SBI MUTUAL FUND

VALUATION POLICY

Version 11.00

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A. Scope of the policy

The investment Valuation Policy aims to provide broad valuation guidelines to be followed for each type of security. The same shall be reviewed annually by the Valuation Committee and also by an independent Chartered Accountant firm.

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.

Frequency of review: The policy shall be reviewed annually or more frequently, if required, either due to change in Regulations or business environment.

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 SEBI(MUTUAL FUNDS) REGULATIONS,1996
2. Circular No MFD/CIR/010/024/2000 dated 17-01-2000 inter-alia on Valuation committee)
3. Circular No MFD/CIR/6/73/2000 dated 27-07-2000
4. Circular No MFD/CIR/8/92/2000 dated 18-09-2000
5. Circular No MFD/CIR/8(a)/104/2000 dated 03-10-2000
6. Circular No MFD/CIR/14/088/2001 dated 28-03-2001
7. Circular No MFD/CIR/14/442/2002 dated 20-02-2002
8. Circular No MFD/CIR/03/526/2002 dated 09-05- 2002
9. Circular No MFD/CIR No .23/066/2003 dated 07-03-2003
10. Circular No MFD/CIR No.9/141601/08 dated 18-10-2008
11. Circular No MFD/CIR No.2/166256/2009 dated 12-06-2009
12. Circular No IMD/CIR No.16/193388/2010 dated 02-02-2010
13. Circular No IMD/DF/4/2010 dated 21-06-2010
14. SEBI MUTUAL FUNDS (AMENDMENT) (REGULATIONS),2012 dated 21-02-2012
15. Circular No IMD/DF/6/2012 dated 28-02-2012
16. AMFI Best Practice Guidelines Circular No.135/BP/29/2012-13 dated 15th May 2012
17. AMFI Best Practice Guidelines Circular No.35P/MEM-COR/3/12-13 dated 30th May 2012
18. Circular No SEBI/HO/IMD/DF4/CIR/P/2019/41 dated March 22, 2019
19. Circular No. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019
20. Circular No. SEBI/HO/IMD/DF3/CIR/P/2020/47 dated March 23, 2020
21. Circular No. SEBI/HO/IMD/DF3/CIR/P/2020/76 dated April 30, 2020
22. AMFI Best Practice Guidelines Circular No. 135/BP/83/2019-20 dated November 18, 2019
23. Master Circular for Mutual Funds issued by SEBI

B. VALUATION COMMITTEE

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

Constitution:

The Valuation Committee will comprise of the following members:

Chief Operating Officer

Chief Investment Officer

Chief Risk Officer

Head – Compliance & Company Secretary

Head – Operations

Fund Managers

Designated Officers from Risk, Investments 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. The Committee shall be responsible for addressing areas of conflict of interest and thereafter recommend changes if any in policy/methodology.

Functions of the Valuation Committee:

- to provide guidelines on valuation within the regulatory framework,
- decide on specific cases as may be referred to the Committee,
- appoint/recommend the appointment of third party agencies for valuation,
- evaluate the performance of such agencies on a periodic basis,
- review the valuation policy.

As prescribed by SEBI, valuation guidelines shall attempt to adhere to the principles of fair valuation, in order to ensure that securities are valued at prices/yields that are close to realisable/market values.

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

C. Review by 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.

D. Record Keeping

Policy document should be updated in SID / SAI, website and other documents as prescribed by the SEBI regulations and guidelines.

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.

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 including 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 (NSE) and Bombay Stock Exchange (BSE) would be considered as recognized stock exchanges in India.

1.10 Principal Stock Exchange

National Stock Exchange (NSE) would be considered as principal stock exchange.

1.11 Secondary Stock Exchange

Bombay Stock Exchange (BSE) would be considered as secondary stock exchange.

2. Valuation of Equity and Equity related Instrument

2.1 Valuation of Equity Shares

a) Traded Securities

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

ii) When on a particular valuation day, a security has not been traded on the principal stock exchange; the value at which it is traded on secondary stock exchange may be used.

iii) When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the principal stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date.

iv) On a valuation day, ETFs and Index Funds are to be valued at the last quoted closing price on the stock exchange of the underlying index.

b) Thinly Traded / Non-Traded Securities

Thinly Traded / Non-Traded securities are valued in "good faith" on the basis of the valuation principles laid down below:

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

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:

1. Net Worth per share = [share capital + free reserves (excluding revaluation reserves) - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by Number of Paid up Shares.

