



## SCHEME INFORMATION DOCUMENT

# Samco Dynamic Asset Allocation Fund

(An open ended dynamic asset allocation fund)

This product is suitable for investors who are seeking*:	Scheme Risk-o-meter	Benchmark Risk-o-meter (NIFTY50 Hybrid Composite Debt 50: 50 Index)
<ul style="list-style-type: none"> <li>Capital Appreciation &amp; Income Generation over medium to long term</li> <li>Investment in a dynamically managed portfolio of equity &amp; equity related instruments and debt &amp; money market securities</li> </ul> <p><i>*Investors should consult their financial advisers if in doubt about whether the product is suitable for them.</i></p>	 <p>The risk of the scheme is Very High</p>	 <p>The risk of the benchmark is High</p>

### Continuous offer for Units at NAV based prices

#### Name of Sponsor:

Samco Securities Limited

#### Name of Mutual Fund: Samco Mutual Fund

**Name of Asset Management Company:** Samco Asset Management Private Limited

**Name of Trustee Company:** Samco Trustee Private Limited

#### Address:

1004 - A, 10th Floor, Naman Midtown - A Wing, Senapati Bapat Marg, Prabhadevi 400 013

#### Addresses, Website of the Entities:

**Address:** 1003 - A, Naman Midtown, Senapati Bapat Marg, Prabhadevi West, Mumbai - 400 013

**Website:** [www.samcomf.com](http://www.samcomf.com), **Email:** [mfassist@samcomf.com](mailto:mfassist@samcomf.com)

**Toll Free No.:** 18001034757, **Fax No.:** 022 41708989

The particulars of the Scheme have been prepared in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations 1996, as amended till date, and filed with the Securities and Exchange Board of India (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 (SID) sets forth concisely the information about the scheme that a prospective investor ought to know before investing. Please retain this SID for future reference. Before investing, investors should also ascertain about any further changes to this SID after the date of this Document from the Mutual Fund / Investor Service Centres / Website / Distributors or Brokers.

The investors are advised to refer to the Statement of Additional Information (SAI) for details of Samco Mutual Fund, Tax and Legal issues and general information available on our website [www.samcomf.com](http://www.samcomf.com).

The SAI is incorporated by reference (is legally a part of the Scheme Information Document). For a free copy of the current SAI, please contact your nearest Samco Mutual Fund Investor Service Centre or log on to our website.

The Scheme Information Document should be read in conjunction with the SAI and not in isolation.

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## I - HIGHLIGHTS/ SUMMARY OF THE SCHEME

Sr. No.	Title	Description
I.	<b>Name of the scheme</b>	Samco Dynamic Asset Allocation Fund
II.	<b>Category of the Scheme</b>	Dynamic Asset Allocation
III.	<b>Scheme type</b>	An open-ended dynamic asset allocation fund
IV.	<b>Scheme code</b>	SAMC/O/H/DAA/23/10/0005
V.	<b>Investment objective</b>	<p>The investment objective of the Scheme is to generate income/long-term capital appreciation by investing in equity, equity derivatives, fixed income instruments and foreign securities. The allocation between equity instruments and fixed income will be managed dynamically so as to provide investors with long term capital appreciation while managing downside risk.</p> <p>There is no assurance that the investment objective of the scheme will be achieved.</p>
VI.	<b>Liquidity/ Listing details</b>	<p>Being an open-ended scheme, the Mutual Fund shall provide for purchase/switch-in/redemption/switchout of units of the Scheme, not later than 5 business days from the date of allotment on an on-going basis. On reopening of the scheme the units may be purchased / switched in or redeemed / switched out on every business day at NAV based prices on an ongoing basis, subject to provisions of exit load, if any.</p> <p>The scheme would not be listed on any of the stock exchanges. The AMC, at its discretion, can undertake listing on any of the stock exchange.</p>
VII.	<b>Benchmark</b>	<p>NIFTY50 Hybrid Composite Debt 50: 50 Index</p> <p>The composition of the aforesaid first tier benchmark is such that it is most suited for comparing the performance of the scheme. The Trustees reserves right to change benchmark in future for measuring performance of the scheme.</p>
VIII.	<b>NAV disclosure</b>	<p>The AMC will calculate and disclose the first NAV of the Scheme within 5 business days from the date of allotment. Subsequently, the AMC will calculate and disclose the NAVs on all business Days. The AMC shall update the NAVs on its website (<a href="http://www.samcomf.com">www.samcomf.com</a>) and of the Association of Mutual Funds in India (AMFI) (<a href="http://www.amfiindia.com">www.amfiindia.com</a>) before 11.00 p.m. on every Business Day (subject to following exception).</p> <p>In terms of clause 8.2 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the AMC shall ensure that NAV of scheme is disclosed based on the value of underlying securities/ Funds as on the T day (i.e. date of investment in MF units in India). Accordingly, if the scheme has investment in Overseas securities, then the NAV shall be uploaded at AMFI before 10.00 a.m. on the immediately succeeding Business Day to capture same day price of underlying securities.</p> <p>Further details provided in Section II.</p>
IX.	<b>Applicable timelines for dispatch of redemption proceeds</b>	As per SEBI Regulations, the Mutual Fund shall initiate Redemption proceeds within 3 Working Days of receiving a valid Redemption request. In case of exceptional situations listed in AMFI Circular No. AMFI/35P/MEM-COR/74/2022-23 dated January 16, 2023, read with clause 14.2 of SEBI

		<p>Master Circular dated June 27, 2024, redemption payment would be made within the permitted additional timelines.</p> <p>A penal interest of 15% per annum or such other rate as may be prescribed by SEBI from time to time, will be paid in case the Redemption proceeds are not initiated within above timelines from the date of receipt of a valid Redemption request.</p>
<b>x.</b>	<p><b>Plans and Options</b></p> <p>Plans/Options and sub options under the Scheme</p>	<p>There will be two plans under the Scheme namely, Regular Plan and Direct Plan.</p> <ul style="list-style-type: none"> <li>Samco Dynamic Asset Allocation Fund – Regular Plan</li> <li>Samco Dynamic Asset Allocation Fund – Direct Plan</li> </ul> <p><b>Regular Plan:</b> This Plan is for investors who wish to route their investment through any distributor.</p> <p><b>Direct Plan:</b> This Plan is only for investors who purchase /subscribe Units in a Scheme directly with the Mutual Fund and is not available for investors who route their investments through a Distributor.</p> <p>All the plans will have common portfolio.</p> <p><b>Option under each Plan(s)</b></p> <p>The scheme offers the following Options under each of the above-mentioned Plans:</p> <ul style="list-style-type: none"> <li>Growth option</li> <li>Income Distribution cum Capital Withdrawal (IDCW) Option</li> </ul> <p>The Income Distribution cum Capital Withdrawal Option has the following facilities:</p> <ul style="list-style-type: none"> <li>Reinvestment of Income Distribution cum Capital Withdrawal Option</li> <li>Payout of Income Distribution cum Capital Withdrawal Option</li> <li>Transfer of Income Distribution cum Capital Withdrawal Plan</li> </ul> <p>The investors should indicate the Option/Facility for which Subscription is made by indicating the choice in the appropriate box provided for this purpose in the application form. In case of valid application received without any choice of Option/Facility, the following default Option/Facility will be considered.</p> <ul style="list-style-type: none"> <li><b>Growth option</b></li> </ul> <p>No IDCW will be declared under this option. The income earned under this option will get accumulated as capital accretion and will continue to remain invested in the Scheme and will be reflected in the NAV of the Units held under this option.</p> <ul style="list-style-type: none"> <li><b>Income Distribution cum Capital Withdrawal option</b></li> </ul> <p>IDCW will be declared under this Option at the discretion of the Trustee, subject to availability of distributable surplus calculated in accordance with</p>

		<p>SEBI (MF) Regulations. IDCW, if declared will be paid to those unitholders whose names appear in the register of unitholders on the notified record date. In case of Units under the Income Distribution cum Capital Withdrawal Option held in dematerialised mode, the Depositories (NSDL/CDSL) will give the list of demat account holders and the number of Units held by them in electronic form on the Record date to the AMC/Registrar. The Trustee reserves the right to change the record date from time to time.</p> <p>When units are sold, and sale price (Net Asset Value) is higher than face value of the unit, a portion of sale price that represents realized gains is credited to an Equalization Reserve Account which can be used to pay IDCW. Investors are requested to note that, under the aforesaid Option, the amounts can be distributed out of investors capital (Equalization Reserve), which is part of sale price that represents realized gains. Whenever distributable surplus will be distributed, a clear segregation between income distribution (appreciation on NAV) and capital distribution (Equalization Reserve) shall be suitably disclosed in the Consolidated Account Statement provided to investors.</p> <p>It must be noted that the actual declaration of IDCW and the frequency thereof is at the sole discretion of the Trustee. There is no assurance or guarantee to the unitholders as to the rate of IDCW distribution nor that IDCW be declared regularly. The Trustee reserves the right to declare IDCW. Pursuant to payment of IDCW, the NAV of the Income Distribution cum Capital Withdrawal Option will fall to the extent of the IDCW payout and applicable statutory levies, if any.</p> <p><b>Facilities under the Income Distribution cum Capital Withdrawal Option:</b></p> <p>Payout of Income Distribution cum Capital Withdrawal Option Under this facility, IDCW declared, if any, will be paid (subject to deduction of statutory levy, if any) to those unitholders, whose names appear in the register of unitholders on the notified record date.</p> <p>If the IDCW payable under the Payout of Income Distribution cum Capital Withdrawal Option is equal to or less than Rs. 500 then the IDCW would be compulsorily reinvested in the existing option of the Scheme.</p> <p>In case of Units under the Income Distribution cum Capital Withdrawal Option held in dematerialised mode, the IDCW pay-out will be credited to the bank account of the investor, as per the bank account details recorded with the DP.</p> <p><b>Reinvestment of Income Distribution cum Capital Withdrawal Option</b></p> <p>Under this facility, the IDCW due and payable to the unitholders will be compulsorily and without any further act by the unitholder, reinvested in the respective Income Distribution cum Capital Withdrawal Option at a price based on the prevailing Net Asset Value per unit on the record date (at the applicable ex-IDCW NAV).</p> <p>The amount of IDCW re-invested will be net of tax deducted at source, wherever applicable. On reinvestment of IDCW, the number of units to the credit of the unitholder's account will increase to the extent of the dividend reinvested divided by the Applicable NAV.</p> <p>There shall, however, be no load on the dividends so reinvested.</p>
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		<p><b>Transfer of Income Distribution cum Capital Withdrawal Plan</b></p> <p>Under this facility, the dividend declared in the Scheme, if any, can be transferred to any other open-ended scheme of the Fund (in existence at the time of declaration of dividend, as per the features of the respective scheme) at the Applicable NAV based prices. The amount to the extent of the dividend declared (net of the statutory levy, if any) will be automatically transferred out of this Scheme (source scheme) to the transferee scheme at the Applicable NAV based prices of the transferee scheme on the ex-IDCW date and equivalent units will be allotted. The details, including mode of holding, of unit holders in the transferee scheme will be as per the existing folio in the source scheme. Units in the transferee scheme will be allotted in the same folio.</p> <p>If the IDCW payable under the Transfer of Income Distribution cum Capital Withdrawal Plan is less than Rs.500 then the IDCW would be compulsorily reinvested in the existing option of the Scheme.</p> <p>If an investor opts for Transfer of Income Distribution cum Capital Withdrawal Plan, the investor must meet the minimum balance criterion in the target scheme and in the same folio; else the IDCW will be compulsorily re-invested in the source scheme.</p> <p>In case any of the record date falls on a non business day, the record date shall be the immediately following Business Day.</p> <p>All Units will rank pari passu, among Units within the same Option in each respective Plan under the Scheme, as to assets, earnings and the receipt of IDCW distributions, if any, as may be declared by the Trustee.</p> <p>The AMC, in consultation with the Trustee reserves the right to discontinue/ add more options / facilities at a later date subject to complying with the prevailing SEBI guidelines and Regulations.</p> <p>For detailed disclosure on default plans and options, kindly refer SAI.</p>
<b>XI.</b>	<b>Load Structure</b>	<p><b>Entry Load:</b> Not Applicable</p> <p>In accordance with clause 8.6 of SEBI Master Circular for Mutual Funds dated June 27, 2024, no entry load will be charged on purchase / additional purchase / switch-in/ SIP/ STP transactions. The upfront commission, if any, on investment made by the investor shall be paid by the Investor directly to the Distributor, based on the Investor's assessment of various factors including the service rendered by the Distributor.</p> <p><b>Exit Load:</b> 25% of the units allotted may be redeemed without any exit load, on or before completion of 12 months from the date of allotment of units. Any redemption in excess of such limit in the first 12 months from the date of allotment shall be subject to the following exit load:</p> <ul style="list-style-type: none"> <li>• 1% if redeemed or switched out on or before completion of 12 months from the date of allotment of units:</li> </ul>



		<ul style="list-style-type: none"> <li>• Nil if redeemed or switched out after completion of 12 months from the date of allotment of unit.</li> </ul> <p>For more details on Load Structure, please refer paragraph "Load Structure".</p>
<b>XII.</b>	<b>Minimum Application Amount/ switch in</b>	<p><b>During ongoing offer:</b></p> <ul style="list-style-type: none"> <li>• <b>Fresh Purchase (lumpsum):</b> Rs. 5,000/- and in multiples of Re. 1/- thereafter</li> <li>• <b>Systematic Investment Plan (SIP):</b> Rs. 500 and above: minimum 12 instalments.</li> </ul> <p>Two-Factor Authentication will be applicable for subscription as well as redemption transactions in the units of Mutual Fund.</p> <p>For more information, please refer SAI.</p>
<b>XIII.</b>	<b>Minimum Additional Purchase Amount</b>	Rs. 500/- and in multiples of Re. 1/- thereafter
<b>XIV.</b>	<b>Minimum Redemption /switch out amount</b>	There will be no minimum redemption criterion.
<b>XV.</b>	<b>Segregated portfolio /side pocketing disclosure</b>	<p>SEBI has, vide clause 4.4 of Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, permitted creation of segregated portfolio of debt and money market instruments by mutual funds schemes, in order to ensure fair treatment to all investors in case of a credit event / actual default of either the interest or principal amount (in case of unrated debt or money market instruments).</p> <p>The AMC may create segregated portfolio of debt and money market instruments in the scheme. For details, kindly refer SAI.</p>
<b>XVI.</b>	<b>Swing pricing disclosure</b>	Not Applicable
<b>XVII.</b>	<b>Stock lending/short selling</b>	The Scheme may engage in Securities Lending activity. The same shall be in accordance with clause 12.11 of the Master Circular on Mutual Funds dated June 27, 2024.
<b>XVIII.</b>	<b>How to Apply and other details</b>	<p>New investors can purchase units by using an application form, whereas, existing Unit holders may use transaction slip or application form. The application form/Transaction Slip for the Sale of Units of the respective Schemes/ Plans will be available and accepted at the office of the Investor Service Centres (ISCs) / Official Points of acceptance during their business hours on their respective business days. The same can also be downloaded from the website of the Mutual Fund viz. <a href="http://www.samcomf.com">www.samcomf.com</a>.</p> <p>Further details provided in Section II.</p>
<b>XIX.</b>	<b>Investor services</b>	<p>Investors can lodge any service request or complaints or enquire about NAVs, Unit Holdings, etc. by calling the Investor line of the AMC at "1800 1034757" (toll-free number) and additional contact number +91 63572 22000 from 9.30 am to 6.00 pm (Monday to Friday) (at local call rate for enquiring at AMC ISC's) or email – <a href="mailto:mfassist@samcomf.com">mfassist@samcomf.com</a>.</p> <p>Any complaints should be addressed to Mr. Sadath Ali Khan who has been appointed as the Investor Relations Officer and can be contacted at:</p>

		<p><b>Address:</b> Samco Asset Management Private Limited 1003 – A, Naman Midtown, Senapati Bapat Marg, Prabhadevi, Mumbai – 400 013 Phone no.: +91 63572 22000.</p> <p>If not satisfied with the response of the intermediary you can lodge your grievances with SEBI at <a href="http://scores.gov.in">http://scores.gov.in</a> or you may also write to any of the offices of SEBI. For any queries, feedback or assistance, please contact SEBI Office on Toll Free Helpline at 1800 22 7575 / 1800 266 757.</p> <p>For any grievances with respect to transactions through BSE StAR and / or NSE MFSS, the investors / Unit Holders should approach either the stock broker or the investor grievance cell of the respective stock exchange.</p>
<b>XX.</b>	<b>Special product/facility available on ongoing basis</b>	<p><b>Stock Exchange Infrastructure Facility:</b> The investors can subscribe to the Units of the Scheme through Mutual Fund Service System ("MFSS") platform of National Stock Exchange and "BSEStAR MF" platform of Bombay Stock Exchange Ltd.</p> <p><b>MF Utility (MFU):</b> Investor can also subscribe to the Units of the Scheme through MFU which allows transacting in multiple Schemes of various Mutual Funds with a single form / transaction request and a single payment instrument / instruction. The list of Point of Services of MFUI is published on the website of MFUI at "<a href="http://www.mfuindia.com/">http://www.mfuindia.com/</a>" and may be updated from time to time.</p> <p>Further, Systematic Investment Plan (SIP) / Systematic Withdrawal Plan (SWP) / Systematic Transfer Plan (STP) facilities would be available to the investors. For further details of above special products / facilities, investors/ unit holders are kindly requested to refer SAI.</p>
<b>XXI.</b>	<b>Weblink</b>	<p>The Total Expense Ratio shall be made available to the investors on the website of the AMC at link: <a href="https://www.samcomf.com/total-expense-ratio">https://www.samcomf.com/total-expense-ratio</a></p> <p>The scheme factsheet shall be made available to the investors on the website of the AMC at link: <a href="https://www.samcomf.com/downloads">https://www.samcomf.com/downloads</a></p>



## **DUE DILIGENCE BY THE ASSET MANAGEMENT COMPANY**

It is confirmed that:

1. 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.
2. 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.
3. 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.
4. 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.
5. The contents of the Scheme Information Document including figures, data, yields etc. have been checked and are factually correct.
6. 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.
7. 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.
8. The Trustees have ensured that the Samco Dynamic Asset Allocation Fund approved by them is a new product offered by Samco Mutual Fund and is not a minor modification of any existing scheme/fund/product.

Place: Mumbai  
Date: May 29, 2025

Signed : Sd/-  
Name : **C. Balasubramanian**  
Designation: Company Secretary & Compliance Officer

## II – INFORMATION ABOUT THE SCHEME

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

Under normal circumstances, the asset allocation pattern will be as follows:

Instruments	Indicative allocations (% of net assets)	
	Minimum	Maximum
Equity & Equity related instruments including derivatives	0%	100%
Debt and Money Market Instruments, including Units of Debt oriented mutual fund schemes	0%	100%

The Scheme may also take exposure to

- Investment in Equity Derivatives upto 100% for the purpose of hedging and portfolio balancing. Further, in case of other than hedging purpose, the scheme shall not exceed 50% of net assets. For example, if the scheme uses 50% of net assets for hedging purpose then the scheme shall use other 50% for other than hedging purpose and if the scheme uses 100% of net assets for hedging purpose then the scheme shall not use any exposure for other than hedging purpose. The Scheme may invest in fixed income derivatives instruments to the extent of 50% of the permissible allocation to debt assets permitted by the Regulations, including for the purpose of hedging and portfolio balancing, based on the opportunities available and subject to guidelines issued by SEBI from time to time.
- Investment in ADR / GDR / Foreign equity shall be upto 35% of total assets in accordance with the guidelines stipulated by SEBI and RBI from time to time.
- A maximum of 20% of net assets may be deployed in securities lending and the maximum single party exposure may be restricted to 5% of net assets outstanding at any point of time.
- Securitized debt up to 35% of the net assets of the scheme. However, in accordance with clause 12.3 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, investment in the following instruments shall not exceed 10% of the debt portfolio of the Scheme and the group exposure in such instruments shall not exceed 5% of the debt portfolio of the Scheme:
  - Unsupported rating of debt instruments (i.e. without factoring-in credit enhancements) is below investment grade; and
  - Supported rating of debt instruments (i.e. after factoring-in credit enhancement) is above investment grade.

The Scheme may invest in other scheme(s) under the same AMC or any other mutual fund without charging any fees, provided that aggregate inter-scheme investment made by all Schemes under the same AMC or in Schemes under the management of any other asset management shall not exceed 5% of the net asset value of the Mutual Fund. Further, the Scheme shall not invest in any fund of funds scheme.

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

S.no	Type of Instrument	Percentage of exposure (% of total assets)	Circular references
1.	Equity Derivatives for non-hedging purposes	Upto 50%	Para 12.25 of SEBI Master Circular on Mutual Funds dated June 27, 2024
2.	Debt Derivative	Upto 50%	Para 12.25 of SEBI Master Circular on Mutual Funds dated June 27, 2024
3.	ADR / GDR / Foreign Equity	Upto 35%	Para 12.19 of SEBI Master Circular on Mutual Funds dated June 27, 2024

S.no	Type of Instrument	Percentage of exposure (% of total assets)	Circular references
4.	Securities Lending and borrowing	Upto 20%	Para 12.11 of SEBI Master Circular on Mutual Funds dated June 27, 2024
5.	Securitized Debt	Upto 35%	Para 12.15 of SEBI Master Circular on Mutual Funds dated June 27, 2024
6.	Debt instruments with Credit enhancement/ structured obligations	Upto 10%	Para 12.3 of SEBI Master Circular on Mutual Funds dated June 27, 2024
7.	Units of mutual Fund schemes	Upto 35%	Clause 4 of the Seventh Schedule of SEBI (Mutual Funds) Regulations, 1996

The scheme will not invest in following securities:

S.no	Type of Instrument
1.	Overseas Mutual Funds
2.	Units issued by REITs and InvITs
3.	Commodity derivatives
4.	Repo transactions in Corporate debt securities
5.	Credit Default Swap transactions
6.	Short Selling in debt instruments
7.	Debt instruments with special features (AT1 and AT2 Bonds)

The cumulative gross exposure through equity, debt, foreign securities, derivative positions (including fixed income derivatives), other permitted securities/assets and such other securities/ assets as may be permitted by SEBI 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.

However, cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure in line with clause 12.25 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024. Further, SEBI vide letter dated November 3, 2021, has clarified that Cash Equivalent shall consist of Government Securities, T-Bills and Repo on Government Securities.

Pending deployment of funds of the Scheme, in securities in terms of the investment objective, and for margin purposes, the AMC may park the funds of the Scheme in short term deposits of scheduled commercial banks, subject to the clause 12.16 of the SEBI Master Circular for Mutual Funds dated June 27, 2024, as amended from time to time.

#### Rebalancing due to Short Term Defensive Consideration:

Due to market conditions, the AMC may invest beyond the range set out in the asset allocation. Such deviations shall normally be for a short term and defensive considerations only in terms of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024. In the event of deviations, the fund manager will carry out rebalancing within 30 calendar days.

#### Timelines for Rebalancing of Portfolios in case of passive breach:

In the event of deviations from asset allocation due to passive breaches, the fund manager will carry out rebalancing within 30 business days. Where the portfolio is not rebalanced within 30 business days, justification for the same shall be placed before the Investment Committee and reasons for the same shall be recorded in writing. The

Investment committee, if so desires, can extend the timelines up to sixty (60) business days from the date of completion of mandated rebalancing period. In case the portfolio of scheme is not rebalanced within the extended timelines, AMC's shall not be permitted to launch any new scheme till the time the portfolio is rebalanced. Further, no exit load shall be levied to the investors who exiting the scheme.

Additionally, the AMC shall report the deviation to the Trustees at each stage. In case the AUM of deviated portfolio is more than 10% of the AUM of main portfolio of scheme, the AMC shall immediately disclose the same to the investors through SMS and email / letter including details of portfolio not rebalanced. Subsequently, the AMC shall also immediately communicate to investors through SMS and email / letter when the portfolio is rebalanced. Additionally, the AMC shall disclose the deviation from the mandated asset allocation to investors along with periodic portfolio disclosures as specified by SEBI from the date of lapse of mandated plus extended rebalancing timelines.

