

### Investment Valuation Norms for Securities held by Schemes of Sundaram Mutual Fund

SEBI vide gazette notification LAD-NRO/GN/2011-12/38/4290 dated February 21, 2012 has amended Regulation 25, 47 and the Eight Schedule of SEBI (Mutual Funds) Regulations, 1996 pertaining to valuation of investments and introduced overriding principles in the form of "Principles of Fair Valuation".

The guiding principles of fair valuation is to minimize the difference in valuation of mutual fund assets relative to market value to enable fair treatment across all classes of investors (including existing as well as new investors) seeking to purchase or redeem units of mutual funds in all schemes at all points of time. In case of any conflict between the principles of fair valuation and valuation guidelines issued by SEBI, the Principles of Fair Valuation shall prevail.

SEBI's notification further prescribes that the valuation shall be reflective of the realizable value of securities and shall be done in good faith and in a true and fair manner through appropriate valuation model and procedures approved by the Board of the Asset Management Company (AMC).

Further to SEBI's amendment of the valuation policy, the Board of Sundaram AMC has adopted a comprehensive policy on investment valuation and procedures effective from July 02, 2012. Accordingly, the disclosure inter alia of the valuation procedure and policy for each type of investment made by the scheme(s) of Sundaram Mutual Fund is given below:

#### 1. Valuation Methodologies

- a. The methodology for valuing each and every type of security held by the schemes is given in the appended table;
- b. Investment in any new type of security shall be made only after establishment of the valuation methodology for such security with approval of the Board of AMC or any committee constituted in this behalf. If required, the new type of securities may be referred to CRISIL/ICRA for providing daily yield/price.

#### 2. Inter Scheme Transfers

- a. Inter scheme transfers shall be effected as per the regulations and internal policy at prevailing market price (essentially fair valuation price);
- b. The methodology to determine the fair valuation of securities which are intended to be transferred from one scheme to another is set out in appended table.

#### 3. Exceptional Events

Following types of the events, inter alia, could be classified as exceptional events where current market information may not be available / sufficient for valuation of securities or the market quotations are no longer reliable for valuation a particular security:

- i. Major policy announcements by the Reserve Bank, The Government or the Regulator;
- ii. Natural disasters or public disturbances that force the markets to close unexpectedly;
- iii. Absence of trading in a specific security or similar securities;
- iv. Breakdown in the information systems / software
- v. Significant volatility in the capital markets.

#### 4. Escalation Procedure

- i. Valuation Committee shall be responsible for monitoring exceptional events and recommending appropriate valuation methods under the circumstances with due guidance from the AMC Audit Committee / Board;
- ii. Deviation from the valuation policy and principles, if any in order to value the assets/ securities at fair value, will be communicated to the AMC Board, Trustee Board and to the unitholders with suitable disclosures on the website;

#### 5. Conflict of Interest

The valuation committee shall review any differences arising out of valuation, methodology or price adopted and report to the AMC Audit Committee / Board after resolution of conflict.

#### 6. Periodic Review

The Valuation Committee shall be responsible for periodic review of the valuation methodologies in terms of its appropriateness and accuracy in determining the fair value of each security. The Valuation Committee shall report to the AMC Audit Committee / Board on any important issues and changes in the valuation methodology. The Board of Trustees shall also be updated of any significant developments.

The valuation policies and procedures shall be reviewed at least once in a Financial Year by an Independent Auditor.

#### 7. Record Keeping and Disclosure of Policy

Valuation Policy would be disclosed in the AMC website and other documents as prescribed by the SEBI regulations and guidelines.

All the documents which forms the basis of valuation including inter scheme transfers (approval notes and supporting documents) shall be maintained by Sundaram AMC in electronic form or physical papers.