2. After taking into account the outstanding warrants and options, Net Worth per share shall again be calculated and shall be = [share capital + consideration on

exercise of Option/Warrants received/receivable by the Company + free reserves (excluding revaluation reserves) - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by Number of Paid up Shares plus Number of Shares that would be obtained on conversion/exercise of Outstanding Warrants and Options.

3. The lower of (1) and (2) above shall be used for calculation of Net Worth per share and for further calculation in (iii) below.

ii) Average capitalisation rate (P/E ratio) for the industry based upon either NSE or BSE data shall be taken and discounted by 75% i.e. only 25% of the Industry average P/E shall be taken as capitalisation rate (P/E ratio). Earnings per share of the latest audited annual accounts will be considered for this purpose.

iii) The value as per the Net Worth value per share and the Capital Earning value calculated as above shall be averaged and further discounted by 15% for illiquidity so as to arrive at the fair value per share.

The above valuation methodology for Thinly Traded, Non-Traded and Unlisted Securities shall be subject to the following conditions:

- All calculation shall be based on audited accounts.

- 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.

2.3 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.

2.4 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.

iii) The valuation committee may in specific cases decide to use a different method for valuation of preference shares by assigning reasons therefor.

2.5 Valuation of Rights

i) Until, rights are traded, the value of "rights" shares should be calculated as per the formula below:

a.1) Vr = n / m * (Pex – Pof),

Where,

Vr	=	Value of rights
n	=	no. of rights offered
m	=	no. of original shares held
Pex	=	Ex – Rights Price
Pof	=	Rights Offer Price

a.2) Ex-right price of underlying security will be considered separately for each valuation day.

a.3) In case the Offer price is higher than the Ex-right price then the rights would be valued at Zero.

a.4) If the rights are on non-traded shares or unlisted shares then the rights would be valued at Zero.

ii) Where it is decided not to subscribe to the rights but to renounce them and renunciations are being traded, the rights can be valued at the renunciation value.

iii) Where it is decided to subscribe the rights, renunciation value might not be appropriate. Hence in such cases valuation of rights entitlement will be done as per the formula stated in clause (a.1) to (a.4) above.

iv) Valuation guidelines related to equity shares would be applicable from the date rights are subscribed.

2.6 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.

2.7 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.

2.8 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.

2.9 Valuation of Suspended Security

i) In case trading in an equity security is suspended upto 30 days, then the last traded price would be considered for valuation of that security.

ii) If an equity security is suspended for more than 30 days, then the fair valuation of Thinly Traded / Non-Traded Security as above would be applied.

2.10 Valuation of Illiquid Security

a) Aggregate value of "illiquid securities" of scheme, which are defined as non-traded, thinly traded and unlisted equity shares, shall not exceed 15% of the total assets of the scheme and any illiquid securities held above 15% of the total assets shall be assigned Zero value.

b) Mutual Funds shall disclose as on March 31 and September 30 the scheme wise total illiquid securities in value and percentage of the net assets while disclosing Half Yearly Portfolios to the unit holders. In the list of investments, an asterisk mark shall be given against all such investments which are recognised as illiquid securities.

c) Mutual Funds shall not be allowed to transfer illiquid securities among their schemes.

3. Corporate Action

3.1 De-merger, Merger, Amalgamation and Scheme of Arrangement

On corporate action, above valuation guidelines may be difficult to adopt due to non-availability of the Balance Sheet of the restructured entities in public domain or the resultant securities come up for listing after few days while the valuation required to be carried out effective on the date of the corporate action itself. Besides, in such case there are generally no comparative parameters readily available for carrying out the valuation exercise. Following broad valuation guidelines would be used for the valuation of securities resulting from the corporate actions:

a) De-Merger

i) In case shares of both the companies (De-merged Company and Resulting Companies) are traded immediately on de-merger, both the shares would be valued at respective traded prices.

ii) In case there is only one Resulting Company along with the De-merged Company and such Resulting Company is unlisted / non-traded:

Traded shares of De-merged Company will be valued at traded price and the shares of Resulting Company will be valued by residual price methodology which would be the closing value of the shares of De-merged Company on the day before the de-merger less opening value of the shares of De-merged Company immediately post de-merger.

