

STATEMENT OF ADDITIONAL INFORMATION (SAI)

This Statement of Additional Information (SAI) contains details of Old Bridge Mutual Fund, its constitution, and certain tax, legal and general information. It is incorporated by reference and is legally a part of the Scheme Information Document (SID).

This SAI is dated October 30, 2024

Name of Mutual Fund	Old Bridge Mutual Fund Registration code: MF/081/23/07
Name of Asset Management Company / Investment Manager	Old Bridge Asset Management Private Limited CIN: U67120MH2022PTC394844
Name of Trustee Company	Old Bridge Mutual Fund Trustee Private Limited CIN: U65999MH2022PTC395188

Addresses, Website of the Entities:

Old Bridge Mutual Fund	1705, ONE BKC, C - Wing, G - Block Bandra Kurla Complex, Bandra - East, Mumbai - 400 051 Website: www.oldbridgemf.com Email: services@oldbridgemf.com (R&TA's) Toll Free No.: 18003094034 Fax No.: 022 6945 9941
Old Bridge Asset Management Private Limited (OBAMPL)	
Old Bridge Mutual Fund Trustee Private Limited (OBMFTPL)	

TABLE OF CONTENTS

Sr No	Particulars	Page No.
I	INFORMATION ABOUT SPONSOR, AMC AND TRUSTEE COMPANY	3
	A CONSTITUTION OF THE MUTUAL FUND	3
	B SPONSOR	3
	C TRUSTEE	3
II	ASSET MANAGEMENT COMPANY	9
	DETAILS OF AMC DIRECTORS	9
	INFORMATION ON KEY PERSONNEL	12
III	SERVICE PROVIDERS	16
IV	CONDENSED FINANCIAL INFORMATION	17
V	RISK FACTORS	18
	A STANDARD RISK FACTORS	18
	B SPECIAL CONSIDERATIONS	24
VI	HOW TO APPLY	27
	SPECIAL PRODUCTS/ FACILITIES OFFERED BY THE AMC/SCHEMES	42
	DEFAULT SCENARIOS AVAILABLE TO THE INVESTORS UNDER PLANS/OPTIONS OF THE SCHEMES	49
VII	RIGHTS OF UNITHOLDERS OF THE SCHEME	53
VIII	INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS	54
	COMPUTATION OF NAV	78
	A POLICY OF COMPUTATION OF NAV	78
	B POLICY OF COMPUTATION OF NAV IN FOREIGN SECURITIES	78
	C PROCEDURE IN CASE OF DELAY IN DISCLOSURE OF NAV	78
IX	TAX & LEGAL & GENERAL INFORMATION	78
	A TAXATION ON INVESTING IN MUTUAL FUNDS	78
	B LEGAL INFORMATION	90
	C GENERAL INFORMATION	101
	D ASSOCIATE TRANSACTIONS	104
	E DOCUMENTS AVAILABLE FOR INSPECTION	105
	F INVESTOR GRIEVANCE REDRESSAL MECHANISM	106
	G INFORMATION PERTAINING TO INVESTMENT BY SCHEMES OF THE FUND	107
	H TRANSACTION CHARGES AND STAMP DUTY	118
X	DISCLOSURE AND REPORTS BY THE FUND	119
	1 ACCOUNT STATEMENT/CONSOLIDATED ACCOUNT STATEMENT	119
	2 HALF YEARLY DISCLOSURES/PORTFOLIO DISCLOSURES/FINANCIAL RESULTS	121
	3 HALF YEARLY RESULTS	121
	4 ANNUAL REPORT	121

Interpretation

For all purposes of the SAI, except as otherwise expressly provided or unless the context otherwise requires:

- all references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa.
- all references to "dollars" or "\$" refer to United States Dollar`s and "Rs" refer to Indian Rupees. A "crore" means "ten million" and a "lakh" means a "hundred thousand".
- all references to timings relate to Indian Standard Time (IST).
- references to a day are to a calendar day including non-Business Day.

Please note that words, expressions and abbreviations used in the SAI but not defined will have the same meaning as assigned to them in the SID of the respective Schemes of Old Bridge Mutual Fund.

I. INFORMATION ABOUT SPONSOR, TRUSTEE COMPANY AND ASSET MANAGEMENT COMPANY (AMC)

A. Constitution of the Mutual Fund

Old Bridge Mutual Fund (the Fund) has been constituted as a trust in accordance with the provisions of the Indian Trusts Act, 1882, as per the terms of the trust deed dated February 21, 2023, and amended from time to time, with Old Bridge Capital Management Private Limited (OBCMPL) as the Sponsor / Settlor and Old Bridge Mutual Fund Trustee Private Limited, as the Trustee. The Trust Deed has been registered under the Indian Registration Act, 1908. The Mutual Fund has been registered with SEBI under registration code MF/081/23/07 on September 01, 2023.

The head office of the Mutual Fund is at 1705, ONE BKC, C - Wing, G - Block, Bandra Kurla Complex, Bandra - East, Mumbai - 400051.

B. Sponsor

Old Bridge Mutual Fund is sponsored by OBCMPL. The Sponsor is the Settler of the Mutual Fund Trust. The Sponsor has entrusted a sum of Rs. 1,00,000/- (Rs. One Lakh only) to Old Bridge Mutual Fund Trustee Private Limited ('the Trustee Company') as the initial contribution towards the corpus of the Mutual Fund.

OBCMPL, the Sponsor, is a company registered under the Companies Act, 2013, and is also registered with SEBI as a Portfolio Manager vide registration number INP000005174 dated June 22, 2016. OBCMPL is also an Investment Manager and Sponsor to a SEBI registered Category III Alternative Investment Fund named "Old Bridge Capital AIF" vide registration number IN/AIF3/17-18/0373 since September 29, 2017. OBCMPL is also SEC Registered Investment Advisor (RIA) since March 8, 2019.

For more information, log on to www.oldbridgecapital.com.

Financial Performance of the Sponsor (past three years):

Old Bridge Capital Management Private Limited

Particulars	Year ended March 31, 2024	Year ended March 31, 2023	Year ended March 31, 2022
Net worth	2,75,66,14,518.00	1,95,57,07,489.00	1,50,01,94,715.00
Total Income	1,38,17,92,555.62	97,91,60,839.00	1,22,35,12,747.00
Profit after tax	80,31,54,117.40	46,40,14,865.00	65,03,54,413.00
Assets under management* (in Crores)	9648.76	6998.39	7374.32

*The Assets under management includes Discretionary and Advisory Services

C. The Trustee

Old Bridge Mutual Fund Trustee Private Limited (the "trustee"), through its Board of Directors, shall discharge its obligations as Trustee of Old Bridge Mutual Fund. The Trustee ensures that the

transactions entered into by the AMC are in accordance with the SEBI (Mutual Funds) Regulations, 1996 ("MF Regulations"/ "Regulations") and will also review the activities carried on by the AMC.

