transmitted to a minor beneficiary, various documents like KYC, PAN, Indemnity should be obtained from the guardian of the minor nominee / legal heir. Bank attestation of the signature of the guardian of the minor should be as per the bank account of the minor or the joint account of the minor with the guardian.
- m. In case of multiple nominees/ claimants, the monetary threshold of more than ₹ 5 lakh for the purpose of obtaining the Indemnity Bond shall be determined on the basis of the aggregate value of the Units under all the folios for which the

- transmission request is being submitted as per the latest NAV as on the date of receipt of the claim, before dividing / splitting the claim amongst multiple nominees or claimants/ surviving co- parceners.
- n. If the total value of the Units being transmitted exceeds ₹5 lakhs, Identity proof such as copy of PAN or redacted Aadhaar card or passport of all legal heirs signing the NOC other than claimant/s i.e. legal heirs other than the claimant mentioned in the Probate or Letters of Administration or Succession Certificate, should be obtained.
- o. Where there are more than one claimants (nominee or legal heir) in a folio or set of folios, the nominees / legal heirs should be encouraged/ requested to submit the transmission request together so that all the Units held by the deceased unitholder(s) could be transmitted in one-go to for operational efficiency and convenience.
- p. In such cases where the deceased was the 1st holder in respect any one of the folios/funds, units in all other holdings across all other folios/schemes, where the deceased was the 1st unitholder shall be 'Stop' marked/blocked against any further transactions on the basis of PAN or PEKRN.
- q. If the deceased unitholder(s) held units in multiple folios, e.g., as the 1st holder(s) in some folios and as the joint holder in others, a single Transmission Request form maybe accepted for operational ease, provided <u>all</u> the deceased holders are common across the multiple folios (irrespective of the order of names of the deceased) AND the nominee(s) / claimant(s) is/are also common/same across ALL the folios.
- r. Once a transmission request is received, it is incumbent upon the AMC/RTA to determine if the deceased unitholder had any unit holdings under any other scheme / folio, and put a flag in the system against all other folios of the deceased unitholder, basis PAN / PEKRN with a suitable communication to the surviving unitholders / nominee/s (if any, registered against the folios) to submit the claim form with required documents in respect of the remaining folios.
- s. The process and documentation for transmission of units where the claimant / nominee is a mentally unsound person, shall be the same as applicable to a Minor claimant, except that the Guardian shall be a court appointed guardian. Additionally, a Medical Certificate from an appropriate registered medical practitioner may be obtained regarding the mentally unsound person.
- t. If the transmission amount is for more than ₹ 5 Lakh, as an operational risk mitigation measure, the signature of the Nominee/ Claimant shall be attested only by a Notary Public or a JMFC (and not banker's attestation). For this purpose, space has been provided for signature in the transmission request form below the signature of the claimant.

u. While the list of documents mentioned above should be taken in all cases, in specific cases and situations related to transmission of units that are not enumerated in section 1 to 6 above, AMCs should adopt proper due diligence and request for appropriate documents depending on the circumstances of each case and apply the general principles enumerated in sections above before transmitting the units in favour of the claimant/s.

# i) PERMANENT ACCOUNT NUMBER (PAN)

With effect from July 2, 2007, Permanent Account Number (PAN) is the sole identification number for all investors transacting in the units of Investment Strategies of Magnum SIF, irrespective of the amount of transaction. Submission of attested copy of PAN card is mandatory for all categories of investors (including NRIs, Guardian of a minor) for transacting in units of Investment Strategies of Magnum SIF. Submission of copy of PAN card by Guardian of a minor is mandatory for investments by minor whether copy of PAN of minor is provided or not. Attestation can be done by distributors / AMC staff etc.

The verification of PAN would be carried out with the Income tax database. In case of failure, communication would be sent to the customers to provide the correct PAN details or communication from Income Tax authorities evidencing the validity of PAN. Such folios would be blocked for additional purchases and future SIP registrations till receipt of the above documents and verification with original. In case of web-based transactions, investors would be allowed to transact subject to PAN validation.

Pursuant to SEBI Circular MRD/DoP/MF/Cir-08/2008 dated April 03, 2008 investors residing in the state of Sikkim are exempted from the mandatory requirement of PAN for their investments in SIF, However, this would be subject to the SIF to verify the veracity of the claim of the investors that they are residents of Sikkim, by collecting sufficient documentary evidence. Further, investors will also be subject to compliance of applicable KYC norms.

SEBI vide its Circular MRD/DoP/Cir-20/2008 dated June 30, 2008 directed that PAN may not be insisted in the case of Central Government, State Government, and the officials appointed by the courts e.g. Official liquidator, Court receiver etc. (under the category of Government) for transacting in the securities market, however, the aforementioned exemption would be subject to the veracity of the claim of the specified organizations, by collecting sufficient documentary evidence in support of their claim for such an exemption.

# i) RIGHT TO SUSPEND PURCHASE OF UNITS

The SIF at its sole discretion reserves the right to withdraw Sale (including switch-in) of the Units in the Scheme(s) (including Plan / Option of the Scheme) temporarily or indefinitely, if in the opinion of the AMC the general market conditions are not favourable and / or suitable investment opportunities are not available for deployment of funds.

Further, the indicative list of circumstances under which sale or switching of units may temporarily be suspended is as follows:

- a) When one or more stock exchanges or markets, which provide the basis for valuation for a substantial portion of the assets of the schemes, 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 schemes 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 schemes, without which the value of the securities of the schemes 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, 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.
- g) If so directed by SEBI.

In the above eventualities, the time limits for processing of requests for purchase of units will not be applicable.

Additionally, in case the size of the Investment Strategy increases to a level which in the opinion of the Trustees is not manageable or occurring of any operational event(s) or any events which in the opinion requires limit / suspend subscription under the Investment Strategy(s), the Trustees reserve the right to stop fresh / ongoing subscription of units to investors in the best of interest of Investment Strategy (s) / investor. The Trustees reserves the right at its sole discretion to withdraw/suspend/limit the allotment/subscription of units in the Investment Strategy (s) temporarily or indefinitely in the above circumstance(s).

# k) RIGHT TO LIMIT REDEMPTIONS

In accordance with SEBI master circular no.SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the provisions of restriction on redemption (including switch out) in Investment Strategies of Magnum SIF are as under:

- 1. Restrictions may be imposed when there are circumstances leading to a systemic crisis or event that severely constricts the market liquidity or the efficient functioning of the market such as:
  - i. **Liquidity Issues:** When markets at large become illiquid affecting almost all securities rather than any issuer specific security.
  - ii. **Market failures, exchange closure**: When markets are affected by unexpected events which impact functioning of exchanges or the regular course of transactions. Such unexpected events could also be related to political, economic, military, monetary or other emergencies.
  - iii. **Operational Issues**: When exceptional circumstances are caused by force majeure, unpredictable operational problems and technical failures (e.g. a black out).
- 2. Restrictions on redemption may be imposed for a specified period of time not exceeding 10 Business Days in any period of 90 days.
- 3. When restrictions on redemption is imposed, the following procedure will be applied:
  - i. No redemption requests upto Rs. 2 Lacs shall be subject to such restriction.
  - ii. Where redemption requests are above Rs. 2 lakh, AMC shall redeem the first Rs. 2 Lacs without such restrictions and remaining part over and above Rs. 2 Lacs shall be subject to such restrictions.