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

Subject to the SEBI Regulations, investment objective and the asset allocation pattern mentioned above, the Scheme may invest in various types of instruments including, but not limited to, any of the following:

- 1) Equity and equity-related Securities including but not limited to derivatives (stock futures/ index futures and other such permitted derivative instruments including options), equity warrants and convertible instruments.
- 2) ADRs/ GDRs issued by Indian or foreign companies
- 3) Equity of overseas companies listed on recognized stock exchanges overseas
- 4) Initial and follow-on public offerings for listing at recognized stock exchanges overseas
- 5) Debt instruments (both public and private sector) issued by banks / development financial institutions.
- 6) Money Market instruments permitted by SEBI including alternative investments for the call money market as may be provided by RBI to meet the liquidity requirements.
- 7) Securities created and issued by the Central and State Governments as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). State Government Securities (popularly known as State Development Loans or SDLs) are issued by the respective State Government in co-ordination with the RBI.
- 8) Debt instruments issued by Domestic Government Agencies and statutory bodies, which may or may not carry a Central / State Government guarantee.
- 9) Debt Instruments with Credit Enhancement / structured obligations.
- 10) Corporate Bonds of public sector or private sector undertakings.
- 11) Corporate debt and securities (of both public and private sector undertakings) including Bonds, Debentures, Notes, Strips, etc.
- 12) Tri-party Repo in Government Securities
- 13) Reverse Repo
- 14) Treasury Bill (T-Bill)
- 15) Non convertible debentures and bonds
- 16) Floating rate debt instruments
- 17) Tri-party Repo (TREPS) through CCIL
- 18) Investments in units of mutual fund schemes
- 19) Short Term Deposits for pending deployment
- 20) Such other securities as may be permitted from time to time and which are in line with the investment objectives of the Scheme.

The securities may be acquired through public offerings (IPOs), secondary market operations, auctions, open market operations, private placement, rights offers or negotiated deals. The Scheme may also enter into repurchase and reverse repurchase obligations in all securities held by it as per the guidelines and regulations applicable to such transactions.

## DEBT AND MONEY MARKETS IN INDIA

The Indian debt market is today one of the largest in Asia and includes securities issued by the Government (Central & State Governments), public sector undertakings, other government bodies, financial institutions, banks and corporates. Government and public sector enterprises are the predominant borrowers in the markets.

Securities in the debt market typically vary based on their tenure and rating. The major players in the Indian debt markets today are banks, financial institutions, mutual funds, insurance companies, primary dealers, trusts, pension funds and corporates. The Indian debt market is the largest segment of the Indian financial markets. The debt market comprises broadly two segments, viz. Government Securities market or G-Sec market and corporate debt market. The latter is further classified as market for PSU bonds and private sector bonds.

The Government Securities market is the oldest and the largest component of the Indian debt market in terms of market capitalization, outstanding securities and trading volumes. The G-Sec market plays a vital role in the Indian economy as it provides the benchmark for determining the level of interest rates in the country through the yields on the Government Securities which are referred to as the risk-free rate of return in any economy. Over the years, there have been new products introduced by the RBI like zero coupon bonds, floating rate bonds, inflation indexed bonds, etc. The corporate bond market, in the sense of private corporate sector raising debt through public issuance in capital market, is only an insignificant part of the Indian Debt Market. A large part of the issuance in the non-Government debt market is currently on private placement basis.

The money markets in India essentially consist of the call money market (i.e. market for overnight and term money between banks and institutions), reverse repo transactions (temporary buy with an agreement to sell the securities at a future date at a specified price), commercial papers (CPs, short term unsecured promissory notes, generally issued by corporates), certificate of deposits (CDs, issued by banks) and Treasury Bills (issued by RBI) and similar securities. In a predominantly institutional market, the key money market players are banks, financial institutions, insurance companies, mutual funds, primary dealers and corporates. In money market, activity levels of the Government and non government debt vary from time to time.

Apart from these, there are some other options available for short tenure investments that include MIBOR linked debentures with periodic exit options and other such instruments. PSU / DFI / Corporate paper with a residual maturity of less than 1 year are actively traded and offer a viable investment option.

Following table exhibits various debt instruments along with current yields as on May 21, 2025.

Instrument	Yield Range (% per annum)
Tri – Party Repo	5.62
91 days T-Bill	5.71
182 days T-Bill	5.71
364 days T-Bill	5.72
91 days CD	6.20
91 days CP	6.25
182 days CD	6.60
182 days CP	6.65
365 days CD	6.57
365 days CP	6.62
10 years G-sec	6.21

(Source: Bloomberg, NDS OM and CCIL)

These yields are indicative and do not indicate yields that may be obtained in future as interest rates keep changing

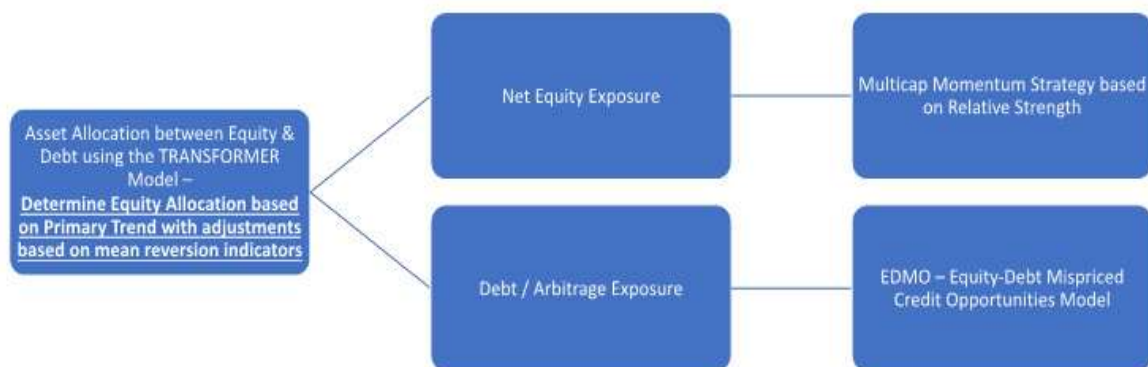
consequent to changes in macro-economic conditions and RBI policy. The price and yield on various debt instruments fluctuate from time to time depending upon the macro economic situation, inflation rate, overall liquidity position, foreign exchange scenario etc. Also, the price and yield vary according to maturity profile, credit risk etc.

### C. WHAT ARE THE INVESTMENT STRATEGIES?

The Scheme will dynamically allocate its net assets to equity and equity related securities and debt instruments.

The portfolio construct & asset allocation of the fund shall vary from 0% Net Equity – 100% Debt or 100% Net Equity – 0% Debt based on SAMCO's proprietary TRANSFORMER model.

## Investment Strategy of Samco Dynamic Asset Allocation Fund

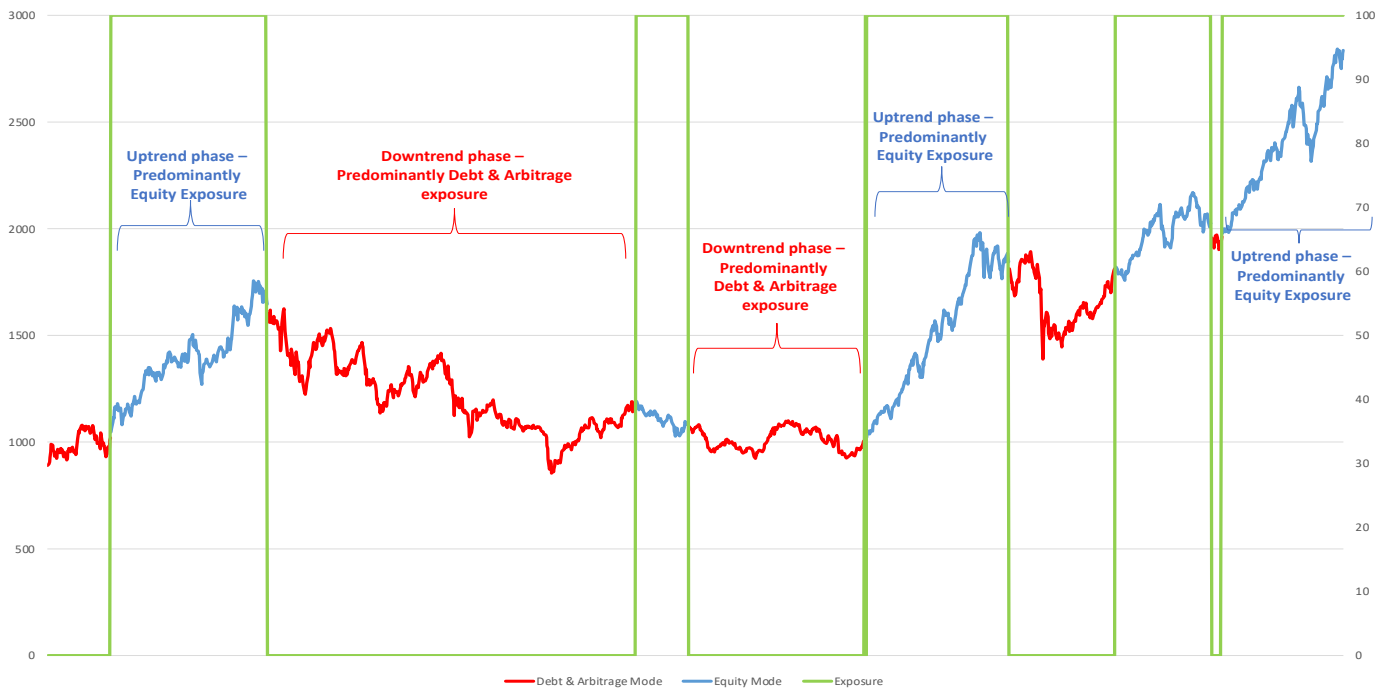


The gross equity and equity related exposure would be normally maintained between 65%-100%, the net equity exposure can be brought down below 65% all the way to 0% through various derivative strategies to protect downside in volatile times. The equity exposure is thus dynamically managed and is increased when various factors are favourable towards equity as an asset class or is brought down when the factors are not favourable. The TRANSFORMER asset allocation model also has built-in trailing stop loss systems to cut risks and equity exposure to minimize drawdown in corrections and bear markets. Subject to the Regulations and the applicable guidelines, the Scheme may engage in Stock Lending activities.

The principal asset allocation of the fund shall be determined based on momentum in equity markets and extreme mean reversion signals which shall be calculated using SAMCO's proprietary TRANSFORMER model. Fundamentally the scheme will operate based on trend following strategies i.e., when markets are in clear uptrends with lower volatility, equity allocations shall be higher and when markets are breaking down, in correction or bear market phases, net equity allocations shall be zero or at extremely low levels. Only in extremely panic or euphoric conditions, the scheme will move to mean reversion models and build equity exposure in bear markets or cut equity exposure in bull markets. Rebalancing based on the model shall happen on real time dynamic basis and will not follow a monthly/quarterly rebalancing model.

### An illustration of how the TRANSFORMER model will move from Equity to Debt & Arbitrage Strategies





T	Trends in Equity Markets	The Fundamental determinant of equity allocation shall be based on market trends. SAMCO's internal models divide the markets into 4 phases – Stage 1 – Consolidation & Accumulation, Stage 2 – Acceleration & Uptrends, Stage 3 – Distribution & Stage 4 – Downtrend or Decelerations. Net Equity Allocations shall be low to moderate in Stages 1, 3 and shall typically be higher in Stage 2. In Stage 4, Net Equity Allocations shall be near zero.
R	Rate Spread in Bond Yields	Credit Spreads between government bonds and low rated/ junk bonds are used to identify the risk appetite of the markets. Extreme readings act as mean reversion indicators to manage asset allocation
A	Averages such as SMA/EMA and deviation of price from averages thereof	It's useful to look at stock market levels compared to where they've been over the past few months. When the NIFTY is above its moving or rolling average of the prior 50/100/200 trading days, that's a sign of positive momentum and vice versa. This is used to understand the health of the trend.
N	Net new 52-week highs and lows	This shows the number of stocks on the NSE/BSE at 52-week highs compared to those at 52-week lows. When there are many more highs than lows, it implies that the market health is good and conducive for higher equity allocations & vice versa.
S	Stock Price Breadth & Volumes	This measure looks at the amount, or volume, of shares on the NSE/BSE that are rising compared to the number of shares that are falling.
F	Fed Funds Rates & Yield curve	The Federal Funds Rate, set by the Federal Reserve (the central bank of the United States), is the interest rate at which depository institutions lend reserve balances to other depository institutions overnight on an uncollateralized basis. The rate is a crucial component of the monetary policy, and its changes can have a significant impact on both debt and equity markets. The same is used in debt strategies for monitoring credit spreads, in equity strategies for computing discount rates and as a part of asset allocation model to compute the relative strength and attractiveness of debt & equity.
O	Options Volatility & VIX	The India VIX that is computed from the prices people are willing to pay for options on the Nifty, a group of important Indian stocks is an important indicator of the expected volatility in the markets. Typically, a

		VIX trending down implies stable markets and equity allocations can be higher and vice versa. Extreme readings on the VIX also act as mean reversion indicators for the model.
R	Relative Strength across Asset Classes & Securities	Within Asset Classes, relative strength i.e., near term performance shall be used to determine asset allocations between Large/Small/Mid-Caps and sectoral allocations.
M	Market Cap to GDP Valuations & Money Supply	The Market cap / GDP ratio is used as a mean reversion indicator to identify extreme levels of panic and euphoria.
E	Equity Earnings Yields	The Equity Earnings Yields & their ratio with bond yields are used to determine equity valuations compared and used as a mean reversion indicator. Extreme values on either end of the spectrum act as rebalance indicator for asset reallocation.
R	Rolling Returns on Trailing basis & Retail trading activity	Rolling returns on leading broad market indices & sectoral indices are used as mean reversion indicators. Extreme deviations from the mean act as indicators to reduce/increase allocations to equity.

### Equity & Equity Derivatives allocation:

Once the TRANSFORMER model determines the net Equity asset allocation levels, the equity allocation at a stock specific level shall be based on a multi-cap momentum strategy. Stocks shall be selected across market capitalizations i.e., Large Caps, Mid-Caps, Small Caps and Microcap companies using cross-sectional momentum, also known as relative strength, measures a stock's performance in comparison to other stocks. Stocks that rank high on relative momentum score shall form a part of the portfolio. The scheme may also invest in foreign securities including ADRs/GDRs, etc based on market conditions.

When the net Equity allocation as per the TRANSFORMER model falls below 65%, lower equity allocation shall be achieved by appropriate hedging strategies which reduce net equity exposure while maintaining a higher gross exposure.

### Debt Strategies:

The fixed income portion of the fund shall endeavor to generate stable returns by investing in debt & money market instruments across the yield curve & credit spectrum using the SAMCO's Equity-Debt Mispriced Credit Opportunities Model. An active management approach for credit & duration management shall be taken achieve diversification and balance risk and return objectives. The fund manager will seek to play out the yield curve and exploit anomalies if any in portfolio construction after analyzing the macro-economic environment including future course of system liquidity, interest rates and inflation along with other considerations in the economy and markets.

The fund also endeavours to take advantage of opportunities arising from the credit spectrum. Historically, the spread between AAA and AA is dynamic and changes over time. The fund manager can dynamically change the portfolio credit composition to take advantage of these opportunities.

The Equity-Debt Mispriced Credit Opportunities Model uses changes in equity prices of listed issuers as leading indicators for upgrade/downgrade credit events. We endeavour to avoid taking exposures where there is a risk of downgrade and take exposure in cases where we think there is a potential for an upgrade. The fund will aim to take advantage of these opportunities from credit spreads as well as potential from rating migrations.

The fund manager will try to allocate assets of the scheme between various fixed income instruments taking into consideration the prevailing interest rate scenario, the liquidity of the different instruments and maintain a diversified portfolio with the objective of achieving stable risk adjusted returns. While investing the fund manager will keep in mind the yield structure of different asset classes (e.g. the sovereign yield curve and the corporate bond yield curve) as well as kinks within a particular yield curve (e.g. the different points of the sovereign yield curve).

Though every endeavour will be made to achieve the objectives of the Scheme, the AMC/Sponsor/Trustees do not guarantee that the investment objectives of the Scheme will be achieved. No guaranteed returns are being offered

under the Scheme.

#### **Derivatives Strategy:**

The Scheme may invest in various derivative instruments. Derivatives will be used for the purpose of hedging, and portfolio balancing or such other purpose as may be permitted under the regulations and Guidelines from time to time. Such investments shall be subject to the investment objective and strategy of the Scheme and the internal limits if any, as laid down from time to time. These include but are not limited to futures (both stock and index) and options (stock and index), covered call, interest rate swaps like overnight indexed swaps (OIS), forward rate agreements, interest rate futures or such other Derivative instruments as may be permitted under the applicable regulations.

For detailed derivative strategies, please refer to SAI.

#### **PORTFOLIO TURNOVER**

The Scheme is an open-ended scheme. It is expected that there would be a number of subscriptions and redemptions on a daily basis. Consequently, it is difficult to estimate with any reasonable measure of accuracy, the likely turnover in the portfolio.

There may be an increase in transaction cost such as brokerage paid, if trading is done frequently. However, the cost would be negligible as compared to the total expenses of the Scheme. Frequent trading may increase the profits which will offset the increase in costs. The fund manager will endeavor to optimize portfolio turnover to maximize gains and minimize risks keeping in mind the cost associated with it. However, it is difficult to estimate with reasonable accuracy, the likely turnover in the portfolio of the Scheme. The Scheme has no specific target relating to portfolio turnover.

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

The Scheme performance would be benchmarked against **NIFTY50 Hybrid Composite Debt 50: 50 Index**

##### **Justification for use of benchmark**

The Scheme invests in both equity and debt using an active asset allocation approach to manage risk. NIFTY50 Hybrid Composite Debt 50:50 Index seeks to track the performance of portfolio having a blend of the 50% Equity and 50% Debt. NIFTY50 Hybrid Composite Debt 50:50 Index being the most appropriate of the available benchmarks reflecting the investible universe of the Scheme, is being used as a benchmark.

Further, as required under SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the benchmark has been selected from amongst those notified by AMFI as the first tier benchmark to be adopted by mutual funds and which are reflective of the category of the scheme.

The Trustee/AMC reserves the right to change the benchmark for the evaluation of the performance of the Scheme from time to time, keeping in mind the investment objective of the Scheme and the appropriateness of the benchmark, subject to SEBI guidelines and other prevalent guidelines.

#### **E. WHO MANAGES THE SCHEME?**

The fund is jointly managed by Mr. Umeshkumar Mehta, Mrs. Nirali Bhansali and Mr. Dhawal Ghanshyam Dhanani.

Their details are as follows:

Name & Designation & Tenure in managing scheme	Age / Educational Qualifications	Experience of the Fund Manager	Names of other schemes under their management
<p>Mr. Umeshkumar Mehta</p> <p>Director, CIO &amp; Fund Manager</p> <p><b>Tenure in managing scheme:</b> Since inception (28-Dec-2023)</p>	<p>Age: 50 years</p> <p>B. Com, CA, MBA</p>	<p>Mr. Umeshkumar Mehta has over 26 years of experience in Indian Capital Markets. His role involves overseeing investment strategies and managing assets across diverse portfolios. He has profound knowledge of financial markets, believes in data driven approach to investments and draws lessons from financial markets histories. He used to lead the Samco group's Research team. He has been associated with the group for the last fifteen years. He is an CA and MBA by qualification.</p>	<p>Samco Flexi Cap Fund, Samco ELSS Tax Saver Fund, Samco Overnight Fund, Samco Active Momentum Fund, Samco Special Opportunities Fund, Samco Multi Cap Fund, Samco Arbitrage Fund, Samco Multi Asset Allocation Fund and Samco Large Cap Fund.</p>
<p>Mrs. Nirali Bhansali</p> <p>Fund Manager</p> <p><b>Tenure in managing scheme:</b> Since February 19, 2025</p>	<p>Age:35 years</p> <p>B.E., MBA</p>	<p>Mrs. Nirali Bhansali has over 11 years of work experience with more than 8 years spanning capital markets and investment research. Her deep understanding of fundamental analysis has enabled her to provide cutting edge insights in conceptualizing and developing Samco Mutual Fund's proprietary research and Investment technology product – The HexaShield Framework. She believes in the “Buy Right Sit Tight” philosophy and her endeavour is to generate long term wealth for her investors through the Funds. She is a regular panelist on media &amp; business news channels such as Bloomberg Quint, Money9 Live, CNBC TV18 etc.</p> <p>She has completed her Engineering, MBA, CFA level 2 at first attempts. With a strong background in Finance and passion for Stock Markets, Nirali has always aimed at being the best at whatever she does and believes in cracking the code to become a value creator. Prior to joining Samco Asset Management Private Limited, she was associated with various companies i.e. Samco Securities Limited, Aranca India Private Limited and STG Heating Private Limited.</p>	<p>Samco Flexi Cap Fund, Samco ELSS Tax Saver Fund, Samco Overnight Fund, Samco Active Momentum Fund, Samco Special Opportunities Fund, Samco Multi Cap Fund, Samco Arbitrage Fund, Samco Multi Asset Allocation Fund and Samco Large Cap Fund.</p>
<p>Mr. Dhawal Ghanshyam Dhanani,</p> <p>Fund Manager</p> <p><b>Tenure in managing scheme:</b> Since inception (28-Dec-2023)</p>	<p>Age:30 years</p> <p>B.Com, C.A.</p>	<p>Mr. Dhawal Ghanshyam Dhanani started out as an equity research analyst at Samco Securities Ltd. He has around 7 years of work experience with more than 5 years spanning capital markets and investment research and has been known for in-depth examination into the business models and computational crux of varied Indian companies. His multi-disciplinary approach and working knowledge of fundamentals have aided the prime objective of guiding investors through</p>	<p>Samco Flexi Cap Fund, Samco ELSS Tax Saver Fund, Samco Overnight Fund, Samco Active Momentum Fund, Samco Special Opportunities Fund, Samco Multi Cap Fund, Samco Arbitrage Fund, Samco Multi Asset Allocation Fund and Samco Large Cap Fund.</p>

Name & Designation & Tenure in managing scheme	Age / Educational Qualifications	Experience of the Fund Manager	Names of other schemes under their management
		insightful ideas for the long term.	