Details of Trustee Directors:

Name	Age	Educational Qualifications	Brief Experience
John Arunkumar Diaz*	72	B.Sc., MBA	John Arunkumar Diaz is a consultant, entrepreneur, mentor, and advisor to a Venture Capital company. He has also had some experience an entrepreneur in the healthcare sector with two ventures in the healthcare delivery space - a clinic and a hospital chain. He serves on the Boards of several private limited companies; both in his personal capacity and as a nominee.
Durga Prasad Duvvuri	68	M.Sc. (Mathematics)	Durga Prasad Duvvuri is a consultant to the World Bank on Governance and Institutional Development issues. He has distinctive competence in the areas of Institution Building, Organization Design and Development, and human resource management systems. Further, he has competence in the area of financial engineering and has provided financial structuring advice to several firms including conducting negotiation with capital providers.
Hemang Bakshi	59	B. Com, CPA - USA & CS	Hemang Bakshi has held senior positions like compliance officer, company secretary, head of legal and risk manager in various financial services organisations for over 25 years in various Mutual Funds. He has dealt with the Department of Company Affairs (current Ministry of Corporate Affairs), Registrar of Companies, Controller of Capital Issues, Indian stock exchanges (including regional ones), Securities and Exchange Board of India and Reserve Bank of India.
Krishnakumar Narayanan Trichur	58	B. Com, ACA - UK & ACA	Krishnakumar Narayanan Trichur has over 30 years of experience across the banking industry and the Big 4 Audit Firms - across India, and UAE, and the UK, This has enabled domain expertise in the financial services space and building multiple capabilities with various banking services for HSBC, Standard Chartered Bank, and the National Bank of Abu Dhabi.

Anantha Subrahmanya Dhananjaya	62	B.Tech, PGDM	Anantha Subrahmanya Dhananjaya has over 35 years of experience in the BFSI segment, across two multinational banks (Bank of America and ABN Amro Bank) and a domestic financial conglomerate. My last assignment was Chief Compliance and Risk Officer at Aditya Birla Capital Ltd., an RBI registered NBFC-CIC (Core Investment Company), with responsibility for the Risk and Compliance function across all subsidiaries, which included an NBFC, an Asset Management Company, a Life Insurance Company, a Health Insurance Company, a Broking company, etc.
--------------------------------	----	--------------	---

*Associate Director

Rights, Obligations, Responsibilities and Duties of the Trustee under the Trust Deed and the SEBI (MF) Regulations:

Pursuant to the Trust Deed dated February 21, 2023, constituting the Mutual Fund, and in terms of the SEBI (MF) Regulations, the rights, obligations, responsibilities and duties of the Trustee are as under:

1. The trustees and the asset management company shall with the prior approval of SEBI enter into an investment management agreement.
2. The investment management agreement shall contain such clauses as are mentioned in the Fourth Schedule and such other clauses as are necessary for the purpose of making investments.
3. The trustees shall have a right to obtain from the asset management company such information as is considered necessary by the trustees.
4. The trustees shall ensure before the launch of any scheme that the asset management company has:
 - a. systems in place for its back office, dealing room and accounting;
 - b. appointed all key personnel including fund manager(s) for the scheme(s) and submitted their bio-data which shall contain the educational qualifications, past experience in the securities market with the trustees, within 15 days of their appointment;
 - c. appointed auditors to audit its accounts;
 - d. appointed a compliance officer who shall be responsible for monitoring the compliance of the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by SEBI or the Central Government and for redressal of investors grievances;
 - e. appointed registrars and laid down parameters for their supervision;
 - f. prepared a compliance manual and designed internal control mechanisms including internal audit systems;
 - g. specified norms for empanelment of brokers and marketing agents;
 - h. obtained, wherever required under SEBI (Mutual Funds) Regulations, 1996, prior in principle approval from the recognised stock exchange(s) where units are proposed to be listed.
5. The trustees shall approve the policy for empanelment of brokers by the asset management company and shall ensure that an asset management company has been diligent in empanelling the brokers, in monitoring securities transactions with brokers and avoiding undue concentration of business with any broker.
6. The trustees shall ensure that the asset management company has not given any undue or unfair advantage to any associates or dealt with any of the associates of the asset management company in any manner detrimental to interest of the unit holders.
7. The trustees shall ensure that the transactions entered into by the asset management company are in accordance with the Regulations and the scheme.

8. The trustees shall ensure that the asset management company has been managing the mutual fund schemes independently of other activities and have taken adequate steps to ensure that the interest of investors of one scheme are not being compromised with those of any other scheme or of other activities of the asset management company.
9. The trustees shall ensure that all the activities of the asset management company are in accordance with the provisions of the Regulations.
10. Where the trustees have reason to believe that the conduct of business of the mutual fund is not in accordance with SEBI (Mutual Funds) Regulations, 1996 and the scheme they shall forthwith take such remedial steps as are necessary by them and shall immediately inform the Board of the violation and the action taken by them.
11. Each trustee shall file the details of his transactions of dealing in securities with the Mutual Fund on a quarterly basis. The same shall be filed by the trustees within one month from the end of respective quarters (March, June, September and December).
12. The trustees shall be accountable for and be the custodian of, the funds and property of the respective schemes and shall hold the same in trust for the benefit of the unit holders in accordance with the Regulations and the provisions of trust deed.
13. The trustees shall take steps to ensure that the transactions of the mutual fund are in accordance with the provisions of the trust deed.
14. The trustees shall ensure that the income calculated by the asset management company under sub-regulation (25) of regulation 25 of SEBI (Mutual Funds) Regulations, 1996, i.e. calculation of any income due to be paid to the mutual fund and also of any income received in the mutual fund for the holders of the units of any scheme in accordance with the Regulations and the trust deed.
15. The trustees shall obtain the consent of the unit holders:
 - a. whenever required to do so by SEBI in the interest of the unit holders; or
 - b. whenever required to do so on the requisition made by three-fourths of the unit holders of any scheme; or
 - c. when the majority of the trustees decide to wind up a scheme in terms of clause (a) of sub regulation (2) of regulation 39 or prematurely redeem the units of a close ended scheme.
16. The trustees shall ensure that no change in the fundamental attributes of any scheme, the fees and expenses payable or any other change which would modify the scheme and effect the interest of the unit holder is carried out by the asset management company, unless it complies with sub-regulation (26) of regulation 25 of Regulations, shall be carried out unless,
 - i. An application has been made with SEBI and views/comments of SEBI are sought on the proposal for fundamental attribute changes;
 - ii. An addendum to the existing SID shall be issued and displayed on AMC website;
 - iii. written communication about the proposed change is sent to each unit holder and an advertisement is given in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of region where the Head Office of the mutual fund is situated;
 - iv. the unit holders are given an option to exit at the prevailing Net Asset Value without any exit load and
 - v. SID shall be revised and updated immediately after completion of duration of the exit option (not less than 30 days);
17. The trustees shall call for the details of transactions in securities by the key personnel of the asset management company in his own name or on behalf of the asset management company and shall report to the Board, as and when required.
18. The trustees shall quarterly review all transactions carried out between the mutual fund, asset management company and its associates.
19. The trustees shall on a quarterly basis review the networth of the asset management company to ensure compliance with the threshold provided in clause (f) of sub-regulation (1) of regulation 21 on a continuous basis.
20. The trustees shall periodically review all service contracts relating to custody arrangements and satisfy itself that such contracts are executed in the interest of the unit holders.
21. The trustees shall ensure that there is no conflict of interest between the manner of deployment of its networth by the asset management company and the interest of the unit holders.
22. The trustees shall periodically review the investor complaints received and the redressal of the same by the asset management company.
23. The trustees shall abide by the Code of Conduct as specified in the Fifth Schedule.