If value of the shares of De-merged Company is equal or in excess of the value of pre de-merger shares, then the shares of Resulting Company will be valued at Zero.

iii) In case there are more than one Resulting Companies along with the De-merged Company and all or some Resulting Companies are unlisted / non-traded:

The shares of Resulting Companies will be valued by residual price methodology as explained in point (ii) above. The residual value will be allocated into Resulting Companies in the ratio provided as a part of scheme of arrangement or such other ratio as decided by the Valuation Committee. If one of the Resulting Companies is listed / traded, the residual value of unlisted / non-traded Resulting Companies would be further determined by reducing the traded value of listed Resulting Companies from the residual value computed as above.

iv) In case shares of both the companies (De-merged Company and Resulting Companies) are not traded on de-merger:

The traded value of the De-merged Company on the day before the de-merger will be allocated between De-merged Company and Resulting Companies in the ratio provided as a part of scheme of arrangement or such other ratio as decided by the Valuation Committee.

v) Cost allocation would be done proportionate to the derived value of the resultant scrips or other appropriate basis to be decided on case to case basis depending on the terms of de-merger.

vi) The valuation committee may in specific cases decide to use a different method for valuation by assigning reasons therefor.

b) Merger

In case of merger, if the shares of the merged entity are not listed / traded, then valuation of the merged entity will be decided on case to case basis depending on the terms of merger and may be valued at previous day closing price of the respective companies prior to merger.

3.2 Buy-back of Securities

If a company offers to buy-back hundred percent of the shares tendered then shares will be valued at the price of buy-back and ignoring the market price. Else, market price of the shares will be considered for valuation till formal confirmation of acceptance of shares tendered under the buy-back schemes. Quantum of shares accepted under buy-back will be accounted as a sale trade.

3.3 Stock Split/ Face value change

In case of stock split, the face value of a stock is reduced and proportionately number of shares is increased. The valuation price will be derived on the basis of the closing price before the ex-date and adjusted in proportion of stock split, till the new stock split shares are listed and traded on a stock exchange. The cost of one share will be proportionately adjusted in line with stock split change, to derive the new cost of share. On stock split/face value change, in case the company specifies any regulations/ method for cost bifurcation or valuation the same will be adopted.

4. Valuation of Futures and Options

i) On the valuation day, settlement price will be considered for valuation.

ii) If the settlement price is not available, then closing price for the security will be considered for the valuation.

iii) In case of Futures MTM is computed on daily basis.

iv) MTM Gain/Loss = Current day settlement/Closing price- Previous day settlement/Closing price (If scrip is purchased first time then it is a Current day settlement / Closing price- Weighted Average Price (WAP)).

v) MTM is computed on scrip wise and series wise.

5. Valuation of Securities Lent under Securities Lending Scheme

The valuation of securities lent under Securities Lending Scheme shall be valued as per the valuation guideline of the respective security as mentioned in this document. The lending fees received for the securities lent out would be accrued in a proportionate manner till maturity of the contract.

6. Valuation of Indian Depositories Receipts (IDR)

Valuation of IDRs listed on the India Stock Exchange would follow the valuation guidelines adopted for the Listed Indian Equity Shares. In case the IDRs are classified as thinly traded / non-traded, the criteria, as laid above for Listed Indian Equity Shares shall be applied taking into consideration the relevant Company's Balance Sheet.