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

## A. Equity and Related Securities

Valuation Policy last updated August 21, 2015

Asset Class	Traded/Non-Traded	Basis of Valuation
Equity Shares, Preference Shares and Equity Warrants	Traded	On the valuation day, at the last quoted closing price on the National Stock Exchange (NSE) or Bombay Stock Exchange, where such security is listed. NSE is the Principal Stock Exchange for the purpose of our valuation. If the stock is not traded / quoted on NSE, then the last traded price of BSE or any other stock exchange will be considered.
	Non Traded	<ol style="list-style-type: none"> <li>When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on NSE or BSE 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 thirty days prior to the valuation date.</li> <li>Securities not traded for more than 30 days: <ol style="list-style-type: none"> <li><b>Equity Shares</b> – Valuation price will be in accordance with the SEBI norms i.e. valuation will be computed on the basis of average of book value and the price computed on the basis of PE ratio (25% of the Industry PE Ratio) and further discount of 10% for illiquidity.</li> <li><b>Preference Shares:</b> Intrinsic Value will be considered;</li> <li><b>Equity Warrants/Rights Entitlement/Partly paid up rights shares:</b>  <b>For Equity Warrants / Partly Paid up rights shares:</b> Valuation price will be arrived, after applying appropriate discount (valuation committee delegated power to decide the discounting factor) after reducing the exercise price/issuance price from the closing of the underlying cash equity security.  <b>For Rights Entitlement:</b> Until they are traded, the value of the rights shares shall be calculated as <math>V_r = n/m * (P_{ex} - P_{of})</math>  Where <math>V_r</math> = Value of Rights; <math>n</math> = no. of rights; <math>m</math> = no. of original shares held;  <math>P_{ex}</math> = Ex-rights price; <math>P_{of}</math> = Rights Offer Price.</li> <li><b>Demerger:</b> Where at least one resultant company is not immediately listed, valuation price will be worked out by using cum-price before demerger reduced for quoted price of the listed resultant company(ies) or in case of demerger pending listing, the resultant company/ies shall be valued at the intrinsic value arrived at on the date of corporate action. Alternatively, an independent valuation of the security by any Market Participant, (a reputed brokers) shall be obtained.</li> </ol> </li> </ol>
	Thinly Traded	When trading in an equity/equity related security in a month is less than Rs.5 lakhs and the total volume is less than 50000 shares, it shall be considered as a thinly traded security. Valuation will be computed on the basis of average of book value and the price computed on the basis of the PE Ratio with appropriate discount to Industry PE) further discounted for illiquidity.
	Unlisted	Refer note (e)
Derivatives - Equity Futures and options	Non-traded / thinly traded	<b>Traded Securities:</b> On the valuation day, at the closing price provided by the respective stock exchanges; <b>Non-traded Securities:</b> At the settlement price provided by the respective stock exchanges, subject to an illiquidity discount. The rate of illiquidity discount shall be decided by the valuation committee.