24. The trustees shall furnish to SEBI on a half-yearly basis,
 - a. report on the activities of the mutual fund;
 - b. certificate stating that the trustees have satisfied themselves that there have been no instances of self-dealing or front running by any of the trustees, directors and key personnel of the asset management company;
 - c. a certificate to the effect that the asset management company has been managing the schemes independently of any other activities and in case any activities of the nature referred to in clause (b) of regulation 24 have been undertaken by the asset management company and has taken adequate steps to ensure that the interests of the unit holders are protected.
25. The independent trustees referred to in sub-regulation (5) of regulation 16 shall give their comments on the report received from the asset management company regarding the investments by the mutual fund in the securities of group companies of the sponsor.
26. No amendments to the Trust Deed shall be carried out without the prior approval of SEBI and Unit holders' approval/ consent will be obtained where it affects the interests of Unit holders as per the procedure / provisions laid down in the Regulations.
27. Notwithstanding anything contained in SEBI (MF) Regulations, the trustees shall not be held liable for acts done in good faith if they have exercised adequate due diligence honestly.
28. The independent directors of the trustees or asset management company shall pay specific attention to the following, as may be applicable, namely: —
 - the Investment Management Agreement and the compensation paid under the agreement,
 - service contracts with associates, whether the asset management company has charged higher fees than outside contractors for the same services,
 - selections of the asset management company's independent directors,
 - securities transactions involving associates to the extent such transactions are permitted,
 - selecting and nominating individuals to fill independent directors' vacancies,
 - code of ethics must be designed to prevent fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions,
 - the reasonableness of fees paid to sponsor, asset management company and any others for services provided,
 - principal underwriting contracts and their renewals,
 - any service contract with the associates of the asset management company

Specific and General due diligence

➤ Specific due diligence:

The Trustees shall:

- i. obtain internal audit reports at regular intervals from independent auditors appointed by the Trustees,
- ii. obtain compliance certificates at regular intervals from the asset management company,
- iii. hold meeting of trustees more frequently,
- iv. consider the reports of the independent auditor and compliance reports of asset management company at the meetings of trustees for appropriate action,
- v. maintain records of the decisions of the Trustees at their meetings and of the minutes of the meetings,
- vi. prescribe and adhere to a code of ethics by the Trustees, asset management company and its personnel,
- vii. communicate in writing to the asset management company of the deficiencies and checking on the rectification of deficiencies.

➤ General Due Diligence:

- i. The Trustees shall be discerning in the appointment of the directors on the Board of the asset management company.
- ii. Trustees shall review the desirability or continuance of the asset management company if substantial irregularities are observed in any of the schemes and shall not allow the asset management company to float new schemes.

- iii. The Trustee shall ensure that the trust property is properly protected, held and administered by proper persons and by a proper number of such persons.
 - iv. The Trustee shall ensure that all service providers are holding appropriate registrations from the Board or concerned regulatory authority.
 - v. The Trustees shall arrange for test checks of service contracts.
 - vi. Trustees shall immediately report to SEBI of any special developments in the mutual fund.
- The trustees shall also exercise due diligence on such matters as may be specified by the Board from time to time. In terms of the said Regulation 18 (25)(C), the Trustees shall exercise independent due diligence on certain “core responsibilities”, which are specified as under:
- i. The Trustees shall ensure the fairness of the fees and expenses charged by the AMC.
 - ii. The Trustees shall review the performance of AMC in its schemes vis-à-vis performance of peers or the appropriate benchmarks.
 - iii. The Trustees shall ensure that the AMC have put in place adequate systems to prevent mis-selling to increase assets under their management and valuation of the AMC.
 - iv. The Trustees shall ensure that operations of AMCs are not unduly influenced by the AMCs Sponsor, its associates and other stakeholders of AMC.
 - v. The Trustees shall ensure that undue or unfair advantage is not given by AMC to any of their associates/group entities.
 - vi. The Trustees shall be responsible to address conflicts of interest, if any, between the shareholders/stakeholders/associates of the AMC and unitholders.
 - vii. The Trustees shall ensure that the AMC has put in place adequate systems to prevent misconduct including market abuse/misuse of information by the employees, AMC and connected entities of the AMC.

Supervisory Role of the Trustee:

The supervisory role of Trustee will be discharged inter alia by reviewing the information and operations of the Mutual Fund based on the internal audit reports/compliance reports received on a periodical basis. The Compliance Officer has direct reporting line to the Board of Directors of the Trustee Company. The Board Meeting of the Trustee shall be held at least once in every two calendar months and at least six such meetings shall be held in every year or at such frequency as may be prescribed under the Regulations. The quorum for a Board meeting of the Trustee shall not be constituted unless such number of independent directors as may be prescribed under SEBI (MF) Regulations from time to time are present at the meeting.

Further the Audit Committee chaired by an independent director of the Trustee Company is responsible for:

- Review of the periodic financial statements of the Trustee and Mutual Fund including audit observations
- To review the internal audit systems and internal and statutory audit reports
- Recommending appointment of auditors

Trustee - Fees and Expenses

In accordance with the Deed of Trust constituting the Mutual Fund, the Trustee shall be entitled to receive a fee not exceeding one-twentieth of one percent of the daily net assets of the Fund. The fees will be calculated and accrued on a daily basis. In addition to the aforesaid remuneration, the Trustee shall be entitled for reimbursement of all costs, charges and expenses incurred in or about the administration and execution of the Fund. Such reimbursement from and out of the Trust Funds would always be to the extent permitted under the Regulations.

II. Asset Management Company (AMC)

Old Bridge Asset Management Private Limited is a Private Limited Company incorporated under the Companies Act, 2013 on December 08, 2022, having its Registered Office at 1705, ONE BKC, C - Wing, G - Block, Bandra Kurla Complex, Bandra - East, Mumbai - 400051. Old Bridge Asset Management Private Limited has been appointed as the Asset Management Company of Old Bridge Mutual Fund by the Trustees vide Investment Management Agreement (IMA) dated March 31, 2023, executed between Old Bridge Mutual Fund Trustee Private Limited and Old Bridge Asset Management Private Limited.

Old Bridge Capital Management Private Limited along with its nominees holds 100% of the share capital of the AMC.

Details of AMC Directors:

Name	Age	Educational Qualifications	Brief Experience
Kenneth Joseph Andrade*	53	B. Com, Post Graduate Diploma in Financial Management	Kenneth Andrade has over 30 years of experience in Indian Capital Markets, portfolio management and investment research. Kenneth is the Founder of Old Bridge Capital Management Private Ltd (OBCMPL) and was Chief Investment Officer of OBCMPL where he was managing the investment process and leads investment ideation. He has over 15-year track record managing equity funds. In his previous assignments Kenneth has worked with IDFC Asset Management Company Limited as Chief Investment Officer. He has also worked as a fund manager with Kotak Mahindra Asset Management Company Limited.
Amit Kanaiyalal Jasani*	55	B. Com	Amit Jasani has over 20 years of experience in the Capital Markets and is the promoter of Amit Jasani Financial Services Private Ltd (AJFSL). AJFSL has been operating as a capital market broker on the NSE and BSE for over two decades. Its main strength lies in the distribution of financial products and in managing its relationship with its network of partners.
Lalith Bukkarayasamudram	44	B. E (Mechanical), MBA (Finance)	Lalith has sixteen years of extensive experience in financial markets, global treasury and banking, risk management, strategy, corporate finance, investor relations, mergers and acquisitions, and personnel management. His wide range of knowledge covers different global assets, particularly Indian equity

			and fixed income markets, foreign exchange risk management, and macro-economics.
Rishi Kakar	49	B. E (Mechanical), MBA (Finance)	Rishi Kakar is the Head of Marketing and Strategy at India's beloved art and stationary company, Kokuyo Camlin Ltd. Previously, he held the position of Director and Head of Marketing at IDFC Asset Management Company, one of the top ten asset managers in India's burgeoning public asset management industry.