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

The existing schemes of the Mutual fund are as stated below:

Scheme Name	Scheme Category
Samco Flexi Cap Fund	Flexi Cap Fund
Samco Multi Cap Fund	Multi Cap Fund
Samco Large Cap Fund	Large Cap Fund
Samco ELSS Tax Saver Fund	ELSS
Samco Active Momentum Fund	Thematic Funds
Samco Special Opportunities Fund	Thematic Funds
Samco Dynamic Asset Allocation Fund	Dynamic Asset Allocation
Samco Multi Asset Allocation Fund	Multi Asset Allocation Fund
Samco Overnight Fund	Overnight Fund
Samco Arbitrage Fund	Arbitrage Fund

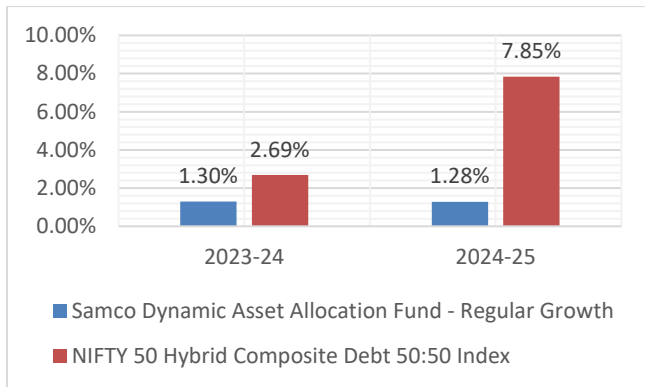
For detailed comparative table of the aforesaid schemes, please click here: <https://www.samcomf.com/StatutoryDisclosure>

#### G. HOW HAS THE SCHEME PERFORMED?

Performance of Samco Dynamic Asset Allocation Fund – Regular Plan - Growth as at April 30, 2025 is as follows:

Period	Samco Dynamic Asset Allocation Fund- Regular Plan- Growth	NIFTY 50 Hybrid Composite Debt 50:50 Index
Returns for the last 1 year	-1.67%	9.98%
Returns for the last 3 years	---	---
Returns for the last 5 years	---	---
Returns Since Inception (28 Dec 2023)	0.15%	10.00%

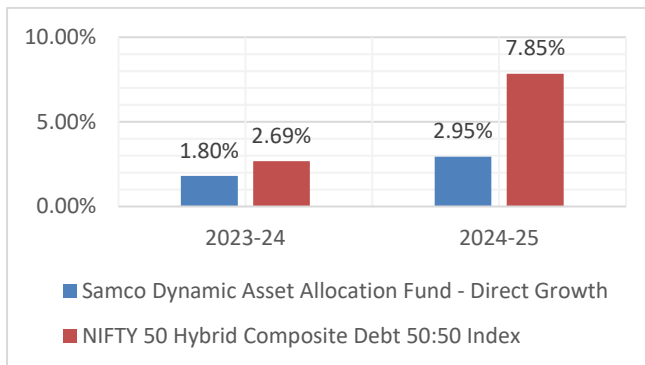
#### Absolute Returns for each Financial Year for the last Five years – Regular Plan



**Performance of Samco Dynamic Asset Allocation Fund – Direct Plan - Growth as at April 30, 2025 is as follows**

Period	Samco Dynamic Asset Allocation Fund- Direct Plan- Growth	NIFTY 50 Hybrid Composite Debt 50:50 Index
Returns for the last 1 year	0.00%	9.98%
Returns for the last 3 years	---	---
Returns for the last 5 years	---	---
Returns Since Inception (28 Dec 2023)	1.86%	10.00%

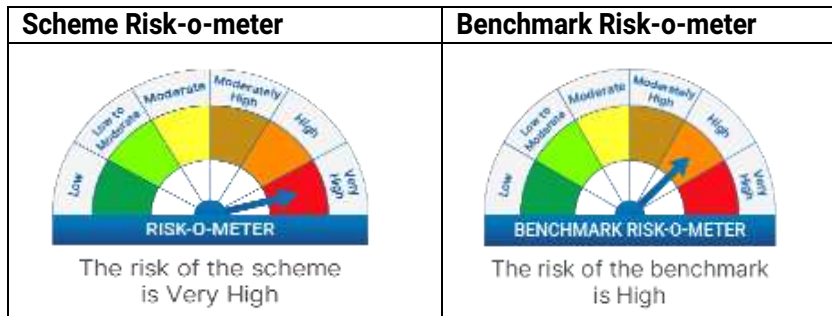
#### **Absolute Returns for each Financial Year for the last Five years – Direct Plan**



*Past performance may or may not be sustained in future and should not be used as a basis of comparison with other investments. Since inception returns of the scheme is calculated on face value of Rs. 10 invested at inception. Different Plans i.e. Regular Plan and Direct Plan under the scheme has different expense structure.*

*Note: Returns are absolute for period less than 1 year. Returns are compounded annualized for period more than or equal to 1 year. The returns are based on growth option NAVs. \*The data is as on April 30, 2025. The benchmark for the Scheme is NIFTY 50 Hybrid Composite Debt 50:50 Index TRI. In case, the start date or the end date of the concerned period is a non-business day, the NAV of the previous business day is considered for computation of returns.*





## H. ADDITIONAL SCHEME RELATED DISCLOSURES

### i. Scheme's portfolio holdings (top 10 holdings by issuer and fund allocation towards various sectors) as on April 30, 2025 –

Please refer the below weblink for detailed description:

<https://www.samcomf.com/downloads>

### ii. Functional website link for Portfolio Disclosure - Fortnightly / Monthly/ Half Yearly

Please visit <https://www.samcomf.com/StatutoryDisclosure> to obtain Scheme's latest monthly portfolio holding statement.

### iii. Portfolio Turnover Rate –8.99 times

### iv. Aggregate investment in the Scheme by Concerned scheme's Fund Manager(s):

S. No.	Category of Persons	Net Value		Market Value (in Rs.)
		Units	NAV per unit	
	<b>Concerned scheme's Fund Manager(s)</b>			
1.	Mr. Umesh Kumar Mehta	1,990	11.31	22,506
2.	Mrs. Nirali Bhansali	1,937	11.31	21,918
3.	Mr. Dhawal Dhanani	1,393	11.31	15,765
	<b>Total</b>	<b>5,321</b>	<b>11.31</b>	<b>60,190</b>

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

### v. Investments of AMC in the Scheme – Pursuant to Regulation 25(16A) of the SEBI (MF) Regulations, 1996 and para 6.9 of SEBI Master Circular on Mutual Funds dated June 27, 2024, the AMC will invest minimum amount as a percentage of AUM based on the risk associated with the Scheme and such investment will not be redeemed unless the Scheme is wound up. The AMC will conduct quarterly review to ensure compliance with above requirement which may change either due to change in value of the AUM or in the risk value assigned to the scheme. The shortfall in value of the investment, if any, will be made good within 7 days of such review.

In addition to investments as mandated under Regulation 25(16A) of the Regulations as mentioned above, the AMC may invest in the scheme during the continuous offer period subject to the SEBI (Mutual Funds) Regulations. As per the existing SEBI (Mutual Funds) Regulations, the AMC will not charge investment management and advisory fee on the investment made by it in the scheme. The Sponsor, Trustee and their associates may invest in the scheme on an ongoing basis subject to SEBI (Mutual Funds) Regulations & circulars issued by SEBI from time to time. In addition,

the funds managed by the sponsors, Samco Group may invest in the Scheme. The details are provided on [www.samcomf.com](http://www.samcomf.com).

In addition, the funds managed by the sponsors, Samco Group may invest in the Scheme. The details are provided on [www.samcomf.com](http://www.samcomf.com).

- vi. Risk-o-meter shall be evaluated on a monthly basis and the Risk-o-meter shall be disclosed along with portfolio disclosure on AMC's website and on AMFI website within 10 days from the close of each month.
- vii. Scheme Summary Document (SSD) shall be updated on a Monthly basis or on changes in any specified fields, whichever is earlier. The same shall be uploaded on websites of the AMC, AMFI and stock exchanges.

### III. OTHER DETAILS

#### A. COMPUTATION OF NAV

The Net Asset Value (NAV) per Unit under the Scheme will be computed by dividing the net assets of the Scheme by the number of Units outstanding on the valuation day. The Mutual Fund will value its investments according to the valuation norms, as specified in Schedule VIII of the SEBI (MF) Regulations, or such norms as may be specified by SEBI from time to time.

The Net Assets Value (NAV) of the Units under the Scheme shall be calculated as shown below:

<b>NAV =</b>	Market Value of the scheme's investments + other assets (including accrued interest) - all liabilities except unit capital & reserves
<b>(Rs. Per unit)</b>	Number of units outstanding at the end of the day

For example, if the net assets of the Scheme are Rs.149,36,40,000 and units outstanding are 100,00,000, then the NAV per unit will be computed as follows:  $149,36,40,000 / 10,00,00,000 = \text{Rs. } 14.94$  per unit. (rounded off to two decimals).

The NAV shall be calculated up to two decimal places. However, the AMC reserves the right to declare the NAVs up to additional decimal places as it deems appropriate. Separate NAV will be calculated and disclosed for each Plan / Option. The NAVs of the Growth Option and the Income Distribution cum Capital Withdrawal Option under each Plan will be different after the declaration of the first IDCW.

The NAVs will be calculated and disclosed on all the Business Days.

While determining the price of the units, the mutual fund shall ensure that the repurchase price of an open ended scheme is not lower than 95 per cent of the Net Asset Value.

Valuation of the scheme's assets, calculation of the scheme's NAV and the accounting policies & standards will be subject to such norms and guidelines that SEBI may prescribe from time to time. For the detailed Valuation Policy and the accounting policy of the AMC, please refer the Statement of Additional Information.

For other details such as policies w.r.t computation of NAV, rounding off, investment in foreign securities, procedure in case of delay in disclosure of NAV etc. refer to SAI.

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

These expenses are incurred for the purpose of various activities related to the NFO like sales and distribution fees paid marketing and advertising, Registrar & Transfer Agent expenses, printing and stationery, bank charges etc. The Scheme, being an open-ended scheme, the NFO expenses shall be borne by the AMC/Sponsor.

#### C. ANNUAL SCHEME RECURRING EXPENSES

These are the fees and expenses for operating the Scheme. These expenses include Investment Management and Advisory Fee charged by the AMC, Registrar and Transfer Agents' fee, marketing and selling costs etc. as given in

the table below:

The AMC has estimated that upto 2.25% of the daily net assets of the scheme will be charged to the scheme as expenses. For the actual Annual Scheme Recurring expenses currently being charged, the investor should refer to the website of the Mutual Fund at <https://www.samcomf.com/total-expense-ratio>

S.no	Expenses Head	(% of Daily Net Assets (Estimated p.a.)
i.	Investment Management & Advisory Fee	Upto 2.25%
ii.	Audit fees/fees and expenses of trustees	
iii.	Custodial Fees	
iv.	Registrar & Transfer Agent Fees including cost of providing account statements / IDCW, redemption cheques/ warrants	
v.	Marketing & Selling Expenses including Agents Commission and statutory advertisement	
vi.	Costs related to investor communications	
vii.	Costs of fund transfer from location to location	
viii.	Cost towards investor education & awareness	
	Goods & Services Tax on expenses other than investment and advisory fees	
ix.	Other Expenses (to be specified as per Reg 52 of SEBI MF Regulations)	Upto 0.12% / 0.05%
xi.	Brokerage and transaction cost, including Goods & Service Tax, under Regulation 52 (6A)(a)	
xii.	Goods and Service Tax on investment and advisory fees	At actual
<b>A.</b>	<b>Maximum total expense ratio (TER) permissible under Regulation 52 (6) (c)</b>	<b>Upto 2.25%</b>
B.	Additional expenses under regulation 52(6A) (c)	Upto 0.05%
C.	Additional expenses for gross new inflows from specified cities	Upto 0.30%

The recurring expenses of the Scheme (including the Investment Management and Advisory Fees) shall be as per the limits prescribed under the SEBI (MF) Regulations. These are as follows:

**(I) Recurring expenses including the investment management and advisory fee:**

Assets under management Slab (In ₹ crore)	Total expense ratio limits
On the first ₹ 500 crores of the daily net assets	2.25%
On the next ₹ 250 crores of the daily net assets	2.00%
On the next ₹ 1250 crores of the daily net assets	1.75%
On the next ₹ 3000 crores of the daily net assets	1.60%
On the next ₹ 5000 crores of the daily net assets	1.50%
On the next ₹ 40,000 crores of the daily net assets	Total expense ratio reduction of 0.05% for every increase of ₹ 5,000 crores of daily net assets or part thereof.
On the balance of the assets	1.05%

**(II) In addition to the above, the following costs or expenses may be charged to the Scheme, as per sub regulation 52(6A) namely-**

- brokerage and transaction costs which are incurred for the purpose of execution of trade up to 0.12 per cent of trade value in case of cash market transactions and 0.05 per cent of trade value in case of derivatives transactions.
- expenses not exceeding 0.30% of daily net assets, if the new inflows from retail investors from such cities as specified by SEBI from time to time are at least - (i) 30% of gross new inflows in the scheme, or; (ii) 15% of the average assets under management (year to date) of the scheme, whichever is higher.

Provided that if inflows from retail investors from such cities are less than the higher of (i) or (ii) above, such expenses on daily net assets of the scheme shall be charged on proportionate basis.

Provided further that expenses charged under this clause shall be utilised for sales, marketing and distribution expenses incurred for bringing inflows from such cities.

Provided further that amount incurred as expense on account of inflows from retail investors from such cities shall be credited back to the scheme in case the said inflows are redeemed within a period of one year from the date of investment.

These expenses are in abeyance with effect from March 1, 2023 till further instructions from SEBI.

- (c) additional expenses not exceeding 0.05% of daily net assets of the scheme towards various permissible expenses.

Provided that such additional expenses shall not be charged to the schemes where the exit load is not levied or applicable.

Any expenditure in excess of the limits specified in sub-regulations 52 (6) and 52 (6A)] shall be borne by the asset management company or by the trustee or sponsors.

**(III) The AMC may charge Goods and service tax on investment and advisory fees to the Scheme in addition to the maximum limit of annual recurring expenses as prescribed in Regulation 52. Further, the below mentioned expenses and charges shall be borne by the Scheme within the maximum limit of annual recurring expenses as prescribed in Regulation 52.**

- Goods and Service tax on expenses other than investment and advisory fees; and,
- brokerage and transaction costs (including Goods and service tax) incurred for the purpose of execution of trade in excess of 0.12% in case of cash market transactions, and 0.05% in case of derivatives transactions, if any.

**Note:**

- These estimates have been made in good faith as per the information available and estimates made by the Investment Manager/ AMC and are subject to change inter-se or in total subject to prevailing Regulations.
- The expenses towards Investment Management and Advisory Fees under Regulation 52(2) and the various sub-heads of recurring expenses mentioned under Regulation 52(4) of SEBI (MF) Regulations are apportionable without any internal cap in nature. Thus, there shall be no internal sub-limits within the expense ratio for expense heads mentioned under Regulation 52 (2) and (4) respectively. Further, the additional expenses under Regulation 52(6A) (c) may be incurred either towards investment & advisory fees and/or towards other expense heads as stated above.
- All fees and expenses charged in a Direct Plan (in percentage terms) under various heads including the investment and advisory fee shall not exceed the fees and expenses charged under such heads in Regular Plan. Direct Plan shall have a lower expense ratio excluding distribution expenses, commission, etc. and no commission for distribution of Units will be paid/ charged under Direct Plan.

**Please refer the illustration given below in this regard:**

Particulars	Regular Plan	Direct Plan
Amount Invested at the beginning of the year (in Rs.)	10,000	10,000
Returns before Expenses (in Rs.)	1,500	1,500
Expenses other than Distribution Expenses (in Rs.)	150	150
Distribution Expenses (in Rs.)	50	-
Returns after Expenses at the end of the Year(in Rs.)	1,300	1,350

Any circular/clarification issued by SEBI in regard to expenses chargeable to the Scheme/Plan(s) will automatically become applicable and will be incorporated in the SID/SAI/KIM accordingly.

The mutual fund would update the current expense ratios on its website ([www.samcomf.com](http://www.samcomf.com)) at least three working days prior to the effective date of the change. Investors can refer 'Total Expense Ratio of Mutual Fund Schemes'

section on <https://www.samcomf.com/total-expense-ratio> for Total Expense Ratio (TER) details.

### Illustration of impact of expense ratio on scheme's returns

For any scheme, NAV is computed on a daily basis factoring in all the assets as well as liabilities of the Scheme (including expenses charged). Expenses charged to the Scheme bring down its NAV and hence the investor's net returns on a corresponding basis.

Illustration of expenses and impact on the return	
Opening NAV Per Unit for the Day (a)	10.0000
Closing NAV Per Unit for the Day (b)	11.0000
NAV Movement Per Unit (c = a - b)	1.0000
Flat Return for the Day after expenses ( d = (c / a) %)	10.00%
TER % (e)	2.00%
Expenses for the Day (f = (b * e)/365)	0.0006
Expenses for the Day % (g = (f / b) %)	0.0055%
Flat Return prior to expenses for the Day (h = d + g)	10.0055%

#### Please Note:

The above illustration is purely given to explain the impact of the expense ratio on a scheme's return and should not be construed as an indicative return of the scheme.

Any tax impact has not been considered in the above example, in view of the individual nature of the tax implications. Each investor is advised to consult his or her own financial advisor.

### D. LOAD STRUCTURE

Load is an amount which is presently paid by the investor to redeem the Units from the Scheme. This amount net of Goods & Services Tax will be credited back to the Scheme. Load amounts are variable and are subject to change from time to time. For the current applicable structure, investors may refer to the website of the AMC ([www.samcomf.com](http://www.samcomf.com)) or may call at 18001034757 (toll-free numbers) or additional contact number +91 63572 22000 from 9.30 am to 6.00 pm (Monday to Friday).

Pursuant to SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, there shall be no entry Load for all Mutual Fund Schemes.

Type of Load	Load chargeable (as %age of NAV)
Entry Load	Not Applicable
Exit Load	<p>25% of the units allotted may be redeemed without any exit load, on or before completion of 12 months from the date of allotment of units. Any redemption in excess of such limit in the first 12 months from the date of allotment shall be subject to the following exit load:</p> <ul style="list-style-type: none"> <li>i. 1% if redeemed or switched out on or before completion of 12 months from the date of allotment of units.</li> <li>ii. Nil, if redeemed or switched out after completion of 12 months from the date of allotment of unit.</li> </ul>

The load structure will be equally applicable to all special products offered under the schemes such as SIP, STP, etc. However, no load will be applicable for switches between the plans under the scheme.

The entire exit load (net of GST), charged, if any, shall be credited to the scheme. The Investor is requested to check the prevailing Load structure of the Scheme before investing.

Pursuant to SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, there shall be



no entry Load for all Mutual Fund Schemes.

For any change in Load structure AMC will issue an addendum and display it on the website/Investor Service Centers.

Under the Scheme, the AMC/Trustee reserves the right to change / modify the Load structure if it so deems fit in the interest of smooth and efficient functioning of the Mutual Fund. The AMC/Trustee reserves the right to introduce / modify the Load depending upon the circumstances prevailing at that time subject to maximum limits as prescribed under the Regulations.

The Redemption Price however, will not be lower than 95% of the NAV. Any imposition or enhancement of Load in future shall be applicable on prospective investments only. The difference between the Redemption price and Sale price at any point in time shall not exceed the permitted limit as prescribed by SEBI from time to time which is presently 5% calculated on the Sale Price.

#### **At the time of changing the Load Structure:**

- i. An Addendum detailing the changes will be attached to Scheme Information Document and Key Information Memorandum. The addendum may be circulated to all the distributors / brokers so that the same can be attached to all Scheme Information Documents and Key Information Memorandum already in stock.
- ii. The addendum will be displayed on the website of the AMC and arrangements will be made to display the addendum in the form of a notice in all the Investor Service Centres and distributors / brokers' office.
- iii. The introduction of the Exit Load along with the details may be stamped in the acknowledgement slip issued to the Investors on submission of the application form and may also be disclosed in the statement of accounts issued after the introduction of such Load.
- iv. Any other measure which the Mutual Fund may consider necessary.

The Trustee/AMC reserves the right to change the load structure subject to the limits prescribed under the Regulations. Any change in load structure shall be only on a prospective basis i.e. any such changes would be chargeable only for Redemptions from prospective purchases (applying first in first out basis).

#### **Methodology of calculation of Exit Load and Redemption Amount:**

**Exit Load:** 1% if units are redeemed or switched out on or before completion of 12 months from the date of allotment of units. Nil if units are redeemed or switched out after completion of 12 months from the date of allotment of units.

**Amount invested on Jan 01 2024 and Applicable NAV:** Rs. 5,000 @ Rs. 10 per unit;

**No. of units Allotted on Jan 01 2024:** 500

**Amount invested on Feb 01 2024 and Applicable NAV:** Rs. 11,000 @ Rs. 11 per unit

**No. of units Allotted on Feb 01, 2024:** 1000

**Units redeemed on Jan 02, 2025:** 700

**Applicable NAV on Jan 02, 2025:** Rs. 12 per unit

**Exit Load Calculation Methodology (on First-in First Out (FIFO) basis) for the 700 units redeemed on Jan 02, 2025, is given as follows:**

- Exit load on 500 units bought on Jan 01, 2024, which has completed more than 12 months on date of redemption viz Jan 02, 2025: Nil
- Exit load on the balance 200 units bought on Feb 01, 2024, which has not completed 12 months on date of redemption viz Jan 02, 2025, is as follows:

**Step 1:** Applicable NAV \* Exit Load applicable in % = Exit Load Amount per unit i.e. Rs. 12 \* 1% = Rs. 0.12 per unit;

**Step 2:** Applicable NAV - Exit Load Amount per unit = Repurchase price per unit; i.e. Rs. 12- Rs. 0.12 = Rs.11.88 per unit.



**Calculation of redemption amount:**

No. of units redeemed (Total 700 units)	Whether 12 months from date of allotment completed (yes/ no)	Exit Load applicable (in %)	NAV per unit applied after consideration of Exit Load, if any	Total Exit Load Amount (in Rs.) on units redeemed	Redemption amount after exit load i.e. Units*NAV applied
500 units	Yes	Nil	Rs. 12.00	Nil	Rs. 6,000
200 units	No	1%	Rs. 11.88	Rs. 24	Rs. 2,376
<b>Total Redemption Amount →</b>					<b>Rs. 8,376</b>

**Note:** The above illustration is only given to explain the methodology of calculation of Exit Load and Redemption Amount. The actual redemption amount would depend on the prevailing Exit Load, applicable taxes, if any, and other terms and conditions mentioned in the scheme documents of the Scheme.

## SECTION II

### I. INTRODUCTION

#### A. DEFINITIONS/INTERPRETATION

In this SID, all references to “U.S.\$” or “\$” are to United States of America Dollars and “Rs.” are to Indian Rupees.

For detailed description please click the link: [www.samcomf.com](http://www.samcomf.com).

#### B. RISK FACTORS

##### i. Standard Risk Factors:

- Investment in mutual fund units involves investment risks such as trading volumes, settlement risk, liquidity risk and 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 depending on the various factors and forces affecting the capital markets.
- Past performance of the Sponsor/AMC/Mutual Fund does not guarantee future performance of the Scheme.
- Samco Dynamic Asset Allocation Fund is the name of the Scheme and 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 ₹1 lakh made by it towards setting up the Fund.
- Samco Dynamic Asset Allocation Fund is not a guaranteed or assured return scheme.

##### ii. Scheme Specific Risk Factors

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.

#### Risks associated with investments in Equity and Equity related instruments

- Equity and equity related securities are volatile and prone to price fluctuations on a daily basis. The liquidity of investments made in the Scheme may be restricted by trading volumes and settlement periods. Settlement periods may be extended significantly by unforeseen circumstances. The inability of the Scheme to make intended securities purchases, due to settlement problems, could cause the Scheme to miss certain investment opportunities. Similarly, the inability to sell securities held in the Scheme portfolio would result at times, in potential losses to the Scheme, should there be a subsequent decline in the value of securities held in the Scheme portfolio. Also, the value of the Scheme investments may be affected by interest rates, currency exchange rates, changes in law/policies of the government, taxation laws and political, economic or other developments which may have an adverse bearing on individual Securities, a specific sector or all sectors.
- Investments in equity and equity related securities involve a degree of risk and investors should not invest in the equity Schemes unless they can afford to take the risk of losing their investment.
- Securities which are not quoted on the stock exchanges are inherently illiquid in nature and carry a larger liquidity risk in comparison with securities that are listed on the exchanges or offer other exit options to the investors.

#### Risks associated with investments in Derivatives

- Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but of the derivative itself. Trading in derivatives carries a high degree of risk although they are traded at

a relatively small amount of margin which provides the possibility of great profit or loss in comparison with the principal investment amount. Thus, derivatives are highly leveraged instruments. Even a small price movement in the underlying security could have an impact on their value and consequently, on the NAV of the Units of the Scheme.