Any restriction on Redemption of the units shall be made applicable only after specific approval of the Board of Directors of the Asset Management Company and Trustee Company. The approval from the AMC Board and the Trustee giving details of the circumstances and justification shall also be informed to SEBI immediately.

#### I) Authorization of data

Investors are informed that the AMC reserves the right and has the authority from the investors to share all sensitive personal data / information collected from the investors with its Registrar and Transfer Agents ("RTA") or with any other third party engaged by the AMC / RTA for the purpose of processing / storage etc. The AMC also authorizes the RTA to collect all such sensitive personal data / information on behalf of the AMC, through any mode of communication either directly from investors or through their distributors or through any other third party engaged by the AMC / RTA. Further, the RTA is entitled to retain all such sensitive personal data / information collected from the investors and distributors or any other third party service providers on a permanent basis for the purpose of authenticating the investor's / distributor's identity.

# m) Loan facility

Unit holders can obtain loan against their Units from any bank, subject to relevant RBI regulations and the respective bank's instructions, by getting a lien registered / recorded with the Registrars.

Unit holders who have borrowed against their Units by recording a lien against their holding can avail of repurchase facility only after the receipt of instructions from the concerned lender that the loan has been repaid in full and the lien can be discharged. In case such an instruction is not received, the lender can apply for redemption in his favour. In such a case, the SIF reserves the right to redeem the Units in favour of the concerned lender after giving 15 days notice to the Unit holder.

#### n) Pledge of SIF Units

Subject to the other terms of the Investment Strategy, the Units under the Investment Strategy can be offered by the Unitholder as security, by way of a pledge, in favour of scheduled banks, financial institutions, Non Banking Financial Company or any other body, as may be permitted under the applicable laws. Upon a specific authorisation request made by a Unitholder and upon completing necessary formalities by the Unitholder, the Fund will instruct the Registrar to mark a lien on the Units standing to the credit of the Unitholder's account. If by invoking the pledge /charge, the pledgee seeks the redemption of the Units, then the AMC shall comply with such request, if the necessary documents are made available to the AMC. No Pledge or charge shall be recognized by the AMC unless it is registered with the Registrar and a confirmation of the same has been issued by the Registrar. The AMC reserves the right to change operational guidelines for pledge on units, from time to time. The Pledgor will not be entitled to redeem Units that are pledged, until the entity in whose favour such Units are pledged provides written authorisation / confirmation to the Fund that the pledge/lien / charge on such Units may be removed. As long as units are pledged, the Pledgee will have complete authority to redeem such Units. The pledge facility is provided to the units of all the Investment Strategy of Magnum SIF.

#### o) Lien on SIF Units

Subject to the extant provisions of the applicable laws, as and when an investor makes an application for subscription of Units, a lien on units allotted to the Investor will be forthwith created and such lien shall remain in force and effect until the payment proceeds towards such subscription are realized by the Fund. During such period such Units cannot be redeemed by the Investor. However, in case a Unitholder makes application for redemption of Units during the period when such lien is in force, the cheque towards the redemption amount of such Units will not be dispatched until the amount(s) towards the subscription of the Units has been received / credited with the Fund. In case the cheque / draft of the Investor towards subscription amount is dishonoured by the bank, the entire transaction shall be reversed and the Units allotted earlier to such Investor will be cancelled, and a fresh Statement of Account / rejection letter shall be dispatched to the Investor. In respect of investment by NRIs, the Fund, in addition to the above circumstance(s), may also mark a lien on Units in case all the documents which are required to be submitted with the Fund are not given. Notwithstanding the aforesaid, AMC / Trustees reserves the right to modify operational guidelines from time to time with respect to the lien on Units

# p) Compliance requirements under international laws / regulations

FATCA is a United States of America ("**U.S.**") tax initiative that requires all financial institutions to report financial transactions of U.S. persons including entities in which U.S. persons hold a substantial ownership, etc. to the relevant tax authorities.

It was introduced by the United States Department of Treasury and the US Internal Revenue Service ("IRS"), the purpose of FATCA is to encourage better tax compliance by preventing U.S. persons from using financial institutions outside U.S. to avoid U.S. taxation on their income and assets.

Further, similar to FATCA, G20 and OECD countries have developed CRS on Automatic Exchange of Information (AEOI). CRS requires the financial institutions of the source jurisdiction to collect and report information to their tax authorities about account holders "resident" in other countries.

The Indian Government signed an Inter-Governmental Agreement ("IGA") with the U.S. on 9<sup>th</sup> July 2015 to implement the FATCA in India. In addition, India also signed the OECD's Model Competent Authority Agreement for tax information sharing in accordance with multilateral Common Reporting Standard (CRS) on 3 June 2015. India had committed to implement CRS and the same has been implemented by 1 January 2016. The Central Board of Direct Taxes has inserted Section 285BA of the Income Tax Act, 1961 along with Rules 114F to 114H (FATCA-CRS Rules), as part of the Incometax Rules, 1962. These Rules require Indian financial institutions such as the Banks, Mutual Funds, etc. to seek additional personal, tax and beneficial owner information and certain certifications and documentation from all our investors and counterparties. According to the FATCA-CRS Rules, financial institutions in India are required to report tax information about account holders that tax resident of U.S. and other foreign countries, to the Indian Government which will, in turn, will relay that information to the IRS.

These developments have resulted in compliance and reporting obligations on Financial Institutions like SBIFML. In relevant cases, information will have to be reported to tax authorities i.e. CBDT. Towards compliance, we may also be required to provide information to any institutions such as withholding agents for the purpose of ensuring appropriate withholding from the account or any proceeds in relation thereto. SBIFML has taken appropriate measures in order to become FATCA and CRS compliant, with effect from the applicable date as per applicable laws / rules/ regulations. SBIFML may also have to comply with other similar laws as and when applicable.

Prospective investors and Unit holders will therefore be required to comply with the request of SBIFML to furnish such information / documentation / declarations as and when deemed necessary by it in accordance with Applicable Laws. In case prospective investor / Unit holder fails to furnish the relevant information / documentation / declarations in accordance with Applicable Laws, SBIFML reserves the right to reject the application or redeem the Units held directly or beneficially and may also require reporting of such accounts and/or levy of withholding tax on payments made to the Unit holders / investor and/or take any other action/s in accordance with Applicable Laws. FATCA-CRS provisions are relevant not only at on-boarding stage of Unit holders but also throughout the life cycle of investment with Magnum SIF. Unit holders therefore should immediately intimate to the SBIFML/Authorized Registrar, any change in their status with respect to any FATCA-CRS related information / documentation / declarations provided by them previously, including but not limited to any declarations provided in respect of residency of the Unit holders for tax purposes. Further, if SBIFML is required by Applicable Laws, to provide information regarding the Fund and/or the unit holders / investors to any regulatory authority and/or the Fund Investments and/or income therefrom, and the Fund and/or the Investment Manager complies with such request in good faith, whether or not it was in fact enforceable, they shall not be liable to the Unit holders / investors or to any other party as a result of such compliance or in connection with such compliance.

