

#### Annexure A SCHEME INFORMATION DOCUMENT

### **Sundaram Money Market Fund**

An open ended debt scheme investing in Money Market instruments. A relatively low interest rate risk and relatively high credit risk.

This product is suitable for investors who are seeking\*

- Income over a short term investment horizon
- Investment in money market instruments

\*Investors should consult their financial advisers if in doubt about whether the product is suitable for them.



Riskometer as on September 30, 2024

vestors understand that their principal will b

Potential Risk Class				
Credit Risk → Relatively Low Moderate Relatively High				
Interest Rate Risk 🔸	(Class A)	(Class B)	(Class C)	
Relatively Low (Class I)	-	B-1	-	
Moderate (Class II)	-	-	-	
Relatively High (Class III)	-	-	-	

**Terms of offer: NAV** 

New Fund Offer Opened on		12-09-2018
New Fund Offer Closed on		26-09-2018
Scheme Re-Opened for Ongoing Subs	cription/Redemption	28-09-2018
Mutual Fund	Sundaram Mutual Fund	
Trustee Company	Sundaram Trustee Compa	ny Limited
Asset Management Company	Sundaram Asset Managen	nent Company Limited
Address	Sundaram Towers 1 & II Fl	loor 46 Whites Road Chennai - 600 014

www.sundarammutual.com

The particulars of the Scheme have been prepared in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations 1996, (herein after referred to as SEBI (MF) Regulations) as amended till date and circulars issued thereunder filed with SEBI, along with a Due Diligence Certificate from the AMC. The units being offered for public subscription have not been approved or recommended by SEBI nor has SEBI certified the accuracy or adequacy of the Scheme Information Document.

The Scheme Information Document sets forth concisely the information about the scheme that a prospective investor ought to know before investing. Before investing, investors should also ascertain about any further changes to this Scheme Information Document after the date of this Document from the Mutual Fund / Investor Service Centres / Distributors / Brokers or visit www.sundarammutual.com

The investors are advised to refer to the Statement of Additional Information (SAI) for details of Sundaram Mutual Fund, Standard Risk Factors, Special Considerations, tax and legal issues and general information on www.sundarammutual.com and www.amfiindia.com

SAI is incorporated by reference and is legally a part of the Scheme Information Document. For a free copy of the current Statement of Additional Information, please contact your nearest Investor Service Centre or visit www.sundarammutual.com.

The Scheme Information Document (Section I and II) should be read in conjunction with the SAI and not in isolation.

This Scheme Information Document is dated 30/09/2024.

Contact No. 1860 425 7237 (India)		E-mail: customerservices@sundarammutual.com
+91 40 2345 2215 (NRI)	+91 95000 57237 (WhatsApp Chatbot)	(NRI): <u>nriservices@sundarammutual.com</u>

#### Trustee

#### Sundaram Trustee Company Limited

CIN: U65999TN2003PLC052058 Corporate Office: Sundaram Towers, I & II Floor, 46 Whites Road, Chennai 600 014 India Phone : 044 28583362 Fax : 044 28583156

#### Investment Manager

#### Sundaram Asset Management Company Limited CIN: U93090TN1996PLC034615

Corporate Office: Sundaram Towers, I & II Floor, 46 Whites Road, Chennai 600 014 India Phone : 044 28583362 Fax : 044 28583156 www.sundarammutual.com

#### Sponsor



Sundaram Finance Limited CIN: L65191TN1954PLC002429 Registered Office: 21, Patullos Road, Chennai 600 002 India

If you wish to reach indicated telephone number from outside India, please use +91 or 0091 followed by 44 and the eight number.

#### Custodian

HDFC Bank Limited, Mumbai registered with SEBI, vide Registration No. IN/CUS/001, has been appointed custodian for the securities in the Scheme.:

- to keep in safe custody all the securities and instruments belonging to the Scheme;
- to ensure smooth inflow/outflow of securities and instruments as and when necessary in the best interest of the investors;
- to ensure that the benefits due on the holdings are received and
- to be responsible for the loss or damage to the securities due to negligence on its part or on the part of its approved agents.

The Trustee reserves the right to appoint any other custodian(s) approved by SEBI.

In addition a foreign custodian may also be appointed for overseas securities/assets.

#### Fund Accountant Sundaram Fund Services Limited

CIN:U67120TN2008PLC068388 Registered Office: No.21, Patullos Road, Chennai 600 002.

The activities inter-alia include:

- i. Record accounting entries to the fund.
- ii. Reconcile account balances for the fund.
- iii. Establish policies and procedures to assure proper fund accounting.
- iv. Maintain proper documentation.
- v. Update computer system records.
- vi. Perform fund valuations of unit trusts and custodian accounts.
- vii. Prepare schedules and tailor-made client reports.
- viii. Coordinate preparation of annual accounts and audit unit trusts and custodian accounts.

However, the Fund administration part would continue to be handled by the Operations Department of the Investment Manager.

#### Registrar and Transfer Agents KFin Technologies Limited

CIN: L72400TG2017PLC117649 Unit: Sundaram mutual Fund, Tower- B, Plot No. 31 & 32, Selenium building, Gachibowli Road, Financial District, Nanakramguda, Serilingampally Mandal, Hyderabad 500032. Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI)

Email us at: customerservices@sundarammutual.com

The Trustee reserves the right to appoint any other entity registered with SEBI as the registrar.

## SECTION - I

#### Part I. HIGHLIGHTS/SUMMARY OF THE SCHEME

Sr. No.	Title	Description				
Ι.	Name of the scheme	Sundaram Money Market Fund				
II.	Category of the Scheme	Money Market Fund				
III.	Scheme type	An open ended debt scheme				
			Potential R	isk Class		
		Credit Risk → Relatively Low Moderate Relatively High				
		Interest Rate Risk $\downarrow$	(Class A)	(Class B)	(Class C)	_
		Relatively Low (Class I)	-	B-1	-	
		Moderate (Class II)	-	-	-	
		Relatively High (Class III)	-	-	-	
IV.	Scheme code	MMDD, MMDG, MMDN MMWD	/I, MMDQ, MI	MDR, MMFD,	, MMGP, MMMD, I	MMQD,
V.	Investment objective	The investment objectiv		-	•	-
		a porfolio comprising of	Money Mark	et instrument	ts having maturity	up to one
		year.		haina affana		/:
		No Guarantee: Investor returns nor any guarant		-		
		also no guarantee of ca	• •	•	•	
		sponsor or by the Asset	•	•		,
VI.	Liquidity/listing details	NA				
VII.	Benchmark (Total Return	Tier I : Nifty Money Mar	ket Index B-I			
	Index)	Tier II : Nifty Money Ma				
		The Trustee reserves the right to change the benchmark if due to a change in				
		market conditions, a different index appears to be providing a more				
		appropriate basis for comparison of fund performance or if the indicated				
		benchmark ceases to exist or undergoes a substantial change that renders it				
VIII.	NAV disclosure	an ineffective base for performance comparison and analysis. NAV will be updated on the websites of Sundaram asset Management				
viii.	INAV disclosure	•				•
		(www.sundarammutual.com) and the association of Mutual Funds of India (www.amfiindia.com) before 11.00 p.m. every business day.				
		In case of any delay, the	•	•	•	to AMFI
		by the next day. If the				
		working hours on the fo				
		press release providing i	reasons and e	explaining wh	ien the Fund would	d be able
	Analisahla timalinas	to publish the NAVs. Timeline for				
IX.	Applicable timelines	<ul> <li>Dispatch of redempt</li> </ul>	ion nroceeds			
		SEBI has clarified th	•		ed to obtain PAN	and KYC
				•		
		documentation before processing any redemption requests. The redemption or redemption proceeds shall be dispatched to the unit				
		holders within 3 business days from the date of redemption. During				
		circumstances such as market closure / breakdown / calamity / strike /				
		violence / bandh, extreme price volatility/SEBI Directives etc, the Trustee				
		can stop/suspend sale/redemption of Units.				
		Dispatch of IDCW (if The IDCW warrant (cl	••	dianatahad	+0 +60	
		The IDCW warrant/ch days of the date of de	•	•		
		be liable to pay int				-

X.	Plans and Options	<ul> <li>specified by SEBI for the period of such delay. The prescribed rate at present is 15% per annum. In case of delay, the AMC shall be liable to pay interest @ 15 per cent per annum to the unit holders. It may be noted that the Mutual Fund is not guaranteeing or assuring any IDCW. IDCW payment may also be done by Direct Credit subject to availability of necessary facility at each location. For further details please refer to the Application Form.</li> <li>Plans: Regular Plan and Direct Plan</li> </ul>
	Plans/Options and sub options under the Scheme	Options: Growth, Income Distribution cum Capital Withdrawal (IDCW), IDCW Pay-out (Monthly & Quarterly), IDCW Reinvestment (Monthly & Quarterly), IDCW Transfer If the investor does not choose Plan/Option or Frequency at the time of submitting the application form, the following default Plan/Option/Frequency shall be applicable: Default Option: Growth. Default frequency if IDCW payout option is chosen: Monthly; If an investor chooses the IDCW Option but fails to indicate a sub-option, the default sub-option shall be IDCW Re- Investment. For detailed disclosure on default plans and options, kindly refer SAI.
XI.	Load Structure	<ul> <li>Entry Load: Nil.</li> <li>There shall be no entry load on SIP's including SIP's registered prior to August 1, 2009.</li> <li>However the upfront commission on investment made by the investor, if any, shall be paid to the ARN Holder (AMFI registered Distributor) directly by the investor, based on the investor's assessment of various factors including service rendered by the ARN Holder.</li> <li>Exit Load: Nil</li> <li>Switches shall be subject to completion of lock-in period, if any, under the respective scheme.</li> <li>The Board of Trustee reserves the right to prescribe or modify the exit load structure with prospective effect, subject to SEBI Regulation.</li> <li>The Board of Trustee reserves the right to prescribe or modify the exit load structure with prospective effect, subject to SEBI Regulation.</li> </ul>
XII.	Minimum Application Amount/switch in	<ul> <li>During NFO: NA</li> <li>On continuous basis: Regular Plan &amp; Direct Plan Options: Rs 1,000 and in multiples of Re 1/- thereafter per application. (applicable for both Regular and Direct Plan). Systematic Transfer Plan: Daily: Rs.1,000/- (6 Instalments); Weekly: Rs.1,000/-; (6 Instalments) Monthly: Rs.250/-(6 Instalments); Quarterly: Rs.750/-(6 Instalments) STP Dates: Investors can choose any date of the month/quarter for availing the STP facility. Any Day STP is applicable only for monthly and quarterly frequencies, Weekly (Every Wednesday) Systematic Withdrawal Plan: Monthly / Quarterly: Rs.500/- (6 instalments) SWP Dates: Any Day (1st to 31st) SIP Top-up facility – Half yearly/Annual Minimum Rs.500 and in multiples of Rs.500/-         </li> </ul>
XIII.	Minimum Additional Purchase Amount	Additional Purchase: Rs 1,000 and in multiples of Re.1/- thereafter per application. (applicable for both Regular and Direct Plan)
XIV.	Minimum Redemption/ switch out amount	<ul> <li>Regular Plan / Direct Plan: 100 units or Rs. 1,000 or account balance, whichever is lower.</li> <li>Minimum amount for STP (Daily) Rs 1000 • (Weekly-every Wednesday) Rs 1000 • (Monthly): Rs 250 • (Quarterly): Rs 750 and any amount thereafter.</li> </ul>

		If Wednesday is not a business day, the STP instalment will be processed on the next business day.
		Investors who had registered for STP facility with distributor code on or before December 31, 2012 and wish to continue to the STP instalments under the Direct Plan shall make a written request to Sundaram Mutual Fund in this behalf. The fund will take at least 21 working days to process such requests. Intervening instalments shall continue to be processed under the Regular Plan of the respective target scheme.
XV.	New Fund Offer Period This is the period during which a new scheme sells its units to the investors.	NA
XVI.	New Fund Offer Price:	NA
	This is the price per unit that the investors have to pay to invest during the NFO.	
XVII.	Segregated portfolio/side pocketing disclosure	Enabled. For Details, kindly refer SAI.
XVIII	Swing pricing disclosure	SWING PRICING FRAMEWORK FOR OPEN ENDED DEBT SCHEME(S) In terms of the SEBI circular no. SEBI/HO/IMD/IMD-II DOF3/P/CIR/2021/631 dated September 29, 2021 (the Circular), all open ended debt mutual fund schemes (except overnight funds, Gilt funds and Gilt with 10-year maturity funds) are required to follow Swing Pricing Framework with effect from March 01, 2022. SEBI has prescribed swing pricing for scenarios related to net outflows from the schemes. Accordingly, a mandatory full swing price framework, during market dislocation times (as and when declared by SEBI), for high-risk open ended debt schemes is being introduced in scheme provisions of the Debt Schemes. For Details, kindly refer SAI.
XIX.	Stock lending/short selling	Enabled. For Details, kindly refer SAI.
	How to Apply and other details	Please refer to the Statement of Additional Information and Key Information Memorandum, which is a part of the Application Form (available free of cost with the offices of the Investment Manager and can be downloaded from the Website of the Investment Manager (www.sundarammutual.com). Details in section II
XXI.	Investor services	Prospective investors and existing unit holders are welcome to contact Customer Service/Complaint resolution using the Toll Free 1860 425 7237 (India) +91 40 2345 2215 (NRI). Investors may also contact the Investor Relations Manager. <b>Baba M J</b> Investor Relations Manager Sundaram Asset Management Company Limited, No. 46, Whites Road, Sundaram Towers, 1st Floor, Royapettah, Chennai - 600014.
	Specific attribute of the scheme (such as lock in, duration in case of target maturity scheme/close ended schemes) (as applicable)	An open ended debt scheme investing in Money Market instruments. A relatively low interest rate risk and Relatively high credit risk.

XXIII.	Special product/facility	(1) Systematic Investment Plan (SIP):	
	available during the NFO	Features of Daily SIP	
	and on ongoing basis	Any Day SIP	
		SIP Top-up feature	
		Half Yearly Top-up	
		Yearly Top-up	
		Sundaram Flexi - Systematic Investment Plan ("Sundaram Flexi SIP")	
		A) Modifications to terms of SIP Cancellation:	
		Investors are requested to note that accordance with SEBI Letter No.	
		SEBI/HO/OW/IMD/IMD-SEC1/P/2024/270/1 dated January 03, 2024, the terms and	
		conditions for SIP Cancellation will undergo the following changes:	
		1. In case of Daily, Weekly, and Monthly frequencies, the SIP registration will stand	
		cancelled, in case of 3 consecutive failed debits;	
		2. In case of Quarterly frequency, the SIP registration will stand cancelled, in case	
		of 2 consecutive failed debits.	
		3. SIP cancellation request submitted by an investor, will be effective within 10	
		calendar days from the date of such request. Any SIP installment falling prior to the	
		date of such cancellation, will be processed as per applicable NAV.	
		(2) Systematic Withdrawal Plan (SWP)	
		Any Day Systematic Withdrawal Plan (Any day SWP)	
		SWP Frequency Choice of the Date* (1-31)	
		(3) Systematic Transfer Plan (STP)	
		4A. As per SEBI Circular SEBI/ho/IMD/IMD-I DoF2/P/CIR/2022/161 as on	
		November 25, 2022.	
		4B. IDCW Transfer Facility (DSo)	
		(5) Pledge	
		Loan Against Mutual Fund Units (LAMF)	
		(6) online Transaction	
		(7) Purchase/Redemption through NSE and BSE Exchange Platform	
		(8) KFINKART Facility	
		For Details, kindly refer SAI	
XXIV	.Weblink	Total Expense Ratio: https://www.sundarammutual.com/TER	
		Daily Total Expense Ratio: https://www.sundarammutual.com/TER Factsheet: https://www.sundarammutual.com/downloads/	
		racisneet. https://www.sunuaranimutual.com/uowinoaus/	

#### Due Diligence by Sundaram Asset Management Company Limited

It is confirmed that:

(i) The Scheme Information Document submitted to SEBI is in accordance with the SEBI (Mutual Funds) Regulations, 1996 and the guidelines and directives issued by SEBI from time to time.

(ii) All legal requirements connected with the launching of the Scheme as also the guidelines, instructions, etc., issued by the Government and any other competent authority in this behalf, have been duly complied with.

(iii) The disclosures made in the Scheme Information Document are true, fair and adequate to enable the investors to make a well informed decision regarding investment in the Scheme.

(iv) The intermediaries named in the Scheme Information Document and Statement of Additional Information are registered with SEBI and their registration is valid, as on date.

(v) The contents of the Scheme Information Document including figures, data, yields etc. have been checked and are factually correct

(vi) A confirmation that the AMC has complied with the compliance checklist applicable for Scheme Information Documents and other than cited deviations/ that there are no deviations from the regulations

(vii) Notwithstanding anything contained in this Scheme Information Document, the provisions of the SEBI (Mutual Funds)

Regulations, 1996 and the guidelines there under shall be applicable.

(viii) The Trustees have ensured that the Sundaram Money Market Fund approved by them is a new product offered by Sundaram Mutual Fund and is not a minor modification of any existing scheme/fund/product (This clause is not applicable to Fixed Maturity Plans and Close Ended Schemes except for those close ended schemes which have the option of conversion into open ended schemes on maturity and also to Interval Schemes.)

#### Chennai 30/09/2024

#### R Ajith Kumar Compliance Officer

#### Part II. INFORMATION ABOUT THE SCHEME

#### A. HOW WILL THE SCHEME ALLOCATE ITS ASSETS?

Instruments	Indicative allocations (% of total assets)	
	Minimum	Maximum
Money Market Instruments* as defined	0%	100%
by RBI/SEBI from time to time and Cash		

\*Money Market Instruments includes Certificate of Deposits, Commercial Papers, T Bills, Government Securities having an unexpired maturity up to 1 Year, Call or notice Money, Non convertible Debentures of original or initial maturity up to one year, Commercial Bills, Bills Rediscounting, TREPS, Reverse Repo and any other instruments as defined by RBI/SEBI from time to time.

- The scheme shall engage in securities lending subject to a maximum limit of 20% of net assets and 5% for a single counter party.
- The scheme may invest in repo in corporate debt upto 10% of the net assets of the scheme.
- The Scheme may use derivatives for trading, hedging and portfolio balancing. Exposure to derivatives will be limited to 50% of the net asset value of the Scheme at the time of transaction.
- The scheme shall not invest in foreign securities / ADRs/ GDRs
- The scheme shall not invest in in securitized debt and Credit Default Swaps.

Pending deployment in terms of the investment objective, funds may be invested in short-term deposits with scheduled commercial banks in accordance with applicable SEBI guidelines.

In accordance with SEBI Circular No. Cir/ IMD/ DF/ 11/ 2010 dated August 18, 2010, the cumulative gross exposure in debt securities and fixed income derivatives shall not exceed 100% of the net assets. Same security wise hedge position shall not be considered in computing gross exposure.

The Scheme shall commence investment only on completion of the New Fund Offer period according to its objective. But the Scheme is permitted to invest in TREPS during the NFO period.

**Changes in Investment Pattern: Subject** to SEBI Regulations, the asset allocation pattern indicated above may change from time to time, keeping in view of the market conditions, market opportunities, applicable Regulations and political & economic factors.

It must be clearly understood that the percentage stated above are only indicative and not absolute. These proportions can vary substantially depending upon the perception of the Investment Manager; the intention being at all times to seek to protect the interests of Unit Holders. Such changes in investment pattern will be for a short-term and for defensive consideration only.

Cumulative gross exposure limits to be adhered in terms of Master Circular dated May 19, 2023

Indicative Table (Actual instrument/percentages may vary subject to applicable SEBI circulars)

S.n		% of	
0	Type of instrument	exposure	Circular references
1	Securities Lending	Upto 20%	Clause 12.11 of the SEBI Master Circular
2	Derivatives	Upto 50%	Clause 12.25 of the SEBI Master Circular
3	Equity Derivatives for non-hedging purposes		Clause 12.25 of the SEBI Master Circular
4	Debt Instruments with SO / CE rating		Clause 12.3 of the SEBI Master Circular
5	Overseas Securities	Nil	Clause 12.19 of the SEBI Master Circular
6	Securitized Debt		
7	Debt Instruments with special features (AT1 and AT2 Bonds)		Clause 12.2 of the SEBI Master Circular
8	Tri-party repos (including Reverse repo in T- bills and G-sec)		
			Clause 4 of the Seventh Schedule of SEBI (Mutual
9	Other / own mutual funds		Funds)Regulations, 1996
10	Repo/ reverse repo transactions in corporate debt securities	Upto 10%	Clause 12.11 of the SEBI Master Circular
11	Credit Default Swap transactions	Nil	Clause 12.11 of the SEBI Master Circular
12	Short Selling		Regulation 45 (2) of SEBI (Mutual Funds) Regulations, 1996
13	Short Term Deposit		Clause 12.16 of the SEBI Master Circular
			Clause 13 in the Seventh
			Schedule of SEBI (Mutual Funds)
14	ReITS and InVITS		Regulations, 1996
15	Foreign Securitized debt		
	Unrated debt and money		
16	market instruments		Clause 12.1 of the SEBI Master Circular
17	Writing of call options under covered call strategy		Clause 12.25.8 of the SEBI Master Circular

\*SEBI circular references (wherever applicable) in support of exposure limits of different types of asset classes in asset allocation shall be provided.

**Portfolio rebalancing:** Subject to SEBI Regulations, the asset allocation pattern may change from time to time for a short term and for defensive considerations, keeping in view the market conditions/applicable regulations/political & economic factors, the perception of the Investment Manager; the intention being at all times to seek to protect the interests of the Unit holders. Rebalancing across sectors and stocks based on valuation levels relative to growth shall be a dynamic exercise, as this is crucial to performance.

The fund manager of the Scheme shall examine factors such as the overall macro-economic conditions, valuation levels, sector-specific factors, company-specific factors and trends in liquidity, to name a few, and reduce the equity exposure, if warranted, to lower levels and raise the fixed income component of the portfolio as a tactical call.

The fund manager shall seek to raise the equity exposure if the environment is conducive. This process of rebalancing may take place in a dynamic manner on a regular basis.

Cash calls (with deployment in appropriate money-market and fixed-income securities), derivatives, changes in the degree of overweight and underweight to sectors and changes in allocation levels to stocks with varying attributes be used to balance the portfolio.

If the macro-economic conditions and market levels warrant, the fund manager may on an exceptional basis, reduce the equity exposure and raise the fixed-income component of the portfolio beyond the asset allocation boundary indicated in the table for normal circumstances. Such an allocation in exceptional circumstances shall be adopted with the approval of the Internal Investment Committee (IIC) of Sundaram Asset Management.

In the event of deviations, the fund manager will carry out rebalancing within 30 days. Where the portfolio is not rebalanced within 30 days, justification for the same shall be placed before the IIC and reasons for the same shall be recorded in writing. The IIC, comprising three members in total, shall then decide on the course of action. However, at all times the portfolio will strive to adhere the overall investment objectives of the Scheme.

#### B. WHERE WILL THE SCHEME INVEST?

In order to achieve investment objectives, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities:

• Fixed Income Securities of the Government of India, state and local governments, government agencies, statutory bodies, public sector undertakings, scheduled commercial banks, non-banking finance companies, development financial institutions, supranational financial institutions, corporate entities and trusts (securitised debt).

• Debt and Money Market securities and such other securities as may be permitted by SEBI and RBI Regulation from time to time.

• Money market instruments including but not limited to, treasury bills, commercial paper of public sector undertakings and private sector corporate entities, repo arrangements, TREPS (Triparty Repo Trades), certificates of deposit of scheduled commercial banks and development financial institutions, treasury bills, promissory notes of Central Government, government securities with unexpired maturity of one year or less and other money market securities as may be permitted by SEBI/RBI Regulation.

• Pass through, Pay through or other Participation Certificates, representing interest in a pool of assets including receivables.

• The securities mentioned above and such other securities the Scheme is permitted to invest in could be listed, unlisted, privately placed, secured, unsecured, securitised debt securities including but, not restricted to, pass through Certificates and strips rated or unrated and of any maturity bearing fixed-rate or floating coupon rate.

- The non-convertible part of convertible securities.
- Units of Mutual funds as may be permitted by Regulation.

• Any other like instruments as may be permitted by RBI / SEBI / such other Regulatory Authority from time to time. The securities may be acquired through Initial Public Offerings (IPO s), secondary market operations, private placement, rights offers or negotiated deals. The Scheme may also enter into repo and reverse repo obligations in all securities held by it as per the guidelines and Regulation applicable to such transactions.

• The Scheme shall invest in the instruments rated as investment grade or above by a recognised rating agency. In case, the instruments are not rated, specific approval of the Board of Directors of the Investment Manager or a committee constituted by the Board of Directors of the Investment Manager and the Board of Directors of Trustee Company or a Committee approved by the Trustee Company shall be obtained.

• A portion of the fund could be invested in liquid investments to meet the redemption requirement.

• The Scheme intends to use fixed-income derivatives as permitted by RBI/SEBI for hedging interest rate risk. The actual percentage of investments in various floating and fixed interest rate securities and the position of derivatives will be decided on day to day basis depending upon the prevailing views on Interest rate.

• Pending deployment of funds in terms of investment objectives of the Scheme, the funds may be invested in short term deposits with scheduled Commercial Banks in accordance SEBI Regulations.

#### Investment in Corporate Debt Market Development Fund by certain debt schemes of the Fund

As per the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996, SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/128 dated July 27, 2023 on framework for Corporate Debt Market Development Fund and SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/129 dated July 27, 2023 on investment by mutual fund schemes and Asset Management Companies (AMCs) in units of Corporate Debt Market Development Fund ("CDMDF"), following specified open ended debt-oriented schemes of Sundaram Mutual Fund and Sundaram Asset

Management Company Limited shall invest such percentage of net assets in the units of the CDMDF.

Specified open ended debt-oriented schemes of Sundaram Mutual Fund

- 1. Sundaram Corporate Bond Fund
- 2. Sundaram Banking and PSU Fund
- 3. Sundaram Money Market Fund
- 4. Sundaram Low Duration Fund (Formerly Known as Principal Low Duration Fund)
- 5. Sundaram Liquid Fund (Formerly Known as Principal Cash Management Fund)
- 6. Sundaram Short Duration Fund (Formerly Known as Principal Short Term Debt Fund)
- 7. Sundaram Ultra Short Duration Fund (Formerly Known as Principal Ultra Short Term
- 8. Sundaram Medium Duration Fund

9. Sundaram Debt Oriented Hybrid Fund

CDMDF is set up as a scheme of the Trust registered as an Alternative Investment Fund ('AIF') in accordance with the SEBI (Alternative Investment Funds) Regulations, 2012

("AIF Regulations"). The objective of the CDMDF is to help to develop the corporate debt market by providing backstop facility at the time of market dislocation to benefit

the wider corporate debt market. The primary motive to set up a back stop facility is to instill confidence amongst the participants in the corporate debt/bond market during

times of market dislocation and to enhance the secondary market liquidity. Further, in times of market dislocation, the aforesaid specified debt-oriented schemes of Sundaram

Mutual Fund shall have access to sell corporate debt securities held in the portfolio and CDMDF shall purchase listed corporate debt securities from the said schemes. The

trigger and period for which the backstop facility will be open shall be as decided by SEBI.

Pursuant to the above, SIDs and KIMs of above-mentioned specified open-ended debt-oriented schemes of Sundaram Mutual Fund stands modified w.e.f. 27th October 2023

to the extent applicable as follows:

1. NAV disclosure timeline:

The following para has been added to clause "Daily Net Asset Value (NAV) Publication" of KIM and 'Transparency / NAV Disclosure' in Section "Highlights/Summary

of the Scheme" and point "Net Asset Value" in sub-section "C. Periodic Disclosures" in section "Section III. Units and Offer" of SID of specified open-ended debtoriented schemes as mentioned above:

'In case NAV of Corporate Debt Market Development Fund ('CDMDF') units is not available by 9:30 p.m of same Business Day, NAV declaration timing for Mutual Fund

Schemes holding units of CDMDF shall be 10 a.m. on next business day instead of 11 p.m. on same Business Day.'

2. Risk Profile:

The following clause has been added to the point 'A. Risk Factors' in Section "Section I. Introduction" of SID and in the point Risk Profile' in KIM of above-mentioned schemes:

CDMDF is set up as a scheme of the Trust registered as an Alternative Investment Fund ('AIF') in accordance with the SEBI (Alternative Investment Funds) Regulations,

2012 ("AIF Regulations"). The objective of the CDMDF is to help to develop the corporate debt market by providing backstop facility to instill confidence amongst the

market participants in the corporate debt/bond market during times of market dislocation and to enhance the secondary market liquidity. In times of market dislocation,

CDMDF shall purchase and hold eligible corporate debt securities from the participating investors (i.e., specified debt-oriented MF schemes to begin with) and sell as

markets recover. The CDMDF will thus act as a key enabler for facilitating liquidity in the corporate debt market and to respond quickly in times of market dislocation.

The trigger and period for which the backstop facility will be open shall be as decided by SEBI. Thus, this backstop facility will help fund managers of the aforementioned

Schemes to better generate liquidity during market dislocation to help the schemes fulfill liquidity obligations under stress situations.

In accordance with the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/129 dated

July 27, 2023 on Investment by Mutual Fund Schemes in units of Corporate Debt Market Development Fund, the aforementioned schemes shall invest 25 bps of its AUM

as on December 31, 2022 in the units of the Corporate Debt Market Development Fund ('CDMDF'). An incremental contribution to CDMDF shall be made every six

months to ensure 25 bps of scheme AUM is invested in units of CDMDF. However, if AUM decreases there shall be no return or redemption from CDMDF. Contribution

made to CDMDF, including the appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

We would further like to bring to the notice of the investors that investments in CDMDF units shall not be considered as violation while considering maturity restriction

as applicable for various purposes (including applicable Investment limits) and the calculations of Potential Risk Class (PRC) Matrix, Risk-o-meter, Stress testing and

Duration for various purposes shall be done after excluding investments in units of CDMDF.

Investors are requested to read detailed disclosure on investment of the schemes in the CDMDF as listed in subsection "C. How will the Scheme allocate its assets?

And sub-section D. Where will the Scheme Invest" in Section "Section II- Information about the scheme".

3. Investment by specified open ended debt-oriented schemes in the units of CDMDF:

The following para has been added in sub- section "How will the Scheme allocate its assets? in Section "II-Information about the scheme" of SIDs and in point Asset

Allocation Pattern of KIM of specified open-ended debt-oriented schemes as mentioned above:

'In accordance with the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/129 dated

July 27, 2023 on Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund, scheme shall invest 25 bps of its AUM as on

December 31, 2022 in the units of the Corporate Debt Market Development Fund ('CDMDF') within 10 working days from the request of CDMDF. Further, an incremental

contribution to CDMDF shall be made every six months within 10 working days from the end of half year starting from December 2023 to ensure 25 bps of scheme

AUM is invested in units of CDMDF. However, if AUM decreases there shall be no return or redemption from CDMDF. Contribution made to CDMDF, including the

appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

However, in case of winding up of contributing Scheme, inter-scheme transfers within the same Mutual Fund or across Mutual Funds may be undertaken.

Further, investments in CDMDF units shall not be considered as violation while considering maturity restriction as

applicable for various purposes (including applicable

Investment limits) and the calculations of Potential Risk Class (PRC) Matrix, Risk-o-meter, Stress testing and Duration for various purposes shall be done after excluding

investments in units of CDMDF.

The following point has been added in sub-section "Where will the Scheme Invest" in Section "II- Information about the scheme" of SIDs of specified open-ended debtoriented schemes as mentioned above:

Investment in CDMDFIn accordance with the requirement of regulation 43A of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/129 dated

July 27, 2023 on Investment by Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund, scheme shall invest 25 bps of its AUM.

CDMDF FrameworkCDMDF shall comply with the Guarantee Scheme for Corporate Debt (GSCD) as notified by Ministry of Finance vide notification no. G.S.R. 559(E) dated July 26, 2023

and SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/128 dated July 27, 2023 and circulars / guidelines/ Letters issued by SEBI and AMFI from time to time, which includes

the framework for corporate debt market development fund. The framework will inclusive of following pointsa) The CDMDF shall deal only in following securities during normal times:

– Low duration Government Securities

- Treasury bills

– Tri-party Repo on G-sec

- Guaranteed corporate bond repo with maturity not exceeding 7 days

b) The fees and expenses of CDMDF shall be as follows:

- During Normal times: (0.15% + tax) of the Portfolio Value charged on daily pro-rata basis.

- During Market stress: (0.20% + tax) of the Portfolio Value charged on daily pro-rata basis.

- "Portfolio Value" means the aggregate amount of portfolio of investments including cash balance without netting off of leverage undertaken by the CDMDF.

c) Corporate debt securities to be bought by CDMDF during market dislocation include listed money market instruments. The long term rating of issuers shall be

considered for the money market instruments. However, if there is no long term rating available for the same issuer, then based on credit rating mapping of CRAs

between short term and long term ratings, the most conservative long term rating shall be taken for a given short term rating.

d) CDMDF shall follow the Fair Pricing document, while purchase of corporate debt securities during market dislocation as specified in SEBI circular no.

SEBI/HO/IMD/PoD2/P/CIR/2023/128 dated July 27, 2023 and circulars / guidelines/ Letters issued by SEBI and AMFI from time to time

e) CDMDF shall follow the loss waterfall accounting and guidelines w.r.t. purchase allocation and trade settlement of corporate debt securities bought by CDMDF,

specified in SEBI circular no. SEBI/HO/IMD/PoD2/P/CIR/2023/128 dated July 27, 2023 and circulars / guidelines/ Letters issued by SEBI and AMFI from time to time.

4. Investment by the AMC in the in units of Corporate Debt Market Development Fund The following point will be added in sub- section "Investment by the AMC" in Section "Section II- Information about the scheme" of SID of specified open-ended debtoriented schemes as mentioned above:

'Pursuant to regulation 43A of SEBI (Mutual Funds) Regulations, 1996 and SEBI circular no.