- The derivatives market in India is nascent and does not have the volumes that may be seen in other developed markets, which may result in volatility to the values.
- Securities which are not quoted on the stock exchanges are inherently illiquid in nature and carry a larger liquidity risk in comparison with securities that are listed on the exchanges or offer other exit options to the investors.
- Investment in derivatives also requires the maintenance of adequate controls to monitor the transactions entered into the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price or interest rate movements correctly. Even a small price movement in the underlying security could have an impact on their value and consequently, on the NAV of the Units of the Scheme.
- The Scheme may face execution risk, whereby the rates seen on the screen may not be the rate at which the ultimate execution of the derivative transaction takes place.
- The Scheme may find it difficult or impossible to execute derivative transactions in certain circumstances. For example, when there are insufficient bids or suspension of trading due to price limit or circuit breakers, the Scheme may face a liquidity issue.
- The option buyer's risk is limited to the premium paid, while the risk of an options writer is unlimited. However, the gains of an options writer are limited to the premiums earned.
- The exchange may impose restrictions on exercise of options and may also restrict the exercise of options at certain times in specified circumstances and this could impact the value of the portfolio.
- The writer of a put option bears the risk of loss if the value of the underlying asset declines below the exercise price. The writer of a call option bears a risk of loss if the value of the underlying asset increases above the exercise price, as per extant regulations.
- Investments in index futures face the same risk as the investments in a portfolio of shares representing an index. The extent of loss is the same as in the underlying stocks.
- The Scheme bears a risk that it may not be able to correctly forecast future market trends or the value of assets, indices or other financial or economic factors in establishing derivative positions for the Scheme.
- The risk of loss in trading futures contracts can be substantial, because of the low margin deposits required, the extremely high degree of leverage involved in futures pricing and the potential high volatility of the futures markets.
- There is the possibility that a loss may be sustained by the portfolio as a result of the failure of another party (usually referred to as the "counter party") to comply with the terms of the derivatives contract. The counter party may default on a transaction before settlement and therefore, the Scheme is compelled to negotiate with another counterparty at the then prevailing (possibly unfavorable) market price.
- Derivatives also carry a market liquidity risk where the derivatives cannot be sold (unwound) at prices that reflect the underlying assets, rates and indices.
- Where derivatives are used for hedging, such use may involve a basis risk where the instrument used as a hedge does not match the movement in the instrument/ underlying asset being hedged. The risk may be inter-related also e.g. interest rate movements can affect equity prices, which could influence specific issuer/industry assets.
- Other risks in using derivatives include the risk of mispricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.
- Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of investment strategies depends upon the ability of the fund manager(s) to identify such opportunities which may not be available at all times. Identification and execution of the strategies to be pursued by the fund manager(s) involve uncertainty and decision of fund manager(s) may not always be profitable. No assurance can be given that the fund manager(s) will be able to identify or execute such strategies.
- 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.

### **Risks associated with covered call strategy**

- Writing call options are highly specialized activities and entail higher than ordinary investment risks. In such investment strategy, the profits from call option writing is capped at the option premium, however the downside depends upon the increase in value of the underlying equity shares. This downside risk is reduced by writing covered call options.
- The Scheme may write covered call option only in case it has adequate number of underlying equity shares as per regulatory requirement. This would lead to setting aside a portion of investment in underlying equity shares. If covered call options are sold to the maximum extent allowed by regulatory authority, the Scheme may not be able to sell the underlying equity shares immediately if the view changes to sell and exit the stock. The covered call options

need to be unwound before the stock positions can be liquidated. This may lead to a loss of opportunity, or can cause exit issues if the strike price at which the call option contracts have been written become illiquid. Hence, the Scheme may not be able to sell the underlying equity shares, which can lead to temporary illiquidity of the underlying equity shares and result in loss of opportunity.

- The writing of covered call option would lead to loss of opportunity due to appreciation in value of the underlying equity shares. Hence, when the appreciation in equity share price is more than the option premium received the Scheme would be at a loss.

### **Risks associated with investments in Fixed Income Securities:**

The following are the risks associated mainly with investment in Fixed Income Securities:

**Interest Rate Risk:** This risk is associated with movements in interest rate, which depend on various factors such as government borrowing, inflation, economic performance etc. Fixed income securities such as government bonds, corporate bonds and money market instruments etc. run price-risk or interest-rate risk. Generally, when interest rates rise, prices of fixed income securities fall and when interest rates drop, the prices generally increase. The extent of fall or rise in the prices depends upon factors such as coupon, maturity of the security, the yield level at which the security is being traded. The longer the time to a bond's maturity, the greater is its interest rate risk. The NAV of the Scheme is expected to increase from a fall in interest rates while it would be adversely affected by an increase in the level of interest rates.

**Re-investment Risk:** Investments in fixed income securities may carry re-investment risk as interest rates prevailing on the interest or maturity due dates may differ from the original coupon of the bond. Consequently, the proceeds may get invested at a lower rate.

**Spread Risk:** Spreads between various fixed income securities may widen or contract. E.g.: Corporate Bonds are exposed to the risk of widening of the spread between corporate bonds and gilts. Prices of corporate bonds tend to fall if this spread widens which will affect the NAV of the scheme accordingly. Similarly, in case of floating rate securities, where the coupon is expressed in terms of a spread or mark up over the benchmark rate, widening of the spread results in a fall in the value of such securities.

**Liquidity Risk related to fixed income instruments:** This risk pertains to how saleable a security is in the market or the ease at which a security can be sold at or close to its true value. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of some of the investments. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. The liquidity of debt securities may change, depending on market conditions. At the time of selling the security, the security can become less liquid (wider spread) or illiquid, leading to loss in value of the portfolio. Securities that are unlisted generally carry a higher liquidity risk compared to listed securities.

Liquidity risk is greater for thinly traded securities such as, lower-rated bonds, bonds that were part of a smaller issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer. Bonds are generally the most liquid during the period right after issuance when the typical bond has the highest trading volume.

Money market securities, while fairly liquid, lack a well-developed secondary market, which may restrict the selling ability of the Scheme and may lead to the Scheme incurring losses when the security is finally sold.

**Credit Risk / Default Risk:** Credit risk is the risk that the issuer of a debenture/ bond or a money market instrument may default on interest and /or principal payment obligations and/or on violation of covenant(s) and/or delay in scheduled payment(s). Even when there is no default, the price of a security may change with expected changes in the credit rating of the issuer.

Government Security is a sovereign security and the default risk is considered to be the least/zero. Corporate bonds carry a higher credit risk than Government Securities. Within corporate bonds also there are different levels of safety. Credit risks of most issuers of debt securities are rated by independent and professionally run rating agencies. Ratings of Credit issued by these agencies typically range from "AAA" (read as "Triple A" denoting "Highest Safety") to "D" (denoting "Default"), with about 6 distinct ratings between the two extremes. A bond rated higher by a particular rating agency is safer than a bond rated lower by the same rating agency.

**Counterparty Risk:** This is the risk of failure of counterparty to the transaction to deliver securities against consideration received or to pay consideration against securities delivered, in full or in part or as per the agreed specification. There could be losses to the Scheme in case of counterparty default.

**Settlement Risk:** Different segments of the Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances. The inability of the Scheme to make purchases in intended securities due to settlement problems could cause the Scheme to miss certain investment opportunities. Fixed income securities run the risk of settlement which can adversely affect the ability of the fund house to swiftly execute trading strategies which can lead to adverse movements in NAV.

**Duration risk:** The modified duration of a bond is a measure of its price sensitivity to interest rates movements, based on the average time to maturity of its interest and principal cash flows. Bond portfolio managers increase average duration when they expect rates to decline, to get the most benefit, and decrease average duration when they expect rates to rise, so as to minimize the negative impact. If rates move in a direction contrary to their expectations, they lose.

**Inflation risk:** Inflation causes tomorrow's currency to be worth less than today's; in other words, it reduces the purchasing power of a bond investor's future interest payments and principal, collectively known as "cash flows." Inflation also leads to higher interest rates, which in turn leads to lower bond prices. Inflation-indexed securities such as Treasury Inflation Protection Securities (TIPS) are structured to remove inflation risk.

**Prepayment Risk:** The borrower may repay the receivables earlier than scheduled, which may result in change in the yield and tenor for the Scheme.

**Call risk:** Some corporate, municipal and agency bonds have a "call provision" entitling their issuers to redeem them at a specified price on a date prior to maturity. Declining interest rates may accelerate the redemption of a callable bond, causing an investor's principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates. (See also Reinvestment risk.)

**Performance Risk:** Performance of the Scheme may be impacted with changes in factors which affect the capital market and in particular the debt market.

### **Risk factors associated with investing in Non-Convertible Preference Shares**

**Credit Risk** - Credit risk is the risk that an issuer will be unable to meet its obligation of payment of dividend and/ or redemption of principal amount on the due date. Further, for non-cumulative preference shares, issuer also has an option to not pay dividends on preference shares in case of inadequate profits in any year.

**Liquidity Risk** - The preference shares generally have limited secondary market liquidity and thus we may be forced to hold the instrument till maturity.

**Unsecured in Nature** - Preference shares are unsecured in nature and rank lower than secured and unsecured debt in hierarchy of payments in case of liquidation. Thus, there is significant risk of capital erosion in case the company goes into liquidation.

### **Risks associated with Investing in Structured Obligation (SO) & Credit Enhancement (CE) rated securities**

The risks factors stated below for the Structured Obligations & Credit Enhancement are in addition to the risk factors associated with debt instruments. Credit rating agencies assign CE rating to an instrument based on any identifiable credit enhancement for the debt instrument issued by an issuer. The credit enhancement could be in various forms and could include guarantee, shortfall undertaking, letter of comfort, etc. from another entity. This entity could be either related or non-related to the issuer like a bank, financial institution, etc. Credit enhancement could include additional security in form of pledge of shares listed on stock exchanges, etc. SO transactions are asset backed/ mortgage backed securities, securitized paper backed by hypothecation of car loan receivables, securities backed



by trade receivables, credit card receivables etc. Hence, for CE rated instruments evaluation of the credit enhancement provider, as well as the issuer is undertaken to determine the issuer rating. In case of SO rated issuer, the underlying loan pools or securitization, etc. is assessed to arrive at rating for the issuer.

**Liquidity Risk:** SO rated securities are often complex structures, with a variety of credit enhancements. Debt securities lack a well-developed secondary market in India, and due to the credit enhanced nature of CE securities as well as structured nature of SO securities, the liquidity in the market for these instruments is adversely affected compared to similar rated debt instruments. Hence, lower liquidity of such instruments, could lead to inability of the scheme to sell such debt instruments and generate liquidity for the scheme or higher impact cost when such instruments are sold.

**Credit Risk:** The credit risk of debt instruments which are CE rated is based on the combined strength of the issuer as well as the structure. Hence, any weakness in either the issuer or the structure could have an adverse credit impact on the debt instrument. The weakness in structure could arise due to inability of the investors to enforce the structure due to issues such as legal risk, inability to sell the underlying collateral or enforce guarantee, etc. In case of SO transactions, comingling risk and risk of servicer increases the overall risk for the securitized debt or assets backed transactions. Therefore, apart from issuer level credit risk such debt instruments are also susceptible to structure related credit risk.

### **Risks associated with investments in securitised paper**

Types of securitised debt vary and carry different levels and types of risks. Credit risk on securitised bonds depends upon the originator and varies depending on whether they are issued with recourse to the originator or otherwise. Even within securitised debt, AAA or equivalent rated securitised debt offers lesser risk of default than AA rated securitised debt. A structure with recourse will have a lower credit risk than a structure without recourse.

As underlying assets in securitised debt may assume different forms and the general types of receivables include auto finance, credit cards, home loans or any such receipts, credit risks relating to these types of receivables depend upon various factors including macro economic factors of these industries and economies. Specific factors like nature and adequacy of property mortgaged against these borrowings, nature of loan agreement/ mortgage deed in case of home loan, adequacy of documentation in case of auto finance and home loans, capacity of borrower to meet its obligation on borrowings in case of credit cards and the intention of the borrower influence the risks relating to the asset borrowings underlying the securitised debt.

Changes in market interest rates and pre-payments may not change the absolute amount of receivables for the investors, but may have an impact on the reinvestment of the periodic cash flows that the investor receives in the securitised paper.

### **Limited Liquidity & price Risk:**

Presently, the 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 Fund 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.

### **Risks due to possible prepayments:**

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 the originator becomes subject to bankruptcy proceedings and the court in the bankruptcy proceedings concludes that the sale from originator to the Trust was not a sale then the Fund 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 the Trust not being construed as a "True Sale". Legal opinion is normally obtained to the effect that the assignment of receivables to the 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 an investor's agent becomes subject to bankruptcy proceedings and the court in the bankruptcy proceedings concludes that the recourse of the investor's agent to the assets/receivables is not in its capacity as agent/Trustee but in his 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 an investor's agent is held as agent and in Trust for the Investors and shall not form part of the personal assets of the investor's agent. Legal opinion is normally obtained to the effect that the investors agent's recourse to assets/ receivables is restricted in his 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 servicers 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 the highest credit rating on a standalone basis to minimize co-mingling risk.

#### **Risk factors associated with investing in Foreign Securities**

Subject to necessary approvals and within the investment objectives / asset allocation pattern of the Scheme may also invest in permitted foreign securities which carry risks related to fluctuations in the foreign exchange rates, the nature of the securities market of the country, repatriation of capital due to exchange controls and political circumstances. It is the AMC's belief that investment in foreign securities offers new investment and portfolio diversification opportunities into multimarket and multi-currency products.

The Scheme may invest in units/securities issued by overseas companies listed on recognized stock exchanges overseas and other securities in accordance with the provisions of clause 12.19 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, subject to a maximum of US\$ 1 billion at in the aggregate at the Mutual Fund level and upto a maximum of US\$ 300 million in overseas Exchange Traded Funds (ETFs) at the Mutual Fund level or such limits as may be prescribed by SEBI from time to time. However, in case the overall industry limit or such other limit as prescribed by SEBI has been breached, the Scheme would temporarily not invest in the overseas securities.

Such investment opportunities may be pursued by the AMC provided they are considered appropriate in terms of the overall investment objectives of the Scheme. Since the Scheme would invest only partially in foreign securities, there may not be readily available and widely accepted benchmarks to measure performance of the Scheme. However, such investments also entail additional risks not only limited to the following.

**Country Risk:** The Country risk arises from the inability of a country, to meet its financial obligations. It is the risk encompassing economic, social and political conditions in a foreign country, which might adversely affect foreign investors' financial interests. In addition, country risks would include events such as introduction of extraordinary exchange controls, economic deterioration, bi-lateral conflict leading to immobilisation of the overseas financial assets and the prevalent tax laws of the respective jurisdiction for execution of trades or otherwise.

**Currency Risk:** Moving from Indian Rupee (INR) to any other currency involves currency risk. To the extent that the assets of the Scheme will be invested in securities denominated in foreign currencies, the Indian Rupee equivalent of the net assets and income may be adversely affected by changes in the value of certain foreign currencies relative to the Indian Rupee.

**Interest Rate Risk:** The pace and movement of interest rate cycles of various countries, though loosely co-related, can differ significantly. Investments in securities of countries other than India, the Scheme stand exposed to their interest rate cycles.

**Repatriation Risk:** The repatriation of capital to India may also be hampered by changes in regulations concerning exchange controls or political circumstances as well as the application to it of other restrictions on investment.

#### **Risks associated with Short Selling & Securities Lending**

Securities Lending is a lending of securities through an approved intermediary to a borrower under an agreement for a specified period with the condition that the borrower will return equivalent securities of the same type or class at the end of the specified period along with the corporate benefits accruing on the securities borrowed. There are risks inherent in securities lending, including the risk of failure of the other party, in this case the approved intermediary to comply with the terms of the agreement. Such failure can result in a possible loss of rights to the collateral, the inability of the approved intermediary to return the securities deposited by the lender and the possible loss of corporate benefits accruing thereon.

Short-selling is the sale of shares or securities that the seller does not own at the time of trading. Instead, he borrows it from someone who already owns it. Later, the short seller buys back the stock/security he shorted and returns the stock/security to the lender to close out the loan. The inherent risks are Counterparty risk and liquidity risk of the stock/security being borrowed. The security being short sold might be illiquid or become illiquid and covering of the security might occur at a much higher price level than anticipated, leading to losses.

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

The Mutual Fund is a member of securities segment and Tri-party Repo trade settlement of the Clearing Corporation of India Limited (CCIL). All transactions of the Mutual Fund in government securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL; thus, reducing the settlement and counterparty risks considerably for transactions in the said segments. The members are required to contribute an amount as communicated by CCIL from time to time to the default fund maintained by CCIL as a part of the default waterfall (a loss mitigating measure of CCIL in case of default by any member in settling transactions routed through CCIL). CCIL shall maintain two separate Default Funds in respect of its Securities Segment, one with a view to meet losses arising out of any default by its members from outright and repo trades and the other for meeting losses arising out of any default by its members from Triparty Repo trades. The Mutual Fund is exposed to the extent of its contribution to the default fund of CCIL at any given point in time i.e., in the event that the default waterfall is triggered and the contribution of the Mutual Fund is called upon to absorb settlement/default losses of another member by CCIL, the Scheme may lose an amount equivalent to its contribution to the default fund.

Further, it may be noted that, 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.

### **Risks associated with investing in repo transactions in corporate bonds**

The market for the aforesaid product is illiquid. Hence, repo obligations cannot be easily sold to other parties.

If a counterparty fails, the scheme would have to take recourse to the collateral provided. If a counterparty fails to repay and the value of the collateral falls beyond the haircut, then the Scheme would be exposed to a loss of interest or principal.

Further, if the Scheme needs to take recourse to the debt securities provided as collateral, and the issuer of the debt securities makes a default, the scheme may lose the whole, or substantial portion of the amount.

This risk is somewhat mitigated by the fact that only bonds which have credit rating of AA and above can be accepted as collateral for repo transactions.

### **Risks associated with transaction in Units through stock exchange(s)**

In respect of transaction in Units of the Scheme through Bombay Stock Exchange ("BSE") and / or National Stock Exchange ("NSE"), allotment and redemption of Units on any Business Day will depend upon the order processing / settlement by NSE and /or BSE and their respective clearing corporations on which the Fund has no control.

### **Risks associated with Restrictions on Redemption**

The Trustee and the AMC may impose restrictions on redemptions when there are circumstances leading to a systemic crisis or event that severely constricts market liquidity or the efficient functioning of markets. Accordingly, such restriction may affect the liquidity of the Scheme and there may be a delay in investors receiving part of their redemption proceeds.

### **Risk associated with Taxation of the Scheme**

Equity oriented mutual fund means a fund which has been set up under a scheme of a Mutual Fund specified under clause (23D) of Income Tax Act, 1961 where more than 65% of the investible funds are invested in equity shares of domestic companies. The percentage of equity shareholding of the fund shall be computed with reference to the annual average of the monthly averages of the opening and closing figures. In an event where the percentage of annual average of monthly averages of equity shares of domestic companies falls below 65% of the investible funds, then the scheme may be classified as a Non Equity Oriented Fund and it may have additional tax implication on investors.

### **Risks associated with segregated portfolio**

The unit holders may note that no redemption and subscription shall be allowed in the segregated portfolio. However, in order to facilitate exit to unit holders in the segregated portfolio, the AMC shall enable listing of units of segregated portfolio on the recognized stock exchange. The risks associated in regard to the segregated portfolio are as follows:

- The investors holding units of the segregated portfolio may not be able to liquidate their holdings till the time of recovery of money from the issuer.
- The security comprising the segregated portfolio may not realize any value.
- Listing of units of the segregated portfolio on a recognized stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units of the segregated portfolio on the stock exchange.
- The trading price of units on the stock exchange may be significantly lower than the prevailing Net Asset Value (NAV) of the segregated portfolio.

## C. RISK MITIGATION STRATEGIES

Investments in Equity and equity related instruments including derivatives, debt and money market instruments carry various risks such as inability to sell securities, trading volumes and settlement periods, market risk, interest rate risk, liquidity risk, default risk, reinvestment risk etc. Whilst such risks cannot be eliminated, they may be mitigated by diversification and hedging.

In order to mitigate the various risks, the portfolio of the Scheme will be constructed in accordance with the investment restriction specified under the Regulations which would help in mitigating certain risks relating to investments in securities market.

Further, the AMC has necessary framework in place for risk mitigation at an enterprise level. The Risk Management division is an independent division within the organization. Internal limits are defined and judiciously monitored. Risk indicators on various parameters are computed and are monitored on a regular basis. There is a Board level Committee, the Risk Management Committee of the Board, which enables a dedicated focus on risk factors and the relevant risk mitigates.

### **Risk control measures with respect to investment Equity and Equity related instruments**

**Concentration Risk:** Concentration risk represents the probability of loss arising from heavy exposure to a particular group of sectors or securities.

Mitigation: The scheme will try to mitigate this risk by diversifying the investment and keep stock-specific concentration risk relatively low.

**Market Risk:** Equity and Equity related securities by nature are volatile and prone to price fluctuations on a daily basis due to both macro and micro factors.

Mitigation - Market risk is a risk which is inherent to an equity scheme. The scheme will try to reduce the market risk by undertaking active portfolio management as per the investment objective.

**Liquidity risk:** The liquidity of investments made in the Scheme may be restricted by trading volumes and settlement periods

Mitigation- As such the liquidity of stocks that the scheme invests into could be relatively low. The scheme will try to maintain a proper asset-liability match to ensure redemption / Maturity payments are made on time.

### **Risk control measures with respect to Debt & Money Market Instruments**

**Market Risk / Interest Rate Risk:** Changes in interest rates may affect the Scheme's Net Asset Value as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. The price movement up and down in fixed income securities will lead to possible movements in the NAV.

Mitigation - In a rising interest rates scenario the scheme may increase its investment in money market securities whereas if the interest rates are expected to fall the allocation to debt securities with longer maturity may be increased thereby mitigating risk to that extent.

**Liquidity or Marketability Risk:** This refers to the ease with which a security can be sold at or near to its valuation yield-to-maturity (YTM).

Mitigation- The scheme may invest in government securities, corporate bonds and money market instruments. While the liquidity risk for government securities, money market instruments and short maturity corporate bonds may be

low, it may be high in case of medium to long maturity corporate bonds.

**Credit risk or default risk:** It refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). Normally, the value of a fixed income security will fluctuate depending upon the changes in the perceived level of credit risk as well as any actual event of default. The greater the credit risk, the greater the yield required for someone to be compensated for the increased risk.

**Mitigation–** Apart from the basic examination, management's past track record will also be studied. In order to assess financial risk a detailed assessment of the issuer's financial statements will be undertaken to review its ability to undergo stress on cash flows and asset quality. A detailed evaluation of accounting policies, off-balance sheet exposures, notes, auditors' comments and disclosure standards will also be made to assess the overall financial risk of the potential borrower. In case of securitized debt instruments, the Scheme will ensure that these instruments are sufficiently backed by assets.

### **Risk control with respect to derivatives**

As and when the Scheme trades in the derivatives market there are risk factors and issues concerning the use of derivatives since derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. The Scheme may invest in derivative for the purpose of hedging, portfolio balancing and other purposes as may be permitted under the Regulations.

**Mitigation-** Exposure with respect to derivatives shall be in line with regulatory limits and the limits specified in the SID. All equity derivatives trade will be done only on the exchange with guaranteed settlement.

### **Risk control with respect to investment in Foreign Securities**

Since the assets may be invested in securities denominated in foreign currency, the INR equivalent of the net assets, distributions and income may be adversely affected by changes / fluctuations in the value of the foreign currencies relative to the INR.

**Mitigation -** The scheme shall have the option to enter into permissible instruments (subject to applicable regulations by SEBI/RBI) for the purposes of hedging against the foreign exchange fluctuations.

## **II. INFORMATION ABOUT THE SCHEME**

### **A. WHERE WILL THE SCHEME INVEST?**

Detailed description of the instruments mentioned in Section I is provided below:

#### **Equity and Equity Related Instruments**

The corpus of the scheme shall be pre-dominantly invested in equity and equity related instruments as may be permitted under the Regulations. Equity related instruments include convertible debentures, convertible preference shares, warrants carrying the right to obtain equity shares, equity derivatives and such other instrument as may be specified by SEBI from time to time.

#### **Equity Derivatives**

Equity Derivatives are financial instruments, generally traded on an exchange, the price of which is directly dependent upon (i.e., "derived from") the value of equity shares or equity indices. The equity derivatives may take the following forms:-



### **Futures:**

Futures are exchange-traded contracts to sell or buy financial instruments for future delivery at a date and at an agreed price. SEBI has permitted futures contracts on indices and individual stocks with maturity of 1 month, 2 months and 3 months on a rolling basis. The futures contracts are settled on last Thursday (or immediately preceding trading day if Thursday is a trading holiday) of each month. The final settlement price is the closing price of the underlying stock(s)/index.

### **Options:**

Option is a contract which provides the buyer of the option the right, without the obligation, to buy or sell a specified asset at the agreed price on or up to a particular date. Option contracts are of two types viz: (a) Call Option - The option that gives the buyer the right but not the obligation to buy specified quantity of the underlying asset at the strike price is a call option. (b) Put Option – The option that gives the buyer the right but not the obligation to sell is called put option.

### **Foreign Securities**

The Scheme may also invest in suitable investment avenues in foreign securities in overseas financial markets for the purpose of diversification, commensurate with the Scheme objectives and subject to necessary stipulations by SEBI / RBI. Towards this end, the Mutual Fund may also appoint overseas investment advisors and other service providers, to the extent permissible under the Regulations.