Prospective investors / Unit holders should consult their own advisors to understand the implications of FATCA-CRS provisions/requirements. Please note that SBIFML will be unable to provide advice to any investor or counterparty about their tax status or FATCA/CRS classification relevant to their account. It is the responsibility of the investor or counterparty to ensure that they record their correct

tax status / FATCA/ CRS classification. Investor/ counterparty may seek advice from their tax advisor in this regard. The onus to provide accurate, adequate and timely inputs in this regard would be that of the investor or counterparty. Any changes in earlier information provided must be intimated within 30 days of such change. As per the recent amendment to the Income tax Act, 1961 there is an additional levy of penalty of INR 5,000 on every inaccurate reportable account. This covers inaccuracies due to incorrect information provided by investors / Unit holders. Where inaccuracy is due to inaccurate information or false self-certification provided by investors / Unit holders. As per the recent amendment to the Income tax Act, 1961 there is an additional levy of penalty of INR 5,000 on every inaccurate reportable account. This covers inaccuracies due to incorrect information provided by investors / Unit holders. Where inaccuracy is due to inaccurate information or false self-certification provided by investors / Unit holders, the financial institution is entitled to recover the penalty from the investors / Unit holders.

# Litigations & Succession:

The AMC shall freeze/lock/remit/transfer/transmit the Units in the folio(s) partially/completely of investor(s)/Unitholder(s) or reject any applications for subscription or redemption or transmission of Units at its sole and absolute discretion pursuant to receipt of instructions/directions/orders issued by any Governmental, judicial, quasi-judicial, regulatory or other similar authority ("Authority"), including orders restricting the investor(s)/Unitholder(s)/Joint holder(s) from dealing in securities or for attachment of Units held by the investor(s)/Unitholder(s)/ Joint holder(s). Similarly, the AMC shall also be entitled to freeze/ lock/remit/transfer/transmit the Units at its sole and absolute discretion in the event of intestate or testamentary succession involving the investor(s)/Unitholder(s)/Joint holder(s). Additionally, the AMC shall be entitled to freeze/lock the folio(s) of investor(s)/Unitholder(s)/Joint holder(s) for further transactions or reject any applications for subscription or redemption.

# Details of Plans / Options offered:

#### **Direct Plan:**

Direct Plan is only for investors who purchase /subscribe Units in a Investment Strategy directly with the Mutual Fund or through Registered Investment Advisor (RIA) and is not available for investors who route their investments through a Distributor. All the features of the Direct Plan under Investment Strategy like the investment objective, asset allocation pattern, investment strategy, risk factors, facilities offered, load structure etc. will be the same except for a lower expense ratio as detailed in **Section - Annual Recurring Expenses** of the SID. Brokerage/Commission paid to distributors will not be paid / charged under the Direct Plan. Both the plans shall have a common portfolio.

**Eligible investors:** All categories of investors as permitted under the Investment Strategy Information Document of the Investment Strategy are eligible to subscribe under Direct Plan

**Modes for applying:** Investments under Direct Plan can be made through various modes offered by the SIF for investing directly with the SIF.

# How to apply:

- Investors desirous of subscribing under Direct Plan of a Investment Strategy will have to ensure to indicate "Direct Plan" against the Investment Strategy name in the application form.
- Investors should also indicate "Direct" in the ARN column of the application form.

# Regular Plan:

This plan is intended for investors who wish to route their investments through a distributor registered with AMFI. The distributor, including their employees, must have successfully completed the National Institute of Securities Markets (NISM) Series-XIII: Common Derivatives Certification Examination.

In case of Regular and Direct plan the default plan under following scenarios will be:

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

In cases of wrong/ invalid/ incomplete ARN codes mentioned on the application form, the application shall be processed under Direct Plan.

Both plans provide two options for investment – Growth Option and Income Distribution cum capital withdrawal (IDCW) Option. Under the IDCW option, facility for Payout of Income Distribution cum capital withdrawal option (IDCW Payout), Reinvestment of Income Distribution cum capital withdrawal option (IDCW Re-investment) is available. Between "Growth" or "IDCW" option, the default will be treated as "Growth". In "IDCW" option between "IDCW Payout" or "IDCW Reinvestment".

Investor can select only one option either IDCW payout or IDCW Reinvestment or in IDCW plan at a Investment Strategy and folio level. Any subsequent request for change in IDCW option viz. IDCW Payout to IDCW Reinvestment or or vice-versa would be processed at the Folio / Investment Strategy level and not at individual transaction level. Accordingly, any change in IDCW option (payout / reinvestment) will reflect for all the units held under the Investment Strategy / folio.

Note - If the payable IDCW amount is less than or equal to Rs. 150/-, the same will be compulsorily reinvested in the respective Investment Strategy (s)/Plan(s)/Option(s) irrespective of the IDCW facility selected by investor. If the IDCW amount payable is greater than Rs. 150/- then it will be either reinvested or paid as per the mandate selected by the investor

# **Appointment of MF Utilities India Private Limited:**

MF Utility ("MFU") - a shared services initiative of various Asset Management Companies, which acts as a transaction aggregation portal for transacting in multiple Schemes of various Mutual Funds with a single form and a single payment instrument.

Accordingly, all financial and non-financial transactions pertaining to Investment Strategies of Magnum SIF can be done through MFU either electronically on <a href="https://www.mfuonline.com">www.mfuonline.com</a> as and when such a facility is made available by MFUI or physically through the authorized Points of Service ("POS") of MFUI with effect from the respective dates as published on MFUI website against the POS locations. The list of

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

Applicability of NAV shall be based on time stamping of application and realization of funds in the bank account of Magnum SIF within the applicable cut-off timing. The uniform cut-off time as prescribed by SEBI and as mentioned in the ISID / KIM of respective Investment Strategy shall be applicable for applications received by MFU (physical/online). However, investors should note that transactions on the MFUI portal shall be subject to the eligibility of the investors, any terms & conditions as stipulated by MFUI / Magnum SIF / the AMC from time to time and any law for the time being in force.

Investors are requested to note that, MFUI will allot a Common Account Number ("CAN"), a single reference number for all investments in the Mutual Fund industry, for transacting in multiple Schemes of various Mutual Funds through MFU and to map existing folios, if any. Investors can create a CAN by submitting the CAN Registration Form (CRF) and necessary documents at the MFUI POS. Investors can visit the website of MFUI (www.mfuindia.com) to download the relevant forms.

The AMC reserves the right to change/modify/withdraw the features mentioned in the above facility from time to time.

# Appointment of MFCentral as Official Point of Acceptance:

Pursuant to paragraph 16.6 of the SEBI Master Circular for Mutual Funds dated June 27, 2024, to comply with the requirements of RTA inter-operable Platform for enhancing investors' experience in Mutual Fund transactions / service requests, the Qualified RTA's (QRTA's), KFin Technologies Private Limited (KFintech) and Computer Age Management Services Limited (CAMS) have jointly developed MFCentral – A digital platform for Mutual Fund investors.

MFCentral is created with an intent to be a one stop portal / mobile app for all Mutual fund investments and service-related needs of investors that significantly reduces the need for submission of physical documents by enabling various digital / phygital (involving both physical and digital processing) services to Mutual fund investors across fund houses subject to applicable Terms & Conditions of the Platform. MFCentral will be enabling various features and services in a phased manner. MFCentral may be accessed using https://mfcentral.com/ and a Mobile App in future.

With a view to comply with all provisions of the aforesaid circular and to increase digital penetration of Mutual funds, SBI Mutual Fund designates MFCentral as its Official Point of Acceptance (DISC – Designated Investor Service Centre).

Any registered user of MFCentral, requiring submission of physical document as per the requirements of MFCentral, may do so at any of the DISC or collection centres of KFintech or CAMS.