*Associate Director

Duties and Obligations of the AMC as specified in the Regulations

1. The AMC shall take all reasonable steps and exercise due diligence to ensure that the investment of funds pertaining to any scheme is not contrary to the provisions of the SEBI Regulations and the Deed of Trust.
2. The AMC shall exercise due diligence and care in all its investment decisions as would be exercised by other persons engaged in the same business.
3. The AMC shall obtain, wherever required under the Regulations, prior in-principle approval from the recognized stock exchange(s) where units are proposed to be listed.
4. The AMC shall be responsible for the acts of commission or omission by its employees or the persons whose services have been procured by the AMC.
5. The AMC shall submit to the Trustee quarterly reports of each year on its activities and the compliance with the SEBI Regulations.
6. The Trustee at the request of the AMC may terminate the assignment of the AMC at any time, provided that such termination shall become effective only after the Trustee have accepted the termination of assignment and communicated their decision in writing to the AMC.
7. Notwithstanding anything contained in any contract or agreement or termination, the AMC or its directors or other officers shall not be absolved of liability to the Mutual Fund for their acts of commission or omission, while holding such position or office.
8. The Chief Executive Officer (whatever his designation may be) of the AMC shall ensure that the Mutual Fund complies with all the provisions of the SEBI Regulations and the guidelines or circulars issued in relation thereto from time to time and that the investments made by the fund managers are in the interest of the unit holders and shall also be responsible for the overall risk management function of the Mutual Fund.

Chief Executive Officer (whatever be the designation) shall also ensure that the Asset Management Company has adequate systems in place to ensure that the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fifth Schedule of these regulations are adhered to in letter and spirit. Any breach of the said Code of Conduct shall be brought to the attention of the Board of Directors of the Asset Management Company and Trustees.

9. (a) The fund managers (whatever the designation may be) shall ensure that the funds of the schemes are invested to achieve the objectives of the scheme and in the interest of the unit holders. (b) The Fund Managers (whatever be the designation) shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fifth Schedule of these Regulations and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any. (c) The Dealers (whatever be the designation) shall ensure that orders are executed on the best available terms, taking into account the relevant market at the time for transactions of the kind and size concerned to achieve the objectives of the scheme and in the best interest of all the unit holders. (d) The Dealers (whatever be the designation) shall abide by the Code of Conduct for Fund Managers and Dealers specified in PART - B of the Fifth Schedule of these Regulations and submit a quarterly self-certification to the Trustees that they have complied with the said code of conduct or list exceptions, if any. (e) The board of directors of the AMC shall ensure that all the activities of the AMC are in accordance with the provisions of these regulations.

10. (a) The AMC shall not through any broker associated with the sponsor, purchase or sell securities, which is average of 5 per cent or more of the aggregate purchases and sale of securities made by the Mutual Fund in all its schemes. For this purpose, the aggregate purchase and sale of securities shall exclude sale and distribution of units issued by the Mutual Fund. The aforesaid limit of 5 percent shall apply for a block of any three months.
(b) The AMC shall not purchase or sell securities through any broker [other than a broker referred to in Pt. 10(a) above which is average of 5 per cent or more of the aggregate purchase and sale of securities made by the Mutual Fund in all its schemes, unless the AMC has recorded in writing the justification for exceeding the limit of 5 per cent and reports of all such investments are sent to the Trustee on a quarterly basis. The aforesaid limit shall apply for a block of three months.
11. The AMC shall not utilise the services of the sponsor or any of its associates, employees or their relatives, for the purpose of any securities transaction and distribution and sale of securities. However, the AMC may utilise such services if disclosure to that effect is made to the unitholders and the brokerage or commission paid is also disclosed in the half-yearly annual accounts of the Mutual Fund. Provided further that the Mutual Fund shall disclose at the time of declaring half yearly and yearly results:
 - a. any underwriting obligations undertaken by the schemes of the Mutual Funds with respect to issue of securities associate companies,
 - b. devolvement, if any,
 - c. subscription by the schemes in the issues lead managed by associate companies, subscription to any issue of equity or debt on private placement basis where the sponsor or its associate companies have acted as arranger or manager.
12. The AMC shall file with the Trustee the details of transactions in securities by the key personnel of the AMC in their own name or on behalf of the AMC and shall also report to the SEBI, as and when required by SEBI.
13. In case the AMC enters into any securities transactions with any of its associates a report to that effect shall be sent to the Trustee at its next meeting.
14. In case any company has invested more than 5 per cent of the net asset value of a scheme, the investment made by that scheme or by any other scheme of the Mutual Fund in that company or its subsidiaries shall be brought to the notice of the Trustee by the AMC and be disclosed in the half-yearly and annual accounts of the respective schemes with justification for such investment provided the latter investment has been made within one year of the date of the former investment calculated on either side.
15. The AMC shall file with the Trustee and the Board—
 - a. detailed bio-data of all its directors along with their interest in other companies within fifteen days of their appointment
 - b. any change in the interests of directors every six months
16. a quarterly report to the Trustee giving details and adequate justification about the purchase and sale of the securities of the group companies of the sponsor or the AMC, as the case may be, by the Mutual Fund during the said quarter
17. Each director of the AMC shall file the details of his transactions of dealing in securities with the Trustee on a quarterly basis in accordance with guidelines issued by SEBI.
18. The AMC shall not appoint any person as key personnel who has been found guilty of any economic offence or involved in violation of securities laws.
19. The AMC shall appoint registrars and share transfer agents who are registered with SEBI, provided if the work relating to the transfer of units is processed in-house, the charges at competitive market rates may be debited to the scheme and for rates higher than the competitive market rates, prior approval of the Trustee shall be obtained and reasons for charging higher rates shall be disclosed in the annual accounts.
20. The AMC shall not invest in any of its schemes unless full disclosure of its intention to invest has been made in the SID, provided that an AMC shall not be entitled to charge any fees on its investment in that scheme.
21. The AMC shall abide by the Code of Conduct as specified in the Fifth Schedule to the Regulations.
22. The AMC shall invest such amounts in such schemes of the mutual fund. Based on the risks associated with the schemes, as may be specified by SEBI from time to time.
23. The asset management company shall report and disclose all the transactions in debt and money market securities, including inter scheme transfers, as may be specified by the Board.