The Scheme may, with the approval of SEBI / RBI, where required invest in:

- i. ADRs (American Depository Receipts)/ GDRs (Global Depository Receipts) issued by Indian or foreign companies
- ii. Equity of overseas companies listed on recognized stock exchanges overseas
- iii. Initial and follow on public offerings for listing at recognized stock exchanges overseas
- iv. Foreign debt securities in the countries with fully convertible currencies, short term as well as long term debt instruments with rating not below investment grade by accredited/registered credit rating agencies
- v. Money market instruments rated not below investment grade
- vi. Repos in the form of investment, where the counterparty is rated not below investment grade; repos shall not however, involve any borrowing of funds by the mutual funds
- vii. Government securities where the countries are rated not below investment grade
- viii. Derivatives traded on recognized stock exchanges overseas only for hedging and portfolio balancing with underlying as securities
- ix. Short term deposits with banks overseas where the issuer is rated not below investment grade.
- x. Units / Securities issued by overseas mutual funds or unit trusts registered with overseas regulators.

As per clause 12.19 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the aggregate ceiling for overseas investments is USD 7 billion as per the above SEBI circulars. Within the overall limit of USD 7 billion, mutual funds can make overseas investments subject to a maximum of USD 1 billion per mutual fund. The overall ceiling for investment in overseas ETFs that invest in Securities is USD 1 billion subject to a maximum of USD 300 million per mutual fund. However, in case the overall industry limit of US\$ 7 billion or such other limit as prescribed by SEBI has been breached, the Scheme would temporarily not invest in the overseas securities.

Since the investment in overseas ETF is a fund of funds scheme, in accordance with SEBI regulations, the restriction on the investments in mutual fund units up to 5% of net assets of the Scheme and which prohibits charging of fees shall not be applicable to investments in mutual funds in foreign countries. However, the management fees and other expenses charged by a mutual fund in foreign countries along with the management fee and recurring expenses charged to the Scheme shall not exceed the total limits on expenses as prescribed under Regulation 52(6) of the SEBI Regulations.



During the NFO, the scheme does not intend to invest in overseas securities. Further, the investment in overseas securities will be made after receipt of approval and release of limits from SEBI.

Subject to the approval of RBI / SEBI and conditions as maybe prescribed by them, the Mutual Fund may open one or more foreign currency accounts abroad either directly, or through the custodian/sub-custodian, to facilitate investments for its efficient management. However, the use of such instruments shall be as permitted from time to time' and with prior approval of SEBI, as the case may be.

### **Investment in Debt and Money Market Instruments**

The Scheme will retain the flexibility to invest in the entire range of debt instruments and money market instruments. These instruments are more specifically highlighted below:

#### **Certificate of Deposit (CD)**

Certificate of Deposit (CD) is a negotiable money market instrument issued by Scheduled Commercial Banks (SCBs) and select All India Financial Institutions (FIs) that have been permitted by the RBI to raise short term resources. The maturity period of CDs issued by the SCBs is between 7 days to 1 year, whereas, in case of FIs, maturity is 1 year to 3 years from the date of issue. CDs also are issued at a discount to face value and can be traded in secondary market.

#### **Tri-party Repo in Government Securities**

Tri-party Repo means a repo contract where a third entity (apart from the borrower and lender), called a Tri-Party Agent, acts as an intermediary between the two parties to the repo to facilitate services like collateral selection, payment and settlement, custody and management during the life of the transaction. The Scheme shall undertake Tri-party Repo transactions in Government Securities.

#### **Commercial Paper (CP)**

Commercial Paper (CP) is an unsecured negotiable money market instrument issued in the form of a promissory note, generally issued by the corporates, primary dealers and All India Financial Institutions as an alternative source of short term borrowings. CP is traded in secondary market and can be freely bought and sold before maturity. CP can be issued for maturities between a minimum of 15 days and a maximum up to 1 year from the date of issue.

#### **Repo / Reverse Repo**

Repo (Repurchase Agreement) or Reverse Repo is a transaction in which two parties agree to sell and purchase the same security with an agreement to purchase or sell the same security at a mutually decided future date and price. The transaction results in collateralized borrowing or lending of funds. Presently in India, Central Government Securities, State Government securities and T-Bills are eligible for Repo/Reverse Repo.

#### **Treasury Bill (T-Bills) / Cash Management Bill (CMB)**

Treasury Bills are issued by the Government of India to meet their short term borrowing requirements. T-Bills are issued for maturities of 14 days, 91 days, 182 days and 364 days. The Scheme may also invest in Cash Management Bill (CMB) issued by the Government of India to meet their short term borrowing requirements. CMB are generally issued for maturities of less than 91 days.

**Securities created and issued by the Central and State Governments** as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). State Government Securities (popularly known as State Development Loans or SDLs) are issued by the respective State Government in coordination with the RBI.

#### **Non-convertible debentures and bonds**

Non-convertible debentures as well as bonds are securities issued by companies / institutions promoted / owned

by the Central or State Governments and statutory bodies which may or may not carry a Central/State Government guarantee, public and private sector banks, All India Financial Institutions and Private Sector Companies. These instruments may be secured or unsecured against the assets of the Company and generally issued to meet the short term and long term fund requirements. The Scheme may also invest in the non convertible part of convertible debt securities.

### **Floating rate debt instruments**

Floating rate debt instruments are instruments issued by Central / State Governments, corporates, PSUs, etc. with interest rates that are reset periodically.

### **Securitized Assets**

Securitization is a structured finance process which involves pooling and repackaging of cashflow producing financial assets into securities that are then sold to investors. They are termed as Asset Backed Securities (ABS) or Mortgage Backed Securities (MBS). ABS are backed by other assets such as credit card, automobile or consumer loan receivables, retail installment loans or participations in pools of leases. Credit support for these securities may be based on the underlying assets and/or provided through credit enhancements by a third party. MBS is an asset backed security whose cash flows are backed by the principal and interest payments of a set of mortgage loans. Such Mortgage could be either residential or commercial properties. ABS/MBS instrument reflect the undivided interest in the underlying assets and do not represent the obligation of the issuer of ABS/MBS or the originator of underlying receivables. Securitization often utilizes the services of SPV.

### **Pass through Certificate (PTC)**

Pay through or other Participation Certificates represents beneficial interest in an underlying pool of cash flows. These cash flows represent dues against single or multiple loans originated by the sellers of these loans. These loans are given by banks or financial institutions to corporates. PTCs may be backed, but not exclusively, by receivables of personal loans, car loans, two wheeler loans and other assets subject to applicable regulations.

The following are certain additional disclosures w.r.t. investment in securitized debt:

#### **1. How the risk profile of securitized debt fits into the risk appetite of the Scheme**

Securitized debt is a form of conversion of normally non-tradable loans to transferable securities. This is done by assigning the loans to a special purpose vehicle (a trust), which in turn issues Pass-Through-Certificates (PTCs). These PTCs are transferable securities with fixed income characteristics. The risk of investing in securitized debt is similar to investing in debt securities. However, it differs in two respects.

Typically the liquidity of securitized debt is less than similar debt securities. For certain types of securitized debt (backed by mortgages, personal loans, credit card debt, etc.), there is an additional pre-payment risk. Pre-payment risk refers to the possibility that loans are repaid before they are due, which may reduce returns if the re-investment rates are lower than initially envisaged.

Because of these additional risks, securitized debt typically offers higher yields than debt securities of similar credit rating and maturity. If the fund manager judges that the additional risks are suitably compensated by the higher returns, he may invest in securitized debt up to the limits specified in the asset allocation table above.

#### **2. Policy relating to originators based on nature of originator, track record, NPAs, losses in earlier securitized debt, etc.**

The originator is the person who has initially given the loan. The originator is also usually responsible for servicing the loan (i.e. collecting the interest and principal payments). An analysis of the originator is especially important in case of retail loans as this affects the credit quality and servicing of the PTC. The key risk is that of the underlying assets and not of the originator. For example, losses or performance of earlier issuances does not indicate quality of current series. However, such past performance may be used as a guide to evaluate the loan standards, servicing capability and performance of the originator.

Originators may be: Banks, Non Banking Finance Companies, Housing Finance Companies, etc. The fund manager / credit analyst evaluates originators based on the following parameters

- Track record
- Willingness to pay, through credit enhancement facilities etc.
- Ability to pay
- Business risk assessment, wherein following factors are considered:
  - Outlook for the economy (domestic and global)
  - Outlook for the industry
  - Company specific factors

In addition, a detailed review and assessment of rating rationale is done including interactions with the originator as well as the credit rating agency.

The following additional evaluation parameters are used as applicable for the originator / underlying issuer for pool loan and single loan securitization transactions:

- Default track record/ frequent alteration of redemption conditions / covenants
- High leverage ratios of the ultimate borrower (for single-sell downs) – both on a standalone basis as well on a consolidated level/ group level
- Higher proportion of reschedulement of underlying assets of the pool or loan, as the case may be
- Higher proportion of overdue assets of the pool or the underlying loan, as the case may be
- Poor reputation in market
- Insufficient track record of servicing of the pool or the loan, as the case may be.

### **3. Risk mitigation strategies for investments with each kind of originator**

An analysis of the originator is especially important in case of retail loans as the size and reach affects the credit quality and servicing of the PTC. In addition, the quality of the collection process, infrastructure and follow-up mechanism; quality of MIS; and credit enhancement mechanism are key risk mitigants for the better originators / servicers.

In case of securitization involving single loans or a small pool of loans, the credit risk of the underlying borrower is analyzed. In case of diversified pools of loans, the overall characteristic of the loans is analyzed to determine the credit risk. The credit analyst looks at ageing (i.e. how long the loan has been with the originator before securitization) as one way of evaluating the performance potential of the PTC. Securitization transactions may include some risk mitigants (to reduce credit risk). These may include interest subvention (difference in interest rates on the underlying loans and the PTC serving as margin against defaults), overcollateralization (issue of PTCs of lesser value than the underlying loans, thus even if some loans default, the PTC continues to remain protected), presence of an equity / subordinate tranche (issue of PTCs of differing seniority when it comes to repayment - the senior tranches get paid before the junior tranche) and / or guarantees.

### **4. The level of diversification with respect to the underlying assets, and risk mitigation measures for less diversified investments**

In case of securitization involving single loans or a small pool of loans, the credit risk of the borrower is analyzed. In case of diversified pools of loans, the overall characteristic of the loans is analyzed to determine the credit risk.

The credit analyst looks at ageing (i.e. how long the loan has been with the originator before securitization) as one way of judging the performance potential of the PTC. Additional risk mitigants may include interest subvention, over collateralization, presence of an equity / subordinate tranche and / or guarantees. The credit analyst also uses analyses by credit rating agencies on the risk profile of the securitized debt.

Currently, the following parameters are used while evaluating investment decision relating to a pool securitization transaction. The Investment Committee may revise the parameters from time to time.

Characteristics/Type of Pool	Mortgage Loan	Commercial Vehicle and Construction	CAR	2 wheelers	Micro Finance Pools	Personal Loans	Single Sell Downs	Others
Approximate Average maturity (in Months)	Up to 10 years	Up to 5 years	Up to 5 years	Up to 3 years	Up to 80 weeks	Up to 3 years	Refer Note 1	Refer Note 2
Collateral margin (including cash, guarantees, excess interest spread, subordinate tranche)	>5%	>5%	>4%	>4%	>4%	>4%	"	"
Average Loan to Value Ratio	<90%	<90%	<90%	<90%	Unsecured	Unsecured	"	"
Average seasoning of the Pool	>3 months	>3 months	>3 months	>3 months	>3 months	>3 months	"	"
Maximum single exposure range (%)	<5%	<7%	Retail	Retail	Retail	Retail	"	"
Average single exposure range %	<5%	<5%	Retail	Retail	Retail	Retail	"	"

Note 1: In case of securitization involving single loans or a small pool of loans, the credit risk of the borrower is analyzed. The investment limits applicable to the underlying borrower are applied to the single loan sell-down.

Note 2: Other investments will be decided on a case-to-case basis

The credit analyst may consider the following risk mitigating measures in his analysis of the securitized debt:

- Size of the loan
- Average original maturity of the pool
- Loan to Value Ratio
- Average seasoning of the pool
- Default rate distribution
- Geographical Distribution
- Credit enhancement facility
- Liquid facility
- Structure of the pool

## 5. Minimum retention period of the debt by originator prior to securitization

Issuance of securitized debt is governed by the Reserve Bank of India. RBI norms cover the "true sale" criteria including credit enhancement and liquidity enhancements. In addition, RBI has proposed minimum holding period of between nine and twelve months for assets before they can be securitized. The minimum holding period depends on the tenor of the securitization transaction. The Scheme will invest in securitized debts that are compliant with the laws and regulations.

## 6. Minimum retention percentage by originator of debts to be securitized

Issuance of securitized debt is governed by the Reserve Bank of India. RBI norms cover the "true sale" criteria including credit enhancement and liquidity enhancements, including maximum exposure by the originator in the PTCs. In addition, RBI has proposed minimum retention requirement of between five and ten percent of the book value of the loans by the originator. The minimum retention requirement depends on the tenor and structure of the securitization transaction. The Fund will invest in securitized debts that are compliant with the laws and regulations.

## **7. The mechanism to tackle conflict of interest when the mutual fund invests in securitized debt of an originator and the originator in turn makes investments in that particular scheme of the fund**

The key risk is securitized debt relates to the underlying borrowers and not the originator. In a securitization transaction, the originator is the seller of the debt(s) and the fund is the buyer. However, the originator is also usually responsible for servicing the loan (i.e. collecting the interest and principal payments). As the originators may also invest in the scheme, the fund manager shall ensure that the investment decision is based on parameters as set by the Investment Review Committee (IRC) of the Asset Management Company and IRC shall review the same at regular interval.

## **8. The resources and mechanism of individual risk assessment with the AMC for monitoring investment in securitized debt**

The fund management team including the credit analyst has the experience to analyze securitized debt. In addition, credit research agencies provide analysis of individual instruments and pools. On an on-going basis (typically monthly) the servicer provides reports regarding the performance of the pool. These reports would form the base for ongoing evaluation where applicable. In addition, rating reports indicating rating changes would be monitored for changes in rating agency opinion of the credit risk.

### **Debt derivative instruments:**

#### **Interest Rate Swap**

An Interest Rate Swap ("IRS") is a financial contract between two parties exchanging or swapping a stream of interest payments for a 'notional principal' amount on multiple occasions during a specified period. Typically, one party receives a predetermined fixed rate of interest while the other party, receives a floating rate, which is linked to a mutually agreed benchmark with provision for mutually agreed periodic resets. Such contracts generally involve exchange of a "fixed to floating" or "floating to fixed" rate of interest. Accordingly, on each payment date that occurs during the swap period, cash payments based on fixed/ floating and floating rates are made by the parties to one another.

#### **Forward Rate Agreement**

A Forward Rate Agreement (FRA) is an agreement to pay or receive the difference between the agreed fixed rate and actual interest rate (reference rate specified in the contract) prevailing at a stipulated future date for a notional loan amount and specified time period.

The interest rate is fixed now for a future agreed price wherein only the interest is settled between the counter parts.

#### **Interest Rate Futures**

A futures contract is a standardized, legally binding agreement to buy or sell a commodity or a financial instrument in a designated future month at a market determined price (the futures price) by the buyer and seller. The contracts are traded on a futures exchange. An Interest Rate Future is a futures contract with an interest bearing instrument as the underlying asset.

#### **Characteristics of Interest Rate Futures**

1. Obligation to buy or sell a bond at a future date
2. Standardized contract
3. Exchange traded
4. Physical settlement
5. Daily mark to market

#### **Tri-party Repo (TREPS) through CCIL**

Trading in the triparty repo is conducted over the Triparty Repo (Dealing) System (TREPS) a screen based anonymous

order matching system that is provided to the members of CCIL's securities segment and Triparty Repo (Dealing) Segment of CCDS. TREPS receives borrowing limits and initial margin details from CCIL for each member based on cash and/or government securities contributions by respective member. Once the orders are matched and the trade is concluded, the first leg consideration is determined by the system based on the tenor and the repo interest rate of the trade. Members can square off the trades or re-repo (i.e. lend trade can be squared off by borrow trades and vice a versa) wherein the second leg settlement date of the squaring off trade is the same business date as the second leg settlement date of original trade. TREPS trades are settled through CCIL's Securities Segment.

### **Investments in the Schemes of Mutual Funds:**

For the purpose of further diversification and liquidity, the Scheme may invest in another scheme managed by the same AMC or by the AMC of any other Mutual Fund without charging any fees on such investments, provided it is in conformity with the investment objectives of the Scheme and in terms of the prevailing SEBI Regulations. Further provided that, the aggregate inter-scheme investment made by all schemes managed by the same AMC or in schemes managed by the AMC of any other Mutual Fund shall not exceed 5% of the net asset value of the Fund.

### **Short Term Deposits**

Pending deployment of funds as per the investment objective of the Scheme, the funds may be parked in short term deposits of the Scheduled Commercial Banks, subject to guidelines and limits specified by SEBI.

The Fund Manager may invest in such any other security as may be permitted by RBI / SEBI from time to time and which are in line with the investment objectives of the Scheme.

## **B. WHAT ARE THE INVESTMENT RESTRICTIONS ?**

Pursuant to Regulations, specifically the Seventh Schedule and amendments thereto, the following investment restrictions are currently applicable to the Scheme:

1. The Scheme shall not invest more than 10 per cent of its NAV in the equity shares or equity related instruments of any company.
2. No sponsor of a mutual fund, its associate or group company including the asset management company of the fund, through the schemes of the mutual fund or otherwise, individually or collectively, directly or indirectly, have
  - 10% or more of the share-holding or voting rights in the asset management company or the trustee company of any other mutual fund; or
  - representation on the board of the asset management company or the trustee company of any other mutual fund.
3. All investments by the Scheme in equity shares and equity related instruments shall only be made provided such securities are listed or to be listed.
4. The Mutual Fund under all its Scheme(s) shall not own more than ten per cent of any company's paid-up capital carrying voting rights.  
 Provided, investment in the asset management company or the trustee company of a mutual fund shall be governed by clause (a), of sub-regulation (1), of regulation 7B.
5. 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 authorized to carry out such activity under the SEBI Act, 1992. Such investment limit may be extended to 12% of the NAV of the Scheme with the prior approval of the Trustee and the Board of Directors of AMC. Provided that such limit shall not be applicable for investments in Government Securities, treasury bills and TREPS. 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.



Further, in accordance with the clause 12.8 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, as amended from time to time, the scheme shall not invest more than:

- a. 10% of its NAV in debt and money market securities rated AAA; or
- b. 8% of its NAV in debt and money market securities rated AA; or
- c. 6% of its NAV in debt and money market securities rated A and below issued by a single issuer.

The above investment limits may be extended by up to 2% of the NAV of the scheme with prior approval of the Board of Trustees and Board of Directors of the AMC, subject to compliance with the overall 12% limit specified in clause 1 of Seventh Schedule of MF Regulation.

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. Exposure to government money market instruments such as TREPS on G-Sec/ T-bills shall be treated as exposure to government securities.

6. The Scheme shall not invest in unlisted debt instruments including commercial papers, except Government Securities, money market instruments and derivative products such as Interest Rate Swaps, Interest Rate Futures, etc. which are used by mutual fund for hedging.

Provided further that the Scheme shall comply with the norms under this clause within the time and in the manner as may be specified by the Board:

Provided further that the norms for investments by the Scheme in unrated debt instruments shall be as specified by the Board from time to time. Further the investments by the Scheme shall be in compliance with SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, and as amended by SEBI from time to time.

7. The total exposure of the Scheme in a particular sector (excluding investments in Bank CDs, CBLO, G- Secs, T-Bills, short term deposits of scheduled commercial banks and AAA rated securities issued by Public Financial Institutions and Public Sector Banks) shall not exceed 20% of the net assets of the Scheme. For the purposes of the sector exposure limit, AMFI sector classification of issuers would be considered. Provided that the Scheme may have an additional exposure to financial services sector (over and above the limit of 20%) not exceeding 10% of the net assets of the Scheme by way of increase in exposure to Housing Finance Companies (HFCs).

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 shall not exceed 20% of the net assets of the Scheme. Further, the scheme may have an additional exposure of 5% of the net assets of the scheme for investments in securitized debt instruments based on retail housing loan portfolio and/or affordable housing loan portfolio.

8. The total exposure of the Scheme 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. For this purpose, a group means a group as defined under regulation 2 (mm) of SEBI (Mutual Funds) Regulations, 1996 and shall include an entity, its subsidiaries, fellow subsidiaries, its holding company and its associates.
9. The Scheme may invest in other schemes of the Mutual Fund 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 the management of any other asset management company shall not exceed 5% of the Net Asset Value of the Fund.

10. The Scheme shall not make any investment 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 the net assets.
11. The Mutual Fund 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.
12. Transfer of investments from one scheme to another scheme in the same Mutual Fund is permitted provided:
  - a) such transfers are done at the prevailing market price for quoted instruments on spot basis (spot basis shall have the same meaning as specified by a Stock Exchange for spot transactions); and
  - b) the securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.

Further, the inter scheme transfer of securities would be done either for meeting liquidity requirements in a scheme in case of unanticipated redemption pressure or to facilitate duration, issuer, sector or group rebalancing in line with SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024.
13. The Mutual Fund shall buy and sell securities on the basis of deliveries and shall in all cases of purchases, take delivery of relevant securities and in all cases of sale, deliver the securities. Provided that the Mutual Fund may engage in short selling of securities in accordance with the framework relating to short selling and securities lending and borrowing specified by SEBI. Provided further that sale of government security already contracted for purchase shall be permitted in accordance with the guidelines issued by the Reserve Bank of India in this regard.
14. The Scheme shall not make any investment in any fund of funds scheme.
15. Save as otherwise expressly provided under the Regulations, the Scheme shall not advance any loans for any purpose.
16. The Scheme 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 / or IDCW to the Unit holder. Provided the scheme shall not borrow more than 20% of the net assets of the Scheme and the duration of the borrowing shall not exceed a period of 6 months.
17. The Scheme shall participate in Repo in corporate debt securities in accordance with SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024 and such other directions issued by RBI and SEBI from time to time.
  - (i) The Gross exposure of the scheme to repo transactions in corporate debt securities shall not be more than 10% of the net asset of the scheme.
  - (ii) The cumulative gross exposure through equity, debt, foreign securities, derivative positions (including fixed income derivatives), other permitted securities/assets and such other securities/ assets as may be permitted by SEBI 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.
  - (iii) The Scheme shall participate in repo transactions only in AA and above rated corporate debt securities.
  - (iv) In terms of Regulation 44 (2) of the Securities and Exchange Board of India (Mutual Funds) Regulations, 1996, the Scheme shall borrow through repo transactions only if the tenor of the transaction does not exceed a period of six months.
  - (v) The Scheme shall ensure compliance with the Seventh Schedule of the Mutual Funds Regulations about restrictions on investments, wherever applicable, with respect to repo transactions in corporate debt securities.
  - (vi) The scheme shall participate Repo in corporate debt securities in accordance with directions issued by

RBI and SEBI from time to time and in accordance with the Policy framed by the Board of Directors of Samco Asset Private Limited and Samco Trustee Private Limited in this regard.

18. Pending deployment of the funds of the Scheme in securities in terms of the investment objective of the Scheme, the Mutual Fund may park the funds of the Scheme in short term deposits of scheduled commercial banks, subject to the following guidelines issued by SEBI vide its Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024 as may be amended from time to time:
- (i) "Short Term" for such parking of funds by the Scheme shall be treated as a period not exceeding 91 days. Such short-term deposits shall be held in the name of the Scheme.
  - (ii) The Scheme shall not park more than 15% of the net assets in short term deposit(s) of all the scheduled commercial banks put together. However, such limit may be raised to 20% with prior approval of the Trustee.
  - (iii) Parking of funds in short term deposits of associate and sponsors scheduled commercial banks together shall not exceed 20% of total deployment by the Mutual Fund in short term deposits.
  - (iv) The Scheme shall not park more than 10% of the net assets in short term deposit(s), with any one scheduled commercial bank including its subsidiaries.
  - (v) The Scheme shall not park funds in short term deposit of a bank which has invested in that Scheme. Further, the Trustees/AMC shall also ensure that the bank in which a scheme has short term deposit do not invest in the said scheme, until the scheme has short term deposit with such bank.
  - (vi) The above norms do not apply to term deposits placed as margins for trading in cash and derivatives market.
  - (vii) The AMC shall not charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks.