SEBI/HO/IMD/PoD2/P/CIR/2023/129 dated July 27, 2023 on Investment by

Mutual Fund Schemes and AMCs in units of Corporate Debt Market Development Fund, AMC shall make a one-time contribution equivalent to 2 bps of the AUM of

the specified debt oriented schemes as on December 31, 2022 in the units of the Corporate Debt Market Development Fund ('CDMDF') within 10 working days of request

from CDMDF. Contribution made to CDMDF, including the appreciations on the same, if any, shall be locked-in till winding up of the CDMDF.

In case of delay in contribution by the Scheme and AMC, the AMC shall be liable to pay interest at fifteen percent (15%) per annum for the period of delay.'

The above-mentioned change shall override the conflicting provisions, if any, and shall form an integral part of the SID & KIM of specified open-ended debt-oriented schemes

as mentioned above of the Fund, as amended from time to time. All the other provisions of the SID & KIM of specified open-ended debt-oriented schemes as mentioned

above of the Fund, except as specifically modified herein above, remain unchanged.

#### C. WHAT ARE THE INVESTMENT STRATEGIES?

The scheme is positioned as low-risk, low-volatility fund which aims at offering returns linked to prevailing money market rates. Investments will be made in Money Market instruments as notified by RBI/SEBI guidelines/circulars.

Purchases of securities may be made either through initial public offer, private placement, through rights offerings, purchase on the floor of a recognised stock exchange or through negotiated deals on the secondary market. The scheme may invest in non-publicly offered securities on the merits of the investment proposals. The Scheme does not aim to concentrate investments in any particular industry. The investment shall be made across industries, sector and promoter group. The fund shall invest in the instruments rated as investment grade or above by a recognised rating agency. In case, the instruments are not rated, specific approval of the Board of Directors of the Investment Manager or a committee constituted by the Board of Directors of Trustees shall be obtained. With this composition, the scheme shall be able to meet the normal repurchase/redemption requirement. The focus of the Scheme would be to generate income over the short term on the portfolio, while maintaining a low risk profile. The Scheme has no specific target relating to portfolio turnover. In case of dealings in PSU bonds and government securities and money market instruments, the portfolio turnover may be substantially higher due to low transaction costs and the scheme may also resort to temporary borrowing within the limits laid down by SEBI.

The Investment Manager will keep in mind the Investment Objective of the Scheme and the applicable Regulations. Though every endeavour will be made to achieve the objective of the Scheme, the Investment Manager/Sponsor /Trustee do not guarantee that the investment objectives of the Scheme will be achieved. No guaranteed returns are being offered under the Scheme.

Derivatives

The scheme may invest derivative instruments for the purpose of hedging, portfolio balancing and trading. The limits and conditions and restrictions prescribed by SEBI vide circular No. Cir/ IMD/ DF/ 11/ 2010 dated August 18, 2010 shall be followed.

Derivatives are financial contracts or instruments that derive their value from an underlying asset. Derivatives may be used for hedging, portfolio balancing and trading purposes to seek to optimise performance in the Scheme and will be subject to applicable Regulations of SEBI/RBI from time to time.

Portfolio balancing includes any type of deals in derivatives as long as they are fully covered by holding a position in the underlying securities/ cash/cash equivalents/options/ futures. Trading is permitted only in exchange-traded derivatives. The derivatives shall be marked-to-market by the Investment Manager at all times.

Transactions in derivatives include a wide range of instruments, including, but not limited to futures, options, swaps, and interest rate swaps, forward rate agreements and any other instrument as may be permitted by SEBI/RBI from time to time.

Trading in derivatives

#### **Scheme Information Documents**

a) Derivatives are high risk, high return instruments as they may be highly leveraged. A small price movement in the underlying security could have a large impact on their value and may also result in a loss.

b) 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.

c) 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.

d) The fund may use derivative instruments like Interest Rate Swaps, Forward Rate Agreements or other fixed income derivatives.

e) Credit Risk: The credit risk in a derivative transaction is the risk that the counter party will default on its obligations and is generally low, as there is no exchange of principal amounts in a derivative transaction.

f) Market risk: Derivatives carry the risk of adverse changes in the market price.

g) Illiquidity risk: The risk that a derivative cannot be sold or purchased quickly enough at a fair price, due to lack of liquidity in the market.

h) It may be mentioned here that the guidelines issued by Reserve Bank of India from time to time for Forward Rate Agreements and Interest Rate Swaps and other derivative products would be adhered to.

The Fund's trading in derivatives would be in line that is permitted by SEBI Regulations from time to time. The Fund 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 guidelines and any hedging techniques that are permissible now or in future, under SEBI regulations, in consonance with the scheme's investment objective, 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 assets 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 has also vide circular DNPD/Cir-29/2005 dated 14th September 2005 permitted Mutual Funds to participate in the derivatives market at par with Foreign Institutional Investors (FII). 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.

#### **Interest Rate Swaps**

Interest Rate Swaps 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.

#### a) Advantages of Derivatives

The volatility in Indian debt markets has increased over last few months. Derivatives provide unique flexibility to the Scheme 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.

#### i. Illustration: Interest Rate Swap (IRS)

Assume that a Mutual Fund 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.

(R. in Crore)	Principal (P)	NSE MIBO	R Interest A	<u>mount (I) (P) + (I)</u>	
Day 1	10	8.10%	0.0022192	10.00221918	
Day 2	10.00222	8.20%	0.0022466	10.00446575	
Day 3	10.00447	8.30%	0.002274	10.00673973	
Day 4 (for 2 days)Saturday	10.00674	8.15%	0.0044658	10.01120548	
Day 5 Sunday Holiday					
Day 6	10.01121	8.40%	0.0023014	10.01350685	
Day 7	10.01351	8.50%	0.0023288	10.01583562	
Floating Interest Payable = 0.0158356164 Fixed Interest Receivable = 0.0167808219					

#### Net Receivable for Mutual Fund receiving fixed = 0.0009452055

In this example Mutual Fund stands to gain by receiving fixed rates. As the NSE MIBOR floating rate is decided daily, in adverse scenario, the Mutual Fund 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 Mutual Funds specified by SEBI vide its Circular No. Cir/IMD/DF/11/2010 dated August 18, 2010 are as follows:

- 1. The cumulative gross exposure through equity, debt and derivative positions should not exceed 100% of the net assets of the scheme.
- 2. Mutual Funds 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 1.
- 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. Mutual Funds may enter into plain vanilla Interest Rate Swaps for hedging purposes. The counter party in such transactions has to be an entity recognized as a market maker by RBI. Further, the value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the scheme. Exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the scheme.
- 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 1 above.
- 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:

- The cost of hedge can be higher than adverse impact of market movements
- The derivatives will entail a counter-party risk to the extent of amount that can become due from the party.
- An exposure to derivatives in excess of the hedging requirements can lead to losses.
- An exposure to derivatives can also limit the profits from a genuine investment transaction.
- 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.
- 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.

#### V Methods to tackle these risks:

- Hedging will not be done on a carpet basis but based on a view about interest rates, economy and expected adverse impact.
- Limits of appropriate nature will be developed for counter parties
- 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.
- vi The losses that may be suffered by the investors as a consequence of such investments:
  - As the use of derivatives is based on the judgment of the Fund Manager, the view on market taken may prove wrong resulting in losses.
  - The upside potential of investments may be limited on account of hedging which may cause opportunity losses.

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- vii. 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
- Viii. 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.

#### Ix. Reporting of Derivatives

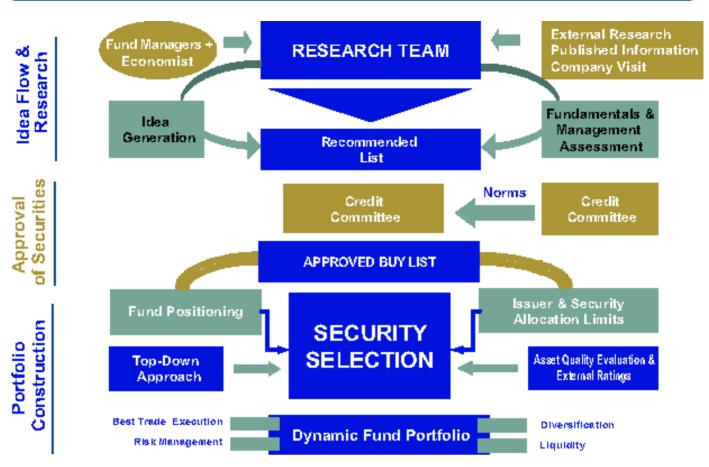
The AMC shall cover the following aspects in their reports to trustees periodically, as provided for in the Regulations:

- 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.

#### **Summary of Investment Process**





**Credit Evaluation / Approval / Monitoring:** The Investment Manager has an independent Credit Department reporting to the MD responsible for credit evaluation. The team undertakes evaluation of companies for probable investment in the Fixed Income portfolios based on requests from the Fund Management team and also of its own accord. The analysis involves detailed study of the financial performance as well as analysis of the business / industry the company operates in and the outlook for the company and the sector. The current economic status including the credit outlook is evaluated and forms part of the evaluation process. Apart from quantitative analysis qualitative analysis is also undertaken with a view to form an opinion on the Corporate governance status of the company. Based on the analysis the Credit team puts out a detailed Credit Review for approval by the Credit committee. The Credit Review inter alia will specify the quantum of limits and tenor of the approval.

The Credit Committee comprises of CIO – Fixed Income, Head – Credit, CEO/MD, COO, Head of Risk & Head-Compliance. The Credit Review needs to be approved by at least two members of the Committee. On approval the Company will be included in the Credit Investment universe and will be eligible for making investments in. The weight of individual companies in the portfolio will be decided by the Fund Manager keeping in mind the market outlook, the mandate of the scheme etc., The Fund Manager will be the sole deciding authority in relation to stock selection, allocation of weight, sale & purchase of stocks and other issues that are related to portfolio construction. The Committee reviews the reports prepared by the risk officers. The Committee also reviews the risk guidelines and sets/modifies limits, reviews the credit quality of the portfolio etc.,

**Ongoing Monitoring and Review:** The Credit Department is responsible for ongoing monitoring of the companies that are in the investment universe. The ongoing monitoring comprises of analysis of quarterly financials. Any adverse development is noted and further evaluated and concerns if any shared with the Credit Committee and recommendations may include reduction of limits to exiting the exposure. At the same time if there has been a positive development the Credit team will evaluate if the development merits an increase in limits or an extension of the tenor of exposure. Apart from the quarterly analysis the Credit team is constantly looking at all news flows on the companies in the universe and adverse new flows are immediately highlighted with a plan of action as may warrant considering the severity of the news. The Credit team also monitors the industry / sector news and policy announcements etc., affecting the companies in the investment universe and any adverse development in the industry / sector is analysed for its likely impact on the companies in the investment universe.

Apart from the ongoing monitoring by the Credit Department there are weekly reports and monthly meetings of the Credit Committee wherein portfolios are reviewed. At the monthly meeting report covering various parameters like liquidity, investor concentration, credit rating downgrades and upgrades, high yielding securities under various buckets like short term / long term, comparison of yields with market, significant deviations in yield, adverse news flows etc., are tabled and discussed.

**Risk Mitigation:** An independent risk management team is in place to oversee and monitor portfolio risk on a dayto- day basis. Internal risk control guidelines are in place and the portfolio contours are tracked on a daily basis to ensure adherence. Any deviation is brought to the notice of the Managing Director and the fund manager for corrective action. Follow up actions are made to ensure that the deviation is corrected within the time period prescribed in internal risk control guidelines. Adherence to limits from SEBI regulations as well as stipulations in the Scheme Information Document is monitored by the Compliance team. The Risk Management team reports to the CEO / MD.

**Risk Process / Guidelines:** Risk Management is an independent function and the Risk team reports directly to the MD. Broadly the function is divided into two – Regulatory and Internal. Regulatory risk consists of ensuring adherence to all the rules prescribed by the SEBI as well as the limits prescribed in the Offer documents. Internal risk monitoring consists of a host of other parameters that the risk team monitors on a continuous basis like internal limits (i.e. soft limits established to red flag potential breach in SEBI prescribed limits), adherence to fund style, operational and preparation of reports etc.,

The primary mechanism that the Risk team employs to monitor is through Bloomberg. All the rules (regulatory and internal) are uploaded into Bloomberg which thereafter monitors its adherence on a continuous basis. All trades are routed through Bloomberg systems and hence no deviation can occur without an alert being triggered by the Bloomberg system. Any breach in limits consequent to inputting of a trade is flagged off with various levels of concern and needs specific approvals in order to proceed.

#### D. HOW WILL THE SCHEME BENCHMARK ITS PERFORMANCE?

#### **CRISIL Money Market Index**

The Trustee reserves the right to change the benchmark if due to a change in market conditions, a different index appears to be providing a more appropriate basis for comparison of fund performance or if the indicated benchmark ceases to exist or undergoes a substantial change that renders it an ineffective base for performance comparison and analysis.

Name, Age & Tenure^	Educational Qualifications	Experience (last 10 years)	Name of the Scheme(s)
<b>Dwijendra Srivastava</b> 51, 14.2 Years	CFA, Bachelor of Technology (Textile Technology), PGDM (Finance),	Sundaram Asset ManagementCompany LimitedApr 2014 – till dateChief Investment Officer - DebtJul 2010 – Apr 2014Head – Fixed IncomeDeutsche Asset Management(India) LimitedJul 2007 – Jul 2010Vice President and FundManagerJM Financial Asset ManagementLimitedMay 2006 – Jul 2007Fund Manager	Joint fund Manager Sundaram Corporate Bond Fund*, Sundaram Banking & PSU Fund*, Sundaram Low Duration Fund*, Sundaram Short Duration Fund*, Sundaram Medium Term Bond Fund*, Sundaram Debt Oriented Hybrid Fund*, Sundaram Liquid Fund*, Sundaram Overnight Fund*, Sundaram Ultra Short Duration Fund*, Sundaram Money Market Fund*, Sundaram

#### E. WHO MANAGES THE SCHEME?

		Tata Asset Management Company Private Limited Jan 2003 – May 2006 Manager (Investments)"	Balanced Advantage Fund* (Debt Portion), Sundaram Equity Savings Fund* (Debt Portion), Sundaram Arbitrage Fund* (Debt Portion) and Sundaram Aggressive Hybrid Fund* (Debt Portion), Sundaram Multi Asset Allocation Fund (Debt Portion)*
Sandeep Agarwal 39, 13.9 Years	B.Com, ACA, CS	Sundaram Asset Management Co Ltd. Sep 2012 – till date Head - Fixed Income -Retail Business, Oct 2010 – Sep 2012 Dealer – Fixed Income Deutsche Asset Management India Pvt. Ltd. Apr 2008 – Oct 2010 Management Trainee - Fixed Income	Joint Fund Managed Sundaram Corporate Bond Fund*, Sundaram Medium Term Bond Fund*, Sundaram Short Duration Fund*, Sundaram Debt Oriented Hybrid Fund (Debt Portion)*, Sundaram Aggressive Hybrid Fund* (Debt Portion), Sundaram Money Market Fund*, Sundaram Ultra Short Duration Fund*, Sundaram Overnight Fund*, Sundaram Liquid Fund*, Sundaram Low Duration Fund* and Sundaram Banking & PSU Debt Fund*, Sundaram Multi Asset Allocation Fund (Debt Portion)*
^ Cut-off date conside	ered for calculation of tenu	re is September 30, 2024.	

#### F. HOW IS THE SCHEME DIFFERENT FROM EXISTING SCHEMES OF THE MUTUAL FUND?

Name of the Scheme	Asset Allocation Pattern	Investment Objective	Differentiation
Sundaram Overnight	Up to 100% Debt, Money	To generate income by	Sundaram Overnight Fund
Fund	Market instruments, Cash and	investing in debt, money	generates income by investing
	Cash equivalents with overnight	market instruments, cash	in debt, money market
	maturity / maturing in one	and cash equivalents with	instruments, cash and
	business day	overnight maturity /	cash equivalents with
		maturing in one business	overnight maturity and
		day	seeking returns in line
			with overnight call / money
			market rates
Sundaram Banking &	Money market and debt	To generate income and	The fund seeks to invest at
PSU Fund	securities issued by Banks,	capital appreciation by	the short end of the fixed-
	Public Sector undertakings	predominantly investing in	income market. It may also
	(PSUs) and Public Financial	debt instruments of Banks,	have a sizeable mark-to-
	Institutions PFIs) and Municipal	Public Sector undertakings,	marked component in line
	Bonds 80%-100% • other Debt	Public Financial Institutions	with what is permitted by the
	and Money Market Securities*	and Municipal Bonds.	Asset Allocation Pattern.
	upto 20% (Investment in		
	securitised debt will be up to		

	50% of the net assets)		
Sundaram Low Duration Fund	Debt securities / Money Market instruments and Cash & Cash equivalents 0 - 100%	To provide a level of income consistent with liquidity through investments made primarily in money market and debt securities. ensuring that the Macaulay duration of the portfolio will be maintained between 6 & 12 months:	Sundaram Low Duration Fund invests in Debt & Money Market instruments such that the Macaulay duration of the portfolio is between 6-12 months. This fund will be categorised under Low Duration Catagory as per SEBI Categorization. Sundaram Asset Management Company Limited do not have any other fund in this category
Sundaram Corporate Bond Fund	80%-100% Investment in corporate bonds (only in AA+ and above rated corporate bonds) and 0%- 20% other debt securities and Money Market Instruments, Cash and Cash equivalents	To generate income and capital appreciation by investing predominantly in AA+ and above rated corporate bonds	The fund seeks to invest at the short end of the fixed-income market. It may also have a sizeable mark-to-marked component in line with what is permitted by the Asset Allocation Pattern.
Sundaram Medium Duration Fund	Up to 100% Debt, Money Market instruments, Cash and Cash equivalents	To generate income and capital appreciation by investing in Fixed Income Securities and Money Market Instruments.ensuring that the Macaulay duration of the portfolio will be maintained between 3 years - 4 years. Portfolio Macaulay duration under anticipated adverse situation is 1 year to 4 years.	This is a Medium term debt scheme investing in instruments with Macaulay durationbetween 3 years and 4 years
Sundaram Liquid Fund	Debt securities / Money Market instruments and Cash & Cash equivalents 0 - 100%	To provide a level of income consistent with the preservation of capital, liquidity and lower level of risk, through investments made primarily in money market and debt securities. The aim is to optimize returns while providing liquidity	Sundaram Money Fund invests primarily in money market and debt security with maturity of up to 91 days only. This fund will be categorised under Liquid Catagory as per SEBI Categorization. Sundaram Asset Management Company Limited do not have any other fund in this category

Sundaram Short Duration Fund	Debt instruments & Money Market instruments, cash and cash equivalents: upto 100%	To generate income and capital appreciation by investing primarily in fixed income securities & money market instruments. ensuring that the Macaulay duration of the portfolio will be maintained between 1 & 3 years	Sundaram Short Duration Fund invests in Debt & Money Market instruments such that the Macaulay duration of the portfolio is between 1 year – 3 years. This fund will be categorised under Short Duration Catagory as per SEBI Categorization. Sundaram Asset Management Company Limited do not have any other fund in this category.
Sundaram Ultra Short Duration Fund	up to 100% Debt, Money Market instruments, Cash and Cash equivalents	The investment objective is to generate regular income by investing predominantly in debt and money market instruments. ensuring that the Macaulay duration of the portfolio will be maintained between 3 to 6 months	Sundaram Ultra Short Duration Fund invests in Debt & Money Market instruments such that the Macaulay duration of the portfolio is between 3 – 6 months. This fund will be categorised under Ultra Short Duration Catagory as per SeBI Categorization. Sundaram Asset Management Company Limited do not have any other fund in this category.
Sundaram Conservative Hybrid Fund	Debt Securities, Money Market instruments & Cash and Cash Equivalents - 75-90%; Equity & Equity related instruments - 10- 25%;Investment in REITs & InvITs - Upto 10%	To generate income and capital appreciation through investments predominantly in fixed income securities and in equity and equity related instruments	Differentiating aspect of Sundaram Debt Oriented Hybrid Fund: The fund seeks to invest at the short end of the fixed-income market. It may also have a sizeable mark-to- marked component in line with what is permitted by the Asset Allocation Pattern.

**Differentiating aspect of Sundaram Money Market Fund:** An open ended debt scheme investing in money market instruments. A Relatively Low Interest Rate Risk and Moderate Credit Risk.

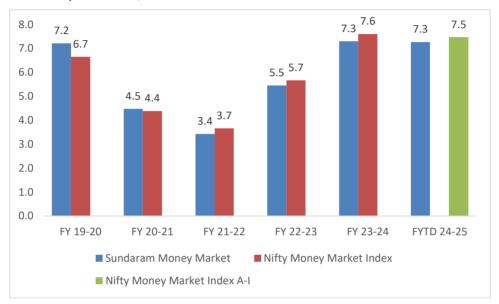
		Track Red	cord				
Fund/Benchmark			Returns (in %)			Folios	AUM
Fullu/ Delicililark	Launched in	One year	Three years	Five years	Since Inception	#	(Rs. Crore)
Liquid Fund	Aug-2004	7.3	6.1	5.2	6.9	8,978	5,294
NIFTY Liquid Index A-I		7.4	6.2	5.3	7.1		
Money Market Fund	Sep-2018	7.4	6.0	5.5	6.0	1,202	235
NIFTY Money Market Index A-I		7.6	6.2	5.5	5.8		
Ultra Short Duration Fund	Dec-2007	6.4	5.1	4.5	5.8	9,738	1,673
NIFTY Ultra Short Duration Debt Index A-I		7.6	6.3	5.8	7.7		
Overnight Fund	Mar-2019	6.7	5.6	4.7	5.0	2,12,886	376
NIFTY1D Rate Index		6.8	5.8	4.9	5.0		
Low Duration Fund	Sep-2004	7.2	5.7	6.9	7.1	12,874	426
NIFTY Low Duration Debt Index A-I		7.5	6.0	5.7	7.4		
Short Duration Fund	Sep-2002	8.2	5.8	7.7	7.2	14,883	195
NIFTY Short Duration Debt Index A-II		7.8	5.7	6.3	7.4		
Banking & PSU Debt Fund	Dec-2004	8.2	5.6	5.8	7.3	1,387	331
NIFTY Banking & PSU Debt Index A-II		7.7	5.4	6.3	7.5		
Medium Term Bond Fund	Dec-1997	6.8	3.7	4.2	7.3	2,691	43
NIFTY Medium Duration Debt Index A-III		8.6	5.3	7.0	N.A		
Corporate Bond Fund	Dec-2004	8.3	5.7	6.6	7.0	2,815	728
NIFTY Corporate Bond Index A-II		7.7	5.6	6.5	7.6		
Debt Oriented Hybrid Fund	Mar-2010	12.9	7.0	9.2	7.6	2,184	28
"CRISIL Hybrid 85+15-Conservative Index"		13.5	7.7	9.3	8.9		

Past performance may or may not be sustained in the future; Returns in %. Returns computed on compounded annualised basis based on the NAV of Regular Plan -Growth option. Performance, Folios & AUM as on September 30, 2024; Relevant benchmarks highlighted in italics.

#### G. HOW HAS THE SCHEME PERFORMED (if applicable)

Compounded Annualised Returns	Scheme Returns %	Benchmark Returns %
Returns for the last 1 year	7.4	7.6
Returns for the last 3 years	6.0	6.2
Returns for the last 5 years	5.5	5.5
Returns since inception	6.0	5.8

Past performance may or may not be sustained in the future. Returns are in %. Returns computed on compounded annualised basis based on the NAV of Regular Plan - Growth option. Relevant benchmarks highlighted in italics. NAV & performance as on September 30, 2024.



#### H. Additional Scheme Related Disclosure(s)

#### i. Portfolio Related Disclosures (as on September 30, 2024)

Portfolio - Top 10 Holdings (Issuer-wise)	
Issuer	% to NAV
Punjab National Bank	8.64
HDFC Bank Ltd	8.50
Bank of Baroda	6.48
Canara Bank	6.45
Indian Bank	6.36
PNB Housing Finance Ltd	6.18
ICICI Bank Ltd	5.52
HSBC InvestDirect Financial Services India Limited	4.41
Deutsche Investments India Private Ltd	4.38
National Bank for Agriculture & Rural Development	4.33
TOTAL	61.25

#### ii. Sector as a percentage of NAV of the scheme

Sector Allocation (% of Net Assets)			
Sector Allocation	% to NAV		
Government			
Securities/Treasury Bills	4.3		
Certificate of Deposits	61.0		
Commercial Papers	27.8		
Reverse Repo / TREPS	6.6		
Cash, Call, NCA & Primary Mkt Appln	0.30		
Others			
TOTAL	100.0		

#### iii. Portfolio Disclosure - Fortnightly / Monthly/ Half Yearly please refer the below link

#### www.sundarammutual.com/Statutory-Disclosures

#### iv. Portfolio Turnover Ratio -Last 1 Year: NA

Aggregate of equity securities and debt instruments held by the Scheme at issuer level/sectors are as of the date indicated.

Top 10 holdings disclosure do not include cash & cash equivalents, fixed deposits and/or exposure in derivative instruments, if any.

Others under sector disclosure include cash & cash equivalents.

For complete details and latest monthly portfolio, investors are requested to visit www.sundarammutual.com/Statutory Disclosures/Monthly Portfolios

#### v. Aggregate investment in the Scheme by:

Sr. No.	Category of Persons	Net Value		Market Value ( in Rs.)
1	Concerned scheme's Fund	Units	NAV per unit	100842.30
1.	Manager(s)	7078.689	14.2459	100842.30

For any other disclosure w.r.t investments by key personnel and AMC directors including regulatory provisions in this regard kindly refer SAI.

#### vi. Investments of AMC in the Scheme

The AMC shall not invest in any of the schemes unless full disclosure of its intention to invest has been made in the Scheme Information Document and that the AMC shall not be entitled to charge any fees on such investment

#### Part III- OTHER DETAILS

#### A. COMPUTATION OF NAV

The Net Asset Value (NAV) is the most widely accepted yardstick for measuring the performance of any Scheme of a Mutual Fund. NAV calculations shall be based upon the following formula:

#### Market value of the Scheme's investments + other current assets + <u>deposits – all liabilities except unit capital, reserves and Profit & Loss Account</u> Number of units outstanding of the Scheme

Valuation of Securities will be according to the valuation norms, as specified in Schedule VIII of the Regulation and will be subject to such rules or Regulation that SEBI may prescribe. The Debt and Money market securities are valued based on the prices provided by AMFI approved agencies suh as CRISIL & ICRA. Please refer the valuation policy on our website https://www.sundarammutual.com/pdf2/2020/common/Valuation\_Norms\_Feburary\_2020.pdf

NAV of the Scheme – Plan/Option wise - will be calculated and disclosed up to four decimals. For details of Valuation of Overseas Securities, please refer Statement of Additional Information.

#### Methodology of calculating the sale and repurchase price of units

Sale Price: Applicable NAV subject to Stamp Duty

**Repurchase Price:** The exit fee is usually a percentage of the Net Asset Value (NAV) of the mutual fund held by investors. Once the AMC deducts the exit load from the total Net Asset Value, the remaining amount gets credited to the investor's account.

Suppose, an investor has invested Rs.10,000 in mutual fund schemes in January 2017. The NAV of the scheme is Rs. 100 and the exit fee for redeeming before one year is 1%. In March 2017, the investor opt for an additional investment of 50 units at Rs 105 in the same fund. He redeems all his investments in the fund in November 2017, when the NAV is Rs. 110 in scenario 1 and Rs 115 in scenario 2 (February 2018)? His exit load is as follows:

100 Units bought in January 2017 @ Rs 100 = Rs 10,000

50 units bought in March 2017 @ Rs 105 = Rs 5,250

Scenario 1 (Full Redemption before completion of 1 year)

Exit charges on redemption in November 2017.

Exit Load: 1% of [(100 units x Rs. 110) + (50 units x Rs. 110)] = Rs 165.

The amount credited the investor Rs. 16,500 (Rs. 110\*150 units) - Rs. 165 = Rs. 16,335 (Total NAV - Exit fee & STT)

In scenario 1 exit load is applicable on 150 units purchased in January and March 2017 as the holding period is less than 1 year

#### B. NEW FUND OFFER (NFO) EXPENSES

This section does not apply as the scheme covered in this document is available on an on-going basis for subscription and redemption.

#### C. ANNUAL SCHEME RECURRING EXPENSES

1. The total annual recurring expenses of the Scheme, excluding deferred revenue expenditure written off, issue or redemption expenses, but including the investment management and advisory fee that can be charged to the scheme shall be within the limits specified in Regulation 52 of SEBI (Mutual Funds) Regulations. Expenses incurred in excess of the permitted limits shall be borne by the Investment Manager or the Trustee or the Sponsor.

The expenses chargeable to the scheme shall include investment management & advisory fee, Trustee fee, custodian fee, Registrar and Transfer Agent fee, Audit fee, Marketing and Selling expenses and other expenses (including listing fee) as listed in the table below:

Expense Head	% of daily Net Assets
Investment Management and Advisory Fees	
Trustee fee & expenses	
Audit fees & expenses	
Custodian fees & expenses	
RTA Fees & expenses	
Marketing & Selling expense incl. agent commission	
Cost related to investor communications	
Cost of fund transfer from location to location	
Cost of providing account statements and dividend redemption cheques and warrants	
Costs of statutory Advertisements	Upto 2.00%
Cost towards investor education & awareness (at least 2 bps)	]
Brokerage & transaction cost over and above 12 bps and 5 bps for cash and derivative market trades resp.	

Service tax on expenses other than investment management and advisory fees	]
Service tax on brokerage and transaction cost	
Other Expenses	
Maximum total expense ratio (TER) permissible under Regulation 52 (4) and (6)(c)	Upto 2.00%
Additional expenses for gross new inflows from specified cities under regulation 52 (6A) (b)	Upto 0.30%

"The current expense ratios will be updated on the website viz. www.sundarammutual.com/TER at least three working days prior to the effective date of change".

Daily TER and proposed changes, if any, are available under the link: <u>https://www.sundarammutual.com/TER</u>.

The maximum total expense ratio (TER) permissible under Regulation 52 (4) and (6) (c) that can be charged to the scheme as a percentage of daily net assets shall be as follows:

First Rs 500 crore:	2.00%
Next Rs 250 crore:	1.75%
Next Rs 1,250 crore:	1.50%
Next Rs 3,000 crore:	1.35%
Next Rs 5,000 crore:	1.25%
Next Rs 40,000 crore:	Total expense ratio reduction of 0.05% for every increase of Rs. 5,000 crores or part thereof
On balance of assets:	0.80%

As per Regulation 52(6A)(b), an additional expense upto 0.30% (30 basis points) on the daily net assets shall be charged to the scheme if new inflows into the scheme from beyond top 30 cities as specified by SEBI, from time to time, are at least:

(i) 30% of the gross new inflows in the scheme (or)

(ii) 15% of the average assets under management (year to date) of the scheme, whichever is higher.

In case the inflows from such cities is less than the higher of (a) or (b) above, expenses shall be charged to the scheme on a proportionate basis as prescribed in the SEBI circular dated September 13, 2012.

The amount so charged shall be utilised for distribution expenses incurred for bringing inflows from such cities.

However, the amount incurred as expense on account of inflows from such cities shall be credited back to the Scheme(s) in case the said inflows are redeemed within a period of one year from the date of investment.

## Additional TER can be charged based on inflows only from retail investors from B30 cities. Inflows of amount upto Rs.2 lakhs per transaction by individual investors shall be considered as inflows from "retail investor".

Top 30 cities shall mean top 30 cities based on Association of Mutual Funds in India (AMFI) data on 'AUM by Geography - Consolidated Data for Mutual Fund Industry' as at the end of the previous financial year.

Commission expenses will not be charged in Direct Plan and no commission shall be paid from Direct Plan. The total expense ratio of Direct Plan shall be lower by atleast 12.5% vis-avis the Regular Plan. i.e., If the expenses of Regular Plan are 100 bps, the expenses of Direct Plan shall not exceed 87.5 bps.

Note: The above percentage is based on the prevailing expenses ratio. Any change in the above mentioned distribution expenses/commission will be replaced while filing the final SID.

SEBI vide Circular dated October 22, 2018 made the following changes with regard to Total Expense Ratio and the substance of the circular is as under:

#### A. Transparency in TER

- 1. All scheme related expenses including commission paid to distributors, shall necessarily be paid from the scheme only within the regulatory limits and not from the books of the Asset Management Companies (AMC), its associate, sponsor, trustee or any other entity through any route.
- 2. MFs/ AMCs shall adopt full trail model of commission in all schemes, without payment of any upfront commission

or upfronting of any trail commission, directly or indirectly, in cash or kind, through sponsorships, or any other route. However, upfronting of trail commission will be allowed only in case of inflows through Systematic Investment Plans (SIPs).

- 3. In respect of inflows by new investors (to be identified based on PAN) through SIPs into MF schemes, the upfronting of trail commissions, based on SIP inflows, shall be up to 1% payable yearly in advance, for a maximum period of three years subject to the following:
- The upfronting of trail commission may be for SIP of upto Rs. 3000 per month, per scheme, for an investor who is a. investing for the first time in Mutual Fund schemes.
- For a new investor, as identified above, only the first SIP(s) purchased by the investor shall be eligible for upb. fronting. In this regard, if multiple SIP(s) are purchased on different dates, the SIP(s) in respect of which the instalment starts on the earliest date shall be considered for upfronting.
- The upfront trail commission will be paid from AMC's books. c.
- d. The said commission shall be amortized on daily basis to the scheme over the period for which the payment has been made.
- The said commission will be charged to the scheme as 'commissions' and will also account for computing the TER e. differential between regular and direct plans in each scheme.
- f. The commission paid shall be recovered on pro-rata basis from the distributors, if the SIP is not continued for the period for which the commission is paid.
- 5. All fees and expenses charged in a direct plan (in percentage terms) under various heads including the investment and advisory fee will not exceed the fees and expenses charged under such heads in a regular plan.
- No pass back, either directly or indirectly, shall be given by MFs/ AMCs/ Distributors to the investors. 6.
- 7. Training sessions and programmes conducted for distributors should continue and should not be misused for providing any reward or non-cash incentive to the distributors.