24. The asset management company and the sponsor of the mutual fund shall be liable to compensate the affected investors and/or the scheme for any unfair treatment to any investor as a result of inappropriate valuation.
25. The asset management company shall compute and carry out valuation of investments made by its scheme(s) in accordance with the investment valuation norms specified in Eighth Schedule, and shall publish the same.
26. The asset management company shall not carry out its operations including trading desk, unit holder servicing and investment operations outside the territory of India.
27. The independent directors of the AMC shall pay specific attention to the following, as may be applicable, namely: –
 - the Investment Management Agreement and the compensation paid under the agreement,
 - service contracts with associates, whether the AMC has charged higher fees than outside contractors for the same services,
 - selections of the AMC's independent directors,
 - securities transactions involving associates to the extent such transactions are permitted,
 - selecting and nominating individuals to fill independent directors' vacancies,
 - code of ethics must be designed to prevent fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions,
 - the reasonableness of fees paid to sponsor, asset management company and any others for services provided,
 - principal underwriting contracts and their renewals,
 - any service contract with the associates of the AMC
28. An AMC shall ensure that Unit-Holder Protection Committee ("UHPC") is constituted and operates in compliance with guidelines issued by SEBI from time to time.

Information on Key Personnel of the Asset Management Company:

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
Ruchi Pandey	42	Chief Executive Officer	MBA	16	Ruchi Pandey is one of the founding members of Old Bridge Capital Group, where she has handled several roles for development of domestic and offshore business. She currently serves as Chief Executive Officer for Old Bridge Asset Management Private Limited. Ruchi has almost two decades of experience in Financial Industry, with over 15 years in Asset Management Industry. Over the last two decades of her career, she has worked closely with Investment Teams to understand the portfolio strategies in detail, worked on building relevant products, enhance their communication and interacted with investors. Her core strength lies in understanding investor needs and behaviour which she has garnered over the years through her client interactions in her AMC roles, managing client relationships and in her Investment Counselling and Relationship Management roles. Her

					previous assignment was Investment Specialist at Old Bridge Capital Management. Her experience cuts across Business Development, Sales & Distribution, Marketing and Product Management. Over the years she has worked with firms like HSBC Global Asset Management, IDFC Asset Management, Prudential ICICI on the AMC side and in her initial years with Banks like ABN Amro NV and IDBI Bank.
Kenneth Joseph Andrade	53	Chief Investment Officer	B. Com, Post Graduate Diploma in Financial Management Age:	30	Kenneth Andrade has over 30 years of experience in Indian Capital Markets, portfolio management and investment research. Kenneth is the promoter of Old Bridge Capital Management Private Ltd (OBCMPL), where he was managing the investment process and leads investment ideation. He has a 20-year track record managing equity funds. In his previous assignments Kenneth has worked with IDFC Asset Management Company Limited as Chief Investment Officer. He has also worked as a fund manager with Kotak Mahindra Asset Management Company Limited.
Shweta Jainn	47	Chief of Staff and Chief Information Security Officer	BSc (Hons), MSW, INSEAD,	25	Shweta is a seasoned leader with 25 years of experience driving People and Culture, Change Management (M&A) specialist. As strategic management consultant at Abundanci she has been catalyst for change, shaped and influenced large scale changes & has been coach to C suite business leaders. Prior to this, she held various leadership positions and managed multicultural workforce in METAM & India at Beckman Coulter Life Sciences (Danaher Corporation) She has worked in various sectors namely IT, Financial services (SCB & UBS) and Life Sciences. In Year 2016, was among TOP 29 finalist in APAC as Conscious Business Leader –Awards by Linked In
Tarang Agrawal	33	Fund Manager	B. Com, CFA	5	Tarang Agrawal has a formal experience of over 5 years in the capital markets. Prior to joining Old Bridge Asset Management, Tarang worked as an Investment Analyst at Old Bridge Capital Management

					Private Ltd. In his role he has covered multiple industries and has a keen interest in state and central finances.
Mayuresh Sonavane	40	Compliance Officer	B.com	15	Mayuresh Sonavane has over 15 years of work experience across various Asset Management Companies in the Compliance, Legal & Secretarial profile. He has overseen implementation of processes and controls under various laws and regulations across various Asset Management Companies. Prior to this, he was associated with Navi Asset Management Company Limited as Chief Compliance Officer. He has also worked with Quantum Asset Management Company Private Limited, PGIM India Asset Management Private Limited and IIFL Asset Management Company Limited.
Pawan Rathi	36	AVP Operations & Investor Service - Investor Relation Officer	B.com, Chartered Accountant	13	Pawan Rathi has an experience of over 13 years in the area related to Operations across various verticals in the financial service industry, viz. Mutual Fund, AIF, PMS. His last assignment was with Trust Asset Management Private Limited as Head - Operations & Investor Services. He has also worked with other mutual fund such as ITI Asset Management Limited and ICICI Prudential Mutual Fund.
Raveen Ayathan	45	(Dealer Equity)	B.A., PGDBA (Marketing)	15	Raveen Ayathan handles Equity Dealing, Trade Execution, using broad suite of algorithms, smart order routing and direct market access. Raveen has more than 15 years of experience. Prior to joining Old Bridge Asset Management Private Limited he was associated with Old Bridge Capital Private Limited. He has also worked with IDFC Securities Limited for 10 years where he handled Execution of trades using the electronic trading tools and algorithm strategies

Sheetal Acharya	36	Risk Officer	Certificate Program in Applied Financial Risk Management - IIM Indore. MBA - ICFAI	14	Sheetal has experience of over 14 years in the area related to Mutual Fund Investments Support & Operations. Her last assignment was with White Oak Capital Asset Management Ltd as Investment Risk & Support Manager. She has also worked with other mutual fund such as DSP Mutual Fund and Bandhan Mutual Fund.
-----------------	----	--------------	---	----	--

Equity Research Team

Name/Designation	Qualification/Age	Brief Experience
Kushagra Bhattar (Investment Analyst)	CA & CFA Age: 28	Kushagra Bhattar has an experience of over 6 years in the capital markets. Prior to joining Old Bridge Asset Management, Kushagra worked as an Investment Analyst at Old Bridge Capital Management Private Ltd for 3 years. In his role he has covered multiple industries and has a keen interest in state and central finances. He has also worked with Ambit Capital in a sell side role for 3 years.
Aditya Kumar (Investment Associate) Appointed with effect from October 30, 2023	CFA (Level 3 clear) Age: 25	Aditya Kumar has an experience of around 1 year in the capital markets. Prior to joining Old Bridge Asset Management, Aditya worked as an Equity Research Analyst at a family office based in Mumbai for 5 months. He has completed his Finplus Programme from Finnacle Institute.
Mansi Zaveri (Investment Associate)	BMS, MSc in Finance Age-24	Mansi Zaveri has past experience of 1.5 years. Prior to joining Old Bridge Asset Management, Mansi worked as a Consultant at Deloitte for 1 year. She has completed her MSc in Finance and Accounting from Imperial College London and Bachelor's in Management Studies from Jai Hind College, Mumbai.

The Fund Managers also do the Research and are involved in the Research Activities. In addition to the Fund Management Team, the AMC Research Team comprises of 4 employees in the Research Team.

