

**NOTICE CUM ADDENDUM No. 48/2025**

**Reclassification of Real Estate Investment Trusts (REITs) as equity related instruments**

Investors are requested to note that in accordance with SEBI notification no. SEBI/LAD-NRO/GN/2025 /272 dated October 31, 2025 and SEBI Circular dated November 28, 2025, related to ‘Reclassification of Real Estate Investment Trusts (REITs) as equity related instruments for facilitating enhanced participation by Mutual Funds and Specialized Investment Funds (SIFs)’ the definition of equity and equity related instruments have been modified to reclassify REITs as equity related instruments. Consequently, the following provisions in the SID and KIM of Samco Large & Mid Cap Fund, Samco Large Cap Fund, Samco Multi Asset Allocation Fund and Samco Small Cap Fund Schemes of Samco Mutual Fund shall stand revised effective from **January 01, 2026:**

Section		Existing Provision			Revised Provision		
I.	How will the Scheme allocate its assets?	Instruments	Indicative allocations (% of net assets)		Instruments	Indicative allocations (% of net assets)	
			Minimum	Maximum		Minimum	Maximum
		Units issued by REITs and InvITs	0%	10%	Units issued by InvITs	0%	10%
II	Indicative Table	Indicative Table (Actual instrument/percentages may vary subject to applicable SEBI circulars)			Indicative Table (Actual instrument/percentages may vary subject to applicable SEBI circulars)		
		Units issued by REITs and InvITs	10		Units issued by InvITs	10	
		The cumulative gross exposure through equity, debt (including money market instruments), derivative positions (including covered call options), foreign securities, units issued by REITs & InvITs, repo transactions in corporate debt securities and such other securities/assets as may be permitted by the Board from time to time shall not exceed 100% of the net assets of the Scheme in accordance with SEBI Master Circular no. SEBI/HO/IMD/IMDPoD-1/P/CIR/2024/90 dated June 27, 2024			The cumulative gross exposure through equity, debt (including money market instruments), derivative positions (including covered call options), foreign securities, units issued by InvITs, repo transactions in corporate debt securities and such other securities/assets as may be permitted by the Board from time to time shall not exceed 100% of the net assets of the Scheme in accordance with SEBI Master Circular no. SEBI/HO/IMD/IMDPoD-1/P/CIR/2024/90 dated June 27, 2024		
III.	B. Where will the Scheme invest?	Investments in units of Real Estate Investment Trust (ReIT) and Infrastructure Investment Trust (InvIT)			Investments in units of Infrastructure Investment Trust (InvIT)		
IV.	Risk factors	REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. Investors may note that AMC/Fund Manager’s investment decisions may not always be profitable, as actual market movements may be at variance with the anticipated trends. The NAV of the scheme is vulnerable to movements in the prices of securities invested by the scheme, due to various market related factors like changes in the general market conditions, factors and forces affecting capital market, level of interest			InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. Investors may note that AMC/Fund Manager’s investment decisions may not always be profitable, as actual market movements may be at variance with the anticipated trends. The NAV of the scheme is vulnerable to movements in the prices of securities invested by the scheme, due to various market related factors like changes in the general market conditions, factors and forces affecting capital market, level of interest rates, trading volumes, settlement periods and transfer		

		<p>rates, trading volumes, settlement periods and transfer procedures. The scheme will undertake active portfolio management as per the investment objective to reduce the market risk.</p> <p>i) <b>Liquidity Risk:</b> This refers to the ease with which securities/instruments of REITs/InvITs can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence, there could be times when trading in the units is infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities/instruments for which a liquid market exists. As these products are new to the market they are likely to be exposed to liquidity risk.</p> <p>ii) <b>Reinvestment Risk:</b> Investments in securities/instruments of REITs and InvITs may carry reinvestment risk as there could be repatriation of funds by the Trusts in form of buyback of units or Payout of Income Distribution cum Capital Withdrawal, etc. Consequently, the proceeds may get invested in assets providing lower returns.</p> <p>iii) <b>Price Risk:</b> Securities/Instruments of REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. The extent of fall or rise in the prices depends upon factors such as general market conditions, factors and forces affecting capital market, real estate and infrastructure sectors, level of interest rates, trading volumes, settlement periods and transfer procedures.</p> <p>iv) <b>Interest Rate Risk:</b> Securities/Instruments of REITs and InvITs run interest rate risk. Generally, when interest rates rise, prices of units fall and when interest rates drop, such prices increase.</p> <p>v) <b>Credit Risk:</b> Credit risk means that the issuer of a REIT/InvIT security / instrument may default on interest payment or even on paying back the principal amount on maturity. Securities / Instruments of REITs and InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be pre-scheduled.</p> <p><b>Regulatory/Legal Risk:</b> REITs and InvITs being new asset classes, rights of unit holders such as right to information etc. may differ from existing capital market asset classes under Indian Law.</p>	<p>procedures. The scheme will undertake active portfolio management as per the investment objective to reduce the market risk.</p> <p>i) <b>Liquidity Risk:</b> This refers to the ease with which securities/instruments of InvITs can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence, there could be times when trading in the units is infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities/instruments for which a liquid market exists. As these products are new to the market they are likely to be exposed to liquidity risk.</p> <p>ii) <b>Reinvestment Risk:</b> Investments in securities/instruments of InvITs may carry reinvestment risk as there could be repatriation of funds by the Trusts in form of buyback of units or Payout of Income Distribution cum Capital Withdrawal, etc. Consequently, the proceeds may get invested in assets providing lower returns.</p> <p>iii) <b>Price Risk:</b> Securities/Instruments of InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. The extent of fall or rise in the prices depends upon factors such as general market conditions, factors and forces affecting capital market, and infrastructure sectors, level of interest rates, trading volumes, settlement periods and transfer procedures.</p> <p>iv) <b>Interest Rate Risk:</b> Securities/Instruments of InvITs run interest rate risk. Generally, when interest rates rise, prices of units fall and when interest rates drop, such prices increase.</p> <p>v) <b>Credit Risk:</b> Credit risk means that the issuer of a InvIT security / instrument may default on interest payment or even on paying back the principal amount on maturity. Securities / Instruments of InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be pre-scheduled.</p> <p>vi) <b>Regulatory/Legal Risk:</b> InvITs being new asset classes, rights of unit holders such as right to information etc. may differ from existing capital market asset classes under Indian Law.</p>
V	<b>Risk control measures</b>	<p><b>Market Risk :</b> REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. Investors may note that AMC/Fund Manager's investment decisions may not always be profitable, as actual market movements may be at variance with the</p>	<p><b>Market Risk :</b>InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. Investors may note that AMC/Fund Manager's investment decisions may not always be profitable, as actual market movements may be at variance with the anticipated trends. The NAV of the</p>

