

REPORT OF COMPLIANCE OF STEWARDSHIP CODE FOR THE FINANCIAL YEAR 2020-21

In terms of the Securities and Exchange Board of India (“SEBI”) circular no. CIR/CFD/CMD1/168/2019 dated December 24, 2019, the AMC have framed a Stewardship code based on the principles indicated in the Circular. The purpose of the Stewardship Code is to enhance the quality of engagement between institutional investors and the investee companies to help improve the Corporate Governance practices with a view to enhance long term returns to Unitholders and the governance responsibilities.

The following are the principles adopted by the AMC for their conduct at general meetings of the Investee Company and disclosures thereto:

Principle 1: Institutional Investors should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically:

- i. Policy for exercising Voting Rights:*
The AMC have acted in the best interest of the Unitholders and have executed the Voting rights based on the Voting Rights Policy.
- ii. Policy for Prevention of Conflicts of Interests:*
The AMC have ensured that there are no conflicts of interests and have conducted its business fairly.

The Investment Committee is in charge of shareholder engagement activities and voting rights and ensuring utilization of the corporate monitoring materials provided by the analysts and fund managers. The Compliance Team is responsibly monitoring the potential conflicts of interests, which may arise during the course of carrying out the stewardship activities.

Principle 2: Institutional investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it:

As part of our policy for the prevention of conflicts of interests, the management have established information exchange barriers (Chinese Wall) that safeguards the information between different management. These exchange barriers serve to prevent undisclosed material information from being accessed by unauthorized employees, departments, or external parties.

The AMC have complied with the said principle in a consistent manner with an aim to prioritize the best interests of unitholders.

Principle 3: Institutional investors should monitor their investee companies

The analysts and fund managers of the AMC monitors the investee companies on a regular basis and has effective communication and dialogue with such companies.

The Equity Investment team of the AMC which is also responsible for actively monitoring the investee companies have complied with all the aspects of this principle.

Principle 4: Institutional investors should have a clear policy on intervention in their investee companies. Institutional investors should also have a clear policy for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors, which should be disclosed

There has been no such instance in the Financial year 2020-21 where intervention of the AMC was required in order to protect value of its investment and discharge its stewardship responsibility.

Principle 5: Institutional investors should have a clear policy on voting and disclosure of voting activity:

The AMC has disclosed the exercise of voting rights in order to ensure transparency and have uploaded the details of actual voting i.e. whether voted for/against/abstained and the rationale for such voting on the website on a quarterly basis.

Principle 6: Institutional investors should report periodically on their stewardship activities:

The AMC have timely disclosed all the activities undertaken by the Equity Investment team, as mandated by the Investment Committee, in regard to implementing this stewardship policy and discharging its responsibilities, on its website, as part of public disclosure on an annual basis.

The Status of Compliance with the Stewardship Code is stated below:

Principle	Compliance Status
Principle 1: Institutional Investors should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically:	Complied
Principle 2: Institutional investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it:	Complied
Principle 3: Institutional investors should monitor their investee companies	Complied
Principle 4: Institutional investors should have a clear policy on intervention in their investee companies. Institutional investors should also have a clear policy for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors, which should be disclosed.	Complied
Principle 5: Institutional investors should have a clear policy on voting and disclosure of voting activity:	Complied
Principle 6: Institutional investors should report periodically on their stewardship activities:	Complied