# 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.

  <u>Explanation</u>: "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:

Presently, this disclosure is not applicable.

	vestment Strategy .)				
Scheme Name	AMC Board of Directors	Key personnel (excluding Fund Manager)	Fund Manager		
Not Applicable					

# 3. Dematerialisation and Rematerialisation procedures

#### Dematerialization

The Applicants intending to hold the Units in dematerialized mode will be required to have a beneficiary account with a Depository Participant of the NSDL/CDSL and will be required to mention in the application form DP's Name, DP ID No. and Beneficiary Account No. with the DP at the time of purchasing Units during the NFO of the respective series of the Scheme. The Units allotted will be credited to the DP account of the Unit holder as per the details provided in the application form. The statement of holding of the beneficiary account holder for units held in demat will be sent by the respective DPs periodically. Units held in demat form are freely transferable. It may be noted that trading and settlement in the Units of respective series over the stock exchange(s) (where the Units are listed) will be permitted only in electronic form. If 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 Account Statement (non demat) form into Demat (electronic) form or vice versa should be submitted alongwith a Demat/Remat Request Form to their Depository Participants, However, the Trustee / AMC reserves the right to change the dematerialization/rematerialization process in accordance with the procedural requirements laid down by the Depositories, viz. NSDL/ CDSL and/or in accordance with the provisions laid under the Depositories Act, 1996 and the Regulations thereunder. Investors will be issued allotment advice in accordance with the Regulation.

# **Rematerialization of Units**

Rematerialization of Units shall be carried out in accordance with the provisions of SEBI (Depositories and Participants) Regulations, 1996 as may be amended from time to time.

The process for rematerialisation of Units will be as follows:

Unit Holders/investors should submit a request to their respective Depository Participant for rematerialisation of Units in their beneficiary accounts.

Subject to availability of sufficient balance in the Unit Holder's/investor's account, the Depository Participant will generate a Rematerialisation Request Number and the request will be despatched to the AMC/Registrar.

On acceptance of request from the Depository Participant, the AMC/Registrar will dispatch the account statement to the investor and will also send electronic confirmation to the Depository Participant.

#### 4. ASBA disclosures

# Applications Supported by Blocked Amount (ASBA) facility

In respect of New Fund Offer (NFO) of Schemes 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)/Plan(s) of the Investment Strategy in the ASBA Application Form and following the procedure as prescribed in the form.

ASBA facility shall be provided to investors as a supplementary facility in addition to existing facility through cheques/demand drafts or any other mode of electronic payment for subscribing to the units of scheme(s) during the New Fund Offer period. Please note that ASBA facility is purely optional and not mandatory.

ASBA is an application containing an authorization given by the Investor to block application money in his specified bank account towards the subscription of Units offered during the NFO of the Investment Strategy. If an investor is applying through ASBA facility, the application money towards the subscription of Units shall be debited from his specified bank account only if his/her application is selected for allotment of Units.

To avail of the ASBA Facility, an investor must be holding a Bank account with Self Certified Syndicate Bank (SCSB). SCSB means a banker to an issue registered with the SEBI, which offers the facility of ASBA. ASBA applications can be accepted only by SCSBs at their designated branches, whose names appear on the list of SCSBs displayed in SEBI's website (http://www.sebi.gov.in/pmd/scsb.pdf).

The SCSB shall then block the application money in the bank account specified in the ASBA, on the basis of an authorization to this effect given by the account holder in the ASBA. The application money shall remain blocked in the bank account till the allotment of the issue or till withdrawal/rejection of the application, as the case may be. ASBA facility will be available to all the category of investors mentioned under "Who can invest" Section of the respective SID. An investor, who is eligible for ASBA facility, has the option of making application through ASBA or through the existing facility of applying with cheque / demand draft as mentioned in the SID.

Investors should note that ASBA facility shall be made available to investors only for subscribing to the units of scheme during the New Fund Offer period.

# SALIENT FEATURES OF ASBA FACILITY:

- An ASBA investor shall submit a duly filled up ASBA Application form, physically or electronically, to the SCSB with whom the bank accounts to be blocked, is maintained.
  - (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 Mutual Fund scheme authorising SCSB to block the application money in a bank account.
- j. Investors shall correctly mention the Bank Account number in the ASBA Application Form and ensure that funds equal to the application amount are available in the bank account maintained with the SCSB before submitting the same to the designated branch.

- k. Upon submission of an ASBA Form with the SCSB, whether in physical or electronic mode, investor shall be deemed to have agreed to block the entire application amount specified and authorized the Designated Branch to block such amount in the Bank Account.
- I. On the basis of an authorization given by the account holder in the ASBA application, the SCSB shall block the application money in the Bank Account specified in the ASBA application. The application money shall remain blocked in the Bank Account (till receipt of instructions for enabling allotment or till rejection as the case maybe).
- m. If the Bank Account specified in the ASBA application does not have sufficient credit balance to meet the application money, the ASBA application shall be rejected by the SCSB.
- n. The ASBA Form should not be accompanied by cheque, demand draft or any mode of payment other than authorisation to block application amount in the Bank Account.
- o. All grievances relating to the ASBA facility may be addressed to the AMC / Registrar to the Issue, with a copy to the SCSB, giving full details such as name, address of the applicant, application amount blocked on application, bank account number and the Designated Branch or the collection centre of the SCSB where the ASBA Form was submitted by the Investor.

ASBA facility extended to investors shall operate in accordance with the SEBI guidelines in force from time to time.

#### 5. Portfolio Turnover Details

The Portfolio Turnover is defined as the lower of the value of purchases or sales as a percentage of the average corpus of the Scheme during a specified period of time. The Asset Management Company does not have a policy statement on portfolio turnover. Generally, the Asset Management Company's portfolio management style is conducive to a low portfolio turnover rate. However, given the nature of the Scheme which follows a monthly cycle or rollover / positions the portfolio turnover is expected to be high.

Further, there are trading opportunities that present themselves from time to time. These trading opportunities may be due to trading opportunities in equities, changes in interest rate policy by the Reserve Bank of India, shifts in the yield curve, credit rating changes or any other factors where in the opinion of the fund manager there is an opportunity to enhance the total return of the portfolio. It will be the endeavour of the fund manager to keep portfolio turnover rates as low as possible.

# 6. Unclaimed Redemption and Income Distribution cum Capital Withdrawal Amount

In line with SEBI master circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, unclaimed redemption and IDCW amounts will be deployed by the SIFs in call money market or money market instruments only and the investors who claim these amounts during a period of three years from the due date shall be paid at the prevailing Net Asset Value. After a period of three years, this amount will be transferred to a pool account and the investors can claim the amount at NAV prevailing at the end of the third year. The income earned on such funds may be used for the purpose of investor education. The AMC would make continuous effort to remind the investors through letters to take their unclaimed amounts. The investment management fee charged by the AMC for managing unclaimed amounts shall not exceed 50 basis points.

Further in accordance with SEBI master circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, list of Investors in whose folios there are unclaimed IDCW / redemption amount will be disclosed on our website <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a>.

#### D. Associate Transactions

Apart from applicable SEBI regulations from time to time, there is no separate policy regarding investments in associate or group companies of the sponsor. Therefore, as per SEBI Regulations, the Investment Strategy will not invest more than 25% of net assets of the Investment Strategy in the securities of the State Bank Group companies. Further, the aggregate investment made by all the Investment Strategies in the securities of Group companies of the sponsor will not exceed 25% of the net assets of the fund as a whole. No investment shall be made in any unlisted security of an associate or Group Company of the Sponsor, any security issued by way of private placement by an associate or group company of the Sponsor.