7. Valuation of American Depository Receipt (ADR), Global Depository Receipt (GDR) and all Overseas Securities

a) Traded Securities

i) Traded foreign securities will be valued at latest available closing price of the stock exchange on which the security is traded.

ii) In case the security is traded on more than one stock exchange, the security will be valued at the latest available closing price of the principal stock exchange. Principal stock exchange will be decided by the AMC at the time of purchase of securities and the reason for the selection will be recorded in writing. Any subsequent change in principal stock exchange selected for valuation will be necessarily backed by reasons for such change being recorded in writing by the AMC and approved by the Valuation Committee.

iii) When on a particular valuation day, a security has not been traded on the principal stock exchange; the value at which it is traded on secondary stock exchange may be used.

iv) When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the principal stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date.

v) Due to differences in the time zones across different markets, the AMC would consider a cut off time of 5.00 PM (IST) for availability of the closing market price for the purpose of valuation i.e. if any market closes on or before 5.00 pm (IST) that day's last closing price will be considered for valuation else the previous day's closing price of that stock exchange will be considered. Accordingly, the valuation of the securities will be done based on T day prices or T-1 day prices, depending upon the closure of business hours of the stock exchange on which the particular securities are traded / listed.

vi) 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.

All the corporate action for foreign securities will be recorded on the same basis as valuation of foreign securities by considering a cut off time of 5.00 PM (IST). The corporate action of the securities will be recorded on T day or T+1 day, depending upon the closure of business hours of the stock exchange on which the particular securities are traded / listed.

8. Valuation of Infrastructure Investment Trust (InvITs) & Real Estate Investment Trust (ReITs)

i. On a valuation day, traded 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.

iv. Where units of InvIT and ReIT are 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.

v. 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.

a) Valuation of Money Market and Debt Securities with residual maturity of over 30 days

All money market and debt securities including floating rate securities, with residual maturity of over 30 days 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.

b) Valuation of Money Market and Debt Securities with residual maturity of upto 30 days

All money market and debt securities including floating rate securities, with residual maturity of upto 30 days shall be valued on amortization basis.

Further, the amortized price shall be compared with the reference price which shall be the average of the security level price of such security as provided by the valuation agencies appointed by AMFI. The amortized price shall be used for valuation only if it is within a threshold of ±0.025% of the reference price. In case of deviation beyond this threshold, the price shall be adjusted to bring it within the threshold of ±0.025% of the reference price.

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.

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 on amortization basis on the date of allotment / purchase.

Further, with effect from June 30, 2020 onwards, amortization based valuation shall be dispensed with and irrespective of residual maturity, all money market and debt securities shall be valued in terms of paragraph (a) above.

9.2 Valuation of securities with Put/Call Options

The option embedded securities would be valued as follows:

a) Securities with Call Option:

The securities with call option shall be values at the lower of the value as obtained by valuing the security to final maturity and valuing the security to call option.

In case there are multiple call options, the lowest value obtained by valuing to the various call dates and valuing to the maturity date is to be taken as the value of the instrument.

b) Securities with Put Option:

The securities with put option shall be values at the higher of the value as obtained by valuing the security to final maturity and valuing the security to put option.

In case there are multiple put options, the highest value obtained by valuing to the various put dates and valuing to the maturity date is to be taken as the value of the instrument.

c) Securities with both Put and Call Option:

Only securities with put / call options on the same day and having the same put and call option price, shall be deemed to mature on such put / call date and shall be valued accordingly. In all other cases, the cash flow of each put / call option shall be evaluated and the security shall be valued on the following basis:

i) Identify a ‘Put Trigger Date’, a date on which ‘price to put option’ is the highest when compared with price to other put options and maturity price.

ii) Identify a ‘Call Trigger Date’, a date on which ‘price to call option’ is the lowest when compared with price to other call options and maturity price.

iii) In case no Put Trigger Date or Call Trigger Date ('Trigger Date") is available, then valuation would be done to maturity price. In case one Trigger Date is available, then valuation would be done as to the said Trigger Date. In case both Trigger Dates are available, then valuation would be done to the earliest date.

d) If a put option is not exercised by a Mutual Fund when exercising such put option would have been in favour of the scheme, in such cases the justification for not exercising the put option shall be provided to the Board of AMC and Trustees.

e) Any put option inserted subsequent to the issuance of the security shall not be considered for the purpose of valuation and original terms of the issue will be considered for valuation.

9.3 Government Securities

Government Securities includes:

i) Central Government Securities (G-Sec)
ii) State Government Securities / State Development Loans (SDL)
iii) Treasury Bills (T-Bills)
iv) Cash Management Bills (CMB)

Irrespective of the residual maturity, Government Securities (including T-bills) shall be valued at average of security level prices obtained from valuation agencies appointed by AMFI.