**B. Valuation Of Securities – Fixed Income and Related Securities**

Category	Basis of Valuation
Traded Securities maturity >60 days upto (91 days upto 29 Sept 2012)	At valuation prices provided by AMFI approved agencies* with (currently - CRISIL & ICRA) with effect from 29th November 2013 In case of new securities, not forming part of the universe covered by the AMFI approved agencies, it would be valued on purchase yield on the date of purchase.
Instruments maturity upto 60 days (91 days upto 29 Sep 2012)	Continue the amortization model subject to the benchmark yields provided by the AMFI approved agencies. (Traded prices are to be considered for construction of benchmark yield curve by the Agency). At the time of initial purchase, the spread between the purchase yield and the benchmark yield should be fixed and the spread should be continued till the maturity of the security. The spread can be modified depending on the market scenario. The amortisation may be used for valuation as long as it is within +/-0.10% of the reference price. In case the variance exceeds +/-0.10% the valuation shall be adjusted to bring it within the +/-0.10% band. Benchmark yields would be provided for each fortnightly interval. "Whenever a security has moved off from 61 days residual maturity category to 60 days residual category, then the difference between the last valuation yield and the benchmark yield provided by the approved agencies shall be fixed as the spread and thereafter the spread will be maintained till its maturity".
Non-traded	<p><b>For Securities with residual maturity of &lt;=60 days (91 days upto 29 Sep 2012)</b> Continue the amortization model subject to the benchmark yields provided by the AMFI approved agencies. At the time of initial purchase, the spread between the purchase yield and the benchmark yield should be fixed and the spread should be continued till the maturity of the security. The spread can be modified depending on the market scenario. The amortisation may be used for valuation as long as it is within +/- 0.10% of the reference price. In case the variance exceeds +/-0.10% the valuation shall be adjusted to bring it within the +/-0.10% band. Benchmark yields would be provided for each fortnightly interval. "Whenever a security has moved off from 61 days residual maturity category to 60 days residual category, then the difference between the last valuation yield and the benchmark yield provided by the approved agencies shall be fixed as the spread and thereafter the spread will be maintained till its maturity".</p> <p><b>For Securities with residual maturity &gt;60 days</b> At valuation prices provided by AMFI approved agencies* (currently - CRISIL &amp; ICRA) with effect from 29th November 2013 In case of new securities, not forming part of the universe covered by the AMFI approved agencies, it would be valued on purchase yield on the date of purchase.</p>
Inter Scheme Transfers	<p><b>At weighted average YTM</b></p> <ol style="list-style-type: none"> <li>For Securities with residual maturity &gt;60 days (91 days upto 29 Sep 2012): All trades with minimum traded lot of Rs.25 crores of face value or more will be aggregated for same or similar security on a public platform.</li> <li>For Securities with residual maturity &lt;= 60 days (91 days upto 29 Sep 2012): All trades with minimum traded lot of Rs.10 crores of face value or more will be aggregated for same or similar security on a public platform.</li> <li>If same or similar security on a public platform is not available at the time of inter scheme transfer, then the yield at which previous day's closing price was provided by the approved agencies or the fair price as per the valuation policy will be applied.</li> </ol> <p><b>Criteria for identifying the similar securities:</b> Similar security should be identified by the following waterfall logic:</p> <ol style="list-style-type: none"> <li>Same issuer with maturity date +/- 5 days of maturity date of security for inter scheme transfer shall be considered first. If no such instance is available then step 2 to be followed: <b>For example:</b> For inter scheme transfer of SBI CD maturing on 15th July 2012, all secondary market trades of SBI CD maturing between 10th July 2012 to 20th July 2012 shall be considered.</li> <li>Similar security from different issuer, having similar rating and within the same category (PSU Bank, Private Bank or Financial Institution etc) with maturity date +/-</li> </ol>

Category	Basis of Valuation
	<p>5 days of maturity date of security considered for inter scheme transfer.  <b>For example:</b> Canara Bank CD maturing on 15th July 2012, all secondary market trades of similar public sector bank CDs having same rating maturing between 10th July 2012 and 20th July 2012 shall be considered.</p> <p>3. Provided that the maturity dates are within the calendar quarter.</p> <p><b>Note:</b> Outlier trades, if any, shall be ignored after suitable justification by Fund Manager;            In case no data point available for a security, in accordance with above principles: Valuation at previously valued YTM.</p>
Self Trades	<p>A self traded security, including inter scheme, with face value of Rs.5 crore, will be recognized at weighted average YTM for valuation across all schemes.            The Valuation methodology stated for self-trades is applicable for securities with residual maturity less than or equal to 60 days.</p>
Convertible Debentures	<p>The convertible part of Convertible debentures will be valued as an equity share and the valuation policy for equity shares would be applicable for it.            The non-convertible part will be valued as bond and the valuation will be as defined for a bond in the debt valuation policy.            If, after conversion the resultant equity instrument would be traded pari passu with an existing instrument, which is traded, the value of later instrument can be adopted after an appropriate discount for the non-tradability of the instrument during the period preceding conversion.            The rate of illiquidity discount shall be decided by the valuation committee</p>
Government Securities and Treasury Bills	Based on the prices provided by CRISIL or any other agency
Other Special Securities	To be referred to CRISIL and obtain daily valuation quote.
Securities with Call option	Refer Note (d)
Securities with Put option	Refer Note (d)
Securities with both put and call option	Securities with both put & call option on the same day shall be deemed to mature on the put / call day and valued accordingly.
Reverse Repo	<p>If instruments have been bought on "repo" basis the instrument shall be valued at the resale value price after deduction of applicable interest up to the date of resale.            If an instrument has been sold on a 'repo' basis, adjustment would be made for the difference between the redemption price (after deduction of applicable interest upto the date of redemptions) and the value of the instrument. If the redemption price exceeds the value, the depreciation will be provided for and if the redemption price is lower then the value, credit will be taken for the appreciation.</p>
Other Securities	<p>Following assets shall be valued at cost plus accruals/amortisation:</p> <p>a. Bank Deposits;            b. CBLO</p>
Units of Mutual Funds	Units of mutual funds shall be valued at the last published NAV