For applications directly solicited and collected by the branches of SBI or by any associates, they may also be paid an agent commission at a rate not exceeding the rate of commission being paid to other agents for the Investment Strategy.

SBI Funds Management Limited, the Asset Management Company will be using services of the Branches of SBI / Associates/subsidiaries for marketing and selling of various Investment Strategies of Magnum SIF and commission charges will be paid to them at normal rate for the funds mobilized

- The AMC has outsourced the Fund Accounting and Administration services to SBI-SG Global Securities Services Pvt Ltd with the approval of Trustees & SEBI.
- > The AMC is using custody services from SBI-SG Global Securities Services Pvt Ltd with the approval of Trustees and in line with the applicable SEBI Regulations.
- > The AMC has been using the services of SBI General Insurance Co. for various insurance purposes.

At present, the SIF does not have any transaction with the Sponsor or its associates. In future, however, SBI or any associates of SBI may be entrusted the work of marketing, book-building, distribution or any other activity connected with the Investment Strategies of Magnum SIF, as may be allowed by SEBI or any other competent authority, and within the relevant provisions of Regulations prevailing from time to time.

#### E. Documents Available for Inspection

The following documents will be available for inspection at the office of SBI Mutual Fund at 9th Floor, Crescenzo, C-38 & 39, G Block, Bandra-Kurla Complex, Bandra (E), Mumbai – 400 051, during business hours on any day (excluding Saturdays, Sundays and bank/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, 1996 and amendments from time to time thereto.
- Indian Trusts Act, 1882.

#### F. Investor Grievances Redressal Mechanism

Redressal Mechanism

To provide best in class experience to the investors, below mentioned are the ways through which investors can address their queries/ grievances.

A. Investors will be provided with a grievance registration number. Please refer to the below mentioned process:

# LEVEL 1:

Telephone:

1800 209 3333 / 1800 425 5425 (Toll Free No) OR 022 62511600 / 080 25512131 (Non toll free local charges applicable) Timings: From 9:30 AM to 6:30 PM (Monday to Saturday)

Email: <a href="mailto:customer.delight@sbimf.com">customer.delight@sbimf.com</a></a>
Branches / Investor Service Centers

You can also walk-in to any of our branch offices nearest to you and our trained Customer services staff will be glad to be of assistance. For a list of our branch offices, please click link <a href="https://www.sbimf.com/en-us/locate-us">https://www.sbimf.com/en-us/locate-us</a>

#### **LEVEL 2 - INVESTOR RELATIONS OFFICER**

In case you are not satisfied with the response/resolution provided, you may contact the Investor Relations Officer of the AMC: Mr. C.A. Santosh.

Email: <u>headcustomerservice@sbimf.com</u>

Phone No.: (022) 6179 3000

#### LEVEL 3

If your communication was a complaint and you are still not satisfied with the resolution you may have received; you may choose to approach our Vice President (Customer Service): Mr. Danish Kazi

Email Id: vpcustomerservice@sbimf.com

#### B. Remedy through the Regulator viz. SEBI

If not satisfied with the responses from the AMC, you can lodge your grievances with SEBI at <a href="http://scores.gov.in">http://scores.gov.in</a> or you may also write to any of the offices of SEBI. For any queries, feedback or assistance, please contact SEBI Office on Toll-Free Helpline at 1800 22 7575 / 1800 266 7575.

# Online Resolution of Disputes through Conciliation / Arbitration (Smart ODR):

You shall first take up your grievance by lodging a complaint directly with SBI Mutual Fund (Refer Level A).

If the grievance is not redressed satisfactorily, then you may, in accordance with the SCORES guidelines, escalate the same through the SCORES Portal in accordance with the process laid out therein (Refer Level B).

After exhausting all available options for resolution of the grievance, if you are still not satisfied with the outcome, you can opt for online resolution of dispute through Conciliation/Arbitration on SMART ODR Portal at <a href="mailto:smartodr.in">smartodr.in</a>

Alternatively, you can opt for online resolution of dispute through the SMART ODR Portal if the grievance lodged with us was not satisfactorily resolved or at any stage of the subsequent escalations mentioned in the above paragraph (prior to or at the end of such escalation/s).

# **Investor Complaints Report**

History of Complaints received for the last three fiscal years: Not Applicable

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

# 1. Derivative strategies

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

SEBI in terms of paragraph 7.5 of the SEBI Master Circular for Mutual Funds dated June 27, 2024 permitted Mutual Funds to participate in the derivatives market at par with Foreign Portfolio Investors (FPI). Accordingly, Mutual Funds shall be treated at par with a registered FII in respect of position limits in index futures, index options, stock options and stock futures contracts.

#### I. Position Limit

The position limits for the SIF and its investment strategies, for transaction in derivatives segment are in compliance to the paragraph 7.5 of the SEBI Master Circular for Mutual Funds dated June 27, 2024, and to all such amendments as applicable from time to time. The position limits are given as under:

# i. Position limit for the SIF in index options contracts

The SIF position limits in index option contracts on a particular underlying index shall be higher of:

- a. Rs. 500 Crore; or
- b. 15% of the total open interest in the market in index options contracts.

This limit would be applicable on open positions in all options contracts on a particular underlying index.

# ii. Position limit for the SIF in index futures contracts:

The SIF position limits in index futures contracts on a particular underlying index shall be higher of:

- a. Rs. 500 Crore; or
- b. 15% of the total open interest in the market in index futures contracts.

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, the SIF may take exposure in index Derivatives subject to the following limits:

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

#### iv. Position limit for SIFs for stock based derivative contracts

The combined futures and options position limit shall be 20% of the applicable Market Wide Position Limit (MWPL) (as per paragraph 7.5.1.4 of the SEBI Master Circular for Mutual Funds dated June 27, 2024).

#### v. Position limit for each scheme of SIF

The scheme-wise position limit / disclosure requirements shall be -

1. For stock option and stock futures contracts, the gross open position across all derivative contracts on a particular underlying stock of a scheme of a mutual fund shall not exceed the higher of:

1% of the free float market capitalization (in terms of number of shares).

Or

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

- 2. This position limits shall be applicable on the combined position in all derivative contracts on an underlying stock at a Stock Exchange.
- 3. For index based contracts, SIF shall disclose the total open interest held by its scheme or all schemes put together in a particular underlying index, if such open interest equals to or exceeds 15% of the open interest of all derivative contracts on that underlying index.

For the time duration of change in the index constituents, the Investment Strategy may invest in Derivatives to maintain the respective weightages for the stocks, constituting the underlying index.

Index Futures / Stock Futures – buying index futures / stock futures (long position) can provide exposure to the index or the stock without undertaking any position in the underlying stocks. Thus, any market movement can be effectively captured by the scheme through such exposure. This can be useful at the time of any portfolio rebalancing due to index rebalancing and may help the scheme in managing its tracking error and the impact cost more efficiently. On the other hand, the scheme can also sell index futures/ stock futures (short position). Thus, any long or short position in an outgoing or incoming stock in the index can be efficiently managed by suitable exposure through derivatives.

#### Illustration

Spot price for stock A: Rs 650

Near month Stock Future price at the beginning of the month: Rs 653

Scheme buys 1000 lots

Each lot has a nominal value equivalent to 200 units of the underlying stock

Let us assume on the date of unwinding the position, the future price is trading at Rs 660 and the spot price is trading at Rs 657

Profits for the Scheme = (660-653) \* 1000 lots \* 200 = Rs 1,400,000

In effect in the above example, the Investment Strategy can replicate the movement of the underlying stock through derivatives. The above is for illustration purpose only and any associated cost like brokerage, transaction cost, margin etc will have to be accounted for.