#### В. Additional TER of 30 bps for penetration in B-30 cities

Additional TER can be charged based on inflows only from retail investors from B30 cities. Inflows of amount upto Rs 2,00,000/- per transaction, by individual investors shall be considered as inflows from "retail investor. The additional commission for B 30 cities shall be paid as trail only.

The Investment Manager will comply with the above circular.

#### Value of Rs.10000 on 12% annual returns in 1 year, considering 1% Expense Ratio

Amount Invested	10,000.00
NAV at the time of investment	10
No. of units	1,000.00
Assume gross appreciation of	12%
Gross NAV	11.2
Expenses (assuming 1% expense Ratio on average of opening	
opening & closing NAV)	0.11
Actual NAV at the end of 1 year post expenses	
(assuming expense Ratio as above)	11.09
Value of Investment at the end of 1 year (Before expenses)	11,200.00
Percentage Return	12%
Value of Investment at the end of 1 year (after expenses)	11,094.00
Percentage Return	10.94%

**Note:** Please note that the above is an approximate illustration of the impact of expense ratio on the returns, where the Gross NAV has been simply reduced to the extent of the expenses. In reality, the actual impact would vary depending on the path of returns over the period of consideration. Expenses will be charged on daily net assets.

2. Brokerage and transaction costs which are incurred for execution of trades and included in the cost of investment shall

be charged to the Scheme(s) in addition to the total expense limits prescribed under Regulation 52 of the SEBI (Mutual Funds) Regulations. These expenses shall not exceed 0.12% of the value of trades in case of cash market transactions and 0.05% of the value of trades in case of derivatives transactions. Payment towards brokerage and transaction cost in excess of 0.12% and 0.05% for cash market transactions and derivatives transactions respectively shall be charged to the scheme within the maximum limits prescribed under regulation 52 of the SEBI (Mutual Funds) Regulations, 1996. Any expenditure (including brokerage and transaction cost, if any) in excess of the prescribed maximum limit shall be borne by the Investment Manager or by the Trustee or Sponsor.

3. The Investment Manager shall set apart at least 0.02% (2 basis points) on the daily net assets of the scheme(s) within the maximum limit of total expense ratio prescribed under Regulation 52 of SEBI (Mutual Funds) Regulations for initiatives towards investor education and awareness taken by Sundaram Mutual fund.

#### 4. GST:

- Pursuant to SEBI circular no CIR/IMD/DF/24/2012 dated November 19, 2012, GST on brokerage and transaction cost paid for execution of trade, if any, shall be within the expenses limit prescribed under Regulation 52 of SEBI (Mutual Funds) Regulations.

- GST on investment management and advisory fee shall be charged to the scheme in addition to the maximum limit of total expense ratio as prescribed in Regulation 52 of SEBI (Mutual Funds) Regulations.

- GST for services other than investment management and advisory shall be charged to the scheme within the maximum limit of total expense ratio as prescribed in Regulation 52 of SEBI (Mutual Funds) Regulations.

Any circular/clarification issued by SEBI / AMFI in regard to expenses chargeable to the Scheme/Plan(s) will automatically

become applicable and will be incorporated in the SID/SAI/KIM accordingly.

#### D. LOAD STRUCTURE

#### Entry Load: Nil.

There shall be no entry load on SIP's including SIP's registered prior to August 1, 2009.

However the upfront commission to distributor (ARN holder) will be paid by the investor directly to the distributor, based on his assessment of various factors including the service rendered by the distributor. The distributor (ARN holder) will disclose all the commissions (in the form of trail commission or any other mode) payable to them for the different competing Scheme of various mutual funds from amongst which the Scheme is being recommended to the investor.

#### Exit Load: Nil.

Switches shall be subject to completion of lock-in period, if any, under the respective scheme.

The Board of Trustee reserves the right to prescribe or modify the exit load structure with prospective effect, subject to SEBI Regulation.

#### Applicability

(a) Units issued on reinvestment of dividend shall not be subject to exit load.

(b) Prescribed exit load will be applicable for switch out and every instalment under a Systematic Transfer Plan and Systematic Withdrawal Plan. The period indicated for exit load shall be reckoned from the date of allotment.

(c) Switch of existing investments from Regular Plan to Direct Plan where the transaction has been received without broker code in the Regular Plan shall not be subject to exit load.

However, any subsequent switch / redemption of such investment shall be subject to exit load based on the original date of investment in the Regular Plan and not from the date of switch into Direct Plan. (effective from April 01, 2013)

(d) In case of switch of investments from Regular Plan to Direct Plan received with broker code in the Regular Plan, the exit load as applicable to redemption of units under the respective scheme(s) shall apply.

However, any subsequent switch-out or redemption of such investment shall not be subject to exit load. (effective from April 01, 2013)

(e) In case of switch of investments from Direct Plan to Regular Plan, no exit load shall be levied. However, any subsequent switch-out or redemption of such investment shall be subject to exit load based on the original date of investment in the Direct Plan and not from the date of switch into Regular Plan. (effective from April 01, 2013)

(f) Investors wishing to transfer their accumulated unit balance held under discontinued plans and Regular Plan (through lumpsum / systematic investments made with Distributor code) to Direct Plan can switch their investments (subject to applicable Exit Load, if any) to Direct Plan. However, any subsequent switch-out or redemption of such investment shall not be subject to exit load. (effective from April 01, 2013)

Investors wishing to transfer their accumulated unit balance held under discontinued plans and Regular Plan (through lumpsum / systematic investments made without Distributor code) to Direct Plan can switch their investments, without Exit Load, to Direct Plan. However, any subsequent switch / redemption of such investment shall be subject to exit load based on the original date of investment in the Regular Plan / Discontinued Plans and not from the date of switch into Direct Plan. (effective from April 01, 2013)

Switches shall be subject to completion of lock-in period, if any, under the respective scheme.

The Board of Trustee reserves the right to prescribe or modify the exit load structure with prospective effect, subject to a maximum as prescribed under SEBI Regulation.

#### Details of the modifications will be communicated in the following manner:

- Addendum detailing the changes will be attached or incorporated to the SID and Key Information Memorandum. The addendum will become an integral part of this Scheme information document.
- The change in exit load structure will be notified by a suitable display at the Corporate Office of the Sundaram Asset Management and at the Investor Service Centres of the registrar.
- A public notice shall be given in one English daily newspaper having nation-wide circulation as well as in a newspaper published in the language of region where the Head Office of the Mutual Fund is situated.

The introduction/modification of exit load will be stamped on the acknowledgement slip issued to the investors on submission of an application form and will also be disclosed in the account statement issued after the introduction of such exit load.

Investors are requested to ascertain the applicable exit load structure prior to investing.

For the applicable structure, please refer to the website/offices of the Investment Manager/Registrar or call at (toll free no 1860 - 425 -7237) or your distributor.

# **SECTION II**

#### I. Introduction

#### Definition

In this document, the following words and expressions shall have the meaning specified herein, unless the context otherwise requires:

: Pursuant to SEBI Circulars SEBI/IMD/CIR No. 11/142521/08 dated October 24, 2008 and CIR/IMD/DF/19/2010 dated November 26, 2010 read along with the circular CIR/IMD/DF/21/2012 dated September 13, 2012, (NEW CIRCULAR) applicable NAV shall be as follows:

For subscription/redemption/switch request received before 3.00 pm on any business day, the closing NAV of the day of receipt of application.

For subscription/redemption/switch request received after 3.00 pm on any business day, the closing NAV of next business day after the receipt of application.

For further details, please refer page number 4

**Benchmark:** The index for evaluating the performance of the Scheme.

#### **Business Day**

A day other than A

Saturday;

A Sunday;

A day on which there is no RBI clearing/settlement of securities;

A day on which the Reserve Bank of India and/or banks in Mumbai are closed for business/clearing;

A day on which the Stock Exchange, Bombay or National Stock Exchange of India or RBI and/or banks are closed; A day

which is a public and/or bank holiday at an investor centre where the application is received;

A day on which sale/redemption/switch of units is suspended by the Investment Manager / Trustee; A

day which falls within a book closure period announced by the Trustee / Investment Manager and

A day on which normal business cannot be transacted due to storms, floods, bandh, strikes or such other events as the Investment Manager may specify from time to time.

The Investment Manager reserves the right to declare any day as a business day or otherwise at any or all branches / Investor Service Centres.

**Custodian:** A person who has been granted a certificate of registration to carry on the business of custodian of securities under the Securities and Exchange Board of India (Custodian of Securities) Regulation, 1996 and includes any entity appointed to act as custodian in respect of foreign securities (including approved banks).

**First Time Mutual Fund Investor:** An investor who invests for the first time ever in any mutual fund either by way of purchase/subscription or Systematic Investment Plan.

**Investment Management Agreement:** Investment Management Agreement dated August 24, 1996, executed between the Trustee and the Investment Manager as amended from time to time.

**Investment Manager:** Sundaram Asset Management Company Limited incorporated under the provisions of the Companies Act, 1956 and approved by the Securities and Exchange Board of India to act as the Investment Manager for the Schemes of Sundaram Mutual Fund. AMC is also called as Investment Manager alternatively.

**Investor Service Centres or Official Points of acceptance of transactions:** Designated branches of Sundaram Asset Management Limited or such other centres/offices as may be designated by the Investment Manager or its registrars from time to time.

**Mutual Fund or the Fund:** Sundaram Mutual Fund, a trust set up under the provisions of the Indian Trust Act, and registered with SEBI vide Registration No.MF/034/97/2.

**NAV:** The Net Asset Value per unit of the Scheme, calculated in the manner provided in the Scheme Information Document, as may be prescribed by SEBI Regulation from time to time.

Regulations: Securities and Exchange Board of India (Mutual Funds) Regulation 1996 as amended from time to time.

**Trustee:** Sundaram Trustee Company Limited, as incorporated under the Provisions of the Companies Act, 1996, and approved by SEBI to act as Trustee to the Scheme of Sundaram Mutual Fund.

Trust Deed: The Trust Deed dated March 31st 2006 (as amended from time to time) establishing the Mutual Fund.

Unit Holder: The term unit holder and investor has been used interchangeably in this document.

#### Abbreviation & Interpretation Abbreviation

In this document, an investor may find the following abbreviations.

AMFIAssociation of Mutual Funds in IndiaAMLAnti-Money LaunderingAUMAssets Under ManagementBSEBombay Stock Exchange LimitedSFSSundaram Fund Services LimitedCCCCustomer Care CentreCDSCContingent Deferred Sales ChargeECSElectronic Clearing SystemEFTElectronic Funds TransferFATCAForegin Account Tax Compliance ActFPIForeign Portfolio InvestorFRAForward Rate AgreementHUFHindu Undivided FamilyIDCWIncome Distribution cum Capital WithdrawalIMAInvestment Management AgreementIRSInterest Rate SwapKIMKey Information MemorandumKYCKnow Your CustomerMFUMutual Fund UtilityNAVNet Asset ValueNRINon-Resident IndianNSENational Stock Exchange of India LimitedPANPermanent Account NumberPIOPerson of India OriginPMLAPrevention of Money Laundering Act, 2002POSPoints of ServiceRBIReserve Bank of IndiaRTGSReal Time Gross SettlementSAIStatement of Additional InformationSEBISecurities and Exchange Board of India Act, 1992SEFTSpecial Electronic Funds TransferSIStanding InstructionsSIDScheme Information DocumentSIPSystematic Investment PlanSTPSystematic Transfer Plan	AMC	Asset Management Company
AUMAssets Under ManagementBSEBombay Stock Exchange LimitedSFSSundaram Fund Services LimitedCCCCustomer Care CentreCDSCContingent Deferred Sales ChargeECSElectronic Clearing SystemEFTElectronic Funds TransferFATCAForegin Account Tax Compliance ActFPIForeign Portfolio InvestorFRAForward Rate AgreementHUFHindu Undivided FamilyIDCWIncome Distribution cum Capital WithdrawalIMAInvestment Management AgreementIRSInterest Rate SwapKIMKey Information MemorandumKYCKnow Your CustomerMFUMutual Fund UtilityNAVNet Asset ValueNRINon-Resident IndianNSENational Stock Exchange of India LimitedPANPermanent Account NumberPIOPerson of Indian OriginPMLAPrevention of Money Laundering Act, 2002POSPoints of ServiceRBIReserve Bank of IndiaRTGSReal Time Gross SettlementSAIStatement of Additional InformationSEBISecurities and Exchange Board of India Act, 1992SEFTSpecial Electronic Funds TransferSIDScheme Information DocumentSIPSystematic Investment Plan	AMFI	Association of Mutual Funds in India
BSEBombay Stock Exchange LimitedSFSSundaram Fund Services LimitedCCCCustomer Care CentreCDSCContingent Deferred Sales ChargeECSElectronic Clearing SystemEFTElectronic Funds TransferFATCAForegin Account Tax Compliance ActFPIForeign Portfolio InvestorFRAForward Rate AgreementHUFHindu Undivided FamilyIDCWIncome Distribution cum Capital WithdrawalIMAInvestment Management AgreementIRSInterest Rate SwapKIMKey Information MemorandumKYCKnow Your CustomerMFUMutual Fund UtilityNAVNet Asset ValueNRINon-Resident IndianNSENational Stock Exchange of India LimitedPANPermanent Account NumberPIOPerson of Indian OriginPMLAPrevention of Money Laundering Act, 2002POSPoints of ServiceRBIReserve Bank of IndiaRTGSReal Time Gross SettlementSAIStatement of Additional InformationSEBISecurities and Exchange Board of India Act, 1992SEFTSpecial Electronic Funds TransferSIDScheme Information DocumentSIPSystematic Investment Plan	AML	Anti-Money Laundering
SFSSundaram Fund Services LimitedCCCCustomer Care CentreCDSCContingent Deferred Sales ChargeECSElectronic Clearing SystemEFTElectronic Funds TransferFATCAForegin Account Tax Compliance ActFPIForeign Portfolio InvestorFRAForward Rate AgreementHUFHindu Undivided FamilyIDCWIncome Distribution cum Capital WithdrawalIMAInvestment Management AgreementIRSInterest Rate SwapKIMKey Information MemorandumKYCKnow Your CustomerMFUMutual Fund UtilityNAVNet Asset ValueNRINon-Resident IndianNSENational Stock Exchange of India LimitedPANPermanent Account NumberPIOPerson of Indian OriginPMLAPrevention of Money Laundering Act, 2002POSPoints of ServiceRBIReserve Bank of IndiaRTGSReal Time Gross SettlementSAIStatement of Additional InformationSEBISecurities and Exchange Board of IndiaSEIStatement of Additional InformationSEIStanding InstructionsSIDScheme Information DocumentSIPSystematic Investment Plan	AUM	Assets Under Management
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CDSCContingent Deferred Sales ChargeECSElectronic Clearing SystemEFTElectronic Funds TransferFATCAForegin Account Tax Compliance ActFPIForeign Portfolio InvestorFRAForward Rate AgreementHUFHindu Undivided FamilyIDCWIncome Distribution cum Capital WithdrawalIMAInvestment Management AgreementIRSInterest Rate SwapKIMKey Information MemorandumKYCKnow Your CustomerMFUMutual Fund UtilityNAVNet Asset ValueNRINon-Resident IndianNSENational Stock Exchange of India LimitedPANPermanent Account NumberPIOPerson of Indian OriginPMLAPrevention of Money Laundering Act, 2002POSPoints of ServiceRBIReserve Bank of IndiaRTGSReal Time Gross SettlementSAIStatement of Additional InformationSEBISecurities and Exchange Board of IndiaSEBI ActSecurities and Exchange Board of IndiaSEFTSpecial Electronic Funds TransferSIStanding InstructionsSIDScheme Information DocumentSIPSystematic Investment Plan	SFS	Sundaram Fund Services Limited
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SIDScheme Information DocumentSIPSystematic Investment Plan	SEFT	Special Electronic Funds Transfer
SIP Systematic Investment Plan	SI	Standing Instructions
	SID	Scheme Information Document
STP Systematic Transfer Plan	SIP	Systematic Investment Plan
	STP	Systematic Transfer Plan

SWP	Systematic Withdrawal Plan
TREPS	Triparty Repo Trades

#### Interpretation

The words and expressions used in this document and not defined shall have the meanings respectively assigned to them therein under the SEBI Act or the SEBI Regulation.

For the purpose of this document, except as otherwise expressly provided or unless the context otherwise requires:

- the terms defined in this Scheme Information Document include the singular as well as the plural;
- pronouns having a masculine or feminine gender shall be deemed to be all inclusive;
- all references to 'dollars' or '\$' refers to the United States dollars;
- Rs refers to Indian Rupee;
- A crore means ten million or 100 lakh;
- A lakh means a hundred thousand;
- References to timings relate to Indian Standard Time (IST) and
- References to a day are to a calendar day including non-Business Day.

#### **B.** Risk factors

#### **Standard Risk Factors**

Investment in Mutual Fund Units involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.

As the price / value / interest rates of the securities in which the Scheme invests fluctuates, the value of your investment in the Scheme may go up or down.

Past performance of the Sponsor/Investment Manager/Mutual Fund does not guarantee future performance of the Scheme.

The names of each Scheme does not in any manner indicate either the quality of the Scheme or its future prospects and returns.

The sponsor is not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution of Rs 1 lakh made towards setting up the Fund.

The Scheme is not a guaranteed or assured return Scheme.

#### Scheme-Specific Risks

Changes in the prevailing rates of interest are likely to affect the value of the Scheme's holdings and consequently the value of the Scheme's Units. The Scheme may use derivative instruments such as Interest Rate Swaps, Forward Rate

Agreements or other derivative instruments for the purpose of hedging and portfolio balancing and trading, as permitted under the Regulations and guidelines. Usage of derivatives will expose the Scheme to certain risks inherent to such derivatives. There is risk of capital loss.

#### **General Risk Factors**

Mutual Funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the Scheme will be achieved.

The main types of risks to which the Scheme is exposed are risk of capital loss, market risk, currency risk, liquidity risk, credit risk, counter party default risk, to name a few.

As with any investment in securities, the NAV of the Units issued under the Scheme can go up or down depending on the factors and forces affecting the capital markets.

The NAV may be affected by factors such as market conditions, level of interest rates, market-related factors, trading volumes, settlement periods, transfer procedures, price/interest rate risk, credit risk, government policy, volatility and liquidity in markets, exchange rate, geo-political development, to name a few.

Trading volumes in the securities in which the Scheme invest may inherently restricts the liquidity of the Scheme's investments.

Change in Government policy in general and changes in tax benefits applicable to mutual funds may impact the returns to Investors in the Scheme.

The tax benefits available under the Scheme is as available under the present taxation laws and subject to relevant conditions. The information given is included for general purposes only and is based on advice that the Investment Manager has received regarding the law and the practice that is now in force in India.

Unit holders should be aware that the relevant fiscal rules and their interpretation might change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of 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 own professional tax advisor.

Investors/unit holders are also urged to read the detailed clause(s) titled 'Special considerations'.

FATCA imposes tax withholding upto 30% on any payments (including redemption and Income distribution is suffice proceeds) made by the Fund/AMC to a US Person classified as recalcitrant account holder in respect of whom the applicable documentation and reporting requirements are not met.

This is only an illustrative list and not an exhaustive list factors that could affect the NAV of the Scheme. They should read the risk factors presented in this document though the list is no way exhaustive. Potential investors should rely solely on the information contained in this Scheme Information Document and are advised to consult their investment advisors before taking investment decisions.

#### **Liquidity Risk**

#### For Equity Asset Class, and Equity & Equity Oriented schemes:

Sundaram Asset Management Company (SAMC) evaluates both stock level and portfolio level liquidity of the equity schemes and the concentration of investors and Distributors in the AUM of each Equity scheme. The portfolio level liquidity of each scheme is estimated every month for very short time horizons as a % of AUM assuming 20% participation in the combined daily average market volume (across all exchanges) for the last three months and the trend of excessive liquidity over the Top Investors and Top Distributors concentration is evaluated. The monthly trend of estimated portfolio liquidity of the scheme, contribution by Top Investors and Top Distributors to the scheme AUM is analysed regularly by the Investment Manager to make relevant changes in the portfolio to maintain adequate portfolio liquidity.

At each investee company's stock level, number of days to liquidate (DTL) a stock position held across by all the schemes of SAMC based on the volume assumptions as mentioned above is measured and monitored every month for increase or decrease in the liquidity levels of the stock position. Exposure to stocks with more than high levels of DTL at the fund house level is monitored every month along with scheme level exposure for such stocks. Cumulative exposure across all schemes to overall free float levels of each stock and significant changes in the free float level of each stock is monitored on a monthly basis.

The trends of the trading volume at the stock level are monitored and significant changes in the trading volume at stock level is discussed during the monthly risk review meetings. The impact cost levels of the Stocks are monitored every month and exposure to the top stocks in terms of impact cost is closely monitored. In addition to this, the bulk / block trades are regularly monitored. The monthly trend of the Liquidity Risk Score for each scheme under the Risk- o-Meter framework is monitored.

#### For Debt Asset Class, Debt and Debt Oriented Schemes:

Liquidity Risk evaluation Framework for Debt and Debt Orientation Schemes of SAMC is based on the following principles –

• Regular estimation of the scheme portfolio assets by assigning liquidity grades / scores to each category of

securities by factoring in the credit rating, maturity levels, sector, issuer type, structure etc.,

- Regular estimation of potential liabilities at the investor level and at the distributor level based on the concentration levels and fund category level redemption probabilities.
- Use of liquidity ratios/tools for monitoring liquidity
- System-based preparation of cash flows with adequate maker/ check controls
- Linkage with stress testing policy, stress events and early warning signals

# Liquidity Risk Management (LRM) framework:

A Liquidity Risk Management (LRM) framework was introduced by AMFI during July 2021 (as per AMFI Best Practices Guidelines Circular No.93 / 2021-22) in accordance with the SEBI circular issued during Nov 2020 and Jun 2021. The fund-category wise redemption probability data provided by AMFI which is used for arriving at the Redemption-at-Risk (RaR) and Conditional Redemption-at-Risk (CRaR) requirements, covers all possible outflow (liquidity requirement) scenarios including stress scenarios. Further the factors used for arriving at the potential liquidity requirements for each category of fund is derived from industry data based on last 11-year period.

The redemption probability data for RaR & CRaR would be updated annually thereby fulfilling the criteria of both near terms as well as longer term (through the cycle) liquidity events. The LRM framework thus effectively addressees Liquidity Risk evaluation and adequate buffers for managing such requirements through the RaR and CRaR requirements on the asset side for a period of 0-30 days.

The LRM approach focuses on management of mismatch in putative liabilities (arising in short term period of up to 30 days) vis-à-vis the liquid and eligible assets of each scheme, and include the below liquidity ratios –

- Liquidity ratio based on 30-day Redemption at Risk (LR-RaR) requirements
- Liquidity ratio based on Conditional Redemption at Risk (LR-CRaR)) requirements

The LRM framework also highlights additional factors contributing to the Liquidity Risk like Investor Concentration and Distributor concentration, for which additional mark-up in the Liquidity Ratio would be applied if the concentration levels are beyond certain maximum thresholds.

Back testing of the RaR and CRaR is done for each scheme every month by comparing RaR and CRaR fixed at the start of the month with the actual redemptions that have occurred during the month to evaluate the need for further mark- up in the RaR and CRaR levels. Comparison of LR-CRaR with the proportion of the fund AUM beyond the exit load period and proportion of the fund AUM beyond the long-term capital gain window (3 year holding period) is also be done to evaluate the adequacy of the LR-CRaR.

# Asse-Liability Management (ALM):

With up to 30-day Liquidity Risk Management Covered under the LRM Framework, the ALM framework is intended to address a slightly longer-term asset Liability matching up to a period of 90 days.

The redemption probability data input on the liability side and the value realization assumptions on the asset side for these calculations has been provided by AMFI and is based on similar methodology used for the LRM Framework, i.e., 11 years industry level fund category wise redemption data ending October 2020. In line with the LRM framework, this data will also by revised by AMFI once a year.

The ALM framework calculates potential liquidity requirements (net AUM change) over a 90-day period with a confidence interval of 95% for the four liability buckets mentioned in the LRM circular i.e., Rs. 0-1 Cr, Rs.1 to 5 Cr, Rs. 5 to 100 Cr and more than Rs.100 Cr. Against this data, the asset side is expected to be evaluated by applying haircuts in line with Risk-o-Meter scores in an accelerated (non – linear) manner.

The adequacy on the asset side vs the liability side is measured monthly (like under the LRM framework). Any negative gaps in this ALM framework would trigger asset realignment in the fund portfolio or any other appropriate efforts at the sales side in terms of moderating the investor concentration.

# Stress Testing Framework:

Liquidity Risk is also evaluated under the Stress Testing Framework by assuming certain liquidity stress impact scenarios for various rating categories, maturity buckets and issuer types of securities.

SAMC regularly evaluates the intraday liquidity requirements and ensure that there are sufficient liquid assets, back up facilities in terms of intra-day bank limits, short term borrowing limits etc., for meeting the liquidity requirements considering seasonal / event based factors.

As a part of the Liquidity Risk evaluation framework for debt asset class/schemes, SAMC regularly evaluate the trend of the top investor and top distributor concentration and the trend of the liquidity risk score under the Risk-o-Meter Framework.

#### **Risk of Capital Loss**

The Net Asset Value (NAV) of the Scheme is exposed to market fluctuations, and its value can go up as well as down. Investors may lose their entire principal.

#### **Risk Factors - Debt Markets**

Interest Rate Risk: Changes in the prevailing rates of interest may affect the value of the Scheme's holdings and consequently the value of the Scheme's Units. Increased rates of interest, which frequently accompany inflation and

/or a growing economy, may have a negative effect on the value of the Units. The value of debt securities held by the Scheme generally will vary inversely with the changes in prevailing interest rates.

While it is the intent of the fund manager to invest primarily in high rated debt securities, the Scheme may from time to time invest in higher yielding, low rated securities. As a result, an investment in the Scheme may be accompanied by a higher degree of risk relative to an investment consisting exclusively of high rated, lower yielding securities.

**Credit Risk:** Credit Risk refers to the risk of failure of interest (coupon) payment and /or principal repayment. All debt instruments carry this risk. Government securities carry sovereign credit risk. The assets of the Scheme may be partly invested in fixed income securities issued by a corporate entity, bank, financial institution and/or a public sector undertaking owned by the Government of India or by a government in any state. The credit risk associated with the aforementioned issuers of debt is higher than that of government securities.

**Price Risk:** As long as the Scheme remains invested, its Net Asset Value (NAV) would be exposed to market fluctuations, and its value can go up as well as down. The portfolio of fixed-income securities that the Scheme invests in would be exposed to price changes on a day-to-day basis.

These price changes may occur due to instrument-specific factors as well as general macroeconomic conditions. In general, price of fixed-income securities go up when interest rates fall, and vice versa.

**Market Risk:** The Scheme may also be subject to price volatility due to such factors as interest sensitivity, market perception or the creditworthiness of the issuer and general market liquidity.

**Liquidity Risk:** A lower level of liquidity affecting an individual security (ies) or an entire market may have an adverse bearing on the value of the Scheme's assets. This may more importantly affect its ability to sell particular securities with minimal impact cost as and when necessary to meet requirement of liquidity or to sell stocks in response to triggers such as a specific economic/corporate event. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of a few of the investments.

**Risk relating to investment pattern:** Different types of securities in which the Scheme would invest as given in the Scheme Information Document carry different levels and types of risk. Accordingly the Scheme's risk may increase or decrease depending upon its investment pattern. e.g. corporate debt carry credit risk unlike Government securities. Further even among corporate debt, AAA rated debt is comparatively less risky (in credit risk terms) than those rated lower (say AA or A).

**Risks relating to duration:** Fixed Income securities of any issuer that has higher duration could be more risky in terms of price movements relative to those with lower duration. Thus any impact of interest rate changes would be higher on securities with higher duration irrespective of the status of the issuer of the security.

Limited Liquidity & Price Risk: Presently, secondary market for securitised papers is not very liquid. There is no assurance that a deep secondary market will develop for such securities. This could limit the ability of the investor to resell them. Even if a secondary market develops and sales were to take place, these secondary transactions may be at a discount to the initial issue price due to changes in the interest rate structure.

Limited Recourse, Delinquency and Credit Risk: Securitised transactions are normally backed by a pool of receivables and credit enhancement as stipulated by the rating agency, which differ from issue to issue. The Credit Enhancement stipulated represents a limited loss cover to the Investors. These Certificates represent an undivided beneficial interest in the underlying receivables and there is no obligation of either the Issuer or the Seller or the originator, or the parent or any affiliate of the Seller, Issuer and Originator. No financial recourse is available to the Certificate Holders against the Investors' Representative. Delinquencies and credit losses may cause depletion of the amount available under the Credit Enhancement and thereby the Investor Payouts may get affected if the amount available in the Credit Enhancement facility is not enough to cover the shortfall. On persistent default of an Obligor to repay his obligation, the servicer may repossess and sell the underlying Asset. However many factors may affect, delay or prevent the repossession of such Asset or the length of time required to realize the sale proceeds on such sales. In addition, the price at which such Asset may be sold may be lower than the amount due from that Obligor.

Risks due to possible prepayments: Weighted Tenor / Yield: Asset securitisation is a process whereby commercial or consumer credits are packaged and sold in the form of financial instruments Full prepayment of underlying loan contract may arise under any of the following circumstances;

• Obligor pays the Receivable due from him at any time prior to the scheduled maturity date of that Receivable; or

• Receivable is required to be repurchased by the Seller consequent to its inability to rectify a material misrepresentation with respect to that Receivable; or

• The servicer recognizing a contract as a defaulted contract and hence repossessing the underlying Asset and selling the same.

In the event of prepayments, investors may be exposed to changes in tenor and yield.

Bankruptcy of the Originator or Seller: If originator becomes subject to bankruptcy proceedings and the court in the bankruptcy proceedings concludes that the sale from originator to Trust was not a sale then an Investor could experience losses or delays in the payments due. All possible care is generally taken in structuring the transaction so as to minimize the risk of the sale to Trust not being construed as a "True Sale". Legal opinion is normally obtained to the effect that the assignment of Receivables to Trust in trust for and for the benefit of the Investors, as envisaged herein, would constitute a true sale.

Bankruptcy of the Investor's Agent: If the Investor's agent, becomes subject to bankruptcy proceedings and the court in the bankruptcy proceedings concludes that the recourse of Investor's Agent to the assets / receivables is not in its capacity as agent / Trustee but in its personal capacity, then an Investor could experience losses or delays in the payments due under the swap agreement. All possible care is normally taken in structuring the transaction and drafting the underlying documents so as to provide that the assets/receivables if and when held by Investor's Agent is held as agent and in Trust for the Investors and shall not form part of the personal assets of Investor's Agent. Legal opinion is normally obtained to the effect that the Investors Agent's recourse to assets/ receivables is restricted in its capacity as agent and trustee and not in its personal capacity.

**Credit Rating of the Transaction / Certificate:** The credit rating is not a recommendation to purchase, hold or sell the Certificate in as much as the ratings do not comment on the market price of the Certificate or its suitability to a particular investor. There is no assurance by the rating agency either that the rating will remain at the same level for any given period of time or that the rating will not be lowered or withdrawn entirely by the rating agency.

**Risk of Co-mingling:** The servicer normally deposit all payments received from the Obligors into the Collection Account. However, there could be a time gap between collection by a servicer and depositing the same into the Collection account especially considering that some of the collections may be in the form of cash. In this interim period, collections from the Loan Agreements may not be segregated from other funds of the servicer. If the servicer fails to remit such funds due to Investors, the Investors may be exposed to a potential loss. Due care is normally taken to ensure that the servicer enjoys highest credit rating on stand alone basis to minimize Co-mingling risk.

#### **Risk Factors - Derivatives**

**Counter Party Risk:** This is the risk of default of obligations by the counter party.

Market risk: Derivatives carry the risk of adverse changes in the market price.

**Illiquidity risk:** The risk that a derivative cannot be sold or purchased quickly enough at a fair price, due to lack of liquidity in the market.

**Basis Risk:** the risk that the movements in swap rates does not actually reflect the expected movement in benchmark rates, thus, creating a mismatch with what was intended.

# Risk envisaged and mitigation measures for repo transactions:

Credit risks could arise if the counterparty does not return the security as contracted or interest received by the counter party on due date. This risk is largely mitigated, as the choice of counterparties is largely restricted and their credit rating is taken into account before entering into such transactions. Also operational risks are lower as such trades are settled on a DVP basis.

In the event of the scheme being unable to pay back the money to the counterparty as contracted, the counter party may dispose of the assets (as they have sufficient margin) and the net proceeds may be refunded to us. Thus the scheme may in remote cases suffer losses. This risk is normally mitigated.

In addition to the above, the Internal Investment Committee (IIC) or Credit Committee of the AMC shall prescribe limits, restrictions and conditions for the enhancement proposed. The IIC / Credit Committee will also periodically review the limits, restrictions and conditions at its meeting.

# Risks associated with investing in Tri-Party Repo through CCIL (TREPS)

Tri-party Repo i.e. TREPS facilitates, borrowing and lending of funds, in Triparty Repo arrangement. CCIL would be the Central Counterparty to all trades from Tri Party Repo Dealing System (TREPS) and would also perform the role and responsibilities of Triparty Repo Agent, in terms of Repurchase Transactions (Repo) (Reserve Bank) Directions, 2018 as amended from time to time. The mutual fund is a member of securities segment and Tri-party Repo trade settlement of the Clearing Corporation of India (CCIL). All TREPS trades are settled anonymously and centrally through the infrastructure and settlement systems provided by CCIL. Further the settlement is guaranteed by CCIL. This is a collateralized investment whereby borrowers have to give adequate amount of securities on which a haircut is applied by CCIL. CCIL periodically prescribes a list of securities eligible for contributions as collateral by members. Presently, all Central Government securities and Treasury bills are accepted as collateral by CCIL. The risk factors may undergo change in case the CCIL notifies securities other than Government of India securities as eligible for contribution as collateral." CCIL has several risk management processes in place such as initial margin, borrowing limits, identification of eligible collateral, haircuts on eligible collateral, mark to market margins (MTM) and volatility margin are applicable for Triparty Repo trades. There is a default fund for Triparty Repo trades. The exposure monitoring is online and on a pre-order basis, ensuring that orders can be placed only if the member has sufficient initial margin and/or borrowing limits to support the resultant trades. CCIL may temporarily impose volatility margin in case of a sudden increase in volatility in interest rates. Thus the settlement and counterparty risks are considerably low.