Procedure followed for Investment decisions:

1. The AMC has put in place an Investment Policy which provides a framework for undertaking investments for various schemes managed by Old Bridge Asset Management Private Limited. The Investment Policy prescribes framework for undertaking investments in equity, fixed income securities and such other securities as specified in the Scheme Information Document of various schemes and as permitted by SEBI from time to time.
2. The Fund Manager of the concerned scheme(s) shall be responsible for undertaking buy/sell decisions of securities in portfolio of various scheme(s). Investment decisions taken by the Fund Manager shall be guided by the framework prescribed in the Investment Policy. Research Reports shall be prepared for undertaking investments in various securities. The Fund Manager shall be responsible for performance of various mutual fund scheme(s).
3. Investment decisions taken for various scheme(s) shall be recorded in accordance with the requirements prescribed in SEBI MF Regulations and applicable Circulars/Guidelines.

4. The Investment Committee shall meet periodically and shall undertake review of fund management activities including scheme(s) performance, portfolio of the scheme(s), asset allocation etc. The Investment Committee will be headed by the Chief Executive Officer.
5. Chief Executive Officer is not involved in the investment decision making process. The role of Chief Executive Officer of the AMC is to ensure that due diligence is exercised while making investment decisions, the process and procedure are followed in accordance with policies, mechanism etc. laid down by the Board of Directors and are in the best interests of the unit holders.
6. Review of scheme(s) performance will also be undertaken by the Board of Directors of AMC and Trustee Company in the Board Meeting. Scheme(s) performance will also be compared with the respective scheme(s) benchmark.
7. The AMC shall ensure that all investment decisions are taken in the interest of unit holders of the scheme(s) and in compliance with SEBI MF Regulations and various Circulars, Guidelines etc issued from time to time pertaining to investments.

III. Service Provider

Custodian	Registrar and Transfer Agent
Deutsche Bank AG SEBI Registration No. – IN/CUS/003 Address: Deutsche Bank House, Hazarimal Somani Marg, Fort, Mumbai 400001	KFIN Technologies Limited SEBI Registration - INR000000221 Address – Selenium Building, Tower-B, Plot No. 31 & 32, Financial District, Nanakramguda, Serilingampally, Hyderabad, R. R. District, Telangana 500032.
Fund Accountant	Collecting Bankers
Deutsche Bank AG Address: Deutsche Bank House, Hazarimal Somani Marg, Fort, Mumbai 400001	HDFC Bank Limited SEBI Registration - INBI00000063 Address – HDFC Bank House, Senapati Bapat Marg, Lower Parel(W), Mumbai - 400 013 IDFC First Bank Limited SEBI Registration - INBI00001149 Address- No. C-32, Naman Chambers, Opposite Pragati Tower, G- Block, Bandra Kurla Complex, Bandra (East) Mumbai- 400051 ICICI Bank Limited SEBI Registration - INBI00000004 Address- ICICI Bank ICICI Centre, 163, H.T. Parekh Marg, Backbay Reclamation, Churchgate, Mumbai-400020. Kotak Mahindra Bank Limited SEBI Registration- INBI00000927 Address- Kotak Bank, C-12, G Block, University of Mumbai, Vidya Nagari, Bandra Kurla Complex, Bandra (East) Mumbai- 400051 State Bank of India SEBI Registration- INBI00000038 Address- SBI Bank, Horniman Circle, Mumbai Samachar Marg, Fort, Mumbai-400001, Maharashtra. Axis Bank SEBI Registration- INBI00000017 Address- Jeevan Prakash Building, Mezzanine Floor, Sir P M Road, Fort, Mumbai- 400001, Maharashtra

	YES Bank SEBI Registration- INBI00000935 Address- Yes Bank Unit No. 2/A1, Hallmark Business Plaza, Guru Nanak Hospital Road, Kala Nagar, Mumbai- 400051, Maharashtra
Statutory Auditor for Mutual Fund	Legal Counsel
S.R. Batliboi & Co. LLP – Chartered Accountants The Ruby, 12th Floor, 29, Senapati Bapat Marg, Dadar (W), Mumbai – 400 028, Maharashtra, India	There is no retained legal counsel to the mutual fund or AMC. The AMC uses such services, if need arises.

The Board of the Trustees and AMC have ensured that the Registrar and Transfer Agent (KFINT Technologies Limited) has adequate capacity to discharge responsibilities with regard to processing of applications within the time limit prescribed in the Regulations and also has sufficient capacity to handle investor complaints.

IV. Condensed Financial Information (CFI) for all the schemes launched by MF during the last three fiscal years (excluding redeemed schemes):

Sr No	HISTORICAL PER UNIT STATISTICS	OLD BRIDGE FOCUSED EQUITY FUND		
		2023-2024	2022-2023	2021-2022
	Financial Year			
1	NAV at the beginning of the year (as on April 1) \$			
2	Regular Plan - Growth Option	10	N.A	N.A
	Regular Plan - IDCW Option	10	N.A	N.A
	Direct Plan - Growth Option	10	N.A	N.A
	Direct Plan - IDCW Option	10	N.A	N.A
3	NAV at the end of the year (as on March 31)			
	Regular Plan - Growth Option	9.91	N.A	N.A
	Regular Plan - IDCW Option	9.91	N.A	N.A
	Direct Plan - Growth Option	9.93	N.A	N.A
	Direct Plan - IDCW Option	9.93	N.A	N.A
4	Annualised return**			
4(a)	Regular Plan - Growth	-0.90%	N.A	N.A

4(b)	Direct- Growth*	-0.70%	N.A	N.A
5	Net Assets end of period (Rs. Crs.)	223.43	N.A	N.A
6	Benchmark Returns			
6(a)	Scheme Benchmark Return BSE 500 TRI	5.68%	N.A	N.A
6(b)	Additional Benchmark Return Nifty50TRI	5.27%	N.A	N.A
7	Ratio of Recurring Expenses to net assets			
7(a)	Regular Plan - Growth	2.48%	N.A	N.A
7(b)	Direct- Growth	1.43%	N.A	N.A

\$ NAV at the beginning is considered as date of allotment i.e. January 24, 2024

* Excluding dividend details of liquid scheme.

** Only for growth option. Explanation to be given for not providing annualised return for options other than growth option. Absolute returns to be provided for schemes less than one year.

V. RISK FACTORS

1. Standard Risk Factors:

a. Standard Risk Factors for investments in Mutual Fund

- Investment in Mutual Fund Units involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.
- As the price / value / interest rates of the securities in which the scheme invests fluctuates, the value of your investment in the scheme may go up or down depending on the various factors and forces affecting the capital markets and money markets.
- Past performance of the Sponsor /AMC/Mutual Fund does not guarantee future performance of the scheme.
- The name of the scheme does not in any manner indicate either the quality of the scheme or its future prospects and returns.
- The sponsor is not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution of Rs.100000/- made by it towards setting up the Fund.
- The present scheme is the first scheme being launched under its management.
- The present Scheme are not guaranteed or assured return Scheme.

b. Risk factors of not maintaining average AUM of Rs. 20 crore on half yearly rolling basis (Applicable only for open ended debt oriented schemes)

c. Risks associated with different derivative strategies

Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies. 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. As and when the Scheme trade in the derivatives market there are risk factors and issues concerning the use of derivatives that investors should understand.

Derivative products are specialized instruments that require investment techniques and risk analyses 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. Derivatives require 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. 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 specific risk factors arising out of a derivative strategy used by the Fund Manager may be as below:

- Lack of opportunity available in the market;
- The risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.

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.