#### 19. Limitations and restrictions for investments in derivative instruments

All derivative position taken in the portfolio would be guided by the following principles

##### i. Position limit for the Mutual Fund in index options contracts

- a. The Mutual Fund position limit in all index options contracts on a particular underlying index shall be Rs. 500 crore or 15% of the total open interest of the market in index options, whichever is higher, per Stock Exchange.
- b. This limit would be applicable on open positions in all options contracts on a particular underlying index.

##### ii. Position limit for the Mutual Fund in index futures contracts

- a. The Mutual Fund position limit in all index futures contracts on a particular underlying index shall be Rs. 500 crore or 15% of the total open interest of the market in index futures, whichever is higher, per Stock Exchange.
- b. This limit would be applicable on open positions in all futures contracts on a particular underlying index.

##### iii. Additional position limit for hedging

In addition to the position limits at point (i) and (ii) above, the Mutual Fund may take exposure in equity index derivatives subject to the following limits:

- a. Short positions in index derivatives (short futures, short calls and long puts) shall not exceed (in notional value) the Mutual Fund's holding of stocks.
- b. Long positions in index derivatives (long futures, long calls and short puts) shall not exceed (in notional value) the Mutual Fund's holding of cash, government securities, T-Bills and similar instruments.

#### iv. Position limit for Mutual Fund for stock based derivative contracts

The combined futures and options position limit shall be 20% of the applicable Market Wide Position Limit (MWPL).

#### v. Position limit for each scheme of a Mutual Fund for stock based derivative contracts

The position limits for the Scheme and disclosure requirements are as follows:

- For stock option and stock futures contracts, the gross open position across all derivative contracts on a particular underlying stock of a scheme of a mutual fund shall not exceed the higher of 1% of the free float market capitalisation (in terms of number of shares) or 5% of the open interest in the derivative contracts on a particular underlying stock (in terms of number of contracts).
- This position limits shall be applicable on the combined position in all derivative contracts on an underlying stock at a Stock Exchange.
- For index based contracts, Mutual Funds shall disclose the total open interest held by its scheme or all schemes put together in a particular underlying index, if such open interest equals to or exceeds 15% of the open interest of all derivative contracts on that underlying index.

#### Exposure limits for the Scheme

In accordance with SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the following exposure limits for investment in derivatives will be applicable to the Scheme:

- The cumulative gross exposure through equity, debt, derivative positions (including fixed income derivatives), foreign securities, other permitted securities/assets and such other securities/ assets as may be permitted by SEBI from time to time shall not exceed 100% of the net assets of the Scheme.
- The Scheme shall not write options or purchase instruments with embedded written options except call options under a covered call strategy.
- The total exposure related to option premium paid shall not exceed 20% of the net assets of the Scheme.
- Exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
  - Hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains.
  - Hedging positions cannot be taken for existing derivative positions. Exposure due to such positions have to be added and treated under limits mentioned in point 1 above.
  - Any derivative instrument used to hedge shall have the same underlying security as the existing position being hedged.
  - 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.
- 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 as exposure for the limit mentioned in point 1 above.

#### VI. Definition of Exposure in case of Derivative Positions:

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
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20. The Scheme may write call options only under a covered call strategy for constituent stocks of NIFTY 50 and BSE SENSEX subject to the following:
- The total notional value (taking into account strike price as well as premium value) of call options written by scheme shall not exceed 15% of total market value of equity shares held in that scheme.
  - The total number of shares underlying the call options written shall not exceed 30% of the unencumbered shares of a particular company held in the scheme. The unencumbered shares in a scheme shall mean shares that are not part of Securities Lending and Borrowing Mechanism (SLBM), margin or any other kind of encumbrances.
  - At all points of time the Mutual Fund scheme shall comply with the provisions at paragraph (i) and (ii) above. In case of any passive breach of the requirement at paragraph (i), the respective scheme shall have 7 trading days to rebalance the portfolio. During the rebalancing period, no additional call options can be written in the said scheme.
  - In case the Scheme needs to sell securities on which a call option is written under a covered call strategy, it must ensure compliance with paragraphs (i) and (ii) above while selling the securities.
  - In no case, the scheme shall write a call option without holding the underlying equity shares. A call option can be written only on shares which are not hedged using other derivative contracts.
  - The premium received shall be within the requirements prescribed in SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024 i.e. the total gross exposure related to option premium paid and received must not exceed 20% of the net assets of the Scheme.

The exposure on account of the call option written under the covered call strategy shall not be considered as exposure of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024.

21. The Mutual Fund may hedge the portfolio or part of the portfolio (including one or more securities) on weighted average modified duration basis by using Interest Rate Futures (IRFs). The maximum extent of short position that may be taken in IRFs to hedge interest rate risk of the portfolio or part of the portfolio, is as per the formula given below:

$(\text{Portfolio Modified Duration} \times \text{Market Value of the Portfolio}) / (\text{Futures Modified Duration} \times \text{Futures Price} / \text{PAR})$

The Scheme will comply with the other Regulations applicable to the investments of Mutual Funds from time to time.

All the investment restrictions will be applicable at the time of making investments.

The AMC/Trustee may alter these above stated restrictions from time to time to the extent the Regulations change, so as to permit the Scheme to make its investments in the full spectrum of permitted investments for mutual funds to achieve its respective investment objective.

## C. FUNDAMENTAL ATTRIBUTES

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

### (i) Type of a Scheme:

An open ended dynamic asset allocation fund

### (ii) Investment Objective:

- Investment Objective** – The investment objective of the Scheme is to generate income/long-term capital appreciation by investing in equity, equity derivatives, fixed income instruments and foreign securities. The



allocation between equity instruments and fixed income will be managed dynamically so as to provide investors with long term capital appreciation while managing downside risk. There is no assurance that the investment objective of the scheme will be achieved.

- **Investment pattern** - Please refer to the section “How will the scheme allocate its assets?”. The fund retains the option to alter the asset allocation on a short-term basis in the interest of unitholders on defensive considerations.

### (iii) Terms of Issue

- **Liquidity provisions such as listing, repurchase, redemption** - Please refer to the Part I
- **Aggregate fees and expenses charged to the scheme:** Please refer to the section Part II Other details
- **Any safety net or guarantee provided:** This scheme is not a guaranteed or an assured return scheme.

In accordance with Regulation 18(15A) of the SEBI (MF) Regulations and SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the Trustee shall ensure that no change in the fundamental attributes of the Scheme(s) and the Plan(s) / Option(s) thereunder or the trust or fee and expenses payable or any other change which would modify the Scheme(s) and the Plan(s) / Option(s) thereunder and affect the interests of Unit holders is carried out unless:

- SEBI has reviewed and provided its comments on the proposal
- A written communication about the proposed change is sent to each Unitholder and 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 Unitholders are given an option for a period of atleast 30 calendar days to exit at the prevailing Net Asset Value without any exit load.

### D. OTHER SCHEME SPECIFIC DISCLOSURES:

<b>Listing and transfer of units</b>	<p>The Scheme is an open-ended equity Scheme under which Sale and Repurchase will be made on a continuous basis and therefore listing on stock exchanges is not envisaged. The Trustee/AMC may at its discretion list the units on any Stock Exchange.</p> <p>The Unit holders are given an option to hold the Units by way of an Account Statement (physical form) or in Dematerialized (demat form). Units held in Demat form are transferable (subject to lock-in period, if any and subject to lien, if any marked on the units) in accordance with the provisions of SEBI (Depositories and Participants) Regulations, 1996, as may be amended from time to time. Transfer can be made only in favor of transferees who are capable of holding Units and having a Demat Account. The delivery instructions for transfer of Units will have to be lodged with the DP in requisite form as may be required from time to time and transfer will be effected in accordance with such rules / regulations as may be in force governing transfer of securities in dematerialized mode. Further, for the procedure of release of lien, the investors shall contact their respective DP.</p> <p>Pursuant to AMFI Best Practice Guideline No. 135/ BP/116/ 2024-25 dated August 14, 2024, the facility for transfer of units held in non-demat (SoA) mode shall be available to individual unitholders falling under the following three categories:</p> <p>a) Surviving joint unitholder, who wants to add new joint holder(s) in the folio upon demise of one or more joint unitholder(s).</p>
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	<p>b) A nominee of a deceased unitholder, who wants to transfer the units to the legal heirs of the deceased unitholder, post the transmission of units in the name of the nominee.</p> <p>c) A minor unitholder who has turned a major and has changed his/her status from minor to major, wants to add the name of the parent / guardian, sibling, spouse etc. in the folio as joint holder(s).</p> <p>For detailed process/guidelines for transfer of units held in non-demat (SoA) mode, kindly refer SAI.</p>
<b>Dematerialization of units</b>	<p>The Unit holders are given an option to hold the Units in physical form (by way of an account statement) or in dematerialized form (Demat).</p> <p>Each Option under each Plan held in the dematerialised form shall be identified on the basis of an International Securities Identification Number (ISIN) allotted by National Securities Depositories Limited (NSDL) and Central Depository Services Limited (CDSL). The ISIN No. details of the respective option under the respective Plan can be obtained from your Depository Participant (DP) or the investors can access the website link <a href="http://www.nsdl.co.in">www.nsdl.co.in</a> or <a href="http://www.cdslindia.com">www.cdslindia.com</a>. The holding of units in the dematerialised mode would be subject to the guidelines/procedural requirements as laid by the Depositories viz. NSDL/CDSL from time to time.</p> <p><b>Subscription of units under Dematerialised Mode &amp; allotment thereof:</b></p> <p>The Applicants intending to hold the Units in dematerialised mode will be required to have a beneficiary account with a DP of the NSDL/CDSL and will be required to mention the DP's Name, DP ID No. and Beneficiary Account No. with the DP in the application form at the time of subscription/ additional purchase of the Units of the Scheme/Plan/Option.</p> <p>The applicant shall mandatorily attach a self-attested copy of the latest demat account statement/client master statement along with the application forms at the time of initial subscription. The application for subscription would be liable to be rejected by the AMC/ Registrar under the following conditions:</p> <ol style="list-style-type: none"> <li>In case the applicants do not provide their Demat Account details in the application form; or</li> <li>The demat details provided in the application form are incomplete / incorrect or do not exactly match with the details in the Depository records; and/or</li> <li>The mode of holding in the application form does not match exactly with that of the demat mode of holding.</li> </ol> <p>Applicants intending to hold units in the dematerialised mode would be considered to be KYC compliant as per the DP records and no separate KYC acknowledgment proof needs to be submitted to the AMC/Registrar. However, the submission of KYC acknowledgement proof is optional. It may be noted that in case the application stands rejected due to any of the above reasons, the AMC/ Registrar shall refund the amount to the applicants in line with the provisions of the SID. However, if the applicant has submitted the KYC acknowledgment proof along with the application forms, the units will be allotted in the physical mode 'by default' (without any separate intimation to such applicant) and an Account Statement shall be sent to the Unit holders in accordance with the provisions of the SID. It may be further noted that for any such default allotment the "Source Bank Account" (as per the payment instrument submitted along with the application form) shall be considered as the bank mandate for all purposes.</p>

	<p>NOTE: It may be noted that the facilities viz. Switch in and out, Systematic Withdrawal Plan (SWP) / Systematic Transfer Plan (STP), are currently not available in the dematerialised mode. It may also be noted that units in the demat mode shall only be credited in the DP account on the basis of realization of funds.</p> <p>Note:</p> <p>It is further clarified that the demat mode of holding is subject to the following:</p> <ol style="list-style-type: none"> <li>Mandatory Submission of the PAN details along with the necessary proofs in accordance with the provisions of the SAI;</li> <li>Provisions of "Non-Acceptance of Third Party Payment Instruments for subscription/investments of units" under the section "How to Apply" in the SAI.</li> <li>Submission of such other mandatory authority documents as may be specified in the application forms for individual/non-individual category of investors;</li> <li>All communications under demat mode of holding shall be on the basis of DP ID and client ID submitted in the application form and no separate folio shall be created for the same.</li> </ol> <p>For further details on dematerialised mode of holding Units, investors are requested to refer to the SAI.</p>
<b>IDCW Policy</b>	<p>The Trustee will endeavour to declare IDCW under the Income Distribution cum Capital Withdrawal Option, subject to availability of distributable surplus calculated in accordance with the Regulations.</p> <p><b>IDCW Declaration Procedure: -</b></p> <p>The procedure for IDCW distribution would be as under:</p> <p>The quantum of IDCW and the record date may be fixed by the Trustee in their meeting. IDCW so decided shall be paid subject to availability of distributable surplus. Record date is the date that will be considered for the purpose of determining the eligibility of investors whose name appears on the register of unitholders.</p> <p>The AMC shall issue a notice to the public communicating the decision of IDCW declaration including the record date, within one calendar day of the decision of the Trustee, 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.</p> <p>The record date shall be two working days from the date of publication in at least one English newspaper or in a newspaper published in the language of the region where the Head Office of the mutual fund is situated, whichever is issued earlier.</p> <p><b>IDCW Distribution Procedure: -</b></p> <p>The IDCW proceeds will be paid by way of cheque, IDCW Warrants / Direct Credit / National Electronic Fund Transfer (NEFT) / Real Time Gross Settlement (RTGS) / National Electronic Clearing System (NECS) or any other manner to the unitholder's bank account as recorded in the Registrar's</p>

	<p>records. The AMC, at its discretion at a later date, may choose to alter or add other modes of payment.</p> <p>In case of Units under the Income Distribution cum Capital Withdrawal Option held in dematerialised mode, the IDCW pay-out will be credited to the bank account of the investor, as per the bank account details recorded with the DP.</p> <p><b>Effect of IDCW:</b></p> <p>The investors should note that the Fund does not assure or guarantee declaration of IDCW under the Income Distribution cum Capital Withdrawal Option. The actual declaration of IDCW, frequency and the rate of IDCW will inter alia, depend on availability of distributable surplus calculated in accordance with SEBI (MF) Regulations and the decisions of the Trustee shall be final in this regard. There is no assurance or guarantee to the unitholders as to the rate of IDCW nor that the IDCW will be paid regularly. Post declaration of IDCW, the NAV of the Units under the Income Distribution cum Capital Withdrawal Option will stand reduced by the amount of IDCW declared and applicable surcharge/cess/any other statutory levy.</p> <p>Even though the asset portfolio will be common at the scheme level, the NAVs of the growth option and Income Distribution cum Capital Withdrawal Option in each respective Plan under the Scheme will be distinctly different after declaration of the first IDCW to the extent of distributed income, applicable tax and statutory levy, if any, and expenses relating to the distribution of the IDCW.</p> <p>All the IDCW declaration and payments shall be in accordance and in compliance with SEBI regulations, as amended from time to time.</p>
<b>Allotment</b>	<p>The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 working days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or mobile number (whether units are held in demat mode or in account statement form).</p> <p>A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 12th of the succeeding month who opted for delivery via electronic mode and to investors that have opted for delivery via physical mode, within fifteen (15) days from the month end.</p> <p>In case there is no transaction in any of the mutual fund and demat accounts then CAS with holding details shall be sent to the investors by email on half yearly basis. The investors that have opted for delivery via electronic mode, the CAS shall be send on or before the eighteenth (18th) day of April and October and to investors that have opted for delivery via physical mode, on or before the twenty-first (21st) day of April and October. However, where an investor does not wish to receive CAS through email, option shall be given to the investor to receive the CAS in physical form at the address registered with the Depositories and the AMCs/RTAs.</p> <p>For further details, refer SAI.</p>
<b>Refund</b>	<p>The AMC will refund the application money to applicants whose applications are found to be incomplete, invalid or have been rejected for any other reason whatsoever. The Refund proceeds will be paid by way of NEFT / RTGS / Direct</p>

	<p>credits/ IMPS / any other electronic manner if sufficient banking details are available with the Mutual Fund for the Unit holder or else through dispatch of Refund instruments within 5 business days of the closure of NFO period.</p> <p>In the event of delay beyond 5 business days, the AMC shall be liable to pay interest at 15% per annum or such other rate of interest as maybe prescribed from time to time. Refund orders will be marked "A/c Payee only" and drawn in the name of the applicant (in the case of a sole applicant) and in the name of the first applicant in all other cases, or by any other mode of payment as authorised by the applicant. All refund orders will be sent by registered post or as permitted by Regulations.</p>
<p><b>Who can invest?</b> This is an indicative list and you are requested to consult your financial advisor to ascertain whether the scheme is suitable to your risk profile.</p>	<p>The following persons (subject to, wherever relevant, purchase of Units of mutual funds, being permitted under respective constitutions, and relevant statutory regulations) are eligible and may apply for Subscription to the Units of the Scheme:</p> <ol style="list-style-type: none"> <li>1. Resident adult individuals either singly or jointly (not exceeding three) or on an Anyone or Survivor basis;</li> <li>2. Hindu Undivided Family (HUF) through Karta;</li> <li>3. Minor (as the first and the sole holder only) through a natural guardian (i.e. father or mother, as the case may be) or a court appointed legal guardian;</li> <li>4. Partnership Firms including limited liability partnership firms;</li> <li>5. Proprietorship in the name of the sole proprietor;</li> <li>6. Companies, Bodies Corporate, Public Sector Undertakings (PSUs), Association of Persons (AOP) or Bodies of Individuals (BOI) and societies registered under the Societies Registration Act, 1860 (so long as the purchase of Units is permitted under the respective constitutions);</li> <li>7. Banks (including Co-operative Banks and Regional Rural Banks) and Financial Institutions;</li> <li>8. Religious and Charitable Trusts, Wakfs or endowments of private trusts (subject to receipt of necessary approvals as "Public Securities" as required) and Private trusts authorised to invest in mutual fund schemes under their trust deeds;</li> <li>9. Non-Resident Indians (NRIs) / Persons of Indian origin (PIOs)/ Overseas Citizen of India (OCI) residing abroad on repatriation basis or on non-repatriation basis;</li> <li>10 Foreign Institutional Investors (FIIs) and their sub-accounts registered with SEBI on repatriation basis;</li> <li>11. Army, Air Force, Navy and other para-military units and bodies created by such institutions;</li> <li>12. Scientific and Industrial Research Organizations;</li> <li>13. Multilateral Funding Agencies / Bodies Corporate incorporated outside India with the permission of Government of India / RBI;</li> <li>14. Provident/ Pension/ Gratuity Fund to the extent they are permitted;</li> <li>15. Other schemes of Samco Mutual Fund or any other mutual fund subject to the conditions and limits prescribed by the SEBI (MF) Regulations;</li> <li>16. Schemes of Alternative Investment Funds;</li> <li>17. Trustee, AMC or Sponsor or their associates may subscribe to Units under the Scheme;</li> <li>18. Qualified Foreign Investor (QFI)</li> <li>19. Such other individuals' /institutions/ body corporates etc., as may be decided by the AMC from time to time, so long as, wherever applicable, subject to their respective constitutions and relevant statutory regulations.</li> </ol>

The list given above is indicative and the applicable laws, if any, as amended from time to time shall supersede the list.

**Note:**

1. Non Resident Indians (NRIs) and Persons of Indian Origin (PIOs) residing abroad / FPIs have been granted a general permission by Reserve Bank of India under Schedule 5 of the Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulations, 2017 for investing in / redeeming units of the mutual funds subject to conditions set out in the aforesaid regulations.

2. It is expressly understood that at the time of investment, the investor/unitholder has the express authority to invest in units of the Scheme and AMC / Trustee / Mutual Fund will not be responsible if such investment is ultravires the relevant constitution. Subject to the Regulations, the Trustee may reject any application received in case the application is found invalid/ incomplete or for any other reason in the Trustee's sole discretion.

3. Dishonoured cheques are liable not to be presented again for collection, and the accompanying application forms are liable to be rejected.

4. The Trustee, reserves the right to recover from an investor any loss caused to the Scheme on account of dishonour of cheques issued by the investor for purchase of Units of this Scheme.

5. For subscription in the Scheme, it is mandatory for investors to make certain disclosures like bank details etc. and provide certain documents like PAN copy etc. (for details please refer SAI) without which the application is liable to be rejected.

6. Subject to the SEBI (MF) Regulations, any application for units of this Scheme may be accepted or rejected in the sole and absolute discretion of the Trustee/AMC. The Trustee/AMC may inter-alia reject any application for the purchase of units if the application is invalid or incomplete or if the Trustee for any other reason does not believe that it would be in the best interest of the Scheme or its unitholders to accept such an application.

7. Pursuant to 17.6 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the following process shall be applicable for investments made in the name of a minor through a guardian:

a. Payment for investment by any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with the parent or legal guardian. Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor, i.e. the account the minor may hold with the parent/ legal guardian after completing all KYC formalities. For existing folios, in case the pay-out bank mandate is not held solely by the minor or jointly by minor and guardian, the investors are requested to provide a change of pay-out bank mandate request along with supporting documents before providing redemption request.

b. Upon the minor attaining the status of major, the minor in whose name the investment was made, shall be required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new account. This in regard, the investors are required to submit the 'Minor attaining majority – request form to change status' available on the AMC's website [www.samcomf.com](http://www.samcomf.com). Upon the minor attaining the status of major, no further transactions shall be allowed till the status of the minor is changed to major.



	<p>c. Any instructions registered for Systematic Investment Plan (SIP), Systematic Transfer Plan (STP) and Systematic Withdrawal Plan (SWP) shall be suspended when the minor attains majority, till the status is changed to major.</p> <p>For further details, please refer the SAI.</p>
<b>Who cannot invest</b>	<ol style="list-style-type: none"> <li>Any individual who is a foreign national or any other entity that is not an Indian resident under the Foreign Exchange Management Act, 1999 (FEMA Act) except where registered with SEBI as a FPI or otherwise explicitly permitted under FEMA Act/ by RBI/ by any other applicable authority.</li> <li>Pursuant to RBI A.P. (DIR Series) circular no. 14 dated September 16, 2003, Overseas Corporate Bodies (OCBs) cannot invest in Mutual Funds.</li> <li>NRIs residing in Non-Compliant Countries and Territories (NCCTs) as determined by the Financial Action Task Force (FATF), from time to time.</li> <li>U.S. Persons and Residents of Canada as defined under the applicable laws of U.S. and Canada except the following: <ol style="list-style-type: none"> <li>subscriptions received by way of lump sum / switches /systematic transactions received from Non-resident Indians (NRIs) / Persons of Indian origin (PIO) / Overseas Citizen of India (OCI) who at the time of such investment, are present in India and</li> <li>FPIs</li> </ol> </li> <li>Such other persons as may be specified by AMC from time to time.</li> </ol> <p>The AMC reserves the right to include/exclude new/existing categories of investors to invest in the Scheme from time to time, subject to SEBI Regulations and other prevailing statutory regulations, if any. The Mutual Fund / Trustee / AMC may redeem Units of any Unit holder in the event it is found that the Unit holder has submitted information either in the application or otherwise that is false, misleading or incomplete or Units are held by any person in breach of the SEBI Regulations, any law or requirements of any governmental, statutory authority.</p>
<b>How to Apply and other details</b>	<p>The Applications Forms shall be made available at Investor Service Centres (ISCs)/Official Points of Acceptance (OPAs) of Samco Mutual Fund and/or may be downloaded from the website of AMC (<a href="http://www.samcomf.com">www.samcomf.com</a>). Please refer to the SAI and Application form for the instructions.</p> <p>The link for the list of the Investor Service Centres (ISCs)/Official Points of Acceptance (OPAs), collecting bank details etc will be provided on the website of the AMC.</p> <p>It is mandatory for applicants to mention their bank account numbers in their applications for subscription or redemption of units of the Scheme. If the investor fails to provide the bank mandate, the request for redemption would be considered as not valid and the scheme retains the right to withhold the redemption until a proper bank mandate is furnished. Any provision with respect to penal interest in such cases will not be applicable.</p>
<b>The policy regarding reissue of repurchased units, including the maximum extent, the manner of reissue, the entity (the scheme or the AMC) involved in the same</b>	Not Applicable
<b>Restrictions, if any, on the right to freely retain or dispose of units being offered</b>	<b>Suspension of sale of units</b>



With the approval of the Boards of Directors of the Trustee and the Asset Management Company, the sale of Units may be suspended temporarily or indefinitely when any of the following conditions exist:

1. The equity / debt market stops functioning or trading is restricted.
2. Periods of extreme volatility in the equity / debt market, which, in the opinion of the Investment Manager, is prejudicial to the interest of the investors.
3. When there is a strike by the banking community or trading is restricted by RBI or other authority.
4. Period of extreme volatility in the equity / debt / money market, which in the opinion of the Board of Directors of AMC and Trustee is prejudicial to the interest of the scheme's investors.
5. As and when directed by the Government of India or RBI or SEBI to do so or conditions relating to natural calamity/external aggression/internal disturbances etc. arises, so as to cause volatile movements in the money or debt market, which in the opinion of the AMC, will be prejudicial to the interest of the unitholders, if further trading in the scheme is continued.
6. Break down in the information processing/communication systems affecting the valuation of investments/processing of sale/repurchase request.
7. Natural calamity.
8. SEBI, by order, so directs.
9. Trustee views that increasing the Scheme's size further may prove detrimental to the existing/prospective Unitholders of the Scheme.
10. Any other circumstances which in the opinion of the Board of Directors of AMC and Trustee is prejudicial to the interest of the existing/prospective investors.