Category	Basis of Valuation
Overseas Equity securities	<p>On the valuation day, the securities issued outside India and listed on the stock exchanges outside India shall be valued at the closing price on the stock exchange at which it is listed or at the last available traded price.</p> <p>In case a security is listed on more than one stock exchange, the AMC reserves the right to determine the stock exchange, the price of which would be used for the purpose of valuation of that security. The Stock Exchange once selected would be used consistently till changed by recording the reasons in writing by Board of AMC.</p> <p>Due to difference in time zones of different markets, in case the closing prices of the security are not available within the given time frame to enable the AMC to upload NAVs for a valuation day, the AMC may use the last available traded price for the purpose of valuation. The use of closing price/last available traded price for the purpose of valuation will also be based on the practice followed in a particular market.</p> <p>In case a security is not traded on valuation day, the price adopted for the previous working day shall be considered, provided that the date on which last available price was available, should not be more than 30 days.</p> <p>If a security is not traded for the last 30 days, AMC may value it on a fair value basis by the valuation committee.</p> <p>The source of the price shall be taken from (a) Bloomberg or (b) Reuters or (c) any other publicly available sources.</p>

**Remarks:**

- a. Public Platform refers to
  - (i) F-trac – for Corporate bonds/debentures, commercial papers, Certificate of Deposits and securitized debts;
  - (ii) NDS-OM for treasury bills.
- b. Weighted average YTM shall be considered as it is.
- c. The NAV of the units of a scheme will be computed by dividing its net assets by the number of units outstanding on the valuation date.
- d. Securities with Put/Call Option:
  - (i) Securities with Put Option: Once the option is exercised, the put option date would be deemed to be the maturity date of the security and accordingly the valuation of the security would be based on the valuation guidelines. In case the deemed maturity date (put option date) is  $\leq 60$  days, the prices provided by the AMFI approved agencies\* would be ignored and would follow the valuation model applicable to securities with residual maturity of  $\leq 60$  days (e.g.amortisation). If the residual days are more than 60 days, the security shall be valued on the basis of prices provided by the AMFI approved agencies\* till the residual maturity date is  $\leq 60$  days and based on the amortisation for the period less than 60 days.
  - (ii) Securities with Call option: Once the option is exercised, the call option date would be deemed to be the maturity date of the security and accordingly the valuation of the security would be based on the valuation guidelines. In case the deemed maturity date (Call option date) is  $\leq 60$  days, the prices provided by the AMFI approved agencies\* would be ignored and would follow the valuation model applicable to securities with residual maturity of  $\leq 60$  days (e.g.amortisation). If the residual days are more than 60 days, the security shall be valued on the basis of prices provided by the AMFI approved agencies\* till the residual maturity date is  $\leq 60$  days and based on the amortisation for the period less than 60 days.
- e. 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 (i) and (ii) below:
    - (i) Net worth per share = [share capital plus free reserves (excluding revaluation reserves) minus miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] divided by number of paid up shares;
    - (ii) After taking into account the outstanding warrants and options, Net worth per share shall again be calculated and shall be =[share capital plus consideration on exercise of option/warrants received/receivable by the company plus free reserves (excluding revaluation reserves) minus 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 of exercise of outstanding warrants and options};

The lower of (i) and (ii) shall be used for calculation of net worth per share and for further calculation in (III) below.

- II. Average capitalization rate (P/E ratio) for the industry based upon either BSE or NSE data (which should be followed consistently and changes, if any, noted with proper justification thereof) shall be taken and discounted by 75% i.e. 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 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 methodology for valuation shall be subject to the following conditions:

- (i) All calculations as aforesaid shall be based on audited accounts;
- (ii) In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero;
- (iii) If the net worth of the company is negative, the share would be marked down to zero;
- (iv) In case of EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalized earning;
- (v) 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 should be valued in accordance with the procedure as mentioned above on the date of valuation.

At the discretion of the AMC and with the approval of trustees, an unlisted equity share may be valued at a price lower than the value derived using the aforesaid methodology.

**\*CRISIL/ICRA Disclaimer**

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