#### Illustrations

# i. Arbitrage:

Buy 1000 stocks of Company A at Rs 100 and sell the equivalent of stocks future of the Company A at Rs 101.

1. Market goes up and the stock end at Rs 150.

At the end of the month the future expires automatically:

At the settlement date we assume that future price = closing spot price = Rs 150

- a. Gain on stock is 1000\*(150-100) = Rs 50000
- b. Loss on future is 1000\*(101-150) = Rs 49000
- c. Then gain realized is 50 000 49 000 = Rs 1000
- 2. Market goes down and the stock end at Rs 50.

At the end of the month the future expires automatically:

At the settlement date we assume that future price = closing spot price = Rs 50

- a. Loss on stock is 1000\*(50-100) = Rs 50000
- b. Gain on future is 1000\*(101-50) = Rs 51000

Then gain realized is 51000 - 50000 = Rs 1000

# ii. Unwinding an arbitrage position:

Buy 1000 stocks of Company A at Rs 100 and sell the equivalent of stocks future of the Company A at Rs 101.

The market goes up and at some point of time during the month the stock trades at Rs 150 and the future trades at Rs 149 then we unwind the position:

- 1. Buy back the future at Rs 149: loss incurred is (101- 149)\*1000= Rs 48 000
- 2. Sell the stock at Rs 150: gain realized: (150-100)\*1000 = Rs 50 000
- 3. Net gain is 50 000 48 000 = Rs 2 000

# iii. Roll over the futures:

In this case we keep the underlying stock position intact and roll over the futures position into next month. For example, if the underlying stock is trading around Rs 150 on or closer to the expiry date, the stock future is also generally likely to trade closer to similar levels. In such a case, if the next month futures are trading at levels higher than the current month futures, we

roll over the future position to the next month (i.e. instead of letting the current month future expire (on expiry day),

buyback the current month future and sell the next month future in its place, keeping the underlying stock position unchanged):

- Stock future next month is at Rs 151
- b. Stock future actual month is at Rs 150
- c. Then sell future next month at Rs 151 and buy back actual future at Rs 150 => gain of 1000\*(151-150) = Rs 1000 and the arbitrage is continuing.

In case, the future price trades at discount to spot price (any time during the period till the expiry date) then the original position will be squared by buying the future and selling the spot market position.

#### **Debt Derivatives**

The Investment Strategy may use derivatives instruments like Interest Rate Swaps, Forward Rate Agreements or such other derivative instruments as may be introduced from time to time for the purpose of hedging and portfolio balancing and as may be permitted under the Regulations and quidelines.

#### **Interest Rate Swaps**

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

# Forward Rage Agreement (FRA)

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

#### Advantages of Derivatives

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

ii) Interest Rate Swaps and Forward rate Agreements

Bond markets in India are not very liquid. Investors run the risk of illiquidity in such markets. Investing for short-term periods for liquidity purposes has its own risks. Investors can benefit if the Fund remains in call market for the liquidity and at the same time take advantage of fixed rates by entering into a swap. It adds certainty to the returns without sacrificing liquidity.

# v. Illustration: Interest Rate Swap (IRS)

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

The deal will be as under:

Receives ←	Floating rate (NSE MIBOR)	Pays
Pays	Fixed rate (8.75%)	Receives

The cash flows on a notional principal amount of Rs. 10 crores would be-

(R. in Crore)

	Principal	NSE MIBOR	Interest	Amount	
Day 1		10.0000	8.10%	.0022192	10.002219 18
Day 2		10.00222	8.20%	.0022466	10.004465 75
Day 3		10.00447	8.30%	.002274	10.006739 73
Day 4 (for 2 days)	Saturday	10.00674	8.15%	.0044658	10.011205 48
Day 5	Sunday		Holiday		
Day 6		10.01121	8.40%	.0023014	10.013506 85
Day 7		10.01351	8.50%	.0023288	10.015835 62
Floating Interest Payable					.01583561 64
Fixed Interest Receivable					.01678082 19
Net Receivable for Mutual Fund receiving fixed					.00094520 55

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

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

Risk factors Interest rate swaps strategy:

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

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

Further the exposure limits for trading in derivatives by SIFs specified by paragraph 12.24 and paragraph 12.25 of SEBI Master Circulars for Mutual Funds dated June 27, 2024 are as follows:

- 1. In accordance with the clause 12.24.1 of the Master Circular for Mutual Funds ('Master Circular') dated June 27, 2024, the cumulative gross exposure through equity, debt, derivative positions (including and fixed income derivatives), repo transactions and credit default swaps in corporate debt securities, Real Estate Investment Trusts (REITs), Infrastructure Investment Trusts (InvITs), other permitted securities/assets and such other securities/assets as may be permitted by the Board from time to time should not exceed 100% of the net assets of the investment strategy..
- 2. SIFs shall not write options or purchase instruments with embedded written options.
- 3. The total exposure related to option premium paid must not exceed 20% of the net assets of the scheme.
- 4. Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.
- 5. Exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
- a. Hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains.
- b. Hedging positions cannot be taken for existing derivative positions. Exposure due to such positions shall have to be added and treated under limits mentioned in Point 3.
- c. Any derivative instrument used to hedge has the same underlying security as the existing position being hedged.
- d. The quantity of underlying associated with the derivative position taken for hedging purposes does not exceed the quantity of the existing position against which hedge has been taken.
- 6. SIFs may enter into plain vanilla Interest Rate Swaps (IRS) for hedging purposes. The value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the scheme.
  - In case of participation in IRS is through over the counter transactions, the counter party has to be an entity recognized as a market maker by RBI and exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the scheme. However, if SIFs are transacting in IRS through an electronic trading platform offered by the Clearing Corporation of India Ltd. (CCIL) and CCIL is the central counterparty for such transactions guaranteeing settlement, the single counterparty limit of 10% shall not be applicable
- 7. Exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated under the limits mentioned in point 3.
- 8. Definition of Exposure in case of Derivative Positions
- 9. Each position taken in derivatives shall have an associated exposure as defined under. Exposure is the maximum possible loss that may occur on a position. However, certain derivative positions may theoretically have unlimited possible loss. Exposure in derivative positions shall be computed as follows:

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

#### II. The risks involved in derivatives are:

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

#### III. Methods to tackle these risks:

- 1. Hedging will not be done on a carpet basis but based on a view about interest rates, economy and expected adverse impact.
- 2. Limits of appropriate nature will be developed for counter parties
- 3. Such an exposure will be backed by assets in the form of cash or securities adequate to meet cost of derivative trading and loss, if any, due to unfavorable movements in the market.

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

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

# V. The use of derivatives for hedging will give benefit of:

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

#### VI. VALUATION OF DERIVATIVES

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

# **VII. REPORTING OF DERIVATIVES**

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

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

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

#### 2. Swing Pricing

Presently, this section is not applicable.

# 3. Provisions on creation of Segregated portfolio/Side pocketing

# (i) Segregation of Portfolio:

Creation of segregated portfolio shall be subject to following guidelines specified by SEBI as per Paragraph 4.4 of Master Circular for Mutual Funds:

The term 'segregated portfolio' shall mean a portfolio, comprising of debt or money market instrument affected by a credit event that has been segregated in an Investment Strategy and the term 'main portfolio' shall mean the Investment Strategy portfolio excluding the segregated portfolio and the term 'total portfolio' shall mean the Investment Strategy portfolio including the securities affected by the credit event.