In the event of a clearing member failing to honour his settlement obligations, the default Fund is utilized to handle any shortfall arising out of such default and to complete the settlement. The sequence in which the above resources are used is known as the "Default Waterfall". As per the waterfall mechanism, after the defaulter's margins and the defaulter's contribution to the default fund have been appropriated, CCIL's contribution is used to meet the losses.

Post utilization of CCIL's contribution if there is a residual loss, it is appropriated from the default fund contributions of the non-defaulting members. Thus the scheme is subject to risk of the initial margin and default fund contribution being invoked in the event of failure of any settlement obligations. In addition, the fund contribution is allowed to be used to meet the residual loss in case of default by the other clearing member (the defaulting member).

# **Minimum Number of Investors & Single-Investor Limit**

As per SEBI Regulations, the Scheme shall have a minimum of 20 investors and no single investor shall account for more than 25% of the corpus of the Scheme in each calendar quarter on an average basis. In case the Scheme does not have a minimum of 20 investors in the stipulated period, the provisions of Regulation 39(2)(c) of the SEBI (MF) Regulation would become applicable automatically without any reference from SEBI and accordingly the Scheme shall be wound up and the units would be redeemed at applicable NAV. The two conditions mentioned above shall also be complied within each subsequent calendar quarter thereafter, on an average basis, as specified by SEBI. If there is a breach of the 25% limit by any investor over the quarter, a rebalancing period of one month would be allowed and thereafter the investor who is in breach of the rule shall be given 15 days notice to redeem his exposure over the 25% limit. Failure on the part of the said

investor to redeem his exposure over the 25% limit within the aforesaid 15 days would lead to automatic redemption by the Mutual Fund on the applicable Net Asset Value on the 15th day of the notice period. The Fund shall adhere to the requirements prescribed by SEBI from time to time in this regard.

### **Special Considerations**

Prospective investors should review / study this Scheme Information Document carefully and in its entirety and shall not construe the contents hereof or regard the summaries contained herein as advice relating to legal, taxation, or financial/ investment matters and are advised to consult their own professional advisor(s) as to the legal or any other requirements or restrictions relating to the subscription, gifting, acquisition, holding, disposal (sale, transfer, switch or redemption or conversion into money) of units and to the treatment of income (if any), capitalisation, capital gains, any distribution, and other tax consequences relevant to their subscription, acquisition, holding, capitalisation, disposal (sale, transfer, switch or redemption or conversion into money) of units within their jurisdiction / of nationality, residence, domicile etc. or under the laws of any jurisdiction to which they or any managed Scheme to be used to purchase/gift units are subject, and (also) to determine possible legal, tax, financial or other consequences of subscribing / gifting to, purchasing or holding units before making an application for units.

Neither this Scheme Information Document nor the units have been registered in any jurisdiction outside India. The distribution of this Scheme Information Document in certain jurisdictions may be restricted or subject to registration

requirements and, accordingly, persons who come into possession of this Scheme Information Document in certain jurisdictions are required to inform themselves about, and to observe, any such restrictions. No person receiving a copy of this Scheme Information Document or any accompanying application form in such jurisdiction may treat this Scheme Information Document or such application form as constituting an invitation to them to subscribe for units, nor should they in any event use any such application form, unless in the relevant jurisdiction such an invitation could lawfully be made to them and such application form could lawfully be used without compliance with any registration or other legal requirements. Neither the delivery of this Scheme Information Document nor any sale made hereunder shall, under any circumstances, create any implication that the information contained herein is correct.

# **Risk Factors - Segregated Portfolio**

**Liquidity Risk:** Securities classified under the segregated portfolio will typically be those securities that are thinly traded or not traded at all. Hence these securities will have significant liquidity risk and investors may not be able to redeem their investments.

**Credit Risk:** Securities classified under the segregated portfolio will typically be securities which are undergoing stress with regard to their ability to make principal and interest payments. Hence these securities will have significant credit risk and investors may not be able to redeem / realize their investments and realizes. It is also highly likely that these securities will undergo bankruptcy / liquidation processes which further increases the risk of the amount and the time taken for the investor to realize his investment.

# The scheme got the approval from the AMC and Trustee to enable the segregation of portfolio in case of credit event

SEBI vide circular number SEBI/HO/IMD/DF2/CIR/P/2018/160 and dated 28th December 2018 prescribed the procedure for segregation of portfolio in mutual fund schemes. Following is the extract from the circular:

- 1. Segregated portfolio may be created, in case of a credit event at issuer level i.e. downgrade in credit rating by a SEBI registered Credit Rating Agency (CRA), as under:
- Downgrade of a debt or money market instrument to 'below investment grade', or
- Subsequent downgrades, or
- Similar such downgrades of a loan rating.
- 2. In case of difference in rating by multiple CRAs, the most conservative rating shall be considered. Creation of segregated portfolio shall be based on issuer level credit events and implemented at the ISIN level.
- 3. Creation of segregated portfolio shall be optional and at the discretion of the AMC. It should be created only if the SID of the scheme has provisions for segregated portfolio with adequate disclosures.
- 4. AMCs shall have a detailed written down policy on creation of segregated portfolio and the same shall be approved by the trustees.
- 5. Process for creation of segregated portfolio
- a. AMC shall decide on creation of segregated portfolio on the day of credit event. Once an AMC decides to

segregate portfolio, it shall

- i. seek approval of trustees prior to creation of the segregated portfolio.
- ii. immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors.
- iii. 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.
- b. Once trustee approval is received by the AMC,
- i. Segregated portfolio shall be effective from the day of credit event ii. AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information shall also be submitted to SEBI.
- ii. An e-mail or SMS should be sent to all unit holders of the concerned scheme.
- iii. The NAV of both segregated and main portfolio shall be disclosed from the day of the credit event.
- v. All existing investors in the scheme 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.
- vi. 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.

- c. If the trustees do not approve the proposal to segregate portfolio, AMC shall issue a press release immediately informing investors of the same.
- 6. Valuation and processing of subscriptions and redemptions
- a. the valuation should take into account the credit event and the portfolio shall be valued based on the principles of fair valuation (i.e. realizable value of the assets).
- b. 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 as under:
- i. upon trustees' approval to create a segregated portfolio
- Investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio.
- Investors subscribing to the scheme will be allotted units only in the main portfolio based on its NAV.
- ii. In case trustees do not approve the proposal of segregated portfolio, subscription and redemption applications will be processed based on the NAV of total portfolio (scheme portfolio including the securities affected by the credit event).

# 7. Disclosure Requirements

- a. A statement of holding indicating the units held by the investors in the segregated portfolio along with the NAV of both segregated portfolio and main portfolio as on the day of the credit event shall be communicated to the investors within 5 working days of creation of the segregated portfolio.
- b. Adequate disclosure of the segregated portfolio shall appear in all scheme related documents.
- c. The Net Asset Value (NAV) of the segregated portfolio shall be declared on every business day.
- d. The information regarding number of segregated portfolios created in a scheme shall appear prominently under the name of the scheme at all relevant places such as SID, KIM-cum-Application Form, advertisement, AMC and AMFI websites, etc.
- e. The scheme performance required to be disclosed at various places shall include the impact of creation of segregated portfolio. The scheme performance should clearly reflect the fall in NAV to the extent of the portfolio segregated due to the credit event and the said fall in NAV along with recovery(ies), if any, shall be disclosed as a footnote to the scheme performance.
- f. The disclosures at paragraph (d) and (e) above regarding the segregated portfolio shall be carried out for a period of

at least 3 years after the investments in segregated portfolio are fully recovered/ written-off.

- g. The investors of the segregated portfolio shall be duly informed of the recovery proceedings of the investments of the segregated portfolio. Status update may be provided to the investors at the time of recovery and also at the time of writing-off of the segregated securities.
- 8. TER for the Segregated Portfolio
- a. AMC shall not charge investment and advisory fees on the segregated portfolio. however, TER (excluding the investment and advisory fees) can be charged, on a prodata basis only upon recovery of the investments in segregated portfolio.
- b. 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.
- c. The legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio in proportion to the amount of recovery. however, the same shall be within the maximum TER limit as applicable to the main portfolio. The legal charges in excess of the TER limits, if any, shall be borne by the AMC.
- d. The costs related to segregated portfolio shall in no case be charged to the main portfolio.
- 9. Monitoring by Trustees
- a. In order to ensure timely recovery of investments of the segregated portfolio, trustees shall ensure that:
- i. The AMC puts in sincere efforts to recover the investments of the segregated portfolio.
- ii. upon recovery of money, whether partial or full, it shall be immediately distributed to the investors in proportion to their holding in the segregated portfolio.

Any recovery of amount of the security in the segregated portfolio even after the write off shall be distributed to the investors of the segregated portfolio.

iii. An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated

portfolio is placed in every trustee meeting till the investments are fully recovered/ written-off.

- iv. The trustees shall monitor the compliance of this circular and disclose in the half-yearly trustee reports filed with SEBI, the compliance in respect of every segregated portfolio created.
- b. In order to avoid mis-use of segregated portfolio, trustees shall ensure to have a mechanism in place to negatively impact the performance incentives of Fund Managers, Chief Investment Officers (CIOs), etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of the AMC, including claw back of such amount to the segregated portfolio of the scheme.
- 10. The existence of the provisions for segregated portfolio should not encourage the AMCs to take undue credit risk in the scheme portfolio.

In partial modification to SEBI Circular No. SEBI/HO/IMD/DF2/CIR/P/2018/160 dated December 28, 2018 on 'Creation of segregated portfolio in mutual fund schemes', it has been decided by SEBI to permit creation of segregated portfolio of unrated debt or money market instruments by mutual fund schemes of an issuer that does not have any outstanding rated debt or money market instruments, vide circular number SEBI/HO/IMD/DF2/CIR/P/2019/127, dated 07th November 2019. subject to the following:

- a. 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.
- b. AMCs will 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 issuer, AMCs may segregate the portfolio of debt or money market instruments of the said issuer in

terms of SEBI circular dated December 28, 2018.

The Scheme intends to have the ability to create a segregated portfolio in line with the above SEBI circular No. SEBI/HO/IMD/DF2/CIR/P/2018/160 dated December 28, 2018.

# Example of Segregation:

The below table shows how a security affected by a credit event will be segregated and its impact on investors. Whether the distressed security is held in the original portfolio or the segregated portfolio, the value of the investors holdings will remain the same on the date of the credit event. Over time, the NAV of the portfolios are subject to change.

**Key Assumptions:** We have assumed a Scheme consists of 3 Securities (A, B, and C). It has two investors with total of 10,000 units. (Investors 1 - 6,000 units, Investors 2 - 4,000 units)

Total Portfolio Value of Rs. 30 Lakhs (each Security invested Rs. 10 Lakh)

#### Current NAV: 30,00,000/10,000 = Rs. 300 Per unit

Suppose Security A is downgraded to below investment grade and consequently the value of the security falls from Rs. 10,00,000 to Rs. 4,00,000 and the AMC decides to segregate the security into a new portfolio. Investors will be allotted the same number of units in the segregated portfolio as they hold in the main portfolio. So, Investor 1 will get 6,000 units and Investor 2 will get 4,000 units in the segregated portfolio.

With Segregation – Portfolio Value is Rs. 24,00,000 (Now B & C Securities worth Rs. 20 Lakh and Security A has fallen from Rs. 10,00,000 to Rs. 4,00,000)

	Main Portfolio	Segregated Portfolio
	(Security of B & C)	(Security A)
Net Assets	Rs. 20,00,000	Rs. 4,00,000
Number of units	10,000 10,000	
NAV per unit	Rs. 20,00,000/ 10,000 = Rs. 200	Rs. 4,00,000/ 10,000 = Rs. 40

#### With respect to Investors.

	Investor 1	Investor 2
units held in Main portfolio (No. of units)	6,000	4,000
NAV of Main Portfolio	Rs. 200 per unit	Rs. 200 per unit
Value of holding in Main Portfolio (A) –	Rs. 12,00,000	8,00,000
units held in Segregated Portfolio	6,000	4,000
NAV of Segregated Portfolio	Rs. 40 Per unit	Rs. 40 Per unit
Value of holding in Segregated Portfolio (B) –	Rs. 2,40,000	1,60,000
Total Value of holdings (A) + (B) –	Rs. 14,40,000	9,60,000

# In case if it does not segregate (Total Portfolio would be)

Net Assets of the Portfolio	No. of Units	NAV per unit Rs.
Rs. 24,00,000	10,000	4,00,000/ 10,000= Rs. 240
(Rs. 4,00,000 in Security A and		
Rs. 10,00,000 in Security B and		
Rs. 10,00,000 in Security C)		
	Investor 1	Investor 2
units held in Original portfolio (No. of units)	6,000	4,000
NAV of Original Portfolio	Rs. 240 Per unit	Rs. 240 Per unit
Value of holding -	Rs. 14,40,000	9,60,000

Note:

1. 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 a mutual fund scheme.

2. The term 'main portfolio' shall mean the scheme portfolio excluding the segregated portfolio.

3. The term 'total portfolio' shall mean the scheme portfolio including the securities affected by the credit event.

# Details under FATCA/Common Reporting Standards (CRS)/Foreign Tax Laws

Compliance under Foreign Account Tax Compliance Act /Common Reporting Standard requirements: Foreign Account Tax Compliance Act: Foreign Account Tax Compliance Act ("FATCA") is a United States (US) law aimed at prevention of tax evasion by US citizens and residents ("US Persons") through use of offshore accounts. FATCA obligates foreign financial institution (FFIs), including Indian financial institutions to provide the US Internal Revenue Service (IRS) with information on the accounts of to report accounts held by specified US Persons. FATCA requires enhanced due diligence processes by the FFI so as to identify US reportable accounts. With respect to individuals, the US reportable accounts would cover those with US citizenship or US residency. The identification of US person will be based on one

or more of following "US indicia" • Identification of the Account Holder as a US citizen or resident; Unambiguous indication of a US place of birth; • Current US mailing or residence address (including a US post office box); • Current US telephone number; • Standing instructions to transfer funds to an account maintained in USA; • Current effective power of attorney or signing authority granted to a person with a US address; or • An "in-care of or "hold mail" address that is the sole address that the Indian Financial Institution has on the file for the Account Holder. Since domestic laws of sovereign countries, (including India) may not permit sharing of confidential client information by FFIs directly with US IRSk, the U.S. has entered into Inter-Governmental Agreement (IGA) with various countries. The IGA between India and USA was signed on 9th July, 2015, which provides that the Indian FIs will provide the necessary information to Indian tax authorities, which will then be transmitted to USA automatically. Common Reporting Standard - The New Global Standard for Automatic Exchange of Information: On similar lines as FATCA, the Organization of Economic Development (OECD), along with the G20 countries, of which India is a member, has released a "Standard for Automatic Exchange of Financial Account Information in Tax Matters", in order to combat the problem of offshore tax evasion and avoidance and stashing of unaccounted money abroad, requiring cooperation amongst tax authorities. The G20 and OECD countries have together developed a Common Reporting Standard (CRS) on Automatic Exchange of Information (AEOI). The CRS on AEOI was presented to G20 Leaders in Brisbane on 16th November, 2014. On June 3, 2015, India has joined the Multilateral Competent Authority Agreement (MCAA) on AEOI. The CRS on AEOI requires the financial institutions of the "source" jurisdiction to collect and report information to their tax authorities about account holders "resident" in other countries, such information having to be transmitted "automatically' annually. The information to be exchanged relates not only to individuals, but also to shell companies and trusts having beneficial ownership or interest in the "resident" countries. Accordingly with effect from November 1, 2015 all investors will have Sundaram Mutual Fund / the AMC is classified as a 'Foreign Financial Institution' under the FATCA provisions. Accordingly, the AMC / Mutual Fund will be required to undertake due diligence process and identify US reportable accounts and collect such information / documentary evidences of the US and / or non-US status of its investors / Unit holders and disclose such information (directly or through its agents or service providers) as far as may be legally permitted about the holdings / investment returns to US Internal Revenue Service (IRS) and / or the Indian Tax Authorities. The MF has registered with US Internal Revenue Service (IRS) and has obtained a Global Intermediary Identification Number (GIIN): EY9227.99999.SL.356 for the said reporting purposes.

FATCA/CRS due diligence will be directed at each investor / Unit holder (including joint investor) and on being identified as a reportable person / specified US person, all the folios will be reported. In case of folios with joint holders, the entire account value of the investment portfolio will be attributable under each such reportable person. An investor / Unit holder will therefore be required to furnish such information as and when sought by the AMC in order to comply with the information reporting requirements stated in IGA and circulars issued by SEBI/Government of India in this regard from time to time. The information disclosed may include (but is not limited to) the identity of the investors and their direct or indirect beneficiaries, beneficial owners and controlling persons. Investors / Unitholders should consult their tax advisors regarding FATCA/CRS requirements with respect to their situation.

# II. Information about the scheme:

# A. Where will the scheme invest

In order to achieve investment objectives, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities:

• Fixed Income Securities of the Government of India, state and local governments, government agencies, statutory bodies, public sector undertakings, scheduled commercial banks, non-banking finance companies, development financial institutions, supranational financial institutions, corporate entities and trusts (securitised debt).

• Debt and Money Market securities and such other securities as may be permitted by SEBI and RBI Regulation from time to time.

• Money market instruments including but not limited to, treasury bills, commercial paper of public sector undertakings and private sector corporate entities, repo arrangements, TREPS (Triparty Repo Trades), certificates of deposit of scheduled commercial banks and development financial institutions, treasury bills, promissory notes of Central Government, government securities with unexpired maturity of one year or less and other money market securities as may be permitted by SEBI/RBI Regulation.

• Pass through, Pay through or other Participation Certificates, representing interest in a pool of assets including receivables.

• The securities mentioned above and such other securities the Scheme is permitted to invest in could be listed, unlisted, privately placed, secured, unsecured, securitised debt securities including but, not restricted to, pass through Certificates and strips rated or unrated and of any maturity bearing fixed-rate or floating coupon rate.

- The non-convertible part of convertible securities.
- Units of Mutual funds as may be permitted by Regulation.

• Any other like instruments as may be permitted by RBI / SEBI / such other Regulatory Authority from time to time. The securities may be acquired through Initial Public Offerings (IPO s), secondary market operations, private placement, rights offers or negotiated deals. The Scheme may also enter into repo and reverse repo obligations in all securities held by it as per the guidelines and Regulation applicable to such transactions.

• The Scheme shall invest in the instruments rated as investment grade or above by a recognised rating agency. In case, the instruments are not rated, specific approval of the Board of Directors of the Investment Manager or a committee constituted by the Board of Directors of the Investment Manager and the Board of Directors of Trustee Company or a Committee approved by the Trustee Company shall be obtained.

• A portion of the fund could be invested in liquid investments to meet the redemption requirement.

• The Scheme intends to use fixed-income derivatives as permitted by RBI/SEBI for hedging interest rate risk. The actual percentage of investments in various floating and fixed interest rate securities and the position of derivatives will be decided on day to day basis depending upon the prevailing views on Interest rate.

• Pending deployment of funds in terms of investment objectives of the Scheme, the funds may be invested in short term deposits with scheduled Commercial Banks in accordance SEBI Regulations.

### Brief note on fixed-income and money market in India

### (i) Debt Instrument Characteristics:

A Debt Instrument is basically an obligation which the borrower has to service periodically and generally has the following features:

Face Value: Stated value of the paper /Principal Amount
Coupon: Zero, fixed or floating
Frequency: Semi-annual; annual, sometimes quarterly
Maturity: Bullet, staggered
Redemption: FV; premium or discount
Options: Call/Put

Issue Price: Par (FV) or premium or discount

A debt instrument comprises of a unique series of cash flows for each paper, terms of which are decided at the time of issue. Discounting these cash flows to the present value at various applicable discount rates (market rates) provides the market price.

#### (ii) Types of Debt Market Instruments:

The Indian Debt market comprises of the Money Market and the Long Term Debt Market.

Money market instruments are Commercial Papers (CPs), Certificates of Deposit (CDs), Treasury bills (T-bills), Repos, Inter-bank Call money deposit, TREPS, Reverse Repo and TREPS etc. They are mostly discounted instruments that are issued at a discount to face value.

Money market instruments have a tenor of less than one year while debt market instruments typically have a tenor of more than one year.

Long Term Debt market in India comprises mainly of two segments viz., the Government securities market and the corporate securities market.

Government securities include central, state and local issues. The main instruments in this market are dated securities (Fixed or Floating) and Treasury bills (Discounted Papers). The Central Government securities are generally issued through auctions on the basis of 'Uniform price' method or 'Multiple price' method while State Govt. are through on- tap sales.

Corporate Debt segment on the other hand includes bonds/debentures issued by private corporates, public sector units (PSUs) and development financial institutions (DFIs). The debentures are rated by a rating agency and based on the feedback from the market, the issue is priced accordingly. The bonds issued may be fixed or floating. The floating rate debt market has emerged as an active market in the rising interest rate scenario. Benchmarks range from Overnight rates or Treasury benchmarks.

Debt derivatives market comprises mainly of Interest Rate Swaps linked to Overnight benchmarks called MIBOR (Mumbai Inter Bank Offered Rate) and is an active market. Banks and corporate are major players here and of late Mutual Funds have also started hedging their exposures through these products.

The following table gives approximate yields prevailing during the month of September 2024 on some of the instruments. These yields are indicative and do not indicate yields that may be obtained in future as interest rates keep changing consequent to changes in macro economic conditions and RBI policy

Issuer	Instruments	Maturity	ОТС
GOI	Treasury Bill	91 days	6.45
GOI	Treasury Bill	364 days	6.55
GOI	Short Dated	1-3 Yrs	6.68-6.70
GOI	Medium Dated	3-5 Yrs	6.70 - 6.74

GOI	Long Dated	5-10 Yrs	6.74 - 6.82
Corporates	Bonds (AAA)	1 - 3 years	7.46 - 7.50
Corporates	Bonds (AAA)	3 - 5 years	7.37 -7.46
Corporates	CPs (A1+)	3 months - 1 yr	7.70 - 7.90
Banks	CDs	3 months - 1 yr	7.28 - 7.60

# Source: Bloomberg. As of October 22, 2024

# (iii) Regulators:

The RBI operates both as the monetary authority and the debt manager to the government. In its role as a monetary authority, the RBI participates in the market through open-market operations as well as through Liquidity Adjustment Facility (LAF) to regulate the money supply. It also regulates the bank rate and repo rate, and uses these rates as indirect tools for its monetary policy. The RBI as the debt manager issues the securities at the cheapest possible rate. The SEBI regulates the debt instruments listed on the stock exchanges.

# (iv) Fixed income and money market segments

The market for fixed-income securities in India can be briefly divided into the following segments:

- The money market The market for borrowing / lending money;
- The securities market The market for trading in securities and
- The derivatives market The market for fixed income derivatives.

In this predominantly institutional market, the key market players are banks, financial institutions, insurance companies, mutual funds, primary dealers and companies. Provident / pension funds, though present, are not active players.

# The Money Market

The money market can be classified into two broad categories. The market for clean borrowing/lending without backing of any collateral:

**Call Money:** The market for overnight borrowing / lending.

**Notice Money:** The market for borrowing/lending from 2 days to a fortnight. Term Money: The market for borrowing/lending for a fortnight to six months. The market for collateralised borrowing/lending:

**Repo transactions:** These are redemption-obligation transactions in which the borrower tenders securities to the lender; these securities are bought back by the borrower on the redemption date. The price difference between the sale and redemption of the securities is the implicit interest rate for the borrowing/lending. The eligible underlying securities for these transactions are government securities and treasury bills. Corporate bonds are not allowed as eligible securities for repo transactions. The minimum repo term (lending /borrowing period) is one day.

**TREPS:** TREPS stands for Triparty Repo Trades. TREPS is a discount instrument introduced by the Clearing Corporation of India Limited (CCIL). They can be traded like any other discount instrument. Lenders buy TREPS and borrowers sell TREPS. CCIL manages the risks inherent in issuing these securities through a system of margins and deposits that it takes from both lenders and borrowers. TREPS can be issued/bought/sold for a minimum of one day to a maximum of 364 days.

# The Securities Market

The market for fixed-income securities can be broadly classified into

The market for money market (short-term) instruments: Money-market securities are generally discount securities maturing within one year from the date of issuance. Instruments satisfying this criterion are treasury bills (obligations of the government), commercial paper (obligations of the corporate sector) and certificate of deposit (obligations of banks).

The market for Government Securities: Government securities are medium-/long-term Fixed Income Securities of the government. The market for government securities is the most liquid segment of the fixed-income market in India. Most of the secondary market trading is concentrated in government securities. Trading in government securities is now done mostly through an electronic trading, reporting and settlement platform developed by the Reserve Bank of India (RBI) called Negotiated Dealing System. The role of brokers, which was an important element of the Indian bond market, is now less significant in this segment than in the past.

The market for corporate bonds: Trading in corporate bonds is relatively subdued (in comparison to government securities). Price discovery and trading in this segment are still through the telephone. Attempts at improving the trading, settlement and risk-management practices for trading corporate bonds are currently underway.

The market for floating-rate securities: The coupon rate in floating-rate securities is linked to an acceptable benchmark. Floating-rate securities generally have a coupon rate, which is reset over a regular period depending on the benchmark chosen. The market widely uses the MIBOR benchmarks announced by Independent agencies such as NSE and Reuters. When benchmark interest rate rises, the income generated on these floating-rate securities may also rise. When the benchmark interest rates decline, the income generated on these floating-rate securities may decline. Increasingly more companies are raising resource through floating-rate securities. Most of such securities are in the form of floating-rate debentures at a spread over NSE MIBOR. The other popular benchmark is the Indian Government securities benchmark yield (known as INBMK). The reset in such cases happen after a period of time, generally six months. The Government of India has also started issuing floating-rate securities using INBMK 1 year as the benchmark.

#### The Fixed-Income Derivatives Market

The interest-rate derivatives market is at a developing stage in India. Instruments broadly transacted are • Interest Rate Swaps • Interest Rate Futures and • Forward Rate Agreements.

**Interest Rate Swaps:** This is an agreement between two parties to exchange stated interest obligations for an agreed period in respect of a notional principal amount. The most common form is a fixed-to-floating-rate swap where one party receives a fixed (pre-determined) rate of interest while the other receives a floating (variable) rate of interest.

**Interest Rate Future (IRF):** An interest rate futures contract is "an agreement to buy or sell a debt instrument at a specified future date at a price that is fixed today." Interest rate futures are derivative contracts which have a notional interest bearing security as the underlying instrument. The buyer of an interest rate futures contract agrees to take delivery of the underlying debt instruments when the contract expires and the seller of interest rate futures agrees to deliver the debt instrument. The fund can effectively use interest rate futures to hedge from increase in interest rates.

**Forward Rate Agreement:** This is basically a forward-starting interest-rate swap. 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. The notional amounts are not exchanged.

# (v) Market Participants:

Given the large size of the trades, the debt market has remained predominantly a wholesale market.

#### **Primary Dealers**

Primary Dealers (PDs) act as underwriters in the primary market, and as market makers in the secondary market.

#### Brokers

Brokers bring together counterparties and negotiate terms of the trade.

#### Investors

Banks, Insurance Companies, Mutual Funds are important players in the debt market. Other players are Trusts, Provident and pension funds.

#### (vi) Trading Mechanism:

#### Government Securities and Money Market Instruments

Negotiated Dealing System (NDS) is an electronic platform for facilitating dealing and online reporting of transactions. Government Securities (including T-bills), call money, notice/term money, repos in eligible securities, etc. are available for negotiated dealing through NDS. Currently G-Sec deals are done telephonically and reported on NDS.

Corporate Debt is basically a phone driven market where deals are concluded verbally over recorded lines. The reporting of trade is done on the NSE Wholesale Debt Market segment.

# B. What are the investment restrictions?

#### **D.Investment Restrictions**

As per the Trust Deed read with the SEBI (MF) Regulations, the following investment restrictions apply in respect of the Schemes at the time of making investments. however, all investments by the Schemes will be made in accordance with the investment objective, asset allocation and where will the schemes invest, described earlier, as well as the SEBI (MF) Regulations, including schedule VII thereof, as amended from time to time. SEBI vide notification No. SEBI/LADNRO/ GN/2015-16/034 dated February 12, 2016 pertaining to Securities and Exchange Board of India (Mutual Funds) (Amendment) Regulations, 2016 and vide circular no SEBI/HO/IMD/DF2/CIR/P/2016/35 dated February 15, 2016 made amendment in Investment Restrictions. The modified Investment restrictions as follows:

1 The Scheme shall not invest more than 10% of its NAV in debt instruments comprising money market instruments and non-money market instruments issued by a single issuer which are rated not below investment grade by a credit rating agency authorised to carry out such activity under the Act. Such investment limit may be extended to 12% of the NAV of the scheme with the prior approval of the Board of Trustees and the Board of directors of the asset management company.

Provided that such limit shall not be applicable for investments in Government Securities, treasury bills and collateralized borrowing and lending obligations.

Provided further that investment within such limit can be made in mortgaged backed securitised debt which are rated not below investment grade by a credit rating agency registered with SEBI.

2 The scheme shall not invest in unlisted debt instruments including commercial papers (cPs), other than (a) government securities, (b) other money market instruments and (c) derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. which are used by mutual funds for hedging. however, the scheme may invest in unlisted Nonconvertible Debentures (NcDs) not exceeding 10% of the debt portfolio of the scheme subject to the condition that such unlisted NcDs have a simple structure (i.e. with fixed and uniform coupon, fixed maturity period, without any options, fully paid up upfront, without any credit enhancements or structured obligations) and are rated and secured with coupon payment frequency on monthly basis.

For this, listed debt instruments shall include listed and to be listed debt instruments. all fresh investments by mutual fund schemes in cPs would be made only in cPs which are listed or to be listed with effect from one

month from the date of operationalization of framework for listing of cPs or January 01, 2020, whichever is later.

Further, investment in unrated debt and money market instruments, other than government securities, treasury bills, derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. by mutual fund schemes shall be subject to the following:

a. Investments will only be made in such instruments, including usance bills, etc., that are generally not rated and for which separate investment norms or limits are not provided in SEBI (mutual Fund) Regulations, 1996 and various circulars issued thereunder.

- b. Exposure of mutual fund schemes in such instruments, shall not exceed 5% of the net assets of the schemes.
- c. All such investments shall be made with the prior approval of the Board of AMC and the Board of trustees.
- 3 Pursuant to SEBI Circular No. SEBI/HO/IMD/DF4/CIR/P/2020/202 dated October 08, 2020 on Inter Scheme Transfer

Transfer of investments from one Scheme to another Scheme, including this Scheme shall be allowed only if such transfers are made at the prevailing market price for quoted securities on a spot basis and the securities so transferred shall be in conformity with the investment objective of the Scheme to which such transfer has been made.

4 The Scheme may invest in other Schemes under the same AMC or any other Mutual Fund without charging any fees, provided the aggregate inter-Scheme investment made by all the Schemes under the same management or in Schemes under management of any other asset management company shall not exceed 5% of the Net Asset Value of the Fund.

Provided that this clause shall not apply to any fund of funds scheme.

- 5 The Scheme shall buy and sell securities on the basis of deliveries and shall in all cases of purchases, take delivery of relative securities and in all cases of sale, deliver the securities. The Mutual Fund may enter into derivative transactions in recognized stock exchange (Indian/Overseas) in accordance with the guidelines/framework specified by SEBI.
- 6 The scheme shall get the securities purchased/ transferred in the name of the Fund on account of the concerned Scheme, wherever investments are intended to be of a long-term nature.
- 7 No mutual fund Scheme shall make any investments in;
- a any unlisted security of an associate or group company of the sponsor; or
- b any security issued by way of private placement by an associate or group company of the Sponsor; or
- c the listed securities of group companies of the Sponsor which is in excess of 25% of its net assets.
- 8 The schemes shall not invest in Fund of funds scheme.
- 9 No loans for any purpose can be advanced by the Scheme.
- 10 The Fund shall not borrow except to meet temporary liquidity needs of the Fund for the purpose of repurchase/ redemption of units or payment of interest and Dividend to the unit holders. Such borrowings shall not exceed more than 20% of the net assets of the individual Scheme and the duration of the borrowing shall not exceed a period of 6 months.
- 11 The Scheme will comply with provisions specified in Circular dated August 18, 2010 related to overall exposure limits applicable for derivative transactions as stated below:
- i. The cumulative gross exposure through equity, debt and derivative positions should not exceed 100% of the net assets of the scheme.
- ii. Mutual Funds shall not write options or purchase instruments with embedded written options.
- iii. The total exposure related to option premium paid must not exceed 20% of the net assets of the scheme.
- iv. Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.
- v. 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. Any derivative instrument used to hedge has the same underlying security as the existing position being hedged.

- c. The quantity of underlying associated with the derivative position taken for hedging purpose does not exceed the quantity of the existing position against which hedge has been taken.
- vi. Mutual Funds may enter into interest rate swaps for hedging purposes. The counterparty in such transactions has to be an entity recognized as a market maker by RBI. Further, the value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the scheme. exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the scheme.
- vii. 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 i.

# **12 SECTOR EXPOSURES**

Total exposure of debt schemes of mutual funds in a particular sector (excluding investments in Bank CDs, TREPS, G-Secs, T Bills, short term deposits of Scheduled commercial Banks and AAA rated securities issued by Public Financial Institutions and Public Sector Banks) should not exceed 20% of the net assets of the scheme. Provided that an additional exposure to financial services sector (over and above the limit of 20%) not exceeding 10% of the net assets of the scheme shall be allowed only by way of increase in exposure to Housing Finance Companies (HFCs).

Further, an additional exposure of 5% of the net assets of the scheme has been allowed for investments in securitized debt instruments based on retail housing loan portfolio and/or affordable housing loan portfolio.