#### **Suspension of redemption of units**

With the approval of the Boards of Directors of the Trustee and the Asset Management Company, the redemption of Units may be suspended temporarily 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. 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.

iv. Based on any other guidance/ circular issued by SEBI from time to time.

	<p>Restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period. The approval from the Boards of AMC / Trustee shall also be informed to SEBI in advance.</p> <p><b>When restriction on redemption is imposed, the following procedure shall be applied:</b></p> <ol style="list-style-type: none"> <li>No redemption requests upto Rs. 2 lakh shall be subject to such restriction.</li> <li>Where redemption requests are above Rs. 2 lakh, AMC shall redeem the first Rs. 2 lakh without such restriction and remaining part over and above Rs. 2 lakh shall be subject to such restriction.</li> </ol> <p>Any Units which, by virtue of these limitations, are not redeemed on a particular Business Day will be carried forward for redemption on the next following Business Day in order of receipt. Redemptions carried forward will be made at the NAV in effect on the subsequent Business Day(s) on which the condition for redemption request is fulfilled. To the extent multiple redemptions are being satisfied in a single day under these circumstances, such payments will be made pro-rata based on the size of each redemption request. Under such circumstances, redemption cheques may be mailed out to investors within a reasonable period of time and will not be subject to the normal response time for redemption cheque mailing.</p> <p>In case where more than one application is received for redemption in a scheme for an aggregate redemption amount equal to or more than Rs.2 lakhs on any Business Day across all plans/options of the relevant scheme, then such applications shall be aggregated at the investor level (same holders/joint holders identified by their Permanent Account Numbers (PAN) in the same sequence).</p> <p>Such aggregation shall be done irrespective of the number of folios under which the investor is redeeming and irrespective of mode, location and time of application.</p>
<p><b>Cut off timing for subscriptions/ redemptions/ switches</b></p> <p>This is the time before which your application (complete in all respects) should reach the official points of acceptance.</p>	<p><b>Subscriptions/Purchases including Switch – ins:</b></p> <p>The following cut-off timings shall be observed by the Mutual Fund in respect of purchase of units of the Scheme and the following NAVs shall be applied for such purchase:</p> <ol style="list-style-type: none"> <li>In respect of valid applications received upto 3.00 p.m. on a Business Day at the Designated Investor Service Centre and funds for the entire amount of subscription/purchase /switch-in as per the application are credited to the bank account of the respective Scheme / the Fund before the cut-off time i.e. available for utilization before the cut-off time – the closing NAV of the day on which the funds are available for utilization shall be applicable</li> <li>In respect of valid applications received after 3.00 p.m. on a Business Day at the Designated Investor Service Centre and funds for the entire amount of subscription/purchase /switch-in as per the application are credited to the bank account of the respective Scheme / the Fund after cut-off time i.e. available for utilization after the cut-off time – the closing NAV of the day next business day on which the funds are available for utilization shall be applicable</li> <li>Irrespective of the time of the receipt of valid at the Designated Investor Service Centre where funds for the entire amount of subscription/purchase /switch-in as per the application are credited to the bank account of the respective Scheme / the Fund before cut-off time of next business day i.e. available for utilization before the cut-off time on any subsequent Business day – the closing NAV of the day of such Business day on which the funds are available for utilization shall be applicable.</li> </ol>

	<p>For allotment of units in respect of purchase in the Scheme under Pt. (3) above, it shall be ensured that:</p> <ul style="list-style-type: none"> <li>i. Application is received before the applicable cut-off time</li> <li>ii. Funds for the entire amount of subscription/purchase as per the application are credited to the bank account of the Scheme before the cut-off time.</li> <li>iii. The funds are available for utilization before the cut-off time without availing any credit facility whether intra-day or otherwise, by the Scheme.</li> </ul> <p>For allotment of units in respect of switch-in to the scheme under Pt. (3) above from other schemes, it shall be ensured that:</p> <ul style="list-style-type: none"> <li>i. Application for switch-in is received before the applicable cut-off time.</li> <li>ii. 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.</li> <li>iii. The funds are available for utilization before the cut-off time without availing any credit facility whether intra-day or otherwise, by the Scheme.</li> </ul> <p><b>Redemptions including Switch – outs:</b></p> <p>The following cut-off timings shall be observed by the Mutual Fund in respect of Repurchase of Units:</p> <ul style="list-style-type: none"> <li>1. where the application received upto 3.00 pm – closing NAV of the day of receipt of application; and</li> <li>2. an application received after 3.00 pm – closing NAV of the next Business Day.</li> </ul> <p><b>Note:</b> In case the application is received on a Non-Business Day, it will be considered as if received on the Next Business Day.</p> <p>The above mentioned cut off timing shall also be applicable to transactions through the online trading platform.</p> <p>In case of Transaction through Stock Exchange Infrastructure, the Date of Acceptance will be reckoned as per the date &amp; time; the transaction is entered in stock exchange's infrastructure for which a system generated confirmation slip will be issued to the investor.</p>
<b>Minimum amount for purchase/redemption/switches</b>	<p><b>Minimum amount for purchase/Switch in:</b></p> <p>₹ 5,000 and in multiples of ₹1/- thereafter</p> <p><b>Minimum Additional Purchase Amount:</b></p> <p>₹ 500 and in multiples of ₹1/- thereafter</p> <p><b>Minimum Redemption Amount/Switch Out</b></p> <p>There will be no minimum redemption criterion. The Redemption / Switch-out would be permitted to the extent of credit balance in the Unit holder's account of the Plan(s) / Option(s) of the Scheme (subject to completion of Lock-in period or release of pledge / lien or other encumbrances).</p> <p>The AMC/ Trustee reserves the right to change/ modify the terms of minimum redemption amount/switch-out provision offered under the Scheme of the Fund.</p>
<b>Accounts Statements</b>	<p>The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 working days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or</p>

	<p>mobile number (whether units are held in demat mode or in account statement form).</p> <p>A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 12th of the succeeding month who opted for delivery via electronic mode and to investors that have opted for delivery via physical mode, within fifteen (15) days from the month end.</p> <p>In case there is no transaction in any of the mutual fund and demat accounts then CAS with holding details shall be sent to the investors by email on half yearly basis. The investors that have opted for delivery via electronic mode, the CAS shall be send on or before the eighteenth (18th) day of April and October and to investors that have opted for delivery via physical mode, on or before the twenty-first (21st) day of April and October. However, where an investor does not wish to receive CAS through email, option shall be given to the investor to receive the CAS in physical form at the address registered with the Depositories and the AMCs/RTAs.</p> <p>For further details, refer SAI.</p>
<b>Income Distribution cum Capital Withdrawal</b>	<p>The IDCW warrants / proceeds shall be dispatched to the unitholders within 7 working days from the record date.</p> <p>In case of Unit holders having a bank account with certain banks with which the Mutual Fund would have an arrangement from time to time, the IDCW proceeds shall be electronically credited to their account.</p> <p>In case of specific request for IDCW by warrants/cheques/demand drafts or unavailability of sufficient details with the Fund, the IDCW will be paid by warrant/cheques/demand drafts and payments will be made in favour of the unitholder (registered holder of the Unit or, if there are more than one registered holder, only to the first registered holder) with bank account number furnished to the Fund.</p> <p>Please note that it is mandatory for the unitholders to provide the bank account details as per SEBI guidelines.</p> <p>In case of Units under the Income Distribution cum Capital Withdrawal Option held in dematerialised mode, the Depositories (NSDL/CDSL) will give the list of demat account holders and the number of Units held by them in electronic form on the Record date to the AMC/Registrar. The IDCW pay-out will be credited to the bank account of the investor, as per the bank account details recorded with the DP.</p>
<b>Redemption</b>	<p>Under normal circumstances, the AMC shall dispatch the redemption proceeds within 3 business days from the date of receipt of request from the Unit holder. A penal interest of 15% per annum or such other rate as may be prescribed by SEBI from time to time, will be paid in case the Redemption proceeds are not initiated within above timelines from the date of receipt of a valid Redemption request.</p>
<b>Bank Mandate</b>	<p><b>Bank Mandate Requirement</b></p> <p>For all fresh subscription transactions made by means of a cheque, if cheque provided alongwith fresh subscription/new folio creation does not belong to the bank mandate opted in the application form, any one of the following documents needs to be submitted.</p> <ol style="list-style-type: none"> <li>1) Original cancelled cheque having the First Holder Name printed on the cheque.</li> </ol>

	<ol style="list-style-type: none"> <li>2) Original bank statement reflecting the First Holder Name, bank account number and bank name as specified in the application.</li> <li>3) Photocopy of the bank statement duly attested by the bank manager with designation, employ-ee number and bank seal.</li> <li>4) Photocopy of the bank passbook duly attested by the bank manager with designation, employee number and bank seal.</li> <li>5) Photocopy of the bank statement/passbook/cheque duly attested by the AMC officials after verification of original bank statement/passbook shown by the investor or their representative.</li> <li>6) Confirmation by the bank manager with seal, designation and employee number on the bank's letter head confirming the name of investor, account type, bank branch, MICR and IFSC code of the bank branch. The letter should not be older than 3 months.</li> </ol> <p>This condition is also applicable to all subscription transactions made by means of a Demand raft. In case the application is not accompanied by the aforesaid documents, the AMC reserves the right to reject the application, also the AMC will not be liable in case the redemption/IDCW proceeds are credited to wrong account in absence of above documents.</p> <p>In case the bank account details are not mentioned or found to be incomplete or invalid in a sub-scription application, then the AMC may consider the account details as appearing in the investment amount cheque and the same shall be updated under the folio as the payout bank account for the payment of redemption/IDCW amount etc.</p> <p>The aforementioned updation of bank account shall however be subject to compliance with the third party investment guidelines issued by Association of Mutual Funds in India (AMFI) from time to time.</p> <p>The AMC reserves the right to call for any additional documents as may be required, for pro-cessing of such transactions with missing/incomplete/invalid bank account details. The AMC al-so reserves the right to reject such applications.</p>
<b>Delay in payment of redemption / repurchase proceeds / IDCW</b>	<p>The AMC shall be liable to pay interest to the Unit holders at 15% or such other rate as may be prescribed by SEBI from time to time, in case the Redemption / Repurchase proceeds are not made within 3 Business Days of the date of Redemption / Repurchase. As per AMFI circular no. AMFI/35P/MEM-COR/74/2022-23 dated January 16, 2023, in case of exceptional situations the AMC might follow the additional timelines for making redemption payments. For further information, please refer to the SAI.</p> <p>If the Unit holder fails to provide the Bank mandate, the request for redemption would be considered as not valid and the Fund retains the right to reject/withhold the redemption until a proper bank mandate is furnished by the Unitholder and the provision with respect of penal interest in such cases will not be applicable/ entertained.</p> <p>The mode of payment may be direct credit/ECS/cheque, or any other mode as may be decided by AMC in the interest of investors. If the investor(s)/unitholder(s) submit(s) redemption request accompanied with request for change of Bank mandate or submits a redemption request within 7 days from the date submission of a request for change of Bank mandate details, the Asset Management Company will process the redemption but the release of redemption proceeds shall be deferred on account of additional verification, but will be within the regulatory limits as specified by Securities and Exchange Board of India time to time.</p>



<p><b>Unclaimed Redemptions and IDCW</b></p>	<p>As per clause 14.3 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the unclaimed redemption and IDCW amounts shall be deployed by the Fund in call money market or money market instruments or in a separate plan of Overnight Fund / Liquid scheme / Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts. Provided that such schemes where the unclaimed redemption and IDCW amounts are deployed shall be only those Overnight scheme/ Liquid scheme / Money Market Mutual Fund schemes which are placed in A-1 cell (Relatively Low Interest Rate Risk and Relatively Low Credit Risk) of Potential Risk Class matrix as per clause 17.5 of SEBI Master Circular for Mutual Funds dated June 27, 2024. There shall be no exit load in this plan, and TER (Total Expense Ratio) of such plan shall be capped as per the TER of direct plan of such scheme or at 50bps whichever is lower. Investors claiming these amounts during a period of three years from the due date shall be paid initial unclaimed amount along-with the income earned on its deployment. Investors, who claim these amounts after 3 years, shall be paid initial unclaimed amount along-with the income earned on its deployment till the end of the third year. After the third year, the income earned on such unclaimed amounts shall be used for the purpose of investor education. The AMC shall make a continuous effort to remind investors through letters to take their unclaimed amounts.</p> <p><b>Process for claiming the unclaimed amounts:</b></p> <p>i) Investors can obtain information regarding the unclaimed amounts, if any, under their folios from the website of Samco Mutual Fund viz. <a href="http://www.samcomf.com">www.samcomf.com</a>.</p> <p>ii) The process of claiming the unclaimed amount and the necessary forms / documents required for the same is available on the website of Samco Mutual Fund. Further, the information on unclaimed amount along with its prevailing value (based on income earned on deployment of such unclaimed amount), will be separately disclosed to investors through the periodic statement of accounts / Consolidated Account Statement sent to the investors.</p> <p>Please refer SAI for complete detail.</p> <p><b>Mutual Fund Investment Tracing and Retrieval Assistant</b></p> <p>SEBI, vide its circular no. SEBI/HO/IMD/IMD-SEC-3/P/CIR/2025/15 dated February 12, 2025, has introduced a service platform Mutual Fund Investment Tracing and Retrieval Assistant (MITRA) designed to help investors trace inactive and unclaimed Mutual Fund folios. MITRA platform provides a centralized, industry-wide searchable database, enabling investors to identify overlooked investments or those made by others for which they may be rightful legal claimants. The platform also encourages investors to complete their KYC as per current norms, thereby reducing the number of non-KYC-compliant folios and ultimately leading to a decline in unclaimed Mutual Fund folios.</p> <p>An inactive folio is defined as a Mutual Fund folio where no investor-initiated transactions (financial or non-financial) have taken place in the last 10 years, but unit balances remain available. These may include folios where investors have either consciously chosen to remain invested in an open-ended scheme or have lost track of their investments. There is no adverse consequence for folios appearing on the platform if the investor is aware of their holdings and has intentionally remained invested. The primary objective of MITRA is to</p>
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	<p>assist investors in retrieving forgotten Mutual Fund investments and ensuring their KYC compliance.</p> <p>The MITRA platform will be jointly hosted by the two Qualified RTAs (QRTAs)—Computer Age Management Services Limited (CAMS) and KFIN Technologies Limited—acting as agents for Asset Management Companies (AMCs). It will be accessible via a link on the websites of MF Central, AMCs, AMFI, the two QRTAs, and SEBI, ensuring widespread availability and ease of access for investors.</p>
<b>Disclosure w.r.t investment by minors</b>	<p>In case of investments held in the name of a minor, no joint holders will be registered. The minor, acting through the guardian, should be the first and sole holder in the Folio/Account. The guardian should be either the parent (i.e. father or mother) or the court appointed legal guardian. The guardian of the minor may need to submit such declarations and/or other documents/information as a proof of guardianship, as may be prescribed by the AMC from time to time. Date of birth of the minor along with photocopies of the supporting documents (viz. birth certificate, school leaving certificate/ Mark sheet issued by Higher Secondary Board of respective states, ICSE, CBSE etc., or, passport or any other document evidencing the date of birth of the minor) should be mandatorily provided while opening the account. Payment for investment by any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian. Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor, i.e. the account the minor may hold with the parent/ legal guardian after completing all KYC formalities. Upon attainment of majority by the minor, the account should be regularised forthwith, the minor in whose name the investment was made, shall be required to provide all the KYC details, updated bank account details including cancelled original cheque leaf of the new account. No further transactions shall be allowed till the status of the minor is changed to major. The AMC may specify such procedures for regularisation of the Folio, as may be deemed appropriate from time to time. Post attainment of majority by the minor, the Mutual Fund/AMC will not be obliged to accept any instruction or transaction application made under the signature of the guardian. In case of an application for registration of a systematic transaction facility (Systematic Investment Plan / Systematic Transfer Plan / Systematic Withdrawal Plan or Transfer of Income Distribution cum capital withdrawal), if the end date of the facility extends beyond the date of attainment of majority by the minor, such facility will be registered only up to the date of attaining majority.</p>
<b>Risk-o-meter</b>	<p>AMC shall disclose risk-o-meter of the scheme and benchmark while disclosing the performance of scheme vis-à-vis benchmark and shall send the details of the scheme portfolio while communicating the monthly and half-yearly statement of scheme portfolio by email. Any change in risk-o-meter shall be communicated by way of addendum and by way of an e-mail or SMS to unitholders of the scheme. Risk-o-meter shall be evaluated on a monthly basis and AMC shall disclose the Risk-ometer along with portfolio disclosure for the scheme on the AMC website at link: <a href="https://www.samcomf.com/StatutoryDisclosure">https://www.samcomf.com/StatutoryDisclosure</a> and that of AMFI (<a href="http://www.amfiindia.com">www.amfiindia.com</a>) within 10 days from the close of each month.</p>
<b>Scheme Summary Document</b>	<p>The AMC will provide on its website a standalone scheme document for all the Schemes which contains all the details of the Scheme including but not limited to Scheme features, Fund Manager details, investment details, investment objective, expense ratios, portfolio details, etc. Scheme summary document will be uploaded on the websites of AMC, AMFI and stock</p>

	exchanges in 3 data formats i.e. PDF, Spreadsheet and a machine readable format).
<b>Minimum balance to be maintained and consequences of non maintenance</b>	There is no minimum balance to be maintained in the scheme and accordingly there are no consequences on the investors for failure to maintain minimum balance in the scheme.
<b>Nomination for Mutual Fund Unit Holders</b>	<p>Pursuant to clause 17.16 of SEBI Master Circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, Investors subscribing to mutual fund units shall have choice of providing nomination as per the prescribed format or opting out of nomination through a signed declaration.</p> <p>The folios of all existing individual unitholders holding units solely or joint mode that have not complied with the above requirement were supposed to be frozen for debits with effect from June 30, 2024. However, pursuant to SEBI Circular No. SEBI/HO/MIRSD/POD-1/P/CIR/2024/81 dated June 10, 2024, non-submission of 'choice of nomination' shall not result in freezing of mutual fund folios.</p> <p>All new investors/unitholders shall continue to be required to mandatorily provide the 'Choice of Nomination' for Mutual Fund Folios (except for jointly held Mutual Fund Folios).</p> <p>AMC shall provide an option to the unit holder(s) to submit either the nomination form or the declaration form for opting out of nomination in physical or online as per the choice of the unit holder(s). In case of physical option, the forms shall carry the wet signature of all the unit holder(s).</p> <ul style="list-style-type: none"> <li>• In case of online option, instead of wet signature(s) of all the unit holder(s), AMCs shall validate the forms.</li> <li>• In case of online option, instead of wet signature(s) of all the unit holder(s), AMCs shall validate the forms using e-Sign facility recognized under Information Technology Act, 2000; or through two factor authentication (2FA) in which one of the factor shall be a One-Time Password sent to the unit holder at his/her email/ phone number registered with the AMC.</li> </ul> <p>The AMC shall ensure adequate systems in place for providing e-Sign facility and take all necessary steps to maintain confidentiality and safety of client records.</p> <p>The nomination form/ declaration form for opting out of nomination are available at <a href="http://www.samcomf.com">http://www.samcomf.com</a>.</p>
<b>Know Your Customer (KYC) norms:</b>	<p>As per the SEBI Circular No. SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169 dated October 12, 2023, as amended from time to time, as a part of risk management framework, the KYC Registration Agencies (KRAs) shall verify the following attributes of records of all clients within 2 days of receipt of KYC records:</p> <ul style="list-style-type: none"> <li>• PAN</li> <li>• Name</li> <li>• Address</li> <li>• Mobile number</li> <li>• Email id</li> </ul> <p>If KRA is unable to verify the above attributes, such investors shall not be allowed to transact further until the attributes are verified. Investors should ensure that they provide their valid contact details [Email id / Mobile Number] to KRAs.</p>

	KYC Status	Investments in existing Mutual Fund	Investments in New Mutual Fund	Remediation
	KYC Validated – Existing records prior to April 01, 2024	No impact	No impact	Not Required
	KYC Registered	No impact	Allowed, Fresh set of KYC documents to be submitted every time, investing in new Mutual Fund	Investor can do a re-kyc using Aadhaar as OVD (Officially Valid Document) to remediate the status to KYC Validated for seamless transactions in securities market.
	KYC On-Hold / KYC Rejected	Transactions will not be allowed	Transactions will not be allowed	<p>Investor should ensure to do the following to change the status to Registered:</p> <ul style="list-style-type: none"> <li>• To complete PAN Aadhaar seeding;</li> <li>• Update email id / mobile and validate;</li> <li>• re-submit the pending documents to KRA</li> </ul> <p>Investors are suggested to do a re-kyc using Aadhaar as OVD (Officially Valid Document) to remediate the status to KYC validated for seamless transactions in securities market.</p>
<p>SEBI vide its email dated May 14, 2024, has reviewed the status of validation of KYC records by KRAs and decided the following:</p> <ol style="list-style-type: none"> <li>1. NRI's provisions with respect to portability of KYC Records have been relaxed for one year i.e. till April 30, 2025.</li> <li>2. Transaction Validation by either one of the attributes namely Mobile or Email is considered valid for transaction of all investors (including NRIs).</li> <li>3. The existing clients, as on March 31, 2024, in whose respect KYC attributes cannot be verified by the KRAs shall be allowed to exit (sale</li> </ol>				

	<p>/ redemption, etc.) from existing investment in securities market subject to adequate due diligence by intermediaries.</p> <p>As per SEBI Circular No. SEBI/HO/MIRSD/SECFATF/P/CIR/2024/41 dated May 14, 2024, records of Investors whose attributes are verified by KRAs with official database and PAN-AADHAAR linkages are verified shall be considered as Validated Records.</p>
<b>Any other disclosure in terms of Consolidated Checklist on Standard Observations</b>	<p><b>Requirement of minimum investors in the scheme</b></p> <p>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. However, if such limit is breached during the NFO of the Scheme, the Fund will endeavor to ensure that within a period of three months or the end of the succeeding calendar quarter from the close of the NFO of the Scheme, whichever is earlier, the Scheme complies with these two conditions. 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) Regulations would become applicable automatically 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.</p> <p><b>Special Considerations</b></p> <ul style="list-style-type: none"> <li>Prospective investors should study this Scheme Information Document and Statement of Additional Information carefully in its entirety and should not construe the contents hereof as advise relating to legal, taxation, financial, investment or any other matters and are advised to consult their legal, tax, financial and other professional advisors to determine possible legal, tax, financial or other considerations of subscribing to or redeeming Units, before making a decision to invest/ redeem/hold Units.</li> <li>The Scheme related documents i.e. SID/ KIM/ SAI or the units of the Fund are not registered in any jurisdiction including the United States of America nor in any provincial/ territorial jurisdiction in Canada.</li> <li>The distribution of the Scheme related document in certain jurisdictions may be restricted or subject to registration requirements and, accordingly, persons who come into possession of the Scheme related documents are required to inform themselves about, and to observe any such restrictions. No persons receiving a copy of this Scheme related documents or any accompanying application form in such jurisdiction may treat these Scheme related documents 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.</li> </ul>