- **Risks associated with Covered Call Strategy:**

The risk associated with covered calls is the loss of upside, i.e. if the shares are assigned (called away), the option seller forgoes any share price appreciation above the option strike price.

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.

d. Other risk factors

i. **Concentration Risk:**

The Old Bridge Focused Equity Scheme seeks to generate long term capital appreciation/ income by investing in equity & equity related instruments of up to 30 companies. This concentrated nature of the portfolio may result in higher levels of volatility vis-à-vis other diversified equity-oriented schemes. Since the scheme will invest in not more than 30 stocks, it is also expected to have higher market liquidity risk compared to a regular diversified equity scheme.

ii. **Risk associated with schemes investing in equities:**

- The scheme proposes to invest in equity and equity related instruments. Equity instruments by nature are volatile and prone to price fluctuations on a daily basis due to both micro and macro factors. The value of Equity and Equity related instruments may fluctuate due to factors affecting securities market such as volume and volatility in equity markets, interest rates, currency exchange rates, changes in law/policies of the Government, taxation laws, political, economic or other developments, general decline in the Indian Markets which may have an adverse impact on individual securities, a specific sector or all sectors. Consequently, the NAVs of the Units issued under the Scheme may be adversely affected.
- Investments in equity shares and equity related instruments involve a degree of risk and investors should not invest in the Scheme unless they can afford to take the risks.
- Investors may note that AMC/Fund Manager's investment decisions may not be always profitable. Although it is intended to generate capital appreciation and maximize the returns by actively investing in equity/ equity related securities and utilising debt and money market instruments as a defensive investment strategy.
- While securities that are listed on the stock exchange carry lower liquidity risk, the ability to sell these investments is limited by the overall trading volume on the stock exchanges. and may lead to the Scheme incurring losses till the security is finally sold.
- Trading volumes, settlement periods and transfer procedures may restrict the liquidity of the investments made by the Scheme. Different segments of the Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances leading to delays in receipt of proceeds from sale of securities. The NAV of the Scheme can go up and down because of various factors that affect the capital markets in general.
- Securities which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges
- Further, the volatility of medium / small - capitalization stocks may be higher in comparison to liquid large capitalization stocks.

iii. **Risk Associated with Investing in Fixed Income / Money Market Instruments:**

- **Interest-Rate Risk:** Fixed income securities and money market instruments run price-risk or interest-rate risk. Generally, when interest rates rise, prices of existing fixed income securities fall and when interest rates drop, such prices increase. The extent of fall or rise in the prices is a function of the existing coupon, days to maturity and the increase or decrease in the level of interest, credit quality, demand and supply. However, in case of Government securities credit risk remains zero, their prices are influenced by the movement in interest rates in the financial system.

In case of floating rate instruments, an additional risk could arise because of changes in spreads of floating rate instruments. With increase in spread of floating rate instruments, the price can fall and with decrease in spread of floating rate instruments, the prices can rise. Moreover, the floating rate instruments having a periodical interest rate reset carry lower interest rate risk compared to a fixed rate debt security. However, in the falling interest rate scenario, the returns on floating rate debt instruments may not be better than those on fixed rate debt instruments.

- **Credit Risk:** This risk means that the issuer of a debenture/bond or a money market instrument may default on interest payment or even in paying back the principal amount on maturity. Even where no default occurs, the price of a security may go down because the credit rating of an issuer/instrument goes down. Different types of securities in which the scheme(s) would invest as given in the scheme information document carry different levels and types of risk. Accordingly, the scheme's risk may increase or decrease depending upon its investment pattern. E.g. corporate bonds carry a higher amount of risk than Government securities. Further even among corporate bonds, bonds which are AAA rated are comparatively less risky than bonds which are AA rated.
- **Re-investment Risk:** This refers to the interest rate risk at which the intermediate cash flows received from the securities in the Scheme including maturity proceeds are reinvested. 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 debt security. Consequently, the proceeds may get invested at a lower rate.
- **Basis Risk:** During the life of a floating rate security or a swap, the underlying benchmark index may become less active and may not capture the actual movement in interest rates or at times the benchmark may cease to exist. These types of events may result in loss of value in the portfolio.
- **Spread Risk:** In a floating rate security the coupon is expressed in terms of a spread or mark up over the benchmark rate. In the life of the security this spread may move adversely leading to loss in value of the portfolio. The yield of the underlying benchmark might not change, but the spread of the security over the underlying benchmark might increase leading to loss in value of the security.
- **Liquidity Risk:** The liquidity of a bond may change, depending on market conditions leading to changes in the liquidity premium attached to the price of the bond. At the time of selling the security, the security can become illiquid, leading to loss in value of the portfolio.
- **Liquidity Risk on account of unlisted securities:** The liquidity and valuation of the Scheme investments due to their holdings of unlisted securities may be affected if they have to be sold prior to their target date of divestment. The unlisted security can go down in value before the divestment date and selling of these securities before the divestment date can lead to losses in the portfolio.
- **Settlement Risk:** 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.
- **Other Risk:** In case of downward movement of interest rates, floating rate debt instruments will give a lower return than fixed rate debt instruments.

iv. **Risk Factors Associated with Securities Lending:**

As with other modes of extensions of credit, there are risks inherent to securities lending. During the period the security is lent, the Scheme may not be able to sell such security and in turn cannot protect from the falling market price of the said security. Under the current securities lending and borrowing mechanism, the Scheme can call back the securities lent any time before the maturity date of securities lending contract. However, this will be again the function of liquidity in the market and if there are no lenders in the specified security, the Scheme may not be able to call back the security and in the process, the Scheme will be exposed to price volatility. Moreover, the fees paid for calling back the security may be more than the lending fees earned by Scheme at the time of lending the said security and this could result in loss to the Scheme. Also, during the period the security is lent, the Fund will not be able to exercise the voting rights attached to the security as the security will not be registered in the name of the Scheme in the records of the Depository/issuer.

v. **Risk associated with Investments in REITs and InvITs:**

- **Price-Risk or Interest-Rate Risk:** REITs & InvITs run price-risk or interest-rate risk. Generally, when interest rates rise, prices of existing securities fall and when interest rates drop, such prices increase. The extent of fall or rise in the prices is a function of the existing coupon, days to maturity and the increase or decrease in the level of interest rates.
- **Credit Risk:** In simple terms this risk means that the issuer of a debenture/ bond or a money market instrument may default on interest payment or even in paying back the principal amount on maturity. REITs & InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be pre-scheduled.
- **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). The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. As these products are new to the market they are likely to be exposed to liquidity risk.
- **Reinvestment Risk:** Investments in REITs & InvITs may carry reinvestment 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.
- **Risk of lower than expected distributions:** The distributions by the REIT or InvIT will be based on the net cash flows available for distribution. The amount of cash available for distribution principally depends upon the amount of cash that the REIT/ InvITs receives as dividends or the interest and principal payments from portfolio assets.