Segregated portfolio will 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:

- Downgrade of a debt or money market instrument to 'below investment grade, or
- Subsequent downgrades of the said instruments from 'below investment grade, or
- Similar such downgrades of a loan rating.

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

Creation of segregated portfolio of unrated debt or money market instruments of an issuer that does not have any outstanding rated debt or money market instruments: Segregated portfolio of such unrated debt or money market instruments may be created only in case of actual default of either the interest or principal amount. For unrated instruments, 'actual default' by the issuer of such instruments shall be considered for creation of segregated portfolio. AMC shall

inform AMFI immediately about the actual default by the issuer. Upon being informed about the default, AMFI shall immediately inform the same to all AMCs. Pursuant to dissemination of information by AMFI about actual default by the issuers, AMCs may segregate the portfolio of debt and money market instruments of the said issuers.

#### PROCESS:

The recommendation of creating the segregated portfolio needs to be approved by the Board of AMC & Trustee.

Further, the AMC shall will immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors. The AMC 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.

The AMC will ensure that till the time the trustee approval is received, which in no case shall exceed 1 business day from the day of credit event, the subscription and redemption in the scheme shall be suspended for processing with respect to creation of units and payment on redemptions.

#### Post approval process:

Once AMC & trustee approval is received by SBIFML:

- 1. Segregated portfolio shall be effective from the day of credit event
- 2. SBIFML shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information shall also be submitted to SEBI.
- 3. An e-mail or SMS should be sent to all unit holders of the concerned Investment Strategy.
- 4. The NAV of both segregated and main portfolio shall be disclosed from the day of the credit event.
- 5. All existing investors in the Investment Strategy as on the day of the credit event shall be allotted equal number of units in the segregated portfolio as held in the main portfolio.
- 6. No redemption and subscription shall be allowed in the segregated portfolio. However, in order to facilitate exit to unit holders in segregated portfolio, AMC shall enable listing of units of segregated portfolio on the recognized stock exchange within 10 working days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests.
- 7. If the AMC Board/ trustees do not approve the proposal to segregate portfolio, AMC shall issue a press release immediately informing investors of the same.

# Security Valuation and processing of subscriptions and redemptions:

- 1. The valuation of any security sought to be segregated will 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, 1996 and Circular(s) issued thereunder and shall be in line with the valuation policy, which would be either external valuation prices or hair cut based valuation as applicable. The valuation price may deviate from the above based on adequate reasons and necessary disclosure as required by the SEBI guidelines.
- 2. All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as per the existing circular on applicability of NAV. However, in case of segregated portfolio, applicability of NAV will be as under:
- 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

# Disclosure requirements:

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 will be communicated to the investors within 5 working days of creation of the segregated portfolio. Further, adequate disclosure of the segregated portfolio will also appear in all Investment Strategy related documents, in monthly and half-yearly portfolio disclosures and in the annual report of the SIF and the Investment Strategy

Further, the NAV of the segregated portfolio will be declared on daily basis.

The information regarding number of segregated portfolios created in an Investment Strategy shall appear prominently under the name of the Investment Strategy at all relevant places such as ISID, KIM-cum-Application Form, advertisement, AMC and AMFI websites, etc. The scheme performance required to be disclosed at various places will include the impact of creation of segregated portfolio. The scheme performance will 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, will be disclosed as a footnote to the scheme performance. These disclosures regarding the segregated portfolio will be carried out for a period of at least 3 years after the investments in segregated portfolio are fully recovered/ written-off.

The investors of the segregated portfolio will be duly informed of the recovery proceedings of the investments of the segregated portfolio and status update will be provided to the investors at the time of recovery and also at the time of writing-off of the segregated securities.

# Total Expense Ratio (TER) for the segregated portfolio

SBIFML shall not charge investment and advisory fees on the segregated portfolio. However, TER (excluding the investment and advisory fees) can be charged, on a pro-rata basis only upon recovery of the investments in segregated portfolio.

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.

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 SBIFML.

The costs related to segregated portfolio shall in no case be charged to the main portfolio.

# **Monitoring by Trustees**

In order to ensure timely recovery of investments of the segregated portfolio, Trustees will ensure that, the SBIFML puts in sincere efforts to recover the investments of the segregated portfolio. Upon recovery of money, whether partial or full, it will 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. Further, an Action Taken Report (ATR) on the efforts made by the SBIFML to recover the investments of the segregated portfolio will be placed in every Trustee meeting till the investments are fully recovered/ written-off.

The Trustees will 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.

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

Creation of segregated portfolio will be optional and at the discretion of the AMC.

# Illustration of impact of Portfolio Segregation on scheme and its investors:

# **Before Segregation:**

Total Portfolio	Regular Plan	Direct Plan	
Net Asset (a)	500	200	
Units (b)	20.00	10.00	
NAV per Unit (c = a/b)	25.00	20.00	

# **Assumptions:**

The above portfolio has a security XYZ with current market value on the date of segregation of Rs 70 which has been downgraded below investment grade or has defaulted. Post splitting the Total portfolio into Main portfolio and Segregated portfolio, the impact be as below:

# After Segregation:

Main Portfolio	Regular Plan	Direct Plan
Net assets before segregation (a)	500	200
Market Value of Security XYZ (b)	50.00	20.00
Net assets after segregation (c = a - b)	450.00	180.00
Units (d)	20.00	10.00
NAV per unit (c/d)	22.500	18.000

Segregated Portfolio	Regular Plan	Direct Plan
Net Assets* (a)	50.00	20.00
Units (b)	20.00	10.00
NAV per Unit (c = a/b)	2.50	2.00

<sup>(\*</sup>equivalent of market value of segregated security)

For existing investors, the total portfolio will decline by the amount which is segregated (i.e. value of main portfolio after segregation). They will be allotted equal number of units in the main portfolio and the segregated portfolio in the same proportion as held by them in the total portfolio. Thereafter, existing investors can redeem from the main based on the prevailing NAV and they will continue to hold units in the segregated portfolio. For any new investor, they will be allotted units only in the main portfolio based on the prevailing NAV. NAV of the segregated portfolio may undergo a change on the future depending on any recovery and any applicable haircut.

# 4. Short selling / stock lending

# SHORT SELLING:

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

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

# STOCK LENDING:

The Investment Strategy may also 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 expiry of the stipulated period. The Fund may in future carry out stock-lending activity under the scheme, in order to augment its income. Stock lending may involve risk of default on part of the borrower. However, this risk will be substantially reduced as the Fund has opted for the "Principal Lender Scheme of Stock Lending", where entire risk of borrower's default rests with approved intermediary and not with the Fund. There may also be risks associated with Stock Lending such as liquidity and other market risks. Any stock lending done by the Investment Strategy shall be in accordance with any Regulations or guidelines regarding the same. The AMC will apply the following limits, should it desire to engage in Stock Lending:

- (a) Not more than 20% of the net assets can generally be deployed in Stock Lending
- (b) Not more than 5% of the net assets can generally be deployed in Stock Lending to any single intermediary.

# H. Transaction Charges and Stamp Duty

Transaction Charges - Not Applicable.