However the overall exposure in hFcs shall not exceed the sector exposure limit of 20% of the net assets of the scheme.

Provided further that the additional exposure to such securities issued by HFCs are rated AA and above and these HFCs are registered with National housing Bank (NHB) and the total investment/ exposure in HFCs should not exceed 20% of the net assets of the scheme.

# **13 GROUP EXPOSURES**

- a) mutual Funds / amcs shall ensure that total exposure of debt schemes of mutual funds in a group (excluding investments in securities issued by Public Sector units, Public Financial Institutions and Public Sector Banks) shall not exceed 20% of the net assets of the scheme. Such investment limit may be extended to 25% of the net assets of the scheme with the prior approval of the Board of Trustees.
- b) The investments by debt mutual fund schemes in debt and money market instruments of group companies of both the sponsor and the asset management company shall not exceed 10% of the net assets of the scheme. Such investment limit may be extended to 15% of the net assets of the scheme with the prior approval of the Board of Trustees.
- For this purpose, a group means a group as defined under regulation 2 (mm) of SEBI (mutual Funds) Regulations, 1996 (Regulations) and shall include an entity, its subsidiaries, fellow subsidiaries, its holding company and its associates.

The Schemes will comply with any other Regulation applicable to the investments of mutual funds from time to time. Pursuant to SEBI circular No: SEBI/HO/IMD/DF2/CIR/P/2016/57 dated may 31, 2016.

# 14 SHORT TERM DEPOSITS:

Pending deployment of funds of the Schemes in terms of the investment objective of the Schemes, the mutual Fund may invest them in short term deposits (STD) of scheduled commercial banks in accordance with applicable SEBI guidelines as stated below:

- a) "Short Term" for parking of funds by mutual Funds shall be treated as a period not exceeding 91 days.
- b) Such deposits, if made, shall be held in the name of the scheme.
- c) The scheme shall not park more than 15% of its net assets in short term deposits of all scheduled commercial

banks put together. This limit however may be raised to 20% with prior approval of the Trustees. also, parking of funds in short term deposits of associate and sponsor scheduled commercial banks together shall not exceed 20% of the total deployment by the scheme in short term deposits.

- d) The scheme shall not park more than 10% of the net assets in short term deposits with any one scheduled commercial bank including its subsidiaries.
- e) Trustees/asset management companies (amcs) shall ensure that no funds of a scheme is parked in STD of a bank which has invested in that scheme. Trustees/amcs shall also ensure that the bank in which a scheme has STD do not invest in the said scheme until the scheme has STD with such bank.
- f) The Amc(s) shall not charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks.
- g) half Yearly portfolio statements shall disclose all funds parked in short term deposit(s) under a separate heading. Details shall also include name of the bank, amount of funds parked, percentage of NAV.
- h) Trustees shall, in the half Yearly Trustee Reports certify that provisions of the mutual Funds Regulations pertaining to parking of funds in short term deposits pending deployment are complied with at all points of time. The amc(s) shall also certify the same in its CTR(s).

The Trustee of the mutual Fund may alter these limitations/objectives from time to time to the extent the SEBI Regulation change, so as to permit the Scheme to make its investments in the full spectrum of permitted investments for the mutual fund in order to achieve its investment objective. all investments of the Scheme will be made in accordance with the SEBI Regulation. all the Investment restrictions will be considered at the point of Investment.

# SWING PRICING FRAMEWORK FOR OPEN ENDED DEBT SCHEME(S)

In terms of the SEBI circular no. SEBI/HO/IMD/IMD-II DOF3/P/CIR/2021/631 dated September 29, 2021 (the Circular), all open ended debt mutual fund schemes (except overnight funds, Gilt funds and Gilt with 10-year maturity funds) are required to follow Swing Pricing Framework with effect from March 01, 2022. SEBI has prescribed swing pricing for scenarios related to net outflows from the schemes.

Accordingly, a mandatory full swing price framework, during market dislocation times (as and when declared by SEBI), for high-risk open ended debt schemes is being introduced in scheme provisions of the Debt Schemes.

# A) Applicability of Swing Pricing Framework

Subsequent to the announcement of market dislocation by SEBI, the swing pricing framework shall be mandated only for the Debt Schemes: a. having high or very high risk on the risk-o-meter in terms of SEBI circular SEBI/ HO/IMD/DF3/CIR/P/2020/197 dated October 5, 2020 (as of the most recent period at the time of declaration of market dislocation); and b. classifying themselves in the cells A-III, B-II, B-III, C-I, C-II and C-III of Potential Risk Class (PRC) Matrix in terms of SEBI circular SEBI/HO/IMD/IMD-II DOF3/P/ CIR/2021/573 dated June 7, 2021.

# B) Swing Pricing

Swing pricing refers to a process for adjusting a scheme's Net Asset Value (NAV) to effectively pass on transaction

costs stemming from significant net capital activity (i.e., flows into or out of the fund) to the investors associated with

that activity. Swing pricing is aimed at reducing the impact of large redemptions, particularly during market dislocation, on existing investors by reducing dilution of the value of units of a Mutual Fund scheme.

### c) Market Dislocation Period

Market dislocation would be declared and notified by SEBI. Swing pricing will be applicable for a specified period as notified by SEBI.

### **D) Swing Factor**

The minimum swing factor as given below will be applicable. This shall be made applicable to the schemes mentioned above and the NAV will be adjusted downwards for both the incoming and outgoing investors.

Minimum swing factor for open ended debt schemes			
Class A (CRV*>=12)	Class B (CRV>=10)	Class C (CRV<10)	
0.00%	0.05%	0.20%	
0.05%	0.10%	0.40%	
0.10%	0.20%	0.60%	
	Class A (CRV*>=12) 0.00% 0.05%	Class A (CRV*>=12)         Class B (CRV>=10)           0.00%         0.05%           0.05%         0.10%	

#### E) Applicability of Swing Pricing to Investors

When swing pricing mechanism is triggered and swing factor is made applicable during market dislocation, both the incoming and exiting investors shall get NAV adjusted for swing pricing. Swing pricing shall be made applicable to all unitholders at PAN level, with an exemption for redemptions up to Rs.2 lakhs for each mutual fund scheme for market dislocation.

# F) Ilustration

Consider a scheme having NAV of `100 and swing factor of 2%, the NAV shall be adjusted as below on issue of notification of market dislocation by SEBI:

Swing NAV = unswung NAV \* (1 – swing factor)

- =`100\*(1-0.02)
- =`100 \* (0.98)
- = ` 98

If there is any exit load applicable as per scheme provisions, the same will be applied on swung NAV.

# G) Disclosures pertaining to NAV adjusted for swing factor

Disclosures pertaining to NAV adjusted for swing factor along with the performance impact (in the following format as prescribed by SEBI) shall be made in the SIDs of respective schemes and in scheme wise Annual Reports and Abridged summary and the same shall be disclosed on the website prominently only if swing pricing framework has been made applicable for the said mutual fund scheme.

Sr. No.	Period of applicability of swing pricing	Scheme Name	Unswung NAV	Swing factor applied	Whether optional or Mandatory

# H)Computation of NAV for purpose of scheme performance

The scheme performance shall be computed based on unswung NAV.

# Securities Lending by the Fund

Subject to the SEBI (MF) Regulations and in accordance with Securities Lending Scheme, 1997, SEBI Circular No MFD/CIR/01/047/99 dated February 10, 1999, SEBI Circular no. SEBI /IMD / CIR No 14 / 187175 / 2009 dated December 15, 2009 and framework for short selling and borrowing and lending of securities notified by SEBI vide circular No MRD/DOP/SE/ Dep/Cir-14/2007 dated December 20, 2007, as may be amended from time to time, the Scheme seeks to engage in Securities Lending.

The AMC shall adhere to the limits as set out in the respective scheme asset allocation table.

# **Restriction on redemption in Mutual Funds**

- a. Restriction may be imposed when there are circumstances leading to a systemic crisis or event that severely constricts market liquidity or the efficient functioning of markets such as:
- i. Liquidity issues when market at large becomes illiquid affecting almost all securities rather than any issuer specific security. AMCs should have in place sound internal liquidity management tools for schemes.

Restriction on redemption cannot be used as an ordinary tool in order to manage the liquidity of a scheme. Further, restriction on redemption due to illiquidity of a specific security in the portfolio of a scheme due to a poor investment decision, shall not be allowed.

- ii. Market failures, exchange closures-when markets are affected by unexpected events which impact the functioning of exchanges or the regular course of transactions. Such unexpected events could also be related to political, economic, military, monetary or other emergencies.
- iii. Operational issues—when exceptional circumstances are caused by force majeure, unpredictable operational problems and technical failures (e.g. a black out). Such cases can only be considered if they are reasonably unpredictable and occur in spite of appropriate diligence of third parties, adequate and effective disaster recovery procedures and systems.
- b. Restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period.
- c. Any imposition of restriction would require specific approval of Board of AMCs and Trustees and the same should be informed to SEBI immediately.
- d. When restriction on redemption is imposed, the following procedure shall be applied:
- i. No redemption requests upto INR 2 lakh shall be subject to such restriction.
- ii. Where redemption requests are above INR 2 lakh, AMCs shall redeem the first INR 2 lakh without such restriction and remaining part over and above INR 2 lakh shall be subject to such restriction.
- e. Disclosure:

The above information to investors shall be disclosed prominently and extensively in the scheme related documents regarding the possibility that their right to redeem may be restricted in such exceptional circumstances and the time limit for which it can be restricted.

# C. Fundamental Attributes

Following are the Fundamental Attributes of the Scheme, in terms of Regulation 18 (15A) of the SEBI Regulation:

(i) **Type of Scheme:** An open ended debt scheme predominantly investing in debt instruments of Banks, Public Sector Undertakings, Public Financial Institutions and Municipal Bonds. A relatively high interest rate risk and moderate credit risk.

(ii) Investment objective: To generate income and capital appreciation by predominantly investing in debt instruments of Banks, Public Sector Undertakings, Public Financial Institutions and Municipal Bonds.

Though every endeavour will be made to achieve the objectives of the Scheme, the Investment Manager / Sponsor / Trustee do not guarantee that the investment objectives of the Scheme will be achieved. No guaranteed returns are being offered under the Scheme. There is also no guarantee of capital or return either by the mutual fund or by the sponsor or by the Asset management Company.

(iii) **Terms of Issue:** Provisions in respect redemption of units, fees and expenses as indicated in this Scheme Information Document.

• Liquidity provisions such as listing, repurchase, redemption (Indicated in Highlights & Scheme Summary and

Part III of this document).

- Aggregate fees and expenses charged to the Scheme (Indicated in Highlights & Scheme Summary and Part IV of this document).
- Any safety net or guarantee.

The Scheme does not offer a safety net or guarantee.

In accordance with Regulation 18(15A) of the SEBI Regulation, the Trustee shall ensure that no change in the fundamental attributes of the Scheme the Trustee, fee & expenses and any other change which would modify the Scheme and affect the interests of unit holders is carried out unless:

• A written communication about the proposed change is sent to each unit holder; 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 Mutual Fund is situated and

• The unit holders are given an option for a period of 30 days to exit at the prevailing Net Asset Value without any exit load.

# D. Index methodology

# (for index funds, ETFs and FoFs having one underlying domestic ETF)

NA

E. Principles of incentive structure for market makers (for ETFs)

NA

F. Floors and ceiling within a range of 5% of the intended allocation against each sub class of asset, as per clause 13.6.2 of SEBI master circular for mutual funds dated May19, 2023 (only for close ended debt schemes)

NA

# G. other Scheme Specific Disclosures:

Ongoing offer period	The scheme is available for subscription and redemption on all business days.	
Ongoing price for	At applicable NAV	
<b>subscription</b> This is the price you		
need to pay for		
purchase / switch-in.		
Ongoing price for	At the applicable NAV subject to prevailing exit load. Net	
<b>redemption</b> This is the price you will	Asset Value - Applicable Exit Load.	
receive for	Example regarding Redemption price:	
redemptions/switch	Redemption Price = Applicable NAV * (1–Sales Load, if any) Applicable	
outs.	NAV is Rs. 10.00	
	Exit Load: Nil	
	Redemption Price = $10^{*}(101)$ = Rs. 9.90.	
Cut off timing	Pursuant to SEBI Circular No. SeBI/HO/IMD/DF2/CIR/P/2020/175 dated September 17, 2020,	
This is the time before which your application (complete in all	Investors are requested to note the revised provisions for applicability of NAV, with effect from January 1, 2021:	
respects) should reach	Applicable NAV for Subscriptions / Switch-ins (irrespective of application amount):	
respects) should reach the official points of acceptance.	<ol> <li>In respect of valid applications received upto 3.00 p.m on a Business Day at the official point(s) of acceptance and funds for the entire amount of subscription/purchase (including switch ins) as per the application are credited to the bank account of the respective Schemes before the cut-off time of the same day i.e., available for utilization before the cut-off time - the closing NAV of the day shall be applicable.</li> </ol>	
	2. In respect of valid applications received after 3.00 p.m on a Business Day at the official point(s) of acceptance and funds for the entire amount of subscription/purchase (including switch ins) as per the application are credited to the bank account of the respective Schemes before the cut-off time of the next Business Day i.e available for utilization before the cut-off time of the next Business Day - the closing NAV of the next Business Day shall be applicable.	
	3. Irrespective of the time of receipt of application at the official point(s) of acceptance, where funds for the entire amount of subscription/purchase as per the application are credited to the bank account of the respective Schemes before the cut-off time on any subsequent Business	
	Day - i.e. available for utilization before the cut-off time on any subsequent Business Day - the closing NAV of such subsequent Business Day shall be applicable.	
	4. For Switch-ins of any amount:	
	For determining the applicable NAV, the following shall be ensured:	
	• Application for switch-in is received before the applicable cut-off time.	
	• Funds for the entire amount of subscription / purchase as per the switch-in request are credited to the bank account of the Scheme before the cut-off time.	
	• The funds are available for utilization before the cut-off time.	
	• In case of 'switch' transactions from one scheme to another, the allocation and settlement shall be in line with redemption payouts.	

	To clarify, for investments through systematic investment routes such as Systematic Investment
	Plans (SIP), Systematic Transfer Plans (STP) and Transfer IDCW, etc. the units will be allotted as per the closing NAV of the day on which the funds are available for utilization before the cut-off time by the Target Scheme irrespective of the instalment date of the SIP, STP or record date of Income Distribution.
	While subscribing to an option under Direct Plan which does not have a NAV, units shall be allotted based on the NAV of corresponding option/ sub-option under the regular Plan. In case of non-availability of NAV in the corresponding option / sub-option (due to NIL investors under the option/sub-option) in the regular plan, the applicable NAV shall be that of the corresponding Growth option under the regular Plan.
Where can the applications for	Subscription/redemption request can be submitted on any business day at branches of Sundaram Asset Management, the Registrar and at Investor Service Centres of the registrar.
purchase / redemption / switches be	Registrar & Transfer Agent
submitted	KFin Technologies Limited
	CIN: L72400TG2017PLC117649
	Unit: Sundaram mutual Fund,
	Tower- B, Plot No. 31 & 32, Selenium building, Gachibowli Road, Financial District,
	Nanakramguda, Serilingampally Mandal, Hyderabad 500032.
	Contact No. 1800 425 7237 (India) +91 40 2345 2215 (NRI)
	Email us at: <u>customerservices@sundarammutual.com</u> Applications can be submitted at branches of Sundaram Asset Management Company Ltd, details of which are furnished on back cover page of this document. Applications can also be submitted at the authorised POS of MF Utility India. Please refer section on MF Utility Platform under Highlights & Scheme Summary Section for further information in this regard.
	The Investment Manager may modify, from time to time, the places for acceptance of applications in the interest of investors. For details investors may also refer to the website of the Asset Management Company / use the Toll Free Number provided in this document.
Transaction Charge to Distributors	1 The Distributor would be allowed to charge the Mutual Fund Investor a Transaction Charge where the amount of investment is Rs. 10,000/-and above on a per subscription basis
	<ul> <li>For an investor other than First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 100/- per subscription of Rs. 10,000/- and above</li> <li>For a First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 150/- per subscription of Rs. 10,000/- and above</li> </ul>
	3 The Transaction Charge, where applicable based on the above criteria, will be deducted by the Investment Manager from the subscription amount remitted by the Investor and paid to the distributor; and the balance (net) amount will be invested in the scheme. Thus units will be allotted against the net investment.
	4 No Transaction charges shall be levied:
	a) Where the distributor/agent of the investor has not opted to received any Transaction Charges;
	b) Where the investor purchases the Units directly from the Mutual Fund (i.e. not through any distributor);

	c) Where total commitment in case of SIP / Purchases / Subscriptions is for an amount less than Rs. 10,000/-;
	d) On transactions other than purchases / subscriptions relating to new inflows. Switches / Systematic Transfers / Allotment of Bonus Units / IDCW reinvestment Units / Transfer / Transmission of units, etc will not be considered as subscription for the purpose of levying the transaction charge.
	<ul> <li>e) Purchases / subscriptions carried out through stock exchange(s), as applicable.</li> <li>The distributors can opt-in / opt-out of levying transaction charges based on 'type of the Product/Scheme' instead of 'for all Schemes'. Accordingly, the transaction charges would be deducted from the subscription amounts, as applicable.</li> <li>However, the distributor shall not be able to opt-in or opt-out at the investor- level i.e. a distributor shall not charge one investor and choose not to charge another investor.</li> </ul>
	1. During the period of suspension, no commission shall be accrued or payable to the distributor whose ARN is suspended. During the period of suspension, commission on the business canvassed prior to the date of suspension shall stand forfeited, irrespective of whether the suspended distributor is the main ARN holder or a sub-distributor.
	2. All Purchase/Switch requests (including under fresh registrations of Systematic Investment Plan (SIP)/ Systematic Transfer Plan (STP) or under SIPs/STPs registered prior to the suspension period) received during the suspension period shall be processed under Direct Plan and shall continue to be processed under Direct Plan perpetually*, with a suitable intimation to the unitholder/s mentioning that the distributor has been suspended from doing mutual fund distribution.
	* If the AMC receives a written request / instruction from the unitholder/s to shift back to Regular Plan under the ARN of the distributor post the revocation of suspension of ARN, the same shall be honored.
	3. Any Purchase/Switch or SIP/STP transaction requests received through the stock exchange platform, from any distributor whose ARN has been suspended, shall be rejected.
	4. Additionally, where the ARN of a distributor has been terminated permanently, the AMC shall advise the concerned unitholder(s), who may at their option, either continue their existing investments under regular/distributor Plan under any valid ARN holder of their choice or switch their existing investments from regular/distributor Plan to Direct Plan subject to tax implications and exit load, if any.
	The transaction charges are in addition to the existing system of commission permissible to the Distributors. On subscription through Distributors, the upfront commission if any will be paid directly by the Investors to the Distributor by a separate cheque based on their assessment of various factors including the service rendered by the Distributor.
	Any circular/clarification issued by SEBI in this regard will automatically become applicable and will be incorporated in the SID/SAI/KIM wherever applicable.
Allotment on	For subscription to units by the investors, the units shall be allotted to them, provided the
on-going basis	application is complete in every respect and in order. Failing which the application will be rejected.
How to apply	Please refer to the Statement of Additional Information and Key Information Memorandum, which is a part of the Application Form (available free of cost with the offices of the Investment Manager and can be downloaded from the Website of the Investment Manager (www.sundarammutual.com).
Minimum investment	Regular Plan & Direct Plan Options: For first investment - Rs 1,000 and multiples of Rs.
	· · · · · ·

amount	1 thereafter and for additional purchase - Rs. 1,000 & multiples of Rs 1 thereafter.
	<b>Systematic Investment Plan:</b> Minimum Six instalments of Rs. Weekly - Rs.1000 (6 instalments); Monthly - Rs.1000 (6 instalments); Quarterly - Rs.1000 (6 instalments)
	SIP Dates: Any Day (1st of 31st); Weekly (every Wednesday)
	Systematic Transfer Plan:
	Daily: Rs.1,000/- (6 Instalments); Weekly: Rs.1,000/-(6 Instalments); Monthly: Rs.250/- (6 Instalments); Quarterly: Rs.750/-(6 Instalments)
	<b>STP Dates:</b> : Investors can choose any date of the month/quarter for availing the STP facility. Any Day STP is applicable only for monthly and quarterly frequencies.
	Systematic Withdrawal Plan:
	Monthly / Quarterly : Rs.500/- (6 instalments)
	SWP Dates: Any Day (1st of 31st)
	SIP Top-up facility – Half yearly/Annual Minimum Rs.500 and in multiples of Rs.500/-
	<b>Stamp Duty:</b> Pursuant to Notification No. S.O. 1226(e) and G.S.R. 226(e) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of The Finance Act, 2019, notified on February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India, a stamp duty @0.005% of the transaction value of units would be levied on applicable mutual fund inflow transactions, with effect from July 1, 2020. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including IDCW reinvestment and switch-in) to the unit holders would be reduced to that extent.
Minimum amount for Redemption/Switches	The minimum amount for redemption/switch out will be: <b>Regular &amp; Direct Plan:</b> Rs.1000/- or 100 units or account balance, whichever is lower.
	Minimum amount for STP (Daily) Rs 1000 • (Weekly-every Wednesday) Rs 1000 • (Monthly): Rs 250 • (Quarterly): Rs 750 and any amount thereafter.
	If Wednesday is not a business day, the STP instalment will be processed on the next business day.
	Investors who had registered for STP facility with distributor code on or before December 31, 2012 and wish to continue to the STP instalments under the Direct Plan shall make a written request to Sundaram Mutual Fund in this behalf. The fund will take at least 21 working days to process such requests. Intervening instalments shall continue to be processed under the Regular Plan of the respective target scheme.
Minimum balance to be maintained	Nil
Special facilities / products available	(1) Systematic Investment Plan (SIP) Investors can also benefit by investing specified amounts periodically. Weekly, monthly and quarterly frequencies are available for choice. For the weekly SIP, the minimum amount is Rs 1000 per week. For the monthly SIP, the minimum amount is Rs 1000 per month and for the quarterly SIP, the minimum amount is Rs 1000 per quarter. The SIP can be availed by the investors on: 1 2 3 4 5 6 7 8  9  10  11  12  13  14  15  16  17  18  19  20  21  22  23  24  25  26  27  28  29  30 31 of every month/quarter. For weekly Wednesday.
	Any Day SIP: Investors can choose any preferred date of the month as SIP debit date. In case the chosen date falls on a non-business day, the SIP will be processed on the immediate next business day.

last I The not defa mea men inves amo men for p SIP v Chec right SIP T The incre the t	se chosen date is not available in a particular month, the SIP will be processed on the business day of the month. weekly SIP requests shall be processed on Wednesday of every week. If Wednesday is a business day, the SIP instalment will be processed on the next business day. SIP ult date is 7th of every month, if no date is mentioned. Perpetual SIP: Perpetual SIP ns an SIP wherein the maximum period/ instalment of investment under SIP is not tioned by the investor and therefore, the instalments will be recurring until the stor communicates his intention to close/stop the SIP investment. The minimum unt of SIP and the load structure will all remain the same. If the investor does not tion the period/instalments of SIP in the application form, the SIP will be deemed to be erpetuity unless and until the investor communicates his intention otherwise. will be terminated automatically if there are three consecutive failures to honour the que. This will apply for SIP through Auto Debit and NACH/OTM. The Fund reserves the to recover the related bank charges incurred. <b>Top-up feature</b> top-up feature under the Systematic Investment Plan is to enable the investors ease their contribution in an SIP at pre-determined intervals by a fixed amount during tenure of SIP. This feature is optional and is available to investors under all Schemes
	ing SIP facility w.e.f. April 21, 2014. The terms & conditions of the Top-Up feature are ed below:
1.	Frequency for Top-up: Monthly & Quarterly
shall insta Year	For monthly SIP, the top-up options are: Yearly Top-up: Under this option, the amount of investment through SIP instalment be increased by an amount chosen by the Investor post every 6th (sixth) SIP Iment. In Top-up: Under this option, the amount of investment through SIP instalment shall be eased by an amount chosen by the Investor post every 12th (twelfth) SIP instalment.
incre In ca up, t	For Quarterly SIP, the top option is ly Top-up: Under this option, the amount of investment through SIP instalment shall be eased by an amount chosen by the Investor post every 4th (fourth) SIP instalment. use the investor who has registered under quarterly SIP has opted for half yearly Top- he SIP will be registered and processed as Yearly Top-up. Top-up feature shall not be available for weekly SIPs.
2.	Minimum Top-up Amount: Rs. 500 and in multiples of Rs. 500 thereafter.
3.	Default Top-up Frequency and amount:
a.	In case the investor does not specify either the frequency or the amount for Top- up, the applications shall be processed with following default options: Default frequency - Yearly Default Amount – Rs. 500
b.	In case the investor does not specify the frequency for Top-up and amount for Top- up, the application form may be processed as SIP without Top-up feature, subject to it being valid and complete in all other aspects.
4.	The SIP period has to be for a minimum of seven complete months in case of half- yearly top up and thirteen complete months for yearly top up.
5.	SIP instalment amount has to be a minimum of Rs. 500/- in order to avail the top- up feature under monthly SIP. Otherwise, the transaction would be processed as a SIP without Top-up feature subject to it being valid and complete in all other aspects.
6.	The Top-up option must be specified by the investors while enrolling for the SIP facility. The top-up feature can be availed only at the time of registration or renewal of SIP.

7. The Top-up feature shall be available for SIP Investments only through ECS (Debit Clearing) / Direct Debit Facility/Standing Instruction.
<ol> <li>The top-up feature shall not be available in the following cases: (i) SIP registration under perpetual mode. (ii) SIP registrations which are received through Channel Partners, Exchanges and ISIPs. (iii) Registrations under COMBO SIP facility.</li> <li>The Top-up details cannot be modified once enrolled. In order to make any changes, the investor must cancel the existing SIP and enroll for a fresh SIP with the revision in Top-up details.</li> </ol>
For further details please refer the Key Information Memorandum cum Application Form.
SIP Pause Facility The existing investor who has an ongoing SIP will have an option to pause the SIP with effect from 23rd April 2020. The investor will have to submit the signed SIP Pause facility form duly complete in all respects to avail this facility.
1. The SIP Pause Facility is available for SIP registration with monthly frequency only.
2. The request for SIP Pause should be submitted at least 21 days prior to the subsequent SIP date.
3. The request for SIP Pause can be for minimum 1 instalment and maximum 6 instalments
4. Investor can opt for the SIP Pause facility only once during the tenure of particular SIP.
<ul><li>5. The SIP shall continue from the subsequent instalment after the completion of Pause period automatically.</li><li>The terms and conditions for availing the 'SIP Pause Facility' shall be as follows:</li></ul>
<b>2)</b> Systematic Withdrawal Plan (SWP) SWP may be appropriate for those seeking regular inflow of funds for their needs. the minimum amount, which the unit holder can withdraw, is Rs.500/ the unit holder may avail himself of this plan by sending a written request to the Investment manager or the Registrar. Withdrawals through SWP are effected on the specified redemption dates, at an interval of the investor's choice (monthly or quarterly). the amount thus withdrawn by this option will be converted into units at the applicable redemption price on that date and will be subtracted from the units balance to the credit of the unit holder. unit holders may change the amount indicated in the SWP, subject to the minimum amount specified above. the SWP may be terminated on written notice from the unit holder and it will terminate automatically when all the units of the unit holder are liquidated or withdrawn from the account. the unit holders can opt for either fixed or variable amount withdrawal under this facility.
<ul> <li>a. Fixed amount withdrawal:</li> <li>The unit holder can withdraw a fixed amount (subject to a minimum amount of Rs.500/- on the Specified Redemption Dates. In this case, the withdrawal could affect the capital, reducing it or enhancing it based on the amount withdrawn and returns generated by the fund.</li> <li>Example:</li> </ul>
<ul> <li>Amount Invested: Rs.50,000/- in a Scheme of Sundaram mutual Fund – Growth Option.</li> <li>If the unit holder decides to withdraw Rs. 5,000/- every month, and the appreciation in a month is Rs. 1750/-, then such redemption proceeds will comprise of Rs. 1750/- from the capital appreciation and Rs.3250/- from the unit holder's capital account.</li> <li>b Capital Appreciation (Variable) Withdrawal Plan</li> </ul>
The unit holder withdraws the amount by which his/her capital appreciates on the specified redemption dates. here the capital invested remains constant. In the event of there being no capital appreciation, no withdrawal/payment will be effected.
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Example If the appreciation on the investment of the unit holder for the quarter is Rs.1750/- in the first quarter and Rs.1250/- for the second quarter the investor will receive only the
appreciation i.e. Rs.1750/- and Rs.1250/- for the I & II quarters respectively. The Investment Manager reserves the right to prospectively amend the operational details
of SIP/SWP options as may be deemed fit.
The above figures are given by way of examples only. The actual amount will depend on the actual performances of the scheme.
The Systematic Withdrawal Plan will be offered on the following terms and conditions The withdrawal will be made subject to minimum amount of Rs. 1000/- under the fixed amount withdrawal option and subject to Rs. 1000/- capital appreciation available under variable withdrawal option.
unit holders may change the amount of withdrawal, at any time by giving the Registrar of the Mutual Fund, a written notice at least 14 days prior to the next withdrawal date. however, the Investment Manager at its sole discretion retains the right to close an account if the outstanding balance, based on the Net Assets value, falls below Rs. 500/- due to redemption or use of SWP facility or otherwise and the investor fails to invest sufficient funds to bring the value of the amount up to Rs.500/- within 30 days after a written intimation is sent to the unit holder.
Withdrawals are processed on the first business day of every month/quarter as the case maybe.
In the case of SWP Capital Appreciation (Variable) withdrawal option, appreciation, if any, will be calculated from the commencement date of SWP under the folio, till the first
withdrawal date. Subsequently, capital appreciation, if any, will be the capital appreciation between the date immediately succeeding the last withdrawal date and the next withdrawal date. Provided that the NAV per unit on the subsequent withdrawal date is greater than the NAV per unit on the date of purchase. Provided further the capital appreciation is greater than Rs.500/
The capital appreciation portion will be subject to capital gains tax at applicable rates. In the event of there being no capital appreciation, no withdrawal/payment will be effected under the variable Plan.
3) Systematic Transfer Plan (STP)
STP is a facility wherein a unit holder of a Sundaram Mutual Fund scheme can opt to transfer a fixed amount or capital appreciation amount at regular intervals to another scheme of Sundaram Mutual Fund. The amount transferred under the STP from the Transferor scheme to the Transferee scheme, shall be effected by redeeming units of Transferor scheme and subscribing to the units of the Transferee scheme.
Daily: Rs.1,000/- (6 Instalments); Weekly: Rs.1,000/- (6 Instalments) Monthly: Rs.250/- (6 Instalments); Quarterly: Rs.750/- (6
Instalments)
STP Dates: Investors can choose any date of the month/quarter for availing the STP facility. Any Day STP is applicable only for monthly and quarterly frequencies.
The weekly STP requests shall be processed on Wednesday of every week. If Wednesday is not a business day, the STP installment will be processed on the next business day. Also, the amount for each STP shall be a minimum of Rs 1000, Rs 1000, Rs 250 and Rs 750 for daily, weekly, monthly and quarterly respectively.
STP may be terminated automatically if the balance falls below the minimum account balance
The capital appreciation portion will be subject to capital gains tax at applicable rates. Investors may opt to exit from the facility by giving a written notice to the Registrar at least 14 days prior to the next transfer date. STP may be terminated automatically if the balance falls below the minimum account balance or upon the receipt of notification of death (incorposity of the upit balance by the Fund
death/incapacity of the unit holders by the Fund. The Investment Manager reserves the right to have differential load structures for investors

who opt for the STP. Rules relating to the STP may be changed from time to time by the Investment Manager.
Note: Where the specified dates are not business days, the next business day will be relevant. The Trustee can change the prescribed dates/installment amounts or any other feature at their discretion. Systematic Transfer Plan The terms and conditions for availing the 'Any Day STP' shall be as follows:
The terms and conditions for availing the Arry Day STP shall be as follows.
1. In case the STP date is not mentioned/not legible, then the STP will be registered with 07th as default STP date, as applicable.
2. Any Day STP shall be triggered and processed only on Business days.
3. Minimum Any Day STP Amount/instalment: As stated in the respective Scheme Information Document (SID) / Key Information Memorandum (KIM) and satisfying the minimum criteria of source and target schemes.
4. Any day STP is eligible for cycle dates of 1st to 31st
i. For the dates from 1 to 28:
• STP shall be processed on the given the day if that day is a business day. In case the specified date is a non-business day, it shall be processed on the next business day.
ii. For the dates from 29 to 31:
• If the selected date is available in that month and it is a business day, any day STPs should be triggered for processing on that date. If the selected date is not a business day, any day STP shall be triggered for processing on the next business date.
• If the selected date itself is not available in that month, any day STP shall be triggered for processing on its previous business day.
• For example, if 29 is not available in the month of February, any day STP shall be triggered for processing on the last business day of February.
• For example, if 31 is not available in any of the months, any day STP shall be triggered for processing on 30th of that month, provided it is a business day, else last business day of the month shall be considered for any day STP processing.
5. Discontinuation of STP, for all frequencies
a) When the outstanding balance in "transferor Scheme" does not cover any of the STP instalment amount, all outstanding units will be liquidated and STP will be effected for such outstanding balance (subject to the transfer amount satisfying the minimum investment criteria in the destination scheme) and STP will be terminated for subsequent instalments.
b) STP will be terminated if all units from the Transferor Scheme are pledged or upon receipt of intimation of death of first/sole unit holder.
c) Investors can also choose to terminate the STP by giving a written notice of at least 7 Business Days in advance to the Official Points of Transactions and accordingly, termination of STP shall be effected on receipt of valid request.
<ul> <li>6. STP trigger under any frequency will start on a day as opted by the investor falling not later than the 5th working day from the date of receipt of a valid request. The Trustee/AMC reserves the right to change/modify the terms of SIP</li> <li>3A) Daily Systematic Transfer Plan (Daily STP) facility</li> <li>Daily STP is a facility provided wherein the unit holder(s) of "Transferor Scheme(s)" can opt</li> </ul>

to transfer a fixed amount at daily intervals (Business days) from their existing investments under "Transferor Scheme(s)" to eligible "Transferee Scheme(s)" which is available for investment at that time. Investors are requested to note the following terms and conditions with respect to availing Daily STP facility: i. Date of transfer Daily Interval (on all business days). Investors should note that in case of Daily STP, the commencement date for transfers shall be the 15th working day from the date of receipt of a valid request and thereafter, transfers shall be effected on all business days at NAV based prices, subject to applicable load. Thus, in the event of an intervening non-business day (e.g. Saturday and Sunday), STP triggers will not take place and consequently the total number of Daily STP instalments opted by the investor will be adjusted to that extent i.e., For e.g. if the investor has opted for 20 instalments and if 5 non business days happen to occur in the intervening period, then only 15 Daily STP instalments shall be triggered. In view of the intervening non business days, investors are advised to extend the period by including possible non business days during the transfer period for covering the intended instalments. Minimum amount of transfer ii. Investors are required to instruct for a minimum of 20 transfers of Rs.1000/- and in multiples of Rs.100/- thereafter. iii. Load Structure of the Transferor Scheme & Transferee Schemes as on the date of enrolment of STP shall be applicable. iv. Discontinuation of Daily STP a) Daily STP will be automatically terminated if all units are liquidated or withdrawn from the Transferor Scheme or pledged or upon receipt of intimation of death of unit holder. Further, if the outstanding balance in "Transferor Scheme" does not cover any of the Daily STP instalment amount, all outstanding units will be liquidated and Daily STP will be affected for such outstanding balance and Daily STP will be terminated for subsequent instalments. Investors can also choose to terminate the Daily STP by giving a written notice of at b) least 7 Business Days in advance to the Official Points of Transactions and accordingly, termination of Daily STP shall be effected from 8th Business Day of receipt of valid request. The provision of 'Minimum redemption amount' specified in the SID of Transferor ٧. Scheme and 'Minimum application amount' specified in the SID of the Transferee Schemes will not be applicable for Daily STP. vi. The Trustee / AMC reserve the right to change / modify the terms of the Daily STP or withdraw this facility from time to time. (4) A. As per SEBI Circular SEBI/HO/IMD/IMD-I DOF2/P/CIR/2022/161 as on November 25, 2022. a. In partial modification of paragraph II(c) of SEBI Circular SEBI/IMD/CIR No.1/64057/06 dated April 4, 2006, the record date shall be two working days from the issue of public notice, wherever applicable, for the purpose of payment of dividend b. The payment of dividend to the unitholders shall be made within seven working days from the record date IDCW Transfer Facility (DSO) 4) Sundaram Trustee Company Limited, the Trustee to Sundaram Mutual Fund has introduced Transfer IDCW into all open ended schemes from any schemes (open ended and close ended) of Sundaram Mutual Fund. The terms and conditions of the Transfer IDCW are as follows:

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	1) Transfer IDCW is a facility wherein unit holder(s) of eligible scheme(s) [hereinafter referred to as "Source Scheme(s)"] of Sundaram Mutual Fund can opt to automatically invest the IDCW (as reduced by the amount of applicable statutory levy, if any) declared by the eligible Source Scheme(s) into other eligible Scheme(s) [hereinafter referred to as "Target Scheme(s)"] of Sundaram Mutual Fund.
	2) DSO facility is available to unit holder(s) only under the IDCW Plan / Option of the Source Scheme(s). However, the DSO facility will not be available to unit holder(s) under the Daily IDCW Option in the Source Scheme(s). Unit holder's enrolment under the DSO facility will automatically override any previous instructions for 'IDCW Payout' or 'IDCW Reinvestment' facility in the Source Scheme.
	3) The enrolment for DSO facility should be for all units under the respective IDCW Plan / Option of the Source Scheme. Instructions for part IDCW Transfer and part IDCW Payout / Reinvestment will not be accepted. The Income Distribution amount will be invested in the Target Scheme under the same folio. Accordingly, the unit holder(s) details and mode of holding in the Target Scheme will be same as in the Source Scheme.
	4) The enrolment to avail of DSO facility has to be specified for each Scheme/Plan/Option separately and not at the folio level. Under DSO, IDCW declared (as reduced by the amount of applicable statutory levy and deductions, if any) in the Source scheme (subject to minimum of Rs.500/-) will be automatically invested into the Target Scheme, as opted by the unit holder, on the immediate next Business Day after the Record Date at the applicable NAV of the Target Scheme, subject to applicable load as specified under paragraph 8 below and accordingly equivalent units will be allotted in the Target Scheme, subject to the terms and conditions of the Target Scheme.
	6) The provision for 'Minimum Application Amount' specified in the respective Target
	Scheme's Scheme Information Document (SID) will not be applicable under DSO.
	7) Load Structure: The Income Distribution amount to be invested under the DSO from
	the Source Scheme to the Target Scheme shall be invested by subscribing to the
	units of the Target Scheme at applicable NAV.
	Entry Load (Target Scheme): Nil for all type of plans Exit Load (Target Scheme): As per the relevant SID(s) The Trustee/AMC reserves the right to change the load structure at any time in future on a prospective basis.
	8) The account statement will be issued by Email or by post/courier (if opted by the
	unitholder) to the unit holder once in a month, in case of any transactions made
	during the month.
	9) Unitholders who wish to enrol for DSO facility are required to fill DSO Enrolment
	Form available with the ISCs, distributors/agents and also displayed on the website
	www.sundarammutual.com. The DSO Enrolment Form should be completed in
	English in Block Letters only. Please tick () in the appropriate box, where boxes have
	been provided. The DSO Enrolment Form complete in all aspects should be submitted at any of the Investor Services centre (ISCs) of Sundaram Mutual Fund.
	Submitted at any of the investor services centre (iscs) of sumulation would fullu.

- 10) The request for enrolment for DSO must be submitted at least 10 days prior to the Record Date for the Income Distribution. In case of this condition not being met, the enrolment would be considered valid from the immediately succeeding Record Date of the Income Distribution.
- 11) Unitholder(s) are advised to read the SID(s) of Target Scheme(s) carefully before investing. The SID(s) / Key Information Memorandum(s) of the respective Scheme(s) are available with the ISCs of Sundaram Mutual Fund, brokers / distributors and also displayed on the Sundaram Mutual Fund website i.e. www.sundarammutual.com
- 12) Unit holders will have the right to discontinue the DSO facility at any time by sending a written request to the ISC. Notice of such discontinuance should be received at least 10 days prior to the Income Distribution Record Date. On receipt of such request, the DSO facility will be terminated. At the time of discontinuation of DSO facility, the Unit holders should indicate their choice of option i.e. IDCW reinvestment or IDCW payout. In the event the Unitholder does not indicate his choice of IDCW option, the Income Distribution, if any, will be reinvested (compulsory payout if IDCW reinvestment option is not available) in the Source Scheme. Once the request for DSO is registered, then it shall remain in force unless it is terminated as aforesaid.
- 13) The Trustee reserves the right to change/ modify the terms and conditions of the DSO at a later date on a prospective basis.
- IDCW Sweep Option will be available for enrolment with effect from July 07, 2017.

#### (5) Pledge

Pledge of units will be recognised. For details please contact our Investor Service Centres. In case of Pledge of Units held in Demat Form , the prescribed procedures of DP will have to be followed. Transfer/Withdrawal facility will not be available in respect of Units which are subject to Lock-in or pledge

Loan Against Mutual Fund Units (LAMF)

- Loan Against Mutual Funds (LAMF) is a financial solution that allows you to create an overdraft facility against your mutual fund units. This facility is provided by many Banks/Fin tech companies/Financial Institution/NBFC through Offline/Online i.e., through their Web portal. Investors based on their requirement can avail this facility.
- Disbursement of such loans will be at the entire discretion of the bank/financial institution/NBFC or any other body concerned and the Mutual Fund/ AMC assumes no responsibility thereof. The Pledgor will not be able to redeem Units that are pledged until the entity to which the Units are pledged provides authorisation to the Mutual Fund that the pledge/lien charge may be removed. As long as, the units are under pledge, the Pledgee will have complete authority to redeem such units requesting for redemption proceeds to be credited to their account, AMC will obliged to honour such request. In case the units pledged are of close ended scheme and if the units are under pledge at the time of maturity of the scheme, then the AMC reserves the right to pay the maturity amount to the person / bank / financial

	institution/non-banking finance companies (NBFCs)/any other body in whose favour the lien has been marked. An intimation of such payment will be sent to the investor. The AMC thereafter shall not be responsible for any claims made by the investor/third party on account of such payments.
	(6) Online Transaction Investors desirous of using online services can do so after obtaining a login password by
	executing an IPIN agreement. For more details please refer to Statement of
	Additional Information and website <u>www.sundarammutual.com.</u>
	<ul> <li>(7) Purchase/Redemption through NSE and BSE Exchange Platform</li> <li>The units under the Schemes are also available for subscriptions and redemptions through</li> </ul>
	the Stock Exchange(s) infrastructure in NSE MFSS & BSE Star Platform. For details
	please refer Statement of Additional Information of Sundaram Mutual Fund.
	The investor has the option of receiving Account Statement/Physical Certificate or having
	the Units credited to his Demat Account.
	In case the Investor desires credit of the Units to his Demat Account, details of the Demat
	Account (DP & Client ID) must be provided. The names/order of names of the
	Investors in the Application Form must match with that of the Demat Account. In
	case such details are incorrect/incomplete, Account statement will be issued, as the
	default option. For further details please refer to the Instructions in the Application
	Form.
	The Trustee reserves the right to amend, add or withdraw any special features/conditions
	in the interest of investors. The Trustees reserve the right to add other Stock
	Exchanges also to the list to facilitate transactions through their platform.
Account statement	Consolidated Account Statement:
	<ul> <li>A consolidated account statement (CAS)<sup>^</sup> for each calendar month to the Unit holder(s) in whose folio(s) transaction**(s) has/have taken place during the month shall be sent on or before 15th of the succeeding month by mail/e-mail.</li> <li>^Consolidated Account Statement (CAS) shall contain details relating to all the</li> </ul>
	transactions** carried out by the investor across all schemes of all mutual funds
	during the month and holding at the end of the month including transaction charges
	paid to the distributor, if any.
	**The word 'transaction' shall include purchase, redemption, switch, IDCW payout, IDCW
	reinvestment, systematic investment plan, systematic withdrawal plan, systematic
	transfer plan and bonus transactions.
	(2) In case of a specific request received from the Unit holders, the AMC/Mutual Fund will provide the account statement to the investors within 5 Business Days from the receipt of such request.
	(3) In case the mutual fund folio has more than one registered holder, the first named Unit holder shall receive the CAS/account statement.

(4) For the purpose of sending CAS, common investors across mutual funds shall be identified by their Permanent Account Number (PAN).
(5) The CAS shall not be received by the Unit holders for the folio(s) not updated with PAN details. The Unit holders are therefore requested to ensure that the folio(s) are updated with their PAN.
(6) Further, the CAS detailing holding across all schemes of all mutual funds at the end of every six months (i.e. September/ March), shall be sent by mail/e-mail on or before 21st day of succeeding month, to all such Unit holders in whose folios no transaction has taken place during that period. The half yearly CAS will
be sent by e-mail to the Unit holders whose e-mail address is available, unless a specific
request is made to receive in physical. Such Consolidated Account Statement shall
reflect the latest closing balance and value of the Units prior to the date of
generation of the account statement.
(7) The statement of holding of the beneficiary account holder for units held in DEMAT will
be sent by the respective DPs periodically.
8) Pursuant to SEBI circular CIR/MRD/DP/31/2014 dated November 12, 2014, investors having Mutual Fund 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 ten days from the month end. 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.
<ol> <li>Pursuant to SEBI circular SEBI/HO/IMD/DF2/CIR/P/2016/89 dated September 20, 2016, the following points have been incorporated to increase the transparency of information to the investors.</li> </ol>
A. Each CAS issued to the investors shall also provide the total purchase value / cost of investment in each scheme.
B. Further, CAS issued for the half-year (ended September/ March) shall also provide:
(i) The amount of actual commission paid by AMCs/Mutual Funds (MFs) to distributors (in absolute terms) during the half-year period against the concerned investor's total investments in each MF scheme. The term 'commission' here refers to all direct monetary payments and other payments made in the form of gifts / rewards, trips, event sponsorships etc. by AMCs/MFs to distributors. Further, a mention may be made in such CAS indicating that the commission disclosed is gross commission and does not exclude costs incurred by distributors such as GST (wherever applicable, as per existing rates), operating expenses, etc.
(ii) The scheme's average Total Expense Ratio (in percentage terms) along with the break up between investment and advisory fees, commission paid to the distributor and other expenses for the half-year period for each scheme's applicable plan (regular or direct or both) where the concerned investor has actually invested in.
C. Such half-yearly CAS shall be issued to all MF investors, excluding those investors

	who do not have any holdings in MF schemes and where no commission against
	their investment has been paid to distributors, during the concerned half-year
	period.
	10 As per SEBI Circular no. SEBI/HO/IMD/DF3/CIR/P/2020/194 dated October 05, 2020 on
	IDCW option/plans in mutual fund schemes, whenever distributable surplus is
	distributed under IDCW Plan, the AMCs are required to clearly segregate and
	disclose, income distribution (appreciation in NAV) and capital distribution
	(Equalisation Reserve) in the Consolidated Account Statement provided to the
	investors. The above provisions is effective from 1 April 2021
	Any circular/clarification issued by SEBI in this regard will automatically become applicable
	and shall be incorporated in the SID/SAI/KIM wherever applicable.
IDCW	The IDCW warrant/cheque shall be dispatched to the unit holders within 7 days of the date
	of declaration of the IDCW. The Investment Manager shall be liable to pay interest
	to the unit holders at such rate as may be specified by SEBI for the period of such
	delay. The prescribed rate at present is 15% per annum. In case of delay, the AMC
	shall be liable to pay interest @ 15 per cent per annum to the unit holders. It may be
	noted that the Mutual Fund is not guaranteeing or assuring any IDCW. IDCW
	payment may also be done by Direct Credit subject to availability of necessary
	facility at each location. For further details please refer to the Application Form.
Policy on distribution	Income may be declared by the Trustee at its discretion subject to the availability of
of income to	distributable surplus as calculated in accordance with the Regulations. There is no
unitholders of IDCW options.	assurance/guarantee with respect to the quantum or the frequency or the certainty
Further this table is	of income (Dividend) distribution. The decision on whether to declare a Dividend or
not covering the recent circular on	not will depend on the performance of the scheme and availability of distributable
delegation of powers	surplus. The rate of such income distribution may also vary from time to time. The
to CEO/committee etc. for	decision of the Trustee will be final in this regard. It will be declared on the face
frequencies upto	value of Rs 10 per unit.
monthly.	Unit holders opting for the IDCW Option only will be eligible to receive the income
	distributed.
	All unit holders whose names appear in the Register of the Scheme in the IDCW Option
	category as on the Record Date will be entitled to the distribution. The payment will be
	subject to the statutory levy, if any, payable by the Mutual Fund as per the Income
	Tax Act or other laws in force.
	Effect of distribution of income: In the IDCW option, after the record date for distribution
	of income, the NAV per unit will decline to the extent of the pay out and statutory
	levy, if any. the income so distributed shall be will be paid within 7 days from date of

declaration.
Post declaration of income distributed the NAV of the units under the in IDCW option will
stand reduced by the amount of Income Distribution declared and applicable
statutory levy.
In case of delay, the Investment Manager will be liable to pay interest to the unit holders at
such rate as may be specified by SEBI for the period of such delay. The prescribed
rate at present is 15% per annum. However if Bank Details are not properly provided
by the Investor, the provision regarding payment of interest for delay will not apply.
Quantum of IDCW:
For declaration of IDCW upto monthly frequency, as may be determined/approved by the
CEO of AMC, subject to availability of distributable surplus on the record date. The
policy for determining the quantum of IDCW is as detailed below:
IDCW of other frequencies will be approved by Trustees and notified separately through
notice to the public communicating the decision including the record date. The
record date shall be 5 calendar days from the date of publication in at least one
English newspaper or in a newspaper published in the language of the region,
whichever is issued earlier".
Parameters for Deciding the quantum of the IDCW will as follows:
Frequency Quantum Record date
Daily Base NAV will be fixed. Available surplus over and above the base NAV will be
distributed. In case of Liquid & Overnight Fund - All Business days and incase of
series of holidays IDCW will be declared on the calendar day before the next
business day.
In case of Other schemes – On Business days
Weekly Base NAV will be fixed. Available surplus over and above the base NAV will be
distributed. Every Friday
Fortnightly Base NAV will be fixed. Available surplus over and above the base NAV will be
distributed. 2nd and Last Friday of the Month
Monthly Base NAV will be fixed. Available surplus over and above the base NAV will be
distributed. 17th of every month
Whenever any new option is introduced upto Monthly frequency, the BASE NAV shall be
fixed based on the approval of CEO of AMC. Also, any change in BASE NAV needs to
be approved by the CEO of the AMC.
If the record date falls on a non-business day, then the previous business day to the record
date will be considered for declaration of IDCW. For example, in case of Friday is a
holiday, the record date will be considered as Thursday.

	Effect of the same distributions in the ID-OM of the State of the Stat
	Effect of income distribution: In the IDCW option, after the record date for distribution of
	income, the NAV per unit will decline to the extent of the pay out and statutory levy,
	if any. The income so distributed shall be paid within 7 days from the record date.
	Post declaration of income distributed the NAV of the Units under the in IDCW option will
	stand reduced by the amount of Income Distribution declared and applicable
	statutory levy.
	In case of delay, the Investment Manager will be liable to pay interest to the unit holders at
	such rate as may be specified by SEBI for the period of such delay. The prescribed
	rate at present is 15% per annum. However if Bank Details are not properly provided
	by the Investor, the provision regarding payment of interest for delay will not apply.
Redemption	SEBI has clarified that the AMCs are required to obtain PAN and KYC documentation before
	processing any redemption requests. The redemption or redemption proceeds shall
	be dispatched to the unit holders within 3 business days from the date of
	redemption. During circumstances such as market closure / breakdown / calamity /
	strike / violence / bandh, extreme price volatility/SEBI Directives etc, the Trustee can
	stop/suspend sale/redemption of Units.
Delay in payment of repurchase /	The Investment Manager shall be liable to pay interest to the unit holders at such rate as
redemption proceeds	may be specified by SEBI for the period of such delay. The prescribed rate at present
	is 15% per annum.
Policy on unclaimed redemption and IDCW	The treatment of unclaimed redemption & Income distribution amount will be as per SEBI
amounts	circular dated Feb 25, 2016. The unclaimed redemption and Income distribution
	amounts, that were earlier allowed to be deployed only in call money market or money
	market instruments. Alternatively, it is also be allowed to be invested in a separate plan
	of Liquid scheme / Money Market Mutual Fund scheme floated by Mutual Funds
	specifically for deployment of the unclaimed amounts. In this regard, Board of AMC and
	Trustee of Sundaram Mutual Fund have approved the introduction of unclaimed Amount
	Plan for the investor to ascertain any unclaimed Income distribution or redemption
	proceeds shall be deployed in Sundaram Money Fund unclaimed plan on behalf of the
	investor under his/her applicable folios and the same has been provided under following
	link https://mfs.kfintech.com/mfs/sundaram_unclaimed.aspx The Investment Manager
	shall make a continuous effort to remind the investors through letters to take their
	unclaimed amounts. The overall TER for unclaimed plan including AMC Fee is restricted to
	50 bps. please check the circulars and addendum issued for introduction of unclaimed
	plan.
Bank account details	As per the directives issued by SEBI, it shall be mandatory for the Unitholders to mention
	their bank account numbers in their applications. Unitholders are requested to give
	The main account numbers in their applications. Unitholders are requested to give

	the full particulars of their Bank Account i.e. nature and number of account, name,
	Nine digit MICR code No. (For Electronic Credit Facility), IFSC code for NEFT a 11 digit
	number, branch address of the bank at the appropriate space in the application
	form. Proceeds of any redemption will be sent only to a bank account that is
	registered and validated in the Investor's folio at the time of redemption transaction
	processing.
	With a view to monitor, as part of Standard KYC Norms, that third party payment
	Instruments are not be accepted for subscription, the Mutual Funds will be
	providing a facility for investors to do a one-time registration of all their bank
	accounts (subject to a maximum of 5 accounts) where they are one of the holders
	and from where they expect to make a payment for mutual fund subscription. For
	further details please refer to the instructions in the Application Forms/SAI and the
	Website of the Mutual Fund.
Registration of Bank	The Unitholders may choose to receive the redemption/dividend is suffice proceeds in any
Account	of the bank accounts, the details of which are registered with the AMC by specifying
	the necessary details in the "Bank Accounts Registration form" which will be
	available at our office/Sundaram BNP Paribas Fund Services Ltd and on the website
	of <u>www.</u> Sundarammutual.com. Individuals, HUFs, Sole proprietor firms can register
	up to five bank accounts and other type of investors can register up to ten bank
	accounts in a folio. The unitholder can choose anyone of the registered bank
	accounts as default bank account. In case the investor fails to mention any
	preference, then by default the first number indicated in the list shall be the
	preferred account number.
	If unit holder(s) provide a new unregistered bank mandate/ a change of bank mandate
	request with a specific redemption proceeds such bank account may not be
	considered for payment of redemption proceeds, or the Fund may withheld the
	payment for up to 10 calendar days to ensure validation of new bank mandate
	mentioned. Duly filled and valid change of bank mandate requests with supporting
	documents will be processed within ten business days of necessary documents
	reaching the head office of the RTA and any financial transaction request received in
	the interim will be carried based on previous details only.
	For more details please refer our websites <u>www.sundarammutual.com.</u> For any queries
	and clarifications that you may have, please get in touch with us at our office or call
	our toll free number 1860 425 7237.
Non Assessments	
Non Acceptance of Third Party	Applications accompanied by a Third Party Instrument will be rejected. Applications
Instruments	accompanied by pre-funded instruments (such as demand drafts, pay order etc.) will

	also be rejected unless accompanied by a banker's certificate evidencing the source
	of the funds. In case such pre-funded instruments are purchases through cash for
	value of Rs 50,000/- and above the same shall also be rejected irrespective of being
	supported with banker's certificate.
	Following are the exceptional situations when Third-Party Payments can be made with
	relevant declaration and KYC/PAN of such Third Party:
	(i) Payment made by an employer on behalf of its employee(s) under Systematic Investment Plans through payroll deductions;
	(ii) Custodian on behalf of an FII or a client.
	The above list is not a complete list and is only indicative in nature and not exhaustive. Any
	other method of payment, as introduced by the Fund will also be covered under
	these provisions. The AMC may also request for additional documentation as may
	be required in this regard from the investor/person making the payment. when
	payment is made through pre-funded instruments (such as Pay Order, Demand
	Draft, Banker's cheque, etc)., a certificate from the issuing banker must accompany
	the application stating the account holder's name and the account number which
	has been debited for the issue of the instrument. If payment is made by RTGS, NEFT,
	ECS, bank transfer, etc., a copy of the instruction to the bank stating the account
	number debited must accompany the application. The AMC may, at its discretion,
	reject any application which is incomplete or not accompanied with valid
	documents.
Plans / Options	Regular Plan & Direct Plan Options/Sub-Options:
offered	
	Income Distribution cum Capital Withdrawal Option (IDCW):
	- IDCW Payout (Monthly)
	- IDCW Reinvestment (Daily, Weekly & Monthly)
	- IDCW Transfer
	If the investor does not choose Plan/Option or Frequency at the time of submitting the
	application form, the following:
	Default Plan/Option/Frequency shall be applicable:
	Default Option: Growth.
	Default frequency if IDCW payout option is chosen: Monthly
	If an investor chooses the IDCW Option but fails to indicate a sub-option, the default sub-
	option shall be IDCW Re-Investment.
	Investments under Direct

Investments under Direct Plan can be made through various modes offered by the Fund for investing directly with the Fund {except Stock Exchange Platform(s) and all other Platform(s) where investors' applications for subscription of units are routed through Distributors}.

The expense ratio of Direct Plan shall be lower than that of the Regular Plan. No commission for distribution of Units will be paid / charged under Direct Plan. The direct plan will also have a separate NAV.

Investors wishing to subscribe under Direct Plan of a Scheme will have to indicate "Direct

Plan" against the Scheme name in the application form.

In the following cases, the applications shall be processed under the Direct Plan:

1. Distributor code is mentioned in the application form, but "Direct Plan" is indicated against the Scheme name

- 2. Where application is received for Regular Plan without Distributor code or the word "Direct" is mentioned in the ARN column.
- 3. Neither the plan nor the distributor code is mentioned in the application form In the following cases, the applications shall be processed under the Regular Plan:
- 4. The application form contains the distributor code but does not indicate the plan
- 5. Where application is received for Regular Plan with Distributor code
- 6. The following matrix will be applied for processing the applications in the Regular or Direct Plan:

Broker Code mentioned	Plan mentioned	Plan under which
by the investor	by the investor	units will be allotted
Not mentioned	Not mentioned	Direct Plan
Not mentioned	Direct	Direct Plan
Not mentioned	Regular	Direct Plan
Mentioned	Direct	Direct Plan
Direct	Not mentioned	Direct Plan
Direct	Regular	Direct Plan
Mentioned	Regular	Regular Plan
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.

## International Security Identification Number (ISIN)

The Investor have an option to hold the units either in the physical or demat mode in accordance with his/her own choice. International Security Identification Numbers (ISIN) in respect of the plans/options of the schemes have been created in National Securities Depository Limited (NSDL) and Central Depository Services Limited (CDSL). The details of ISIN are provided in Highlights and Scheme Summary section of this document. In case the unitholder desires to hold the units in Dematerialized / Rematerialized form at a later date, the request for conversion of units held in non-DEMAT form into DEMAT (electronic form) or vice-versa should be submitted along with a DEMAT/REMAT request form to their Depository Participants.

**Growth Option:** Investors who prefer to accumulate the income and also do not have a need to receive the cash flow to meet specific financial goals can opt for the growth option. The income earned on the units will remain invested in the Scheme and will be reflected in the Net Asset Value. No IDCW will be declared under this option. If units of this option are held as a capital asset for a period of at least 36 months from the date of allotment, income from such units will be treated as long-term capital gains for tax purposes.

**IDCW Option:** Income distribution may be declared by the Trustee at its discretion from time to time subject to the availability of distributable surplus calculated in accordance with the Regulations. There is no assurance/guarantee with respect to the quantum or the frequency or the certainty of distribution. The decision on whether to declare adividend or not will depend on the performance of the scheme and availability of distributable surplus. The dividend pay out may also vary from time to time. The decision of the Trustee will be final in this regard.

Unit holders opting for the IDCW Option only will be eligible to receive the dividend. Considering the date and value of the eligible units, the income so distributed shall be contrued as Income from reserves or from capital invested and such bi-furcation would be provided in the CAS. All unit holders whose names appear in the Register of the Scheme in the IDCW Option category as on the Record Date will be entitled to the IDCW. The Income Distribution payment will be subject to the distribution tax, if any, payable by the Mutual Fund as per the Income Tax Act or other laws in force.

After the record date for distribution of income, the NAV per unit will decline to the extent of the pay out and distribution tax, if any.

Investors can opt either for income Pay-Out Option or the dividend. Transfer or Reinvestment Option.

IDCW Pay-Out: The Investment Manager shall dispatch the dividend for IDCW option holders cheque/warrant to unit holders within 7 days of declaration of income distribution. The cheques/warrant will be drawn in the name of the sole/first holder and will be posted/mailed to the address indicated by the investor in the application form. Investors are required to provide bank account details - the name of the bank, branch and account number - in the application form. such payment may also be done by Direct Credit subject to availability of necessary facility at each location.

IDCW Re-Investment: Investors have the option to re-invest the by way of buying additional units of the scheme. Additional units will be allotted based on the ex NAV of the IDCW Option on the next business day after the Record date for the IDCW. No entry load will be charged for such re-investment of such income. The re-investment of such income shall automatically be deemed to be constructive payment of income distributed to the unit holder and constructive receipt by the unit holder.

If the distributed amount payable to unitholders in IDCW payout option of the scheme under a folio is less than or equal to ` 500/, then such amount shall be compulsorily reinvested in the same plan / option instead of payout.

Investors who have opted for Reinvestment facility under Discontinued Plan(s) may note that the income so distributed / declared, if any, will be reinvested in the corresponding option of the Regular Plan w.e.f. November 01, 2012.

If additional units issued under this option are held as a capital asset for a period of more than 36 months (as applicable) from the date of allotment, any gain over the cost of acquisition will be treated as long-term capital gains for tax purposes.
Transfer IDCW: This option will be available only when the amount payable to the investor's account on the Record Date in a folio is equal to or more than Rs.500/ The distributed income so payable will be automatically swept into the Target Scheme (Open ended schemes) as opted by the unitholder, on the immediate Business Day (DSO form available in the website www.sundarammutual.com) after the Record Date at the applicable NAV of the Target Scheme, subject to applicable load and accordingly equivalent units will be allotted in the Target Scheme (Open ended schemes), subject to the terms and conditions of the Target Scheme depending upon whether the investment was registered with or without broker code of the chosen scheme at the applicable NAV. The Transfer out date shall be the processed on the record date.

Investors should indicate the Plan and Option in the application form by ticking the appropriate box provided for this purpose. The chosen Plan and Option can be changed by sending a request in writing signed by all the unit holder(s) to the Registrar.
Pursuant to SEBI circular CIR/IMD/DF/21/2012 dated September 13, 2012, subscription, including new SIP and STP registrations, in the Retail and Institutional Plan (including options under the plan) has been discontinued with effect from October 01, 2012. Also, from November 01, 2012, the IDCW declared (irrespective of the amount) under IDCW Reinvestment Option of these discontinued Plan(s)/Option(s) shall be reinvested into the corresponding Option under the Regular Plan of the Scheme, i.e. Super Institutional Plan which is referred to as Regular Plan from October 01, 2012.

Know Your Customer	The Securities and Exchange Board of India has issued detailed guidelines on 18/01/2006
(KYC) / CKYC	and measures for prevention Money Laundering and had notified SEBI (KYC Registration Agency) Regulations, 2011 on December 02, 2011 with a view to bring uniformity in KYC Requirements for the securities market and to develop a mechanism for centralization of the KYC records. SEBI has also issued circulars from time to time on KYC compliance and maintenance of documentation pertaining to unit holders of mutual funds. Accordingly the following procedures shall apply:
	<ul> <li>KYC acknowledgement is mandatory for all investors.</li> <li>An application without acknowledgement of KYC compliance will be rejected</li> <li>New Investors are required to submit a copy of Income Tax PAN card, address proof and other requisite documents along with the KYC application form to any of the intermediaries registered with SEBI, including Mutual Funds to complete KYC effective from January 01, 2012. The KYC application form is available at www.sundarammutual.com</li> </ul>
	• The Mutual Fund shall perform initial KYC of its new investors and send the application form along with the supporting documents to the KYC Registration Agency (KRA).
	<ul> <li>During the KYC process, the Mutual Fund will also conduct In Person Verification (IPV) in respect of its new investors effective from January 01, 2012. Sundaram Asset Management Company Limited and the NISM / AMFI certified distributors who are KYD compliant are authorized to carry out the IPV for investors in mutual funds. In case of applications received directly from the investors (i.e. not through the distributors), mutual funds may rely upon the IPV performed by the scheduled commercial banks.</li> </ul>
	<ul> <li>The KRA shall send a letter to the investor within 10 business days of the receipt of the KYC documents from Mutual Fund, confirming the details thereof.</li> <li>Investors who have obtained the acknowledgement after completing the KYC process can invest in Scheme of the Mutual funds by quoting the PAN in the application form.</li> </ul>
	<ul> <li>Investors are required to complete KYC process only once to enable them to invest in Scheme of all mutual funds.</li> <li>Existing Investors, who have already complied with the KYC requirements, can continue to invest as per the current practice.</li> </ul>
	Pursuant to SEBI circular no. MIRSD/Cir-5/2012 dated April 13, 2012, mutual fund investors who were KYC compliant on or before December 31, 2011 are required to submit 'missing/not available' KYC information and complete the 'In Person Verification' (IPV) requirements if they wish to invest in a new mutual fund, where they have not invested / opened a folio earlier, effective from December 03, 2012: Individual investors have to complete the following missing/not available KYC information:
	a) Father's/Spouse Name,

b) Marital Status,

c) In-Person Verification (IPV).

To update the missing information, investors have to use the "KYC Details Change Form" for Individuals Only available at <u>www.sundarammutual.com</u> or <u>www.amfiindia.com</u>. Section B of the form highlights 'Mandatory fields for KYCs done before 1 January 2012' which has to be completed.

In case of Non Individuals, KYC needs to be done afresh due to significant and major changes in KYC requirements by using "KYC Application form" available for Non-Individuals only in the websites stated above.

Additional details like Nationality, Gross Annual Income or Net worth as on recent date, Politically Exposed Person, and Non Individuals providing specific services have to be provided in Additional KYC details form available in the website of the Investment Manager.

Duly filled forms with IPV can be submitted along with a purchase application, to the new mutual fund where the investor is investing / opening a folio. Alternatively, investors may also approach their existing mutual funds at any investor service centre to update their 'missing/not available' KYC information.