In case security level prices given by valuation agencies are not available for a new security (which is currently not held by any Mutual Fund), then such security may be valued at purchase yield on the date of allotment / purchase.

9.4 Valuation of market linked debentures and all OTC derivatives including Interest Rate Swaps (IRS) / Forward Rate Agreements (FRA)

Irrespective of the residual maturity, valued at average of security level prices obtained from valuation agencies appointed by AMFI.

9.5 Valuation Policy on Interest Rate Futures (IRF)

The Interest Rate Futures (IRF) would be valued at the daily settlement price of the exchange.

9.6 Treatment of Upfront Fees on Trades

a) Upfront fees on all trades (including primary market trades), by whatever name and manner called, would be considered by the valuation agencies for the purpose of valuation of security.

b) Details of such upfront fees should be shared by the AMC on the trade date to the valuation agencies as part of the trade reporting to enable them to arrive at the fair valuation for that date.

c) For the purpose of accounting, such upfront fees should be reduced from the cost of the investment in the scheme that made the investment.

d) In case upfront fees are received across multiple schemes, the such upfront fees should be shared on a pro-rata basis across such schemes.

9.7 Use of Own Trade for Valuation

Mutual Fund's own trades shall not be used for valuation of debt and money market securities and for Inter-Scheme Transfers.

9.8 Waterfall approach for valuation of Money Market and Debt Securities

As per SEBI guidelines on valuation of money market and debt securities, a waterfall approach shall be followed by the valuation agencies for arriving at security level pricing.

AMFI, in consultation with SEBI, has issued detailed guidelines on waterfall approach for valuation of money market and debt securities. The broad principles of the said waterfall approach, for arriving at the security level prices are as follow:

a) All traded securities shall be valued on the basis of traded yields, subject to identification of outlier trades by the valuation agencies.

b) Volume Weighted Average Yield (VWAY) for trades in the last one hour of trading shall be used as the basis for valuation of Government Securities (including T-bills). Valuation of all other money market and debt securities (including Government securities not traded in last one hour) shall be done on the basis of VWAY of all trades during the day.

c) In case of any exceptional events on a day, only VWAY of trades post such event may be considered for valuation. Further, all exceptional events along-with valuation carried out on such dates shall be documented with adequate justification. The following events would be considered as exceptional events:
   i) Monetary / Credit Policy
   ii) Union Budget
   iii) Government Borrowing / Auction Day
   iv) Material Statements on Sovereign Rating
   v) Issuer or Sector Specific events which have a material impact on yields
   vi) Central Government Election Days
   vii) Quarter end days
   viii) In addition to the above, valuation agencies may determine any other event as an exceptional event.

d) All trades on stock exchanges and trades reported on trade reporting platforms till end of the trade reporting time (excluding Inter-scheme transfers), should be considered for valuation on that day.

e) Considering the importance of polling in valuation process, detailed guidelines has also been issued by AMFI on polling by valuation agencies and on the responsibilities of Mutual Funds in polling process, as part of the aforesaid waterfall approach.

9.9 Deviation from valuation guidelines

a) As per the Principles of Fair Valuation specified in Eighth Schedule of SEBI (Mutual Funds) Regulations, 1996, AMCs are responsible for true and fairness of valuation and correct NAV. Considering the same, in case an AMC decides to deviate from the valuation price given by the valuation agencies, the detailed rationale for each instance of deviation shall be recorded by the AMC.

b) The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued vis-a-vis the price as per the valuation agencies and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.

c) The rationale for deviation along-with details as mentioned under paragraph (b) above shall be disclosed immediately and prominently, under a separate head on the website of AMC.

d) Further, while disclosing the total number of instances of deviation in the monthly and half-yearly portfolio statements, AMCs shall also provide the exact link to their website for accessing the information mentioned at paragraph (C) above.

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:

i) The detailed rationale for deviation from the price post haircuts or the price provided by the valuation agencies shall be recorded by the AMC.

ii) The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued vis-a-vis the price post haircuts or the average of the price provided by the valuation agencies (as applicable) and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees

iii) The rationale for deviation along-with details as mentioned at para above shall also be disclosed to investors. In this regard, AMC shall immediately disclose instances of deviations under a separate head on their website. Further, the total number of such instances shall also be disclosed in the monthly and half-yearly portfolio statements for the relevant period along-with an exact link to the website wherein the details of all such instances of deviation are available.