		<p>anticipated trends. The NAV of the Scheme is vulnerable to movements in the prices of securities invested by the scheme, due to various market related factors like changes in the general market conditions, factors and forces affecting capital market, level of interest rates, trading volumes, Real Estate and Infrastructure sectors, settlement periods and transfer procedures. To mitigate this, the maximum exposure to units of REITs and InvITs is capped at 10% of the portfolio.</p> <p><b>Liquidity Risk:</b> This refers to the ease with which REIT/InvIT units can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence there would be times when trading in the units could be infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities for which a liquid market exists. Regular monitoring of the REITs and InvITs liquidity/ trading volume &amp; changes in market conditions/ regulatory changes will help mitigate the same.</p>	<p>Scheme is vulnerable to movements in the prices of securities invested by the scheme, due to various market related factors like changes in the general market conditions, factors and forces affecting capital market, level of interest rates, trading volumes, settlement periods and transfer procedures. To mitigate this, the maximum exposure to units of InvITs is capped at 10% of the portfolio.</p> <p><b>Liquidity Risk:</b> This refers to the ease with which InvIT units can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence there would be times when trading in the units could be infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities for which a liquid market exists. Regular monitoring of the InvITs liquidity/ trading volume &amp; changes in market conditions/ regulatory changes will help mitigate the same.</p>
<b>VI</b>	<b>What are the investment restrictions ?</b>	<p>The Mutual Fund may invest in the units of REITs and InvITs subject to the following:</p> <p>(a) The Mutual Fund under all its schemes shall not own more than 10% of units issued by a single issuer of REIT and InvIT; and</p> <p>(b) The Scheme shall not invest –</p> <p>i. more than 10% of its NAV in the units of REIT and InvIT; and</p> <p>ii. more than 5% of its NAV in the units of REIT and InvIT issued by a single issuer.</p> <p>The cumulative gross exposure through equity, debt, derivative positions, foreign securities, units issued by REITs &amp; InvITs, repo transactions in corporate debt securities and such other securities/assets as may be permitted by the Board from time to time shall not exceed 100% of the net assets of the Scheme in accordance with SEBI Master Circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024.</p>	<p>The Mutual Fund may invest in the units of InvITs subject to the following:</p> <p>(c) The Mutual Fund under all its schemes shall not own more than 10% of units issued by a single issuer of InvIT; and</p> <p>(d) The Scheme shall not invest –</p> <p>i. more than 10% of its NAV in the units of InvIT; and</p> <p>ii. more than 5% of its NAV in the units of InvIT issued by a single issuer.</p> <p>The cumulative gross exposure through equity, debt, derivative positions, foreign securities, units issued by InvITs, repo transactions in corporate debt securities and such other securities/assets as may be permitted by the Board from time to time shall not exceed 100% of the net assets of the Scheme in accordance with SEBI Master Circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024.</p>

Further, in the section in the below Schemes shall be accordingly revised:

<b>Scheme Name</b>	<b>Section</b>	<b>Existing provision</b>	<b>Revised provision</b>
1.Samco Flexi Fund, 2.Samco Overnight Fund, 3.Samco ELSS Tax Saver Fund, 4.Samco Active Momentum Fund, 5.Samco Dynamic Asset Allocation Fund, 6.Samco Special Opportunities Fund, 7.Samco Multi Cap Fund and 8. Samco Arbitrage Fund.	The scheme will not invest in following securities	Units issued by REITs and InvITs	Units issued by InvITs

This notice- cum- addendum shall form an integral part of SID and KIM of all the scheme(s) of Samco Mutual Fund. All other features, terms and conditions as mentioned in the SID and KIM of all the scheme(s) shall remain unchanged.

**For Samco Asset Management Private Limited**  
(Investment Manager for Samco Mutual Fund)

Place: Mumbai  
Date : December 31, 2025

Sd/-  
Authorized Signatory

**MUTUAL FUND INVESTMENTS ARE SUBJECT TO MARKET RISKS, READ ALL SCHEME RELATED DOCUMENTS CAREFULLY.**