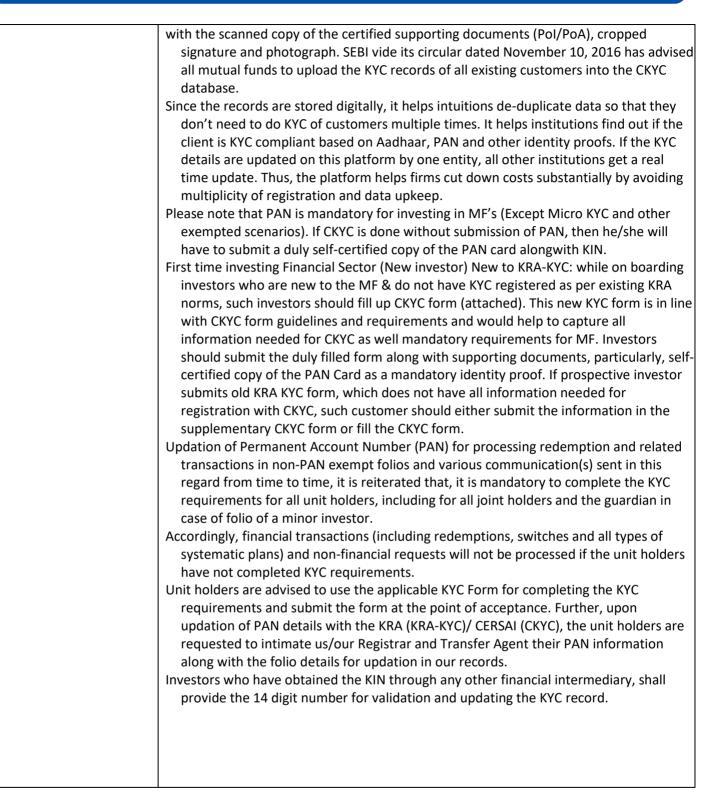
Ultimate Beneficial Owner Pursuant to Prevention of Money Laundering Act, 2002 (PMLA) and Rules framed thereunder and SEBI Master circular dated December 31, 2010 on Anti Money Laundering (AML), sufficient information to identify persons who beneficially own or control the securities account is required to be obtained. Also, SEBI had vide its circular no. CIR / MIRSD / 2 /2013 dated January 24, 2013 prescribed guidelines regarding identification of Ultimate Beneficial Owner(s) ('UBO'). 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. Investors are requested to refer to the 'Declaration for UBO' available in the website of the Investment Manager for detailed guidelines on identification of UBO. 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.

Central KYC

Central KYC Registry is a centralized repository of KYC records of customers in the financial sector with uniform KYC norms and inter-usability of the KYC records across the sector with an objective to reduce the burden of producing KYC documents and getting those verified every time when the customer creates a new relationship with a financial entity. KYC procedure means the due diligence procedure prescribed by the Regulator for identifying and verifying the proof of address, proof of identity and compliance with rules regulations, guidelines and circulars issued by the Regulators or Statutory Authorities under the Prevention of Money Laundering Act, 2002.

The Central Govt. vide notification dt. Nov, 26, 2015 has authorised Central Registry of Securitisation Asset Reconstruction and Security Interest of India (CERSAI) to act as and to perform the functions of the CKYC Registry including receiving, storing, safeguarding and retrieving the KYC records in digital form of a Client. A 14 digit CKYC identification Number (KIN) would be issued as identifier of each client.

As per PMLA (Maintenance of Records) Amendment rules, 2015, Rule 9(IA), every reporting entity shall within three days after the commencement of an account based relationship with an individual, file the electronic copy of the client's KYC records with the Central KYC Registry. Institutions need to upload the common KYC template along



Who can invest	This is an indicative list and investors are requested to consult a financial/investment/tax/legal advisor to ascertain whether the Scheme is suitable to
	their risk profile. Investors need to comply with KYC/PAN verification norms, as
	elaborated in Statement of Additional Information. The following persons, subject to
	subscription to units of mutual funds being permitted under respective constitution
	and relevant statutory regulation, are eligible and may apply for subscription to the units of the Scheme:
	1. Resident adult individuals either singly or jointly (not exceeding three)
	2. Minors through parents/ lawful guardians
	<ol> <li>Companies/Bodies Corporate/Public Sector Undertakings registered in India</li> <li>Religious and Charitable Trusts under the provisions of 11(5)(xii) of Income Tax</li> <li>Act 1061 read with Bule 17C of Income Tax Bules 1062</li> </ol>
	<ul> <li>Act 1961 read with Rule 17C of Income Tax Rules, 1962.</li> <li>5. Wakf Boards or endowments and Registered societies (including registered co operative societies) and private trusts, authorised to invest in units.</li> </ul>
	<ol> <li>6. Partnership firm/Limited Liability Partnership</li> </ol>
	<ul> <li>7. Trustee of private trusts authorised to invest in mutual fund Scheme under the Trust Deed</li> </ul>
	8. Karta of Hindu Undivided Family (HUF)
	9. Banks, including Co-operative Banks and Regional Rural Banks, and Financial Institutions
	10. Non-Resident Indian (NRI) and Persons of India Origin on full repatriation basis subject to RBI approval, if any
	11. A mutual fund subject to SEBI regulation
	12. Foreign Institutional Investors (FIIs) registered with SEBI and sub-accounts of FIIs on full repatriation basis subject to RBI approval, if any
	13. Army/Air Force/Navy/Para-Military Funds and other eligible institutions
	14. Non-Government Provident/Pension/Gratuity and such other funds as and when permitted to invest
	15. Scientific and/or industrial research organisations authorised to invest in mutual fund units
	16. International Multilateral Agencies approved by the Government of India
	17. Non-Government Provident/Pension/Gratuity funds as and when permitted to invest
	18. A Scheme of the Sundaram Mutual Fund, subject to the conditions and limits prescribed by SEBI, Trustee, the Investment Manager and the Sponsor. The Investment Manager shall not charge any fees on such investments.
	19. Other associations and institutions authorised to invest in mutual fund units.
	20. Any individual, being a foreign national who meets the residency tests as laid down in Foreign Exchange Management Act, 1999 or such other act / guidelines
	/ regulations as issued by the RBI / SEBI from time to time.
	21. Qualified Foreign Investors (QFI) as may be permitted by SEBI from time to time
	22. Any other category of persons who are permitted to invest in the Schemes o Mutual Fund as per the guidelines and / or directions issued by the Governmen of India / SEBL / BBL from time to time
	of India / SEBI / RBI from time to time. 23. Foreign Portfolio Investor registered under SEBI (Foreign Portfolio Investor Regulations, 2014
	As per Notification No. LAD-NRO/GN/2014-15/01 dated May 06, 2014 on SEBI (Mutua
	Funds) (Amendment) Regulations, 2014 the sponsor of Sundaram Mutual Fund o Sundaram Asset Management Company Limited shall invest not less than one percen of the assets under management of each of the scheme covered in this document as or

un	less, in the growth option of the scheme and such investment shall not be redeemed alless the scheme is wound up. Such amount shall be invested within one year from the ate of notification of these regulations.
ca no Sc	addition, Sundaram Asset Management may invest in the Scheme depending upon its sh flows and investment opportunities. In such an event, the Investment Manager will ot charge management fees on its investment for the period it is retained in the heme. Such investment shall not exceed 25% of the net assets of the Scheme on the ate of investment.
	<ul> <li>Trustee/Mutual Fund reserves the right to include/exclude a category of investors, bject to SEBI Regulation and other prevailing statutory regulation, if any.</li> <li>it is expressly understood that the investor has the necessary legal authority and has complied with applicable internal procedures for subscribing to the units.</li> </ul>
	<ul> <li>Investment Manager/Trustee will not be responsible in case any transaction made by an investor is ultra vires the relevant constitution/internal procedures.</li> <li>Non-Resident Indians, Persons of Indian Origin residing abroad and Foreign Institutional Investors (FIIs) have been granted a general permission by the Reserve Bank of India [Schedule 5 to the Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulation, 2000] for investing in/redeeming units of mutual funds subject to conditions set out in the aforesaid regulation.</li> <li>In the case of an application under a power of attorney or by a limited company, other corporate body, an eligible institution, a registered society, 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 a duly notarised copy along with 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. In case of a trust/fund, it shall submit a resolution from trustee(s) authorising the purchase.</li> <li>The Investment Manager/Trustee/Registrar may need to obtain documents for 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. Form without these details will be treated as incomplete. Such incomplete applications will be rejected. The Registrar/Investment Manager may ask the investor to provide the name of the bank, branch, address, account type and number as per SEBI requirement. Any Application Form without these details will be treated as incomplete. Such incomplete applications will be rejected. The Registrar/Investment Manager Trustey/SEBI circular PAN shall be the sole identification number for all participants transacting</li></ul>

	cash payment for fresh purchases/additional purchases upto Rs.50,000/- per investor, per mutual fund, per financial year subject to:
	(i) Compliance with Prevention of Money Laundering Act, 2002 and Rules
	framed there under;
	(ii) SEBI Circular(s) on Anti Money Laundering (AML) and other applicable AML
	rules, regulations and guidelines; and
	(iii) Sufficient systems and procedures put in place by the AMC / Mutual Fund.
	However, payment to such investors towards redemptions, Income Distribution, etc.
	with respect to aforementioned investments shall be paid only through banking
	channel. Sundaram Mutual Fund / Investment Manager is yet to set up appropriate
	systems and procedures for the said purpose
Who cannot invest	<ol> <li>Persons residing in countries which require licensing or registration of Indian Mutual Fund products before selling the same in its jurisdiction.</li> <li>Citizens of US/Canada</li> </ol>
	<ol> <li>Chizens of Osycanada</li> <li>Persons residing in any Financial Action Task Force (FATF) declared non-</li> </ol>
	compliant country or territory.
	4. Overseas Corporate Bodies as specified by RBI in its A.P. (DIR Series) Circular
	No. 14 dated September 16, 2003,
	5. Such other persons as may be specified by AMC from time to time.
Allotment	Allotment is assured to eligible applicants as long as applications are subject to
	realization of investment amount into the schemes and in order.
Refund	The refund should be made within five business days from the date of receipt of
	application and realisation of money into the credit of the schemes bank
	account whichever is later and money failing which an interest @15% shall be
Postrictions if any on	paid for the belated refunds. The Trustee may, in the general interest of the unit holders of the Scheme and
Restrictions, if any, on the right to freely retain	when considered appropriate to do so based on unforeseen
or dispose of unit being	circumstances/unusual market conditions limit the total number of units that
offered.	may be redeemed on any Business Day to 5% of the total number of units then
onerea.	in issue in the Scheme, plan (s) and option(s) thereof or such other percentage
	as the Trustee may determine. Any units that are not redeemed on a particular
	Business Day, will be carried forward for redemption to the next Business Day
	in order of receipt. Redemption of such carried forward units will be priced on
	the basis of the applicable NAV, subject to the prevailing load, of the Business
	Day on which redemption is processed. under such circumstances, to the
	extent multiple redemption requests are received at the same time on a single
	Business Day, redemptions will be made on a pro-rata basis based on the size
	of each redemption request; the balance amount will be carried forward for
	redemption to the next Business Day. In addition, the Trustee reserves the
	right, in its sole discretion, to limit redemption with respect to any single
	account to Rs.1 lakh on a single business day.

Allotment Advice (for DEMAT holders)	<ul> <li>On acceptance of a valid application for subscription, units will be allotted and a confirmation specifying the number of units allotted by way of email and/or SMS within 5 Business Days from the date of receipt of valid application / transaction to the Unit holder's registered e-mail address and/or mobile number. Subject to SEBI Regulations, Statement of Accounts will be sent to those unitholders whose registered email address</li> <li>/ mobile number is not available with the Mutual Fund, unless otherwise required. Money would be refunded in respect of applications that are rejected.</li> <li>The Units allotted will be credited to the DP account of the Unit holder as per the details provided in the application form.</li> </ul>
Dematerialisation	If any investor, who holds the units in physical from, wishes to convert the same to DEMAT form, he shall do so in accordance with the provisions of SEBI (depositories and participants). Regulations, 1996 and procedure laid down by NSDL or CDSL, which may be amended time to time.
Rematerialisation	If the applicant desires to hold the units in physical form (statement of account mode), the Investment Manager shall issue the statement subject to rematerialization of Units in accordance with the provisions of SEBI (Depositories & Participants) Regulations, 1996 as may be amended from time to time. All Units will rank pari passu, among Units within the same Option in the Scheme concerned as to assets, earnings and the receipt of income distributions, if any, as may be declared by the Trustee.

## III. other Details

A. In case of Fund of Funds Scheme, Details of Benchmark, Investment objective, Investment Strategy, TER, AuM, Year wise performance, Top 10 holding/ link to Top 10 holding of the underlying fund should be provided NA

## B. Periodic Disclosures such as half yearly disclosures, half yearly results, annual report

Half weathy Diselection	The Investment Menore shall disclose the negative (close with ICIN) as on the last day.
Half yearly Disclosures:	The Investment Manager shall disclose the portfolio (along with ISIN) as on the last day
Portfolio	of the month / half-year for all the schemes in its website www.sundarammutual.com
This is a list of securities	and on the website of AMFI within 10 days from the close of each month/ half-year
where the corpus of the	respectively in a user-friendly and downloadable spreadsheet format.
Scheme is currently	For debt schemes, such disclosure shall be done on fortnightly basis within 5 days of
invested. The market	every fortnight. In addition to the current portfolio disclosure, yield of the instrument
value of these	shall also be disclosed.
investments is also	In case of unitholders whose e-mail addresses are registered, the Investment Manager
stated in portfolio	will send via email both the monthly and half-yearly statement of scheme portfolio within
disclosures.	10 days from the close of each month/ half-year respectively.
	The Investment Manager will publish an advertisement every half-year disclosing the hosting of the half-yearly statement of its schemes portfolio on their respective website and on the website of AMFI and the modes such as SMS, telephone, email or written request (letter) through which a unitholder can submit a request for a physical or electronic copy of the statement of scheme portfolio. Such advertisement will be published in the all India edition of at least two daily newspapers, one each in English and Hindi.
	Go Green Services: Save the Future
	Go Green E-Update/Mobile Services: Registration of Contact Details: By opting
	to receive the Account Statement and Abridged Scheme Annual Report in a

	1
Half Yearly Posults	<ul> <li>paperless mode by e-mail, you contribute to the environment. The investor is deemed to be aware of security risks including interception of documents and availability of content to third parties.</li> <li>Sundaram Asset Management provides interesting information on the economy, markets and funds. If you wish to receive documents such as The Wise Investor, India Market Outlook, Global Outlook, Fact Sheet and One Page Product updates, to name a few, please choose the 'yes' option.</li> <li>Go Green Call Service: If you are an existing investor and wish to register your email ID &amp; mobile number with us, please call our Contact No. 1860 425 7237 (India) +91 40 2345 2215 (NRI) between 9.00 &amp; 6.00 pm on any business day. Provide e-mail ID of either Self or Family Member with Relationship.</li> <li>'Family' for this purpose shall mean self, spouse, dependent children, dependent parents as specified in SEBI Circular No.CIR/MIRSD/15/2011 dated Aug 02, 2011</li> <li>As per AMFI Best practices Guidelines Circular No.77/2018-19, Primary holder's own email address and mobile number should be provided for speed and ease of communication in a convenient and cost-effective manner, and to help prevent fradulent transactions.</li> <li>The Investment Manager will provide a physical copy of the statement of its scheme portfolio, without charging any cost, on specific request received from a unitholder.</li> </ul>
Half Yearly Results	Sundaram Mutual fund shall make half yearly disclosures of unaudited financial results on its website <u>www.sundarammutual.com</u> in the prescribed format within one month from the close of each half year, i.e. on 31st March and on 30th September. The half- yearly unaudited financial results shall contain details as specified in Twelfth Schedule and such other details as are necessary for the purpose of providing a true and fair view of the operations of the mutual fund. In addition, Sundaram Mutual Fund shall publish an advertisement disclosing the hosting of such financial results in its website, in atleast one English daily newspaper having nationwide circulation and in a newspaper having wide circulation published in the language of the region where the Head Office of Sundaram mutual fund is situated.
Annual Report	Pursuant to Regulation 56 of SEBI (Mutual Funds) Regulations, 1996 read with SEBI circular No. Cir/IMD/ DF/16/2011 dated September 8, 2011, read with SEBI Mutual Fund (Second Amendment) Regulation 2018, the Scheme-wise annual report or an abridged summary thereof shall be provided by AMC/Mutual Fund within four months from the date of closure of relevant accounting year in the manner specified by the Board. The scheme wise annual report will be hosted on the websites of the Investment Manager and AMFI. The Investment Manager will display the link on its website and make the physical copies available to the unitholders, at its registered offices at all times. The Investment Manager will e-mail the scheme annual reports or abridged summary thereof to those unitholders, whose email addresses are registered with the Mutual Fund. In case of unitholders whose email addresses are not registered with the Mutual Fund, the Investment Manager will communicate to the unitholders, through a letter enclosing self-addressed envelope enabling unitholders to 'opt-in' within 30 days, to continue receiving a physical copy of the scheme-wise annual report or abridged summary thereof. The Investment Manager will conduct one more round of similar exercise for those unitholders who have not responded to the 'opt-in' communication as stated above, after a period of not less than 30 days from the date of issuances of the second communication will be given to unitholders to exercise their option of 'opt-in' or

ʻopt- out'.
The Investment Manager will publish an advertisement every year disclosing the
hosting of the scheme wise annual report on its website and on the website of AMFI
and the modes such as SMS, telephone, email or written request (letter), etc. through
which unitholders can submit a request for a physical or electronic copy of the scheme
wise annual report or abridged summary thereof. Such advertisement will be published
in all India edition of at least two daily newspapers, one each in English and Hindi.
The Investment Manager will provide a physical copy of the abridged summary of the
Annual Report, without charging any cost, on specific request received from a unitholder.

## C. Transparency/NAV Disclosure (Details with reference to information given in Section I)

Investment manager calculates and discloses the NAVs of the scheme on all business days. The Investment Manager will prominently disclose the NAVs of all schemes under a separate head on its website and on the website of Association of Mutual Funds in India (AMFI).

Further, the Investment Manager will extend facility of sending latest available NAVs to unitholders through SMS, upon receiving a specific request in this regard.

NAV will be updated on the websites of Sundaram asset Management (www.sundarammutual.com) and the association of Mutual Funds of India (www.amfiindia.com) before 11.00 p.m. every business day.

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 working 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.

## D. Transaction charges and stamp duty

1 The Distributor would be allowed to charge the Mutual Fund Investor a Transaction Charge where the amount of investment is Rs. 10,000/-and above per subscription basis

2 For an investor other than First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 100/per subscription of Rs. 10,000/- and above

For a First Time Mutual Fund Investor, the Transaction Charge allowed will be Rs. 150/- per subscription of Rs. 10,000/- and above

3 The Transaction Charge, where applicable based on the above criteria, will be deducted by the Investment Manager from the subscription amount remitted by the Investor and paid to the distributor; and the balance (net) amount will only be invested in the scheme. Thus units will be allotted against the net investment.

- 4 No Transaction charges shall be levied:
- a) Where the distributor/agent of the investor has not opted to received any Transaction Charges;
- b) Where the investor purchases the Units directly from the Mutual Fund;
- c) Where total commitment in case of SIP / Purchases / Subscriptions is for an amount less than Rs. 10,000/-;
- d) On transactions other than purchases / subscriptions relating to new inflows.

Switches / Systematic Transfers / Allotment of Bonus Units / IDCW reinvestment Units / Transfer / Transmission of units, etc will not be considered as subscription for the purpose of levying the transaction charge.

e) Purchases / subscriptions carried out through stock exchange(s) through DeMAT mode.

The distributors can opt-in / opt-out of levying transaction charges based on 'type of the Product/Scheme' instead of 'for all Schemes'. Accordingly, the transaction charges would be deducted from the subscription amounts, as applicable.

However, the distributor shall not be able to opt-in or opt-out at the investor-level i.e. a distributor shall not charge one investor and choose not to charge another investor.

The transaction charges are in addition to the existing system of commission permissible to the Distributors. On subscription through Distributors, the upfront commission if any will be paid directly by the Investors to the

Distributor by a separate cheque based on their assessment of various factors including the service rendered by the Distributor.

Any circular/clarification issued by SEBI/AMFI in this regard will automatically become applicable and will be incorporated in the SID/SAI/KIM wherever applicable.

Initial Issue Expenses

Not applicable as this document covers an existing Scheme.

#### Stamp Duty:

Pursuant to Notification No. S.O. 1226(e) and G.S.R. 226(e) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of The Finance Act, 2019, notified on February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India, a stamp duty @0.005% of the transaction value of units would be levied on applicable mutual fund inflow transactions, with effect from July 1, 2020. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including IDCW reinvestment and switch-in) to the unit holders would be reduced to that extent.

## E. Associate Transactions

Please refer to Statement of Additional Information (SAI)

#### F. Taxation

The information is provided for general information only. However, in view of the individual nature of the implications, each investor is advised to consult his or her own tax advisors/authorised dealers with respect to the specific amount of tax and other implications arising out of his or her participation in the Scheme.

For the Mutual Fund:

Income of Sundaram Mutual Fund: Exempt from Tax

Tax Rates Specific to Mutual Funds

The rates are applicable for the financial year 2024-25 as per Finance Act, 2024.

Tax Implications on Income distribution under Income Distribution cum Capital Withdrawal (IDCW) Option received by Unit holders.

Pursuant to SEBI circular no. SEBI/HO/IMD/DF3/CIR/P/2020/194 dated October 05, 2020, there was a change in nomenclature of Dividend to Income Distribution cum Capital Withdrawal(IDCW) available across all the plans offered by the schemes of the Fund with effect from April 01, 2021. The Finance Act, 2020 abolished income distribution tax and instead introduced taxing of income from mutual fund units in the hands of the unit holders.

Income Distributed by a Mutual Fund					
IDCW	Individual/HUF	Domestic Companies	NRI		
Equity oriented schemes	At applicable slab rates~	30%^^/25%^^^/22%^^^^/15%^^^^	At applicable slab rates~		
Other than Equity oriented schemes	At applicable slab rates~	30%^^/25%^^^/22%^^^^/15%^^^^	At applicable slab rates~		
~ Kindly refer Income Tax rates for the applicable rates in case of individuals.					

Further, tax needs to be deducted at source as detailed below:

Type of Investor	Withholding Tax rate	Section
Resident@	10%*	194К
NRI/FPI	20% or rate as per 196A***/196D**** applicable tax treaty*** (whichever is lower)	196A***/196D****

\* Tax not deductible if income distribution in respect of units of a mutual fund is below `5,000 in a financial year. However, on account of practical difficulties involved due to unique nature of mutual fund investments and different schemes involved, Sundaram Mutual Fund shall deduct TDS from each dividend declared once it exceeds Rs. 4,000 threshold benefit on cumulative basis in a Financial year (Consolidate on PAN basis). In case the total TDS exceeds the actual tax liability of any investor, he/she can claim a refund while filing income-tax return.

TDS will not be deducted in the following cases

• The resident individual (not being a company or firm) can submit Form No. 15G to Mutual Fund for nondeduction of TDS under section 194K of the Act provided that the tax on his estimated total income (including such income received from Mutual Fund) of the financial year is NIL and the aggregate income shall not exceed the maximum amount which is not chargeable to tax.

• Form 15H to be submitted by a resident individual (aged 60 years or more) for non-deduction of TDS under section 194K of the Act provided that the tax on his estimated total income (including such income received from Mutual Fund) of the financial year is NIL.

- Certificate from ITO for lower deduction/NIL deduction of TDS under section 197,
- Entities falling under Circular 18/2017 dated 29th May 2017.

The Form 15G or Form 15H or Certificate from ITO should be submitted on an annual basis at the start of the financial year at any of the Official Points of Acceptance of Sundaram Mutual Branch or customer care center of KFin Technologies Ltd.

It may be noted that exemption from tax deduction will be granted only from the date of receipt of Form15G or Form 15H or Certificate from ITO and any tax deducted and remitted to the government on or before that date cannot be refunded under any circumstances.

Fresh Form 15G or Form 15H to be submitted again when there is a change in the estimated total income already declared, even though the investors might have already furnished the forms for the current financial year.

- \*\* The base tax is to be further increased by surcharge at the rate of:
- 37% on base tax where total income exceeds `5 crore;
- 25% where total income exceeds `2 crore but does not exceed `5 crore;
- 15% where total income exceeds `1 crore but does not exceed `2 crore; and
- 10% where total income exceeds ` 50 lakhs but does not exceed ` 1 crore
- In case investor is opting for 'New Regime' as mentioned on page 3, the rate of

surcharge not to exceed 25%.

Further, "Health and Education Cess" is to be levied at 4% on aggregate of base tax and surcharge.

\*\*\* Tax treaty benefit can be claimed subject to fulfillment of stipulated conditions as well as interpretation of Article of relevant tax treaty.

\*\*\*\* As per the provisions of section 196D of the Act which is specifically applicable in case of FPI/FII, the withholding tax rate of 20% (plus applicable surcharge and cess) on any income in respect of securities referred to in section 115AD(1)(a) credited / paid to FII shall apply. The Finance Act, 2021 inserted a proviso to section 196D(1) of the Act to grant relevant tax treaty benefits with effect from 1 April 2021 at the time of withholding tax on income with respect to securities of FPIs, subject to furnishing of tax residency certificate and such other documents as may be required. As per section 196D(2) of the Act, no TDS shall be made in respect of income by way of capital gain arising from the transfer of securities referred to in section 115AD of the Act.

Non linking of PAN with Aadhaar - As per section 139AA of the Income tax Act, 1961 ('the Act') read with rule 114AAA of the Income-tax Rules, 1962, in the case of a resident person, whose PAN has become inoperative due to PAN – Aadhaar not being linked on or before 30 June 2023 or as extended by Govt., it shall be deemed that he has not furnished the PAN and tax could be withheld at a higher rate of 20% as per section 206AA of the Act. For linking PAN with Aadhaar after 31 March 2022, fees Rs. 500 till 30 June 2022 and Rs. 1,000 till 30 September 2023 has been prescribed.

Capital Gain Taxation					
	Individual/HUF\$	Domestic Company @	NRI \$		
Equity Oriented schemes */+					
Long Term Capital gain ((Units held for more than 12 months	12.5%**###	12.5%**###	12.5%**###		
Short Term Capital Gains (Units held for 12 months or less)	20% <sup>&amp;</sup>	20% <sup>&amp;</sup>	20%&		
<ul> <li>** - On LTCG amount exceeding Rs. 1,25,000.</li> <li>###- 10% for transfer that takes place before 23.07.2024</li> <li>&amp;-15% if the transfer takes place before 23.07.2024</li> </ul>					
Other than Specified Mutual Fund & other than Equity Oriented Schemes (funds investing more than 35% & less than 65% of its total proceeds in the equity shares of domestic companies)					
Long Term Capital gain (Units held for more than 24 months)	12.5% (without indexation)	12.5% (without indexation)	Listed – 12.5% (without indexation) Unlisted – 12.5% (without indexation)		
Short Term Capital Gains (Units held for 24 months or less)	30%^	30%^^/25%^^^/22%^^^/ 15%^^^^	30%^		

Short Term Capital	30%^	30%^^/25%^^^/22%^^^/	30%^			
Gains		15%^^^^				
	@@ - At the rate of 20% (with indexation) if transfer takes place before 23.07.2024. \$\$\$ - At the rate of 10% (without indexation) if transfer takes place before 23.07.2024.					
555 - At the fate of 1	to% (without indexatio		.2024.			
Specified Mutual Fund Other Than Equity Oriented Schemes \$\$						
Short Term Capital	30%^	30%^^/25%^^^/22%^^^/	30%^			
Gains		15%^^^^				
Tax Deducted at Source (Applicable only to NRI Investors #)						
		Short term capital gains \$	Long term capital gains \$			
Equity Oriented Scheme		20%	12.5% **###			
Other than Specified Mutual Fund &		30%^	Listed – 12.5% <sup>@@</sup>			
other than Equity Oriented Schemes			Unlisted - 12.5% <sup>@@</sup>			
Specified Mutual Fund Other Than		30%				
Equity Oriented Schemes \$\$						

- \$ Surcharge to be levied at:
- 37% on base tax 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.

In case total income includes income by way of dividend on shares and short-term capital gains on units of equity oriented mutual fund schemes and long-term capital gains on mutual fund schemes, the rate of surcharge on

the said type of income not to exceed 15%. In case investor is opting for 'New Regime' the rate of surcharge not to exceed 25%.

\*\* Specified income – Total income excluding income by way of dividend on shares and short-term capital gains on units of equity oriented mutual fund schemes and long-term capital gains on mutual fund schemes.

Further, Health and Education Cess to be levied at the rate of 4% on aggregate of base tax and surcharge.

\$\$ As per amendment to Finance Bill, 2023 gains arising on transfer, redemption or maturity of specified mutual funds acquired on or after 1 April 2023 will deemed to be 'short-term capital gains' (regardless of the period of holding). Specified mutual fund means a mutual fund by whatever name called, where not more than 35% of its total proceeds is invested in the equity shares of domestic companies.

@ Surcharge at the rate of 7% is levied for domestic corporate unit holders where the income exceeds `1 crore but less than `10 crores and at the rate of 12%, where income exceeds `10 crores. However, Taxation Laws (Amendment) Ordinance, 2019 provides for surcharge at flat rate of 10 percent on base tax for the companies opting for lower rate of tax of 22%/15%.

# Short term/ long term capital gain tax (along with applicable Surcharge and "Health and Education Cess") will be deducted at the time of redemption/switches of units in case of NRI investors only. Tax treaty benefit can be claimed for withholding tax on capital gains subject to fulfillment of stipulated conditions.

## The base year for indexation purpose has been shifted from 1981 to 2001 to calculate the cost of acquisition or to take fair market value of the asset as on that date. Further, it provides that cost of acquisition of an asset acquired before 1 April 2001 shall be allowed to be taken as fair market value as on 1 April 2001.

^ Assuming the investor falls into highest tax bracket.

<sup>^</sup> This rate applies to companies other than companies engaged in manufacturing business who are taxed at lower rate subject to fulfillment of certain conditions.

<sup>^^^</sup> If total turnover or gross receipts during the financial year 2020-21 does not exceed `400 crores.

^^^^ This lower rate is optional and subject to fulfillment of certain conditions as provided in section 115BAA.

^^^^ This lower rate is optional for companies engaged in manufacturing business (set-up & registered on or after 1 October 2019) subject to fulfillment of certain conditions as provided in section 115BAB.

+ Securities Transaction Tax (STT) will be deducted on equity oriented funds at the time of redemption / switch to other schemes / sale of units.

Further, Minimum Alternate Tax (MAT) applicable to domestic companies (except for those who opt for lower rate of tax of 22%/15%) are not considered in the above tax rates.

## Taxability of segregated portfolios of a mutual fund scheme

The Finance Act, 2020 has rationalized capital gains taxability in relation to mutual fund portfolio segregation as per SEBI regulations as follows: -

• The period of holding for units in the segregated portfolio to be reckoned from the period for which the original units in the main portfolio were held by the taxpayer.

• Acquisition cost of units in segregated portfolio to be proportionate to the NAV of assets transferred to the segregated portfolio to the NAV of the total portfolio immediately before the segregation. The cost of acquisition of the original units in the main portfolio to be reduced by the acquisition cost of units in the segregated portfolio.

## Stamp Duty

Pursuant to Notification No. S.O. 1226(E) and G.S.R. 226(E) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of The Finance Act, 2019, notified on February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India, with effect from July 1, 2020, mutual fund units issued against Purchase transactions (whether through lump-sum investments or SIP or STP or switch-ins or dividend reinvestment) would be subject to levy of stamp duty @ 0.005% of the amount invested. Transfer of mutual fund units (such as transfers between demat accounts) are subject to payment of stamp duty @ 0.015%. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including dividend reinvestment and switch-in) to the Unit holders would be reduced to that extent. The Stamp duty should be considered for the purpose of cost of the investments while calculating capital gains.

## Special provision for deduction of tax at source for non-filers of income-tax return

Tax to be deducted at twice the applicable rate in case of payments to specified person (except non-resident not having permanent establishment in India) who has not furnished the return of income for the assessment year relevant to previous year immediately preceding the financial year in which tax is required to be deducted, for which time limit for filing return has expired and the aggregate of tax deducted at source in his case is ` 50,000 or more in the said previous year. Additionally, if provisions of section 206AA are also applicable then tax to be deducted at higher of the two rates provided i.e. rate as per section 206AB or section 206AA.

**Disclaimer:** The information set out above is included for general information purposes only and does not constitute legal or tax advice. In view of the individual nature of the tax consequences, each investor is advised to consult his or her own tax consultant with respect to specific tax implications arising out of their participation in the Scheme. Income Tax benefits to the mutual fund & to the unit holder is in accordance with the prevailing tax laws. Any action taken by you on the basis of the information contained herein is your responsibility alone. Sundaram Mutual Fund will not be liable in any manner for the consequences of such action taken by you. The information contained herein is not intended as an offer or solicitation for the purchase and sales of any schemes of Sundaram Mutual Fund.

## **G.** Rights of unitholders

Please refer to SAI for details.

## **Penalties & Pending Litigations**

Details of penalties awarded by SEBI under the SEBI Act or any of its Regulation against the sponsor of the Mutual Fund: the Securities and Exchange Board of India has alleged non disclosure of information to the stock exchanges under SEBI (Prohibition of Insider Trading) Regulations, 1992 and imposed a penalty of Rs, 10 lakhs on the Sponsor. On appeal by the Sponsor, the Securities Appellate Tribunal vide its order dated 1st September 2010, partly allowed the appeal and reduced the Quantum of penalty to Rs. 2. lakh.

No penalties have been awarded by SEBI under the SEBI Act or any of its Regulation against the sponsor of the Mutual Fund or any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any of the directors or any key personnel (specifically the fund managers) of the Investment Manager and Trustee. No penalties have been awarded on the Sponsor and its associates by any financial regulatory body, including stock exchanges, for defaults in respect of shareholders, debenture holders and depositors. No penalties have been awarded for any economic offence and violation of any securities laws.

There are no pending material litigation proceedings incidental to the business of the Mutual Fund to which the sponsor of the Mutual Fund or any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any of the directors or key personnel of the Investment Manager is a party. Further, there are no pending criminal cases against the Sponsor or any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any of the directors or key personnel.

There is no deficiency in the systems and operations of the sponsor of the Mutual Fund or any company associated with the sponsor in any capacity, including the Investment Manager which SEBI has specifically advised to be disclosed in the Scheme Information Document, or which has been notified by any other regulatory agency.

There are no enquiries or adjudication proceedings under the SEBI Act and the Regulation, which are in progress against any company associated with the sponsor in any capacity including the Investment Manager, Trustee or any directors or key personnel of the Investment Manager.

#### Jurisdiction

All disputes arising out of or in relation to the issue made under the Scheme will be subject to the exclusive jurisdiction of courts in India.