Treatment of accrued interest and future interest accrual

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

l) 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%
B	25%	40%	50%
C	35%	55%	70%
D	50%	75%	100%

2. Haircuts on subordinated and unsecured (or both) securities

Rating/ Sector	Infrastructure, Real Estate, Hotels, Loan against shares and Hospitals	Other Manufacturing and Financial Institutions	Trading, Gems & Jewellery and Others
BB	25%	25%	25%
B	50%	50%	50%
C	70%	70%	70%
D	100%	100%	100%

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 will 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 (including units of ETF)

12.1 Domestic Mutual Fund Units

i) Mutual Fund 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 or Mutual Fund units listed but not traded on valuation date would be valued at the last available NAV as per AMFI website.

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.

v) Due to differences in the time zones across different markets, the AMC would consider a cut off time of 5.00 PM (IST) for availability of the closing market price for the purpose of valuation i.e. if any market closes on or before 5.00 PM (IST) that day's last closing price will be considered for valuation else the previous day's closing price of that stock exchange will be considered. Accordingly, the valuation of the units will be done based on T day prices or T-1 day prices, depending upon the closure of business hours of the stock exchange on which the particular units are traded / listed.

vi) All the corporate action for Overseas Mutual Fund units will be recorded on the same basis as valuation of Overseas Mutual Fund units by considering a cut off time of 5.00 PM (IST). The corporate action of the units will be recorded on T day or T+1 day, depending upon the closure of business hours of the stock exchange on which the particular units are traded / listed.

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: All securities taken under Reverse Repo 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 plus accrual basis.

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;

b) adjustment for conversion of US dollars into Indian rupees as per the RBI reference rate declared by the Foreign Exchange Dealers Association of India (FEDAI); 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) 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.

17. Abnormal situations & market disruptions

In normal situations the valuation methods detailed above shall be used. However, in abnormal market conditions, due to lack of market trading or otherwise it may not be possible to obtain fair valuation using 'normal' means. In such situations, the 'realizable value' may be substantially different from the benchmark-based prices obtained.

The following occurrences would normally be considered as abnormal situations:

- Major Policy announcements by Central Government, State Government, SEBI or RBI.
- Geo-political situations (Natural disasters, terror attacks, public disturbances, riots, wars) that may force the market to function abnormally.
- Absence in trading in specific securities or equivalent.
- Significant volatility in capital markets.
- Significant illiquidity in fixed income markets.
- Global events like Sovereign bankruptcy, corporate bankruptcy, closure of stock markets, disruptive political scenario that may impact the markets.
- Events which lead to lack of availability of accurate information to value a security.
- Technological breakdown in trading systems.
- Errors and omissions with respect to transaction processing.

- Large redemptions in the fund.
- Quarter-ending & tax-related liquidity tightness.

The events mentioned above are only indicative and may not reflect all possible exceptional events or circumstances. In case of any exceptional circumstances, the Valuation Committee may assess the situation and decide on the valuation methods and document the same as detailed above in clause "Deviation from Valuation Guideline".

18. Treatment and disposal of illiquid securities or securities classified as default at the time of maturity / closure of schemes

In case of close-ended schemes, some of the investments made by Mutual Funds may become default at the time of maturity of schemes. Further, at the time of winding up of a scheme, some of the investments made by Mutual Funds may become default or illiquid. In due course of time i.e. after the maturity or winding up of the schemes, such investments may be realised by the Mutual Funds. Such amount will be distributed to the concerned investors, if it is substantial. In case the amount is not substantial, it will be used for the purpose of investor education. The decision as to the determination of substantial amount shall be taken by the Trustees of Mutual Funds after considering the relevant factors including number of investors, amount recovered, cost of transferring funds to investors; among others.

19. Valuation of securities not covered under the current Valuation Policy

In case of security/ies purchased by the fund does not fall within the current framework of the valuation of securities then the same shall be reported immediately to AMFI. Further, at the time of investment AMC shall ensure that the total exposure in such securities does not exceed 5% of the total AUM of the scheme.

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