#### Stamp Duty:

Pursuant to Notification issued by Department of Revenue, Ministry of Finance, Government of India, a stamp duty of 0.005% would be levied on applicable mutual fund transactions. Accordingly, pursuant to levy of stamp duty, the number of units allotted on applicable transactions (Purchase, Switch-in, IDCW Reinvestment & Systematic transactions viz. SIP / STP-in etc.) to the unit holders would be reduced to that extent.

#### XI. 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 working days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or mobile number.

Pursuant to Regulation 36 of the SEBI Regulation, the following shall be applicable with respect to account statement:

The asset management company shall ensure that consolidated account statement for each calendar month is issued, on or before fifteenth day of succeeding month, detailing all the transactions and holding at the end of the month including transaction charges paid to the distributor, across all schemes of all mutual funds, to all the investors in whose folios transaction has taken place during that month:

Provided that the asset management company shall ensure that a consolidated account statement every half yearly (September/ March) is issued, on or before twenty first day of succeeding month, detailing holding at the end of the six month and commission paid to the distributor, across all schemes of all mutual funds, to all such investors in whose folios no transaction has taken place during that period.

 Provided further that the asset management company shall identify common investor across fund houses by their permanent account number for the purposes of sending consolidated account statement.

As the Units of the Investment Strategy are in demat, the holding statement issued by the Depository Participant would be deemed to be adequate compliance with requirements of SEBI regarding dispatch of statements of account.

In terms of SEBI Circular No. IR/MRD/DP/31/2014 dated November 12, 2014 on Consolidated Account Statement, investors having Demat account has an option to receive consolidated account statement:

- Investors having MF investments and holding securities in Demat account shall receive a single Consolidated Account Statement (CAS) from the Depository.
- Consolidation of account statement shall be done on the basis of Permanent Account Number (PAN). In case of multiple holding, it shall be PAN of the first holder and pattern of holding. The CAS shall be generated on a monthly basis.
- If there is any transaction in any of the Demat accounts of the investor or in any of his mutual fund folios, depositories shall send the CAS within twelve (12) days from the month end and to investors that have opted for delivery via physical mode, within fifteen (15) days from the month end w.e.f May 14, 2025 pursuant to SEBI Circular No. SEBI/HO/MRD/PoD1/CIR/P/2025/16 dated February 14, 2025. In case, there is no transaction in any of the mutual fund folios and demat accounts then CAS with holding details shall be sent to the investor on half yearly basis. The depositories shall dispatch the CAS to investors that have opted for e-CAS on or before the eighteenth (18th) day of April and October and to investors that have opted for delivery via physical mode by the twenty first (21st) day of April and October.
- In case an investor has multiple accounts across two depositories, the depository with whom the account has been opened earlier will be the default depository.

If 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 Account Statement (non demat) form into Demat (electronic) form or vice versa should be submitted alongwith a Demat/Remat Request Form to their Depository Participants. However, the Trustee / AMC reserves the right to change the dematerialization / rematerialization process in accordance with the procedural requirements laid down by the Depositories, viz. NSDL/ CDSL and/or in accordance with the provisions laid under the Depositories Act, 1996 and the Regulations thereunder.

The AMC shall, on production of instrument of transfer together with relevant unit certificates, register the transfer and return the unit certificate to the transferee within 30 days from the date of such production. In case the units are with the depository such units will be transferable in accordance with the provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

All Units will rank pari passu, among Units within the same Option in the Scheme concerned as to assets, earnings and the receipt of IDCW, if any, as may be declared by the Trustee.

# 2. Half Yearly Disclosures/Portfolio Disclosures/Financial Results

# a. Half Yearly disclosure of Un-Audited Financials:

Before expiry of one month from the close of each half year i.e. on March 31 or September 30, the Fund shall host a soft copy of half – yearly unaudited financial results on the website of the Fund i.e. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and that of AMFI www.amfiindia.com. A notice advertisement communicating the investors that the financial results shall be hosted on the website shall be published in one national English daily newspaper and in a newspaper in the language of the region where the Head Office of the fund is situated.

#### b. Portfolio disclosures:

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 AMC website and on the website of AMFI within 10 days from the close of such month in a user friendly and downloadable spreadsheet format.

Further, the Statement of Investment Strategy portfolio shall be emailed to those unitholders whose email addresses are registered with the SIF within the above prescribed timeline. Further, the AMC shall provide physical copy of the statement of Investment Strategy portfolio, without charging any cost, on receipt of a specific request from the unitholder.

# c. Half Yearly disclosure of Portfolio of Investment Strategy:

In terms of 5.1.1 of SEBI circular dated June 27, 2024 on half year basis (i.e. March 31 and September 30), the portfolio of the Investment Strategies shall be disclosed as under:

- 1. The SIF shall disclose the portfolio (alongwith the ISIN) including derivative instruments, in the prescribed format as on the last day of the half year for all its investment strategies on the AMC website and on the AMFI's website i.e. <a href="www.amfiindia.com">www.amfiindia.com</a> within 10 days from the close of the half-year.
- A Statement of Investment Strategy portfolio shall be emailed to those unitholders whose email addresses are registered with the SIF within 10 days from the close of each half year.
- The AMC shall publish an advertisement every half year, in the all India edition of at least two daily newspapers, one each in English and Hindi; disclosing the hosting of the half yearly

Investment Strategy portfolio statement on its website viz. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and on the website of AMFI i.e. <a href="www.amfiindia.com">www.amfiindia.com</a> and the modes through which a written request can be submitted by the unitholder for obtaining a physical or electronic copy of the statement of Investment Strategy portfolio.

4. The AMC shall provide physical copy of the statement of Investment Strategy portfolio, without charging any cost, on receipt of a specific request from the unitholder.

# 3. Half Yearly Results:

Before expiry of one month from the close of each half year i.e. on March 31 or September 30, the Fund shall host a soft copy of half – yearly unaudited financial results on the website of the Fund i.e. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and that of AMFI www.amfiindia.com. A notice advertisement communicating the investors that the financial results shall be hosted on the website shall be published in one national English daily newspaper and in a newspaper in the language of the region where the Head Office of the fund is situated.

# 4. Annual Report:

Investment Strategy wise Annual Report or an abridged summary thereof shall be provided to all unitholders within four months from the date of closure of the relevant accounts year i.e. 31st March each year as follows:

- The Investment Strategy wise annual report / abridged summary thereof shall be hosted on website of the Fund i.e., <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a>. The physical copy of the Investment Strategy -wise annual report or abridged summary shall be made available to the unitholders at the registered office of the AMC at all times.
- 2. The Investment Strategy annual report or an abridged summary thereof shall be emailed to those unitholders whose email addresses are registered with the Fund.
- 3. The AMC shall publish an advertisement on annual basis, in the all India edition of at least two daily newspapers, one each in English and Hindi; disclosing the hosting of the Investment Strategy wise annual report on its website viz. <a href="https://www.sbimf.com/magnumsif">https://www.sbimf.com/magnumsif</a> and on the website of AMFI i.e. www.amfiindia.com and the modes through which a written request can be submitted by the unitholder for obtaining a physical or electronic copy of the Investment Strategy -wise annual report or abridged summary.
- 4. The AMC shall provide physical copy of the abridged summary of the Annual report, without charging any cost, on receipt of a specific request from the unitholder.

Notwithstanding	anything	contained	in	this	Statemer	nt of	Additional	Information	, the
provisions of the	SEBI (Mut	tual Funds)	Reg	gulatio	ns, 1996	and th	ne guideline	s thereunder	shall
be applicable.									