## Applicability of SEBI (Mutual Fund) Regulations

Notwithstanding anything contained in this Scheme Information Document, the provisions of the SEBI (Mutual Funds) Regulation, 1996 and the guidelines thereunder shall be applicable.

## H. List of official points of acceptance

Agra: 9/4 Ground floor, Shankar Point, Sanjay Place, Agra-282002 Ahmedabad: 602 6th Floor Corporate Park, Near Samudra Complex, Near Girish Cold Drink, C G Road Navrangpura, Ahmedabad-380009 Allahabad: 38/1 Tashkant Marg, Vashishta Vinayak Tower, Upper Ground Floor, Allahabad-211001 Amritsar: SCO-25, 1st Floor, District Shopping Complex B Block , , Ranjit Avenue, Amritsar, 143001 Anand: SF No.202, Drashti Arcade Lambvel Road, Opp HDFC Bank, Anand-388001 Aurangabad: No.36, Motiwali Trade Center, Nirala Bazar, Aurangabad-431001 Bangalore (Main Branch): Ground Floor, Sana Plaza, #21/14 A, Near Trinity Metro Station, Bangalore-560001 Baroda (Vadodara): 109, 1st Floor, Siddharth Complex, Near Express Hotel, R.C Dutt Road, Alkapuri, Baroda-390007 Bhilai: No. 36/5, 1st Block, Ground Floor, Nehru Nagar East, Near Kotak Mahindra Bank, Bhilai, Chhattisgarh - 490020 Bhopal: Plot No. 6, V N V Plaza, , 2nd Floor Bank street, M.P.Nagar Zone 2, Bhopal, 462011 Bhubaneshwar: Shop No. 16, Deen Dayal Bawan, Jan Path, Ashok Nagar, Bhubaneswar -751009 Calicut (Kozhikode): 1st Floor, Karuppalli Square, YMCA cross road, Kozhikode -673001 Chandigarh: II Floor, SCO 2475-76, Sector 22/C, Chandigarh -160022 Chennai HO: Sundaram Towers 1st&2nd Floor, No.46 Whites Road, Royapettah, Chennai-600014 Chennai Sales Office: Metro Plaza, 1st floor, 221, (Old No.162), Anna Salai (Mount Road) Above Raymonds Showroom, Chennai, 600002 Cochin: Kassim Towers, Sebastian Road, Kaloor, Cochin-682 017 Coimbatore: 100 West Periyasamy Road, R S Puram, Coimbatore, 641002 Dehradun: 2nd Floor, International Trade Tower, 1 old survey Road, Above Bank of Baroda, Next to cross Road Mall, Dehradun, 248001 Delhi (Sales Office): Room No.301.314, 3rd Floor Ashoka Estate, 24 Barakhamba Road, New Delhi-110001 Dhanbad: Sri Ram Plaza , Room No. 107, 1st Floor, Bank More, Dhanbad-826001 Durgapur: A-307, Bengal Shristi Complex, II Floor, City center, Durgapur-713216 Goa: D-1st Floor, Alfran Plaza, Panaji , Goa-403001 Gorakhpur: Shop No.20, 2nd Floor, Cross Road The Mall, Bank Road, Gorakhpur-273001 Gurugram: Unit No.11 Vipul Agora, Mehrauli Gurugram Road, Gurugram-122002 Guwahati: Ganapati Enclave 4th Floor, Above Datamation, Bora Service, G.S. Road, Guwahati-781007 Hubli: Shop No.UGF 4/5. EUREKA JUNCTION, T.B.Road Hubli 580029. Hyderabad: 6-3-1085/D/501/B/C Dega Towers 5th , Rajbhavan Road, Somajiguda, Hyderabad-500082 Indore: 205, Starlit Towers, 29/1, Y.N.Road, , Indore, 452001 Jaipur: 506-507, 5th floor, , OK Plus Tower, Ajmer Road, , Near Kalyan Jewellers, Jaipur, 302001 Jalandhar: Shop No- 11 B 3rd FLOOR, CITY SQUARE MALL, CIVIL LINES JALANDHAR. 144001 Jamshedpur: Shop No - 1 & 2, 2nd Floor, Meghdeep Building (Beside Hotel South Park), Q Road, Bistupur, Jamshedpur - 831001 Jodhpur: 116, 1st Floor, Mody Arcade, Chopasani Road, Near bombay motor cycle, Jodhpur-342003 Kanpur: 218-219, Kan Chamber, 14/113- Civil Lines, Kanpur-208001 Kolkata (Main Branch): 7, Camac Street, Azimgunj House, 3rd Floor, Block-6, Kolkata-700017 Kottayam: CSI ascension Square, Logos Junction, Collectorate, P.O Kottayam-686002 Lucknow: Room No. G-04, Sky Hi Chambers, 5, Park Road, Lucknow-226001 Ludhiana: SCO 18, Feroz Gandhi Market, Ludhiana-141001 Madurai: No. 183 C-North Veli Street, Madurai-1 Mangalore: B-2, Souza Arcade, Balmatta Road, Mangalore-575002 Mumbai-Fort: 5th Floor, City Ice Building, Plot No.298, Perin Nariman Street, Mumbai-400001 Mumbai-Thane: Shop No.3, Ramrao Sahani Sadan, Kaka Sohani Road, Behind P. N. Gadgil Jewellers, Off Ram Maruti Road, Mumbai, Thane-400601 Mumbai (Andheri): Satellite Gazebo, West Wing, Ground Floor, B D Sawant Marg, Mota Nagar, Andheri (East), Mumbai-400093 Mysore: #145, 2nd floor, 5th Main, 5th Cross, Above Canara Bank, Saraswathi Puram, Mysuru-570009 Nagpur: Fortune Business centre, 1st Floor, 6 Vasant Vihar, W H C Road, Shankar Nagar, Nagpur, 440010 Nashik: shop No. 1, Shrinath apartment, ground floor, , pandit colony-lane no.3, Sharanpur Road, Sharanpur Road, Nashik, 422002 Patna: 305, 306, Hari Nivas, New Dak Bunglow Road, Patna-800001 Pondicherry: Jayalakshmi Complex Door NO.114 & 116, Shop No.: 7, 8, 9 First Floor, Thiruvalluvar Salai, Pondicherry -605013 Pune: CTS No. 930 / Final, Plot No.314, 1st Floor, Office No. 1, Aditya Centeegra Apts, Condominium, F.C. Road, Shivaji Nagar, Pune-411005 Raipur: S 02, 2nd Floor, Jail Road, Near Fafadih Square, Raipur-492001 Rajkot: 301, 3rd floor Metro Plaza, Nr. Eagle Travels, Bhilwas Chowk, Rajkot, 360001 Ranchi: Satya Ganga Arcade, 205 2nd Floor, Lalji Hirji Road, Near Sarjana Chowk, Main Road, Ranchi-834001 Salem: No.20 1st Floor, Ramakrishna Road, Near Federal Bank, Salem-636007 Sangli: SF S 4, 2nd Floor Shiv Ratan Complex, College Corner Madhav Nagar Road, Sangli-416416 Surat: HG-18, International Trade Centre, Majuragate , Surat-395002 Thrissur: 2nd Floor, Sri Lakshmi Building, Near Thiruvampady Temple, Shoranur Road, Thrissur-680022 Trichy: Krishna Complex, 1st Floor, 60, Shastry Road, Tennur, Trichy, 620017 Trivandrum: 1st Floor, Bava Sahib Commercial Complex, Ambujavilasam Road, Old GPO, Trivandrum, 695001 Varanasi: Shop no. 05, 1st Floor, Kuber Complex, , Rathyatra, Varanasi, 221010 Vijayawada: D.No. 40-13-5, Sree Ramachandra Complex, Benz Circle(Bajaj Showroom Lane), Vijayawada-520 010 Vizag: Shop No.2, 3rd Floor, Navaratna Jewel Square, Dwaraka Nagar, Vishakapatnam-530016 Dubai-Representative Office, Unit No. 714, Level 7, Burjuman Business Tower, Bur Dubai, Dubai UAE

## **Collection centres of SAMC**

Akola: SF C-13 First Floor, Dakshata Nagar, Vyapari Complex, Sindhi Camp Chowk, Akola-444001 Ajmer: SF 1st Floor, K C Complex, Opp Daulat Bagh, Ajmer-305001 Bhagalpur: Ann Tower, 1st Floor, RBSS Road, Bhikhanpur, Bhagalpur-812001 Burdwan: SF 43 G T Road, East Stand Officer's Colony, Raymond Building 2nd Floor, Parbirhata, Burdwan-713103 Gwalior: SF 44 2nd Floor City Centre, Narayan Krishna Apartments, Madhav Rao Scindia Road, Gwalior-474002 Jabalpur: SF No.936 Wright Town, 2nd Floor Digambar Tower, Pandit Bhavani Prasad Ward, Napir Town, Jabalpur-482002 Jalgaon: SF India Plaza, 2nd Floor, Above Dominos Pizza, Swatantra Chowk, Jalgaon-425001 Jamnagar: SF Corporate House, 4th Floor Office No 404, Opp St.Anns School P N Marg, Jamnagar-361001 Kolhapur: SF 2nd Floor Raosahib Vichare Complex, Near ST stand, New Shahupuri Gems Stone, Kolhapur-416 001 Kota: SF 393, Shopping Centre, 2nd Floor (Above Reebok Showroom), Near Ghode Wale Baba Circle, Kota-324007 Muzaffarpur: Saroj Complex, Ground Floor, Dewan Road, Muzaffarpur-842002 Siliguri: SF Home Land (Vishal Mega Mart Building ) 4th Floor Opp Sona Wheels Showroom Sevoke Road, Siliguri-734008 Tirunelveli: SF First floor, Indira Complex, No.985/1, C2, 1 D South Bye Pass Road, Opp to Passport Office, Tirunelveli-627005 Udaipur: SF 04 th floor centre point building , opp-B.N College, Udaipur-313001 Vapi: Shop No-19 & 20, First Floor, Walden Plaza, Imran Nagar (opp SBI), Daman , Silvassa Road, Vapi-396191 Vellore: SF No.141/3, First Floor, M P Sarathy Nagar, Vellore DT., Bus Owners Association Building, Chennai-Bangalore Bye Pass Road, Vellore-632012

# Customer care centres of KFin Technologies Limited.

Agartala: Ols Rms Chowmuhani, Mantri Bari Road, 1St Floor, Near Jana Sevak Saloon Building, Traffic Point, Tripura West, Agartala 799001 Agra: House No. 17/2/4 2Nd Floor Deepak Wasan Plaza Behind Hotel Holiday Inn Sanjay Place Agra 282002 Ahmedabad: Office No. 401 On 4Th Floor Abc-I Off. C.G. Road - Ahmedabad 380009 Ajmer: Shop no. 2 3rd Floor, Above Raymond Shop, Opp City Power House, Hathi Bhata, Ajmer-305001 Akola: Shop No 25, Ground Floor, Yamuna Tarang Complex, Murtizapur Road N.H. No- 6, Opp Radhakrishna Talkies, Akola 444001 Maharashthra Aligarh: 1St Floor Sevti Complex Near Jain Temple Samad Road Aligarh-202001 Allahabad: Meena Bazar 2Nd Floor 10 S.P. Marg Civil Lines Subhash Chauraha Prayagraj Allahabad 211001 Alwar: Office Number 137 First Floor Jai Complex Road No-2 Alwar 301001 Amaravathi: Shop No. 21 2Nd Floor Gulshan Tower Near Panchsheel Talkies Jaistambh Square Amaravathi 444601 Ambala: 6349 2Nd Floor Nicholson Road Adjacent Kos Hospitalambala Cant Ambala 133001 Amritsar: Sco 5 2Nd Floor District Shopping Complex Ranjit Avenue Amritsar 143001 Anand: B-42 Vaibhav Commercial Center Nr Tvs Down Town Shrow Room Grid Char Rasta Anand 380001 Ananthapur:. #13/4 Vishnupriya Complex Beside Sbi Bank Near Tower Clock Ananthapur-515001. Asansol: 112/N G. T. Road Bhanga Pachil G.T Road Asansol Pin: 713 303; Paschim Bardhaman West Bengal Asansol 713303 Aurangabad: Shop No B 38 Motiwala Trade Center Nirala Bazar Aurangabad 431001 Azamgarh: Shop no. 18 Gr. Floor, Nagarpalika, Infront of Tresery office, Azamgarh, UP-276001 Balasore: 1-B. 1St Floor Kalinga Hotel Lane Baleshwar Baleshwar Sadar Balasore 756001 Bangalore: No 35 Puttanna Road Basavanagudi Bangalore 560004 Bankura: Plot Nos- 80/1/Anatunchati Mahalla 3Rd Floor Ward No-24 Opposite P.C Chandra Bankura Town Bankura 722101 Bareilly: 1St Floorrear Sidea -Square Building 54-Civil Lines Ayub Khan Chauraha Bareilly 243001 Baroda: 1St Floor 125 Kanha Capital Opp. Express Hotel R C Dutt Road Alkapuri Vadodara 390007 Begusarai: , Sri Ram Market, Kali Asthan Chowk, Matihani Road, Begusarai, Bihar - 851101 Belgaum: Premises No.101 Cts No.1893 Shree Guru Darshani Tower Anandwadi Hindwadi Belgaum 590011 Bellary: Ground Floor 3Rd Office Near Womens College Road Beside Amruth Diagnostic Shanthi Archade Bellary 583103 Berhampur (Or): Opp Divya Nandan Kalyan Mandap 3Rd Lane Dharam Nagar Near Lohiya Motor Berhampur (Or) 760001 Bhagalpur: 2Nd Floor Chandralok Complexghantaghar Radha Rani Sinha Road Bhagalpur 812001 Bharuch: 123 Nexus Business Hub Near Gangotri Hotel B/S Rajeshwari Petroleum Makampur Road Bharuch 392001 Bhatinda: MCB -Z-3-01043 2 Floor Goniana Road Opporite Nippon India Mf Gt Road Near Hanuman Chowk Bhatinda 151001 Bhavnagar: 303 Sterling Point Waghawadi Road - Bhavnagar 364001 Bhilai: Office No.2 1St Floor Plot No. 9/6 Nehru Nagar [East] Bhilai 490020 Bhilwara: Office No. 14 B Prem Bhawan Pur Road Gandhi Nagar Near Canarabank Bhilwara 311001 Bhopal: SF-13 Gurukripa Plaza Plot No. 48A Opposite City Hospital Zone-2 M P Nagar Bhopal 462011 Bhubaneswar: A/181 Back Side Of Shivam Honda Show Room Saheed Nagar -Bhubaneswar 751007 Bikaner: H.No. 10, Himtasar House, Museum circle, Civil line, Bikaner, Rajasthan - 334001 Bilaspur: Shop.No.306 3Rd Floor Anandam Plaza Vyapar Vihar Main Road Bilaspur 495001 Bokaro: City Centre Plot No. He-07 Sector-Iv Bokaro Steel City Bokaro 827004 Burdwan: Saluja Complex; 846 Laxmipur G T Road Burdwan; Ps: Burdwan & Dist: Burdwan-East Pin: 713101 Calicut: Second Floor Manimuriyil Centre Bank Road Kasaba Village Calicut 673001 Chandigarh: First Floor Sco 2469-70 Sec. 22-C - Chandigarh 160022 Chandrapur: C/o Global Financial Services,2nd Floor, Raghuwanshi Complex,Near Azad Garden, Chandrapur, Maharashtra-442402 Chennai: 9Th Floor Capital Towers 180 Kodambakkam High Road Nungambakkam | Chennai - 600 034 Chinsura: No : 96 Po: Chinsurah Doctors Lane Chinsurah 712101 Cochin: Door No:61/2784 Second floor Sreelakshmi Tower Chittoor Road, Ravipuram Ernakulam-Kerala-682015 Coimbatore: 3Rd Floor Jaya Enclave 1057 Avinashi Road - Coimbatore 641018 Cuttack: Shop No-45 2Nd Floor Netaji Subas Bose Arcade (Big Bazar Building) Adjusent To Reliance Trends Dargha Bazar Cuttack 753001 Darbhanga: , H No-185, Ward No-13, National Statistical office Campus, Kathalbari, Bhandar Chowk , Darbhanga, Bihar - 846004 Davangere: D.No 162/6 1St Floor 3Rd Main P J Extension Davangere Taluk Davangere Manda Davangere 577002 Dehradun: Shop No-809/799 Street No-2 A Rajendra Nagar Near Sheesha Lounge Kaulagarh Road Dehradun-248001 Deoria: K. K. Plaza Above Apurwa Sweets Civil Lines Road Deoria 274001 Dhanbad: 208 New Market 2Nd Floor Bank More - Dhanbad 826001 Dhule: Ground Floor Ideal Laundry Lane No 4 Khol Galli Near Muthoot Finance Opp Bhavasar General Store Dhule 424001 Durgapur: Mwav-16 Bengal Ambuja 2Nd Floor City Centre Distt. Burdwan Durgapur-16 Durgapur 713216 Eluru: Dno-23A-7-72/73K K S Plaza Munukutla Vari Street Opp Andhra Hospitals R R Peta Eluru 534002 Erode: Address No 38/1 Ground Floor Sathy Road (Vctv Main Road) Sorna Krishna Complex Erode 638003 Faridabad: A-2B 2Nd Floor Neelam Bata Road Peer Ki Mazar Nehru Groundnit Faridabad 121001 Ferozpur: The Mall Road Chawla Bulding 1st Floor Opp. Centrail Jail Near Hanuman Mandir Ferozepur 152002 Gandhidham: Shop # 12 Shree Ambica Arcade Plot # 300 Ward 12. Opp. Cg High School Near Hdfc Bank Gandhidham 370201 Gandhinagar: 138 - Suyesh solitaire, Nr. Podar International School, Kudasan, Gandhinagar-382421 Gujarat Gaya: Property No. 711045129 Ground Floorhotel Skylark Swaraipuri Road - Gaya 823001 Ghatkopar: 11/Platinum Mall, Jawahar Road, Ghatkopar (East), Mumbai 400077 Ghaziabad: Ff - 31 Konark Building Rajnagar - Ghaziabad 201001 Ghazipur: House No. 148/19 Mahua Bagh Raini Katra- Ghazipur 233001 Gonda: H No 782 Shiv Sadan Iti Road Near Raghukul Vidyapeeth Civil Lines Gonda 271001 Gorakhpur: Shop No 8 & 9 4Th Floor Cross Road The Mall Bank Road Gorakhpur -273001 Gulbarga: H No 2-231 Krishna Complex 2Nd Floor Opp. Opp. Municipal Corporation Office Jagat Station Main Road Kalaburagi Gulbarga 585105 Guntur: 2Nd Shatter 1St Floor Hno. 6-14-48 14/2 Lane Arundal Pet Guntur 522002 Gurgaon: No: 212A 2Nd Floor Vipul Agora M. G. Road - Gurgaon 122001 Guwahati: Ganapati Enclave 4Th Floor Opposite Bora Service Ullubari Guwahati Assam 781007 Gwalior: City Centre Near Axis Bank - Gwalior 474011 Haldwani: Shoop No 5 Kmvn Shoping Complex - Haldwani 263139 Haridwar: Shop No. - 17 Bhatia Complex Near Jamuna Palace Haridwar 249410 Hassan: Sas No: 490 Hemadri Arcade 2Nd Main Road Salgame Road Near Brahmins Boys Hostel Hassan 573201 Hissar: Shop No. 20 Ground Floor R D City Centre Railway Road Hissar 125001 Hoshiarpur: Unit # Sf-6 The Mall Complex 2Nd Floor Opposite Kapila Hospital Sutheri Road Hoshiarpur 146001 Hubli: R R Mahalaxmi Mansion Above Indusind Bank 2Nd Floor Desai Cross Pinto Road Hubballi 580029 Hyderabad: , 2nd floor JBS Station, Lower Concourse 1, Situated in Jubilee Bus Metro Station, Secunderabad 500009 Indore: 101 Diamond Trade Center 3-4 Diamond Colony New Palasia Above Khurana Bakery Indore - 452001 Jabalpur: 2Nd Floor 290/1 (615-New) Near Bhavartal Garden Jabalpur - 482001 Jaipur: Office No 101 1St Floor Okay Plus Tower Next To Kalyan Jewellers Government Hostel Circle Ajmer Road Jaipur 302001 Jalandhar: Office No 7 3Rd Floor City Square Building E-H197 Civil Line Next To Kalyan Jewellers Jalandhar 144001 Jalgaon: 3Rd Floor 269 Jaee Plaza Baliram Peth Near Kishore Agencies Jalgaon 425001 Jalpaiguri: D B C Road Opp Nirala Hotel Opp Nirala Hotel Opp Nirala Hotel Jalpaiguri 735101 Jammu: Kfin Technologies.Ltd 1D/D Extension 2 Valmiki Chowk Gandhi Nagar Jammu 180004 State - J&K Jamnagar: 131 Madhav Plazza Opp Sbi Bank Nr Lal Bunglow Jamnagar 361008 Jamshedpur: Madhukunj 3Rd Floor Q Road Sakchi Bistupur East Singhbhum Jamshedpur 831001 Jhansi: 1St Floor Puja Tower Near 48 Chambers Elite Crossing Jhansi 284001 Jodhpur: Shop No. 6 Gang Tower G Floor Opposite Arora Moter Service Centre Near Bombay Moter Circle Jodhpur 342003 Junagadh: Shop No. 201 2Nd Floor V-Arcade Complex Near Vanzari Chowk M.G. Road Junagadh 362001 Kalyan: Seasons Business Centre, 104 / 1st Floor, Shivaji Chowk, Opposite KDMC (Kalyan Dombivali Mahanagar Corporation) Kalyan - 421301 Kalyani: Ground Floor, H No B-7/27S, Kalyani, Kalyani HO, Nadia, West Bengal – 741235 Kannur: 2Nd Floor Global Village Bank Road Kannur 670001 Kanpur: 15/46 B Ground Floor Opp : Muir Mills Civil Lines Kanpur 208001 Karimnagar: 2Nd Shutterhno. 7-2-607 Sri Matha Complex Mankammathota - Karimnagar 505001 Karnal: 3 Randhir Colony Near Doctor J.C.Bathla Hospital Karnal (Haryana ) 132001 Karur: No 88/11 Bb Plaza Nrmp Street K S Mess Back Side Karur 639002 Khammam: 11-4-3/3 Shop No. S-9 1St Floor Srivenkata Sairam Arcade Old Cpi Office Near Priyadarshini Collegenehru Nagar Khammam 507002 Kharagpur: Holding No 254/220 Sbi Building Malancha Road Ward No.16 Po: Kharagpur Ps: Kharagpur Dist: Paschim Medinipur Kharagpur 721304 Kolhapur: 605/1/4 E Ward Shahupuri 2Nd Lane Laxmi Niwas Near Sultane Chambers Kolhapur 416001 Kolkata: 2/1 Russel Street 4Thfloor Kankaria Centre Kolkata 70001 Wb Kollam: Sree Vigneswara Bhavan Shastri Junction Kollam - 691001 Korba: Office No.202, 2nd floor, ICRC, QUBE, 97, T.P. Nagar, Korba -495677 Kota: D-8 Shri Ram Complex Opposite Multi Purpose School Gumanpur Kota 324007 Kottayam: 1St Floor Csiascension Square Railway Station Road Collectorate P O Kottayam 686002 Kurnool: Shop No:47 2Nd Floor S Komda Shoping Mall Kurnool 518001 Lucknow: Ist Floor A. A. Complex 5 Park Road Hazratganj Thaper House Lucknow 226001 Ludhiana: Sco 122 Second Floor Above Hdfc Mutual Fun Feroze Gandhi Market Ludhiana 141001 Madurai: No. G-16/17 Ar Plaza 1St Floor North Veli Street Madurai 625001 Malda: Ram Krishna Pally; Ground Floor English Bazar - Malda 732101 Mandi: House No. 99/11 3Rd Floor Opposite Gss Boy School School Bazar Mandi 175001 Mangalore: Shop No - 305 Marian Paradise Plaza 3Rd Floor Bunts Hostel Road Mangalore - 575003 Dakshina Kannada Karnataka Margoa: Shop No 21 Osia Mall 1St Floor Near Ktc Bus Stand Sgdpa Market Complex Margao - 403601 Mathura: Shop No. 9 Ground Floor Vihari Lal Plaza Opposite Brijwasi Centrum Near New Bus Stand Mathura 281001 Meerut: Shop No:- 111 First Floor Shivam Plaza Near Canara Bank Opposite Eves Petrol Pump Meerut-250001 Uttar Pradesh India Mehsana: Ff-21 Someshwar Shopping Mall Modhera Char Rasta - Mehsana 384002 Mirzapur: Second Floor, Triveni Campus| Ratanganj, Mirzapur, Uttar Pradesh, 231001 Moga: 1St Floordutt Road Mandir Wali Gali Civil Lines Barat Ghar Moga 142001 Moradabad: Chadha Complex G. M. D. Road Near Tadi Khana Chowk Moradabad 244001 Morena: House No. Hig 959 Near Court Front Of Dr. Lal Lab Old Housing Board Colony Morena 476001 Mumbai: 6/8 Ground Floor Crossley House Near Bse (Bombay Stock Exchange)Next Union Bank Fort Mumbai - 400 001 Muzaffarpur: First Floor Saroj Complex Diwam Road Near Kalyani Chowk Muzaffarpur 842001 Mysore: No 2924 2Nd Floor 1St Main 5Th Cross Saraswathi Puram Mysore 570009 Nadiad: 311-3Rd Floor City Center Near Paras Circle - Nadiad 387001 Nagerkoil: Hno 45 1St Floor East Car Street Nagercoil 629001 Nagpur: Plot No. 2 Block No. B / 1 & 2 Shree Apratment Khare Town Mata Mandir Road Dharampeth Nagpur 440010 Nanded: Shop No.4 Santakripa Market G G Road Opp.Bank Of India Nanded 431601 Nasik: S-9 Second Floor Suyojit Sankul Sharanpur Road Nasik 422002 Navsari: 103 1St Floore Landmark Mall Near Sayaji Library Navsari Gujarat Navsari 396445 Nellore: 24-6-326/1, Ibaco Building 4th Floor, Grand Truck road, Beside Hotel Minerva, Saraswathi Nagar, Dargamitta Nellore -524003 New Delhi: 305 New Delhi House 27 Barakhamba Road - New Delhi 110001 Noida: F-21 2Nd Floor Near Kalyan Jewelers Sector-18 Noida 201301 Palghat: No: 20 & 21 Metro Complex H.P.O.Road Palakkad H.P.O.Road Palakkad 678001 Panipat: Shop No. 20 1St Floor Bmk Market Behind Hive Hotel G.T.Road Panipat-132103 Haryana Panjim: H. No: T-9 T-10 Affran Plaza 3Rd Floor Near Don Bosco High School Panjim 403001 Pathankot: 2Nd Floor Sahni Arcade Complex Adj.Indra Colony Gate Railway Road Pathankot Pathankot 145001 Patiala: B-17/423 Lower Mall Patiala Opp Modi College Patiala 147001 Patna: Flat No.- 102, 2BHK Maa Bhawani Shardalay, Exhibition Road, Patna-800001 Pondicherry: No 122(10B) Muthumariamman Koil Street - Pondicherry 605001 Pune: Office # 207-210 Second Floor Kamla Arcade Jm Road. Opposite Balgandharva Shivaji Nagar Pune 411005 Raipur: Office No S-13 Second Floor Reheja Tower Fafadih Chowk Jail Road Raipur 492001 Rajahmundry: D.No: 6-7-7, Sri Venkata Satya Nilayam,1st Floor, Vadrevu vari Veedhi, T - Nagar, Rajahmundry AP- 533101 Rajkot: 302 Metro Plaza Near Moti Tanki Chowk Rajkot Rajkot Gujarat 360001 Ranchi: Room no 103, 1st Floor, Commerce Tower, Beside Mahabir Tower, Main Road, Ranchi -834001 Ratlam: 106 Rajaswa Colony, Near Sailana Bus Stand, Ratlam (M.P.) 457001 Renukoot: C/O Mallick Medical Store Bangali Katra Main Road Dist. Sonebhadra (U.P.) Renukoot 231217 Rewa: Shop No. 2 Shree Sai Anmol Complex Ground Floor Opp Teerth Memorial Hospital Rewa 486001 Rohtak: Office No:- 61 First Floor Ashoka Plaza Delhi Road Rohtak 124001. Roorkee: Near Shri Dwarkadhish Dharm Shala, Ramnagar, Roorkee-247667 Rourkela: 2Nd Floor Main Road Udit Nagar Sundargarh Rourekla 769012 Sagar: II Floor Above Shiva Kanch Mandir. 5 Civil Lines Sagar Sagar 470002 Saharanpur: Ist Floor, Krishna Complex, Opp. Hathi Gate, Court Road, Saharanpur, Uttar Pradesh, Pincode 247001 Salem: No.6 Ns Complex Omalur Main Road Salem 636009 Sambalpur: First Floor; Shop No. 219 Sahej Plaza Golebazar; Sambalpur Sambalpur 768001 Satara: G7, 465 A, Govind Park Satar Bazaar, Satara - 415001 Satna: 1St Floor Gopal Complex Near Bus Stand Rewa Roa Satna 485001 Shillong: Annex Mani Bhawan Lower Thana Road Near R K M Lp School Shillong 793001 Shimla: 1St Floor Hills View Complex Near Tara Hall Shimla 171001 Shimoga: Jayarama Nilaya 2Nd Corss Mission Compound Shimoga 577201 Shivpuri: A. B. Road In Front Of Sawarkar Park Near Hotel Vanasthali Shivpuri 473551 Sikar: First Floorsuper Tower Behind Ram Mandir Near Taparya Bagichi - Sikar 332001 Silchar: N.N. Dutta Road Chowchakra Complex Premtala Silchar 788001 Siliguri: Nanak Complex 2Nd Floor Sevoke Road - Siliguri 734001 Sitapur: 12/12 Surya Complex Station Road Uttar Pradesh Sitapur 261001 Solan: Disha Complex 1St Floor Above Axis Bank Rajgarh Road Solan 173212 Solapur: Shop No 106. Krishna Complex 477 Dakshin Kasaba Datta Chowk Solapur-413007 Sonepat: Shop No. 205 Pp Tower Opp Income Tax Office Subhash Chowk Sonepat. 131001. Sri Ganganagar: Address Shop No. 5 Opposite Bihani Petrol Pump Nh - 15 Near Baba Ramdev Mandir Sri Ganganagar 335001 Srikakulam: D No 158, Shop No # 3, Kaki Street, Opp Tulasi Das Hospital, CB Road, Srikakulam Andhra Pradesh - 532001 Sultanpur: 1St Floor Ramashanker Market Civil Line - Sultanpur 228001 Surat: Ground Floor Empire State Building Near Udhna Darwaja Ring Road Surat 395002 Tinsukia: 3rd Floor, Chirwapatty Road, Tinsukia-786125, Assam Tirunelveli: 55/18 Jeney Building 2Nd Floor S N Road Near Aravind Eye Hospital Tirunelveli 627001 Tirupathi: Shop No:18-1-421/F1 City Center K.T.Road Airtel Backside Office Tirupathi - 517501 Tiruvalla: 2Nd Floorerinjery Complex Ramanchira Opp Axis Bank Thiruvalla 689107 Trichur: 4Th Floor Crown Tower Shakthan Nagar Opp. Head Post Office Thrissur 680001 Trichy: No 23C/1 E V R Road Near Vekkaliamman Kalyana Mandapam Putthur - Trichy 620017 Trivandrum: 3rdFloor, No- 3B TC-82/3417, CAPITOL CENTER, OPP SECRETARIAT, MG ROAD, TRIVANDRUM- 695001 Tuticorin: 4 - B A34 - A37 Mangalmal Mani Nagar Opp. Rajaji Park Palayamkottai Road Tuticorin 628003 Udaipur: Shop No. 202 2Nd Floor Business Centre 1C Madhuvan Opp G P O Chetak Circle Udaipur 313001 Ujjain: Heritage Shop No. 227 87 Vishvavidhyalaya Marg Station Road Near Icici Bank Above Vishal Megha Mart Ujjain 456001 Valsad: 406 Dreamland Arcade Opp Jade Blue Tithal Road Valsad 396001 Vapi: A-8 Second Floor Solitaire Business Centre Opp Dcb Bank Gidc Char Rasta Silvassa Road Vapi 396191 Varanasi: D.64 / 52, G - 4 Arihant Complex , Second Floor , Madhopur, Shivpurva Sigra , Near Petrol Pump Varanasi -221010 Vellore: No 2/19 1St Floor Vellore City Centre Anna Salai Vellore 632001 Vijayawada: Hno26-23 1St Floor Sundarammastreet Gandhinagar Krishna Vijayawada 520010 Visakhapatnam: Dno : 48-10-40 Ground Floor Surya Ratna Arcade Srinagar Opp Roadto Lalitha Jeweller Showroom Beside Taj Hotel Ladge Visakhapatnam 530016 Warangal: Shop No22 Ground Floor Warangal City Center 15-1-237 Mulugu Road Junction Warangal 506002 Yamuna Nagar: B-V 185/A 2Nd Floor Jagadri Road Near Dav Girls College (Uco Bank Building) Pyara Chowk - Yamuna Nagar 135001

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Andheri: Office No 103, 1st Floor, MTR Cabin-1, Vertex, Navkar Complex M .V .Road, Andheri East , Opp Andheri Court, Mumbai - 400069 Borivali: Gomati Smuti Ground Floor, Jambli Gully, Near Railway Station, Borivali, Mumbai 400 092 Hyderabad(Gachibowli) Selenium Plot No: 31 & 32, Tower B, Survey No.115/22 115/24 115/25, Financial District, Gachibowli Nanakramguda, Serilimgampally Mandal, Hyderabad 500032 Thane: Room No. 302, 3Rd Floor, Ganga Prasad, Near RBL Bank Ltd, Ram Maruti Cross Road, Naupada, Thane West, Mumbai 400602 Vashi: Haware Infotech Park 902, 9th Floor, Plot No 39/03, Sector 30A, Opp Inorbit Mall, Vashi Navi Mumbai 400703