	<p>Accordingly, the Scheme related documents do not constitute an offer or solicitation by anyone in any jurisdiction in which such offer or solicitation is not lawful or in which the person making such offer or solicitation is not qualified to do so or to anyone to whom it is unlawful to make such offer or solicitation as per applicable law. The AMC, Trustee or the Mutual Fund have not authorized any person to issue any advertisement or to give any information or to make any representations, either oral or written, other than that contained in this Scheme Information Document or the Statement of Additional Information or as is provided by the AMC in connection with this offering. Prospective investors are advised not to rely upon any information or representation not incorporated in the Scheme Information Document or Statement of Additional Information or provided by the AMC as having been authorized by the Mutual Fund, the AMC or the Trustee.</p> <ul style="list-style-type: none"> <li>• Redemption due to change in the fundamental attributes of the Scheme or due to any other reasons may entail tax consequences. The Trustee, AMC, Mutual Fund, their directors or their employees shall not be liable for any such tax consequences that may arise due to such redemptions.</li> <li>• The Trustee, AMC, Mutual Fund, their directors or their employees shall not be liable for any of the tax consequences that may arise, in the event that the Scheme is wound up for the reasons and in the manner provided in Statement of Additional Information.</li> <li>• The Mutual Fund may disclose details of the investor's account and transactions thereunder to those intermediaries whose stamp appears on the application form or who have been designated as such by the investor. In addition, the Mutual Fund may disclose such details to the bankers, as may be necessary for the purpose of effecting payments to the investor. The Fund may also disclose such details to regulatory and statutory authorities/bodies as may be required or necessary.</li> <li>• In case the AMC or its Sponsor or its Shareholders or their affiliates/associates or group companies make substantial investment, either directly or indirectly in the Scheme redemption of Units by these entities may have an adverse impact on the performance of the Scheme. This may also affect the ability of the other Unit holders to redeem their Units.</li> <li>• As the liquidity of the Scheme investments may sometimes be restricted by trading volumes and settlement periods, the time taken by the Fund for Redemption of Units may be significant in the event of an inordinately large number of Redemption Requests or of a restructuring of the Scheme portfolio. In view of this, the AMC / Trustee has the right to limit redemptions under certain circumstances - please refer to the paragraph "Suspension/Restriction on Redemption of Units of the Scheme".</li> <li>• The AMC and/ or its Registrars &amp; Transfer Agent (RTA) reserve the right to disclose/share Unit holder's details of folio(s) and transaction details thereunder with the following third parties: a) RTA, Banks and/ or authorised external third parties who are involved in transaction processing, dispatching etc., of the Unit-holder's investment in the Scheme; b) Distributors or sub-brokers through whom the applications are received for the Scheme c) Any other organizations for compliance with any legal or</li> </ul>
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	<p>regulatory requirements or to verify the identity of the Unit-holders for complying with anti-money laundering requirements.</p> <ul style="list-style-type: none"> <li>• The Trustee / AMC may at its sole discretion (and without being responsible and / or liable in any manner whatsoever) freeze/ seize / do such acts to a Unit holder's account as per instructions (or deal with the same in the manner the Trustee / AMC is directed and / or ordered) under the Scheme: i) Under any requirement of any law or regulations for the time being in force; and or ii) Under the direction and / or order (including interim orders) of any regulatory/statutory authority or any judicial authority or any quasi-judicial authority or such other competent authority having the powers to give direction and / or order. Further, pursuant to the provisions of Prevention of Money Laundering Act, 2002, if after due diligence, the AMC believes that any transaction is suspicious in nature as regards money laundering, on failure to provide required documentation, information, etc. by the Unit holder the AMC shall have absolute discretion to report such suspicious transactions to FIU-IND and / or to freeze the folios of the investor(s), reject any application(s) / allotment of Units.</li> </ul>
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### III. OTHER DETAILS

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

**Portfolio / Financial Results:** This is a list of securities where the corpus of the scheme is currently invested. The market value of these investments is also stated in portfolio disclosures.

The Mutual Fund shall within one month of the close of each half year i.e., 31st March and 30th September, upload the soft copy of its unaudited financial results containing the details specified in Regulation 59 on its website and shall publish an advertisement disclosing uploading of such financial results on its website, in one English newspaper having nationwide circulation and in one regional newspaper circulating in the region where the head office of the Mutual Fund is situated.

Further, the mutual fund shall also disclose the debt and money market securities transacted (including inter scheme transfers) in schemes portfolio on daily basis with a time lag of 15 days.

The Mutual Fund shall disclose the scheme portfolios as on the last day of the month/ as on the last day of every half year ended March and September within 10 days from the close of each month / half-year respectively. Further, the Mutual Fund shall also disclose portfolio of the scheme on a fortnightly basis within 5 days from the end of the fortnight. The disclosure shall be on [www.samcomf.com](http://www.samcomf.com) and [www.amfiindia.com](http://www.amfiindia.com). The AMC shall send via email the fortnightly statement of scheme portfolio within 5 days from the close of each fortnight and the monthly and half-yearly statement of scheme portfolio within 10 days from the close of each month / half-year respectively.

Mutual Fund shall publish an advertisement every half-year disclosing the hosting of the half-yearly statement of its schemes portfolio on its website and on the website of AMFI. Such advertisement shall be published in the all India edition of at least two daily newspapers, one each in English and Hindi. Mutual Fund shall provide a physical copy of the statement of its scheme portfolio, without charging any cost, on specific request received from a unitholder.

**Annual Report:** As required by the SEBI Regulations, the Fund will mail the schemewise annual report or an abridged summary thereof to all the unitholders as soon as practical after 31st March each year but not later than four months thereafter, as the Trustee may decide. In case of unitholders whose e-mail addresses are available with the Mutual Fund, the annual report or the abridged summary, as the case may be, would only be sent by email and no physical copies would be mailed to such unitholders. However, those unitholders who still wish to receive physical copies of the annual report/abridged summary notwithstanding their registration of e-mail addresses with the Fund, may indicate their option to the AMC in writing and AMC shall provide the same at nominal price. For the rest of the investors, i.e. whose email addresses are not available with the mutual fund, the AMC shall send physical copies of scheme annual reports or abridged summary to those unitholders who have 'opted-in' to receive physical copies. The AMC shall display the link of the scheme annual reports or abridged summary prominently on the Fund's website and AMFI website and make the physical copies available to the investors at its registered office at all times.



**Monthly Disclosure of Average Assets Under Management (AAUM):** The AMC shall disclose on a monthly basis the AAUM as per the parameters prescribed by SEBI, on its website within 7 working days from the end of the month. The Link of the AMC website for Monthly Disclosure of Average Assets Under Management (AAUM) is <https://www.samcomf.com/StatutoryDisclosure>

**Disclosure of Risk adjusted Return - Information Ratio (IR) for Mutual Fund Schemes:** To enhance transparency in disclosures by Asset Management Companies and support better investor decision-making, SEBI vide its circular no. SEBI/HO/IMD/IMD-PoD-2/P/CIR/2025/6 dated January 17, 2025, has mandated the disclosure of Information Ratio as a financial metric for evaluating scheme portfolios. The Information Ratio is an established financial metric used to measure the risk-adjusted return (RAR) of a scheme portfolio. It serves as an indicator of a portfolio manager's skill in generating excess returns relative to a benchmark while also incorporating risk factors, such as standard deviation, to assess the consistency of performance.

The AMC shall disclose the Information Ratio of each scheme portfolio on their websites daily, alongside performance disclosures. Additionally, the AMFI will ensure that such disclosures are available on its website in a comparable, downloadable (spreadsheet), and machine-readable format. This disclosure requirement shall apply only to equity-oriented schemes.

**Scheme Summary Document:** In terms of the requirement of SEBI vide its letter dated December 28, 2021, the AMC shall prepare a Scheme Summary Document for all the schemes which shall be updated on a monthly basis or on changes to the details and the same shall be uploaded on the websites of the AMC, AMFI and Stock Exchanges. The Link of the AMC website for Scheme Summary Document is <https://www.samcomf.com/StatutoryDisclosure>

**Risk-o-meter:** In terms of para 17.4 of SEBI master circular dated June 27, 2024, the following shall be applicable:

- i. Any change in risk-o-meter shall be communicated by way of Notice cum Addendum and by way of an e-mail or SMS to unitholders of that particular scheme.
- ii. Mutual Funds shall disclose the risk level of schemes as on March 31 of every year, along with number of times the risk level has changed over the year, on their website and AMFI website.
- iii. Mutual Funds shall publish a table of scheme wise changes in Risk-o-meter in scheme wise Annual Reports and Abridged summary.
- iv. The Risk-o-meter of the fund/s is/are evaluated on monthly basis and any changes to Risk-o-meter are disclosed vide addendum on monthly basis, to view the latest addendum on Risk-o-meter, please visit link <https://www.samcomf.com/downloads>

**Investment by the Designated Employees of AMC in the Scheme:** Pursuant to para 6.10 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024 pertaining to 'Alignment of interest of Designated Employees of AMC's with the Unitholders of the Mutual Fund Schemes', investors are requested to note that a part of compensation of the Designated Employees of AMC, as defined by SEBI, shall be mandatorily invested in units of the schemes in which they have a role/oversight effective October 01, 2021.

Further, investors are requested to note that such mandatory investment in units of the scheme shall be made on the day of payment of salary and in proportion to the AUM of the schemes in which such Designated Employee has a role/oversight. AMC shall ensure compliance with the provisions of the said circular and further, the disclosure of such investment shall be made at monthly aggregate level showing the total investment across all relevant employees in scheme on website of AMC (Link: <https://www.samcomf.com/StatutoryDisclosure>)

Further, in accordance with the said regulatory requirement, the minimum application amount and minimum redemption amount as specified for the scheme will not be applicable for investment made in scheme in compliance with the aforesaid guidelines

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

The AMC shall calculate and disclose the first NAV within five business days from the date of allotment. Subsequently, the NAV will be calculated and disclosed at the close of every Business Day. NAV will be determined on every Business Day except in special circumstances. NAV shall be calculated for upto two decimal places. NAV

of the scheme shall be prominently disclosed by the AMC under a separate head on the AMC's website (<https://www.samcomf.com/nav-details>) and on the website of AMFI ([www.amfiindia.com](http://www.amfiindia.com)) by 11.00 p.m. on every business day (subject to following exception).

In terms of clause 8.2 of SEBI Master circular no. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2024/90 dated June 27, 2024, the AMC shall ensure that NAV of scheme is disclosed based on the value of underlying securities/ Funds as on the T day (i.e. date of investment in MF units in India). Accordingly, if the scheme has investment in Overseas securities, then the NAV shall be uploaded at AMFI before 10.00 a.m. on the immediately succeeding Business Day to capture same day price of underlying securities.

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 business hours on the following day due to any reason, the AMC shall issue a press release providing reasons and explaining when the Mutual Fund would be able to publish the NAVs.

### C. Transaction charges and stamp duty

- **Transaction charges:** The AMC/Mutual Fund shall deduct Transaction Charges on purchase/subscription applications received from investors that are routed through a distributor/agent/broker as follows, provided the distributor/agent/broker has opted to receive the transaction charges. The distributors have the option to either opt in or opt out of levying transaction charge based on type of the product:
  - a) **First time investor in Mutual Funds:** Rs.150/- on purchase/subscription application of Rs.10,000 and above.
  - b) **Investors other than first time investor in mutual funds:** Rs.100/- per purchase/subscription application of Rs.10,000 and above
  - c) **Investments through Systematic Investment Plan (SIP)** - the Transaction Charge shall be deducted only if the total commitment through SIP (i.e. amount per SIP instalment x No. of SIP instalments) amounts to Rs.10,000/- and above. The Transaction Charge shall be deducted in 3 or 4 instalments, as may be decided by the AMC from time to time.

Units will be allotted for the balance subscription amount (net of the transaction charge deducted).

Please refer to SAI for further details.

- **Stamp duty:** Mutual fund units issued against Purchase transactions (whether through lump-sum investments or SIP or STP or switch-ins or reinvestment under IDCW Option) 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%. The rate and levy of stamp duty may vary as amended from time to time. For more details, please refer to SAI.

### D. Associate Transactions

Please refer to Statement of Additional Information (SAI)

### E. Taxation

For details on taxation please refer to the clause on Taxation in the SAI apart from the following:

This information is provided for general information only and is based on the prevailing tax laws, as applicable in case of this Scheme. 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 schemes.

Samco Mutual Fund is registered as a Mutual Fund with Securities and Exchange Board of India ('SEBI') under SEBI (Mutual Fund) Regulations, 1996. Any income earned by such mutual fund registered with SEBI is exempt from taxation as per section 10(23D) of the Income Tax Act, 1961 ('Act')

### Taxability in the hands of Investor

If the units are held as stock-in-trade of a business, the said income will be taxed at the rates at which the normal

income of that investor is taxed.

If the units are held as investments, the said income will be taxed as capital gains. In such case, the tax rates applicable will depend on whether the gain on sale of units is classified as a short-term capital gain or a long-term capital gain.

### Tax Rates

Particulars	Taxability in the hands of individuals/Non-corporate/Corporates	
	Resident	Non-Resident
<b>Long-term Capital Gains:</b> (Held for a period of more than 12 months)	12.5% without indexation above LTCG of 1.25 lakhs + applicable Surcharge + 4% Cess (Refer Note 4)	12.5% without indexation and foreign exchange fluctuation benefit above LTCG of 1.25 lakhs + applicable surcharge + 4% Cess (Refer Note 4)
<b>Short Term Capital Gains</b> (Held for a period of 12 months or less)	20% + applicable surcharge + 4% Cess	20% + applicable surcharge + 4% Cess

### Notes –

- Samco Mutual Fund is a Mutual Fund registered with the Securities & Exchange Board of India and hence the entire income of the Mutual Fund will be exempt from income tax in accordance with the provisions of Section 10(23D) of the Act.
- Surcharge at the following rate to be levied in case of individual /HUF / non-corporate non-firm unit holders for equity oriented mutual fund:

Income	Individual/HUF/non-corporate/ non-firm/unit holders*
₹ 50 lakh to 1 crore (including income under section 111A and 112A of the Act)	10%
Above ₹ 1 crore upto ₹ 2 crores (including income under section 111A and 112A of the Act)	15%
Above ₹ 2 crores upto ₹ 5 crores (excluding income under section 111A and 112A of the Act)	25%*
Above ₹ 5 crores (excluding income under section 111A and 112A of the Act)	37%*

\*For income earned under provisions of section 111A and section 112A of the Act and dividend income, surcharge rate would be restricted to 15% where income exceeds Rs. 2 crores.

### 3 (a) Surcharge rates for Firms (including LLPs)

Total Income	Rate of Surcharge for firms (including LLPs)
Upto ₹ 1 crore	Nil
Above ₹ 1 crore	12%

### 3 (b) Surcharge rates for companies

Total Income	Rate of Surcharge for Domestic companies **	Rate of Surcharge for Foreign Companies
Above ₹ 1 crore upto ₹ 10 crores	7%	2%
Above ₹ 10 crores	12%	5%

\*\*Surcharge rate shall be 10% in case resident companies opting taxation under section 115BAA and section 115BAB on any income earned.

4. Withholding of Taxation by Mutual Fund will as per applicable withholding tax rate.

5. Assuming investor falls into highest tax bracket

6. The Health and Education Cess is levied on all income at the rate of 4% on surcharge and tax payable.

7. The above does not consider the double tax avoidance agreement treaty rates if applicable to eligible non-resident investors

**For further details on taxation please refer to the clause on Taxation in the SAI**

### PAN-AADHAR Linking

As per section 139AA of 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 non-linking of PAN with Aadhaar, 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.

### Specified Person (i.e. Non-filer of Income Tax Return)

As per section 206AB of the Act, 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 or person who is not required to furnish the return of income as notified by the Central Government) 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 or tax collected at source in his case is Rs. 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.

### Securities Transaction Tax (STT)

The Scheme will attract securities transaction tax (STT) at 0.001% on the redemption value.

**DISCLAIMER:** The information given here is neither a complete disclosure of every material fact of Income-tax Act 1961 nor does it constitute tax or legal advice. Investors are requested to review the prospectus carefully and obtain expert professional advice with regard to specific legal, tax and financial implications of the investment/participation in the scheme.

### F. Rights of Unitholders

Please refer to SAI for details

### G. List of official points of acceptance

Please refer [www.samcomf.com](http://www.samcomf.com) for a complete list of Official points of acceptance

### H. Penalties, Pending Litigation or Proceedings, Findings of Inspections or Investigations for which action

**may have been taken or is in the process of being taken by any Regulatory Authority**

There have been no penalties or pending litigation on the AMC since incorporation. The investors may refer to the details on the website of the Company at link: <https://www.samcomf.com/StatutoryDisclosure>

**Notwithstanding anything contained in the Scheme Information Document the provisions of the SEBI (Mutual Funds) Regulations, 1996 and the Guidelines thereunder shall be applicable.**

for and on behalf of

**Samco Asset Management Private Limited**

**Sd/-**

**Viraj Gandhi**

**Chief Executive Officer**

**Date: May 29, 2025**



## Investor Service Centers/ Official Point of Acceptance for Samco Mutual Fund

Samco Asset Management Private Limited (AMC), A-1003 Naman Midtown 10th Floor, Prabhadevi (West) Mumbai 400 013.

### Branch Offices of KFin Technologies Private Limited

Kfin Technologies Private Limited - Official Point of Acceptance for Samco Mutual Fund

• **Agartala:** Ols Rms Chowmuhan Mantri Bari Road 1st Floor Near Jana Sevak Saloon Building Traffic Point Tripura West Agartala 799001 • **Agra:** 3Rd Floor, 303 Corporate Park, Block No- 109, Sanjay Place, Agra -282002, Uttar Pradesh • **Ahmedabad:** Office No. 401 On 4Th Floor Abc-I Off. C.G. Road - Ahmedabad 380009 • **Ahmednagar:** Above Shubham Mobile & Home Appliances, 1st Floor, Tilak Road, Maliwada Ahmednagar, Maharashtra 414001 • **Ajmer:** 302 3Rd Floor Ajmer Auto Building Opposite City Power House Jaipur Road; Ajmer 305001 • **Akola:** Shop No 25 Ground Floor Yamuna Tarang Complex Murtizapur Road N.H. No- 6 Opp Radhakrishna Talkies Akola 444001 • **Aligarh:** 1st Floor Sevti Complex Near Jain Temple Samad Road Aligarh-202001 • **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 Hospital Ambala Cant Ambala 133001 • **Amritsar:** Sco 5 2nd Floor District Shopping Complex Ranjit Avenue Amritsar 143001 • **Anand:** 203 Saffron Icon, Opp Senior Citizen Garden, Mota Bazar, V V Nagar Anand-388120 • **Ananthapur:** Kfin Technologies Ltd. #13/4 Vishnupriya Complex Beside Sbi Bank Near Tower Clock Ananthapur-515001. • **Andheri:** Office 103, Vertex Navkar, Commercial Complex, M V Road, Opp Andheri Court, Andheri East, Mumbai 400069 • **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:** House No. 290 Ground Floor Civil Lines Near Sahara Office - Azamgarh 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-851101, Bihar • **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 Opposite 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 • **Borivali:** Gomati Smutground Floor Jambli Gully Near Railway Station Borivali Mumbai 400 092 • **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:** 2nd Floor, Raghuwanshi Complex, Near Azad Garden, Chandrapur, Maharashtra-44240 • **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) Adjacent To Reliance Trends Dargha Bazar Cuttack 753001 • **Darbhanga:** H No-185, Ward No- 13, National Statistical Office Campus, Kathal Bari, Bhandar Chowk, Darbhanga-846007, Bihar • **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:** D.No: 3B-15-1/1, Vaibhav Fort, Agharam, Western Street, Eluru Andhra Pradesh - 534001 • **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 Hdfe Bank Gandhidham 370201 • **Gandhinagar:** 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 Raghubal 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 Shopping 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 • **Hosur:** No.2/3-4. Sri Venkateswara Layout, Denkanikottai Road, Dinnur Hosur - 635109 • **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 • **Hyderabad (Gachibowli):** Selenium Plot No: 31 & 32 Tower B Survey No.115/22 115/24 115/25 Financial District Gachibowli Nanakramguda Serilingampally Mandal Hyderabad 500032 • **Indore:** Kfin Technologies Ltd. 101 Diamond Trade Center 3-4 Diamond Colony New Palasia Above Khurana Bakery Indore • **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 Shopping Mall Kurnool 518001 • **Lucknow:** 1st Floor A. A. Complex 5 Park Road Hazratganj Thaper House Lucknow 226001 • **Ludhiana:** Sco 122 Second Floor Above Hdcc Mutual Fund Feroze Gandhi Market Ludhiana 141001 • **Madurai:** No. G-16/17 Ar Plaza 1st Floor North Veli Street Madurai 625001 • **Malapuram:** MM18/1974, Peekeys Arcade, (ICICI Bank Building), Near Municipal bus stand, A K Road, Downhill, Malappuram, Kerala, 676519 • **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 • **Margao:** 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:** Triveni Campus Near Sbi Life Ratanganj Mirzapur 231001 • **Moga:** 1st Floor Dutt 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 • **Nagercoil:** Hno 45 1st Floor East Car Street Nagercoil 629001 • **Nagpur:** Plot No. 2 Block No. B / 1 & 2 Shree Apartment 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 Floor Landmark Mall Near Sayaji Library Navsari Gujarat Navsari 396445 • **Nellore:** H. No: 216/2/561, Ramarao Complex-2 3Rd Floor, Shop No: 305, Nagula Mitta Road,(Indira Bhavan), Opp: Bank Of Baroda, Nellore Pin : 524001 • **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 Shirdalay, Exhibition Road, Patna-800001 • **Pondicherry:** No 122(10B) Muthumariamman Koil Street - Pondicherry 605001 • **Prayagraj:** Shop No- Tf-9, 3Rd Floor, Vinayak Vrindavan Tower, H No-34/26, Tashkhant Road. Civil Station, Prayagraj- 211001 , Uttar Pradesh • **Pune:** Office # 207-210 Second Floor Kamla Arcade Jm Road. Opposite Balgandharva Shivaji Nagar Pune 411005 • **Raipur:** Office No- 401, 4Th Floor, Pithalia Plaza , Fafadih Chowk, 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 ,Renukoot Dist. Sonebhada -231217, Uttar Pradesh • **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. Uttarakhand • **Rourkela:** 2nd Floor Main Road Udit Nagar Sundargarh Rourkela 769012 • **Sagar:** 2<sup>nd</sup> Floor|Above Shiva Kanch Mandir 5 Civil Lines Sagar Madhya Pradesh -470001 | India • **Saharanpur:** 1st 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, Uttar Pradesh • **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 Gangaganagar:** Address Shop No. 5 Opposite Bihani Petrol Pump Nh - 15 Near Baba Ramdev Mandir Sri Gangaganagar 335001 • **Srikakulam:** D No 4-4-97 First Floor Behind Sri Vijayaganapathi Temple Pedda Relli Veedhi Palakonda Road Srikakulam 532001 • **Sultanpur:** 1st Floor Ramashanker Market Civil Line - Sultanpur 228001 • **Surat:** Ground Floor Empire State Building Near Udhna Darwaja Ring Road Surat 395002 • **Thane:** Room No. 302 3Rd Floorganga Prasad Near Rbl Bank Ltd Ram Maruti Cross Roadnaupada Thane West Mumbai 400602 • **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 Vekkaliannan Kalyana Mandapam Putthur - Trichy 620017 • **Trivandrum:** 1st Floor Marvel Building Opp SI Electricals Uppalam Road Statue Po 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:** 227, 2Nd Floor Heritage Plaza,Above Vishal Megha Mart, Near Hotel Kshipra, Ujjain M.P. - 456010 • **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-64/132 Ka 2nd Floor Anant Complex Sagra Varanasi 221010 • **Vashi:** Haware Infotech Park 902, 9Th Floor, Plot No 39/03, Sector 30A, Opp Inorbit Mall, Vashi Navi Mumbai 400703 • **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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