The above are some of the common risks associated with investments in REITs & InvITs. There can be no assurance that investment objectives will be achieved, or that there will be no loss of capital. Investment results may vary substantially on a monthly, quarterly or annual basis.

vi. **Risks associated with segregated portfolio:**

- Liquidity risk – A segregated portfolio is created when a credit event / default occurs at an issuer level in the scheme. This may reduce the liquidity of the security issued by the said issuer, as demand for this security may reduce. This is also further accentuated by the lack of secondary market liquidity for corporate papers in India. As per SEBI norms, the scheme is to be closed for redemption and subscriptions until the segregated portfolio is created, running the risk of investors being unable to redeem their investments. However, it may be noted that, the proposed segregated portfolio is required to be formed within one day from the occurrence of the credit event.
- Investors may note that no redemption and subscription shall be allowed in the segregated portfolio. However, in order to facilitate exit to unit holders in segregated portfolio, AMC shall list the units of the segregated portfolio on a recognized stock exchange within 10 working days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests. For the units listed on the exchange, it is possible that the market price at which the units are traded may be at a discount to the NAV of such Units. There is no assurance that an active secondary market will develop for units of segregated portfolio listed on the stock exchange. This could limit the ability of the investors to resell them. There may be possibility that the security comprising the segregated portfolio may not realize any value.
- Valuation risk - The valuation of the securities in the segregated portfolio is required to be carried out in line with the applicable SEBI guidelines. However, it may be difficult to ascertain the fair value of the securities due to absence of an active secondary market and difficulty to price in qualitative factors.

vii. **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.

viii. **Performance Risk:**

Performance risk refers to the risk of a scheme being unable to generate returns matching / above the returns of the scheme's benchmark. It would also mean the scheme underperforming against its peer set of other mutual fund schemes having similar portfolios, scheme classification, objective, benchmark and asset allocation. These risks could arise due to a variety of market and economic activities, government policies, global economic changes, currency fluctuations, tax policies, political changes, corporate actions and investors' behaviour.

ix. **Risks associated with 'Restriction on Redemption in Mutual Funds':**

Subject to the approval of Board of Directors of the AMC and Trustee Company and immediate intimation to SEBI, a restriction on redemptions may be imposed by the Scheme under certain exceptional circumstances, which the AMC / Trustee believe that may lead to a systemic crisis or event that constrict liquidity of most securities or the efficient functioning of markets. Please refer to the paragraph "Restrictions, if any, on the right to freely retain or dispose of Units being offered" for further details including the procedure to be followed while imposing restriction on redemptions.

x. **Risks Factors associated with transaction in Units through stock exchange(s):**

In respect of transaction in units of the Scheme through stock exchange platform(s), allotment and redemption of Units on any Business Day will depend upon the order processing / settlement by the stock exchange(s) and their respective clearing corporations on which the Fund has no control.

xi. **Risks associated with investments in mutual fund units:**

To the extent of the investments made by the scheme in mutual funds units, the risks associated with investing in such funds like market risk, credit & default risk, liquidity risk, redemption risk including the possible loss of principal; etc. will exist.

xii. **Risk associated with investing in foreign securities:**

- Subject to necessary approvals and within the investment objectives of the Scheme, the Scheme may invest in overseas markets 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.

- Since the Scheme would invest only partially in foreign securities, there may not be readily available and widely accepted benchmarks to measure performance of such Scheme. To manage risks associated with foreign currency and interest rate exposure, the Fund may use derivatives for efficient portfolio management and hedging and portfolio rebalancing and in accordance with conditions as may be stipulated under the Regulations and by RBI from time to time.
- Investment in Foreign Securities involves a 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, distributions and income may be adversely affected by changes in the value of certain foreign currencies relative to the Indian Rupee. 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.

Keeping in mind the investment limit in foreign securities currently applicable to Mutual Fund, In terms of Para 12.19 of SEBI Master Circular on Mutual Funds dated May 19, 2023, if overall limit for the Mutual Fund in overseas securities reaches USD 1 billion or the overall limit for Mutual Fund Industry in overseas securities reaches USD 7 billion, then Mutual Fund will not be able to invest in overseas securities / will not be able to do incremental overseas investment, unless such limit is increased or further directions is received from SEBI or RBI in this regard. It may be noted that the cap of USD 1 billion will be monitored and enforced at the Mutual Fund level and not at the individual scheme level.

RISK CONTROL/ RISK MANAGEMENT STRATEGY

Risk is an important part of the investment functions. Effective Risk Management is critical to Fund Management for achieving financial goals. Investments made by the Scheme shall be made in accordance with Investment Objective of the Scheme and provisions of SEBI (Mutual Funds) Regulations.

The Fund has identified following Risk and designed Risk Management Strategies, which is the part of the Investment Process to manage such risks.

Risk Associated with Equity & Equity Related Instruments

Type of Risk	Risk Mitigation Measures
Volatility	By monitoring sector / company exposure at portfolio level.
Concentration	By diversifying across stocks / sectors, concentration risk can be reduced. The fund manager will endeavour to build well diversified portfolio within the overall fund specific investment strategy which will help in controlling concentration risk.
Liquidity	The fund manager will control the liquidity at portfolio construction level.
Derivatives Risk	The fund has provision for using derivative instruments for portfolio balancing and hedging purposes. Investments in derivative instruments will be used as per regulatory guidelines. The fund will endeavour to maintain adequate controls to monitor the derivatives transactions entered into.

2. SPECIAL CONSIDERATIONS

Investors are advised to consult their Legal /Tax and other Professional Advisors in regard to tax/legal implications relating to their investments in the Scheme and before making decision to invest in or redeem the Units. The tax information contained in this SID and SAI of Old Bridge Mutual Fund alone may not be sufficient and should not be used for the development or implementation of an investment strategy or construed as investment advice. Investors alone shall be fully responsible/ liable for any investment decision taken on the basis of this document.

Investors are advised to rely upon only such information and/or representations as contained in this SID. Any subscription or redemption made by any person on the basis of statements or representations which are not contained in this SID or which are inconsistent with the information contained herein shall be solely at the risk of the Investor. The Investor is required to confirm the credentials of the individual/firm he/she is entrusting his/her application form along with payment instructions for any transaction in this Scheme. The Mutual Fund/ Trustee/AMC shall not be responsible for any acts done by the intermediaries representing or purportedly representing such Investor.

The AMC may either through itself or through its subsidiaries may undertake other Business Activities such as acting as the investment manager of various Alternative Investment Funds (AIFs), providing portfolio management services, investment advisory services, separately managed accounts; etc. as permitted under Regulation 24(b) of the SEBI (Mutual Funds) Regulations, 1996, as amended from time to time ("the Regulations") and subject to such conditions as may be specified by SEBI from time to time. Any potential conflicts between these activities and the Mutual Fund will be adequately addressed by compliance with the requirements under Regulation 24(b) of the Regulations.

OBAMPL has received No-Objection from SEBI for exchange of research and analysis with the Sponsor.

OBAMPL is providing the services of exchange of research and analysis with the sponsor, Old Bridge Capital Management Private Limited (OBCMPL) on a commercial basis, which are non-binding and non-discretionary in nature and not in conflict of interest with the activities of Old Bridge Mutual Fund.

Neither the SID nor the SAI of Old Bridge Mutual Fund, nor the units of the scheme have been registered in any jurisdiction. The distribution of the SID and SAI of Old Bridge Mutual Fund in certain jurisdictions may be restricted or subject to registration requirements and, accordingly, persons who come into possession of the SID and the SAI of Old Bridge Mutual Fund in such jurisdictions are required to inform themselves about, and to observe, any such restrictions. No person receiving a copy of the SID or any accompanying application form in such jurisdiction may treat the SID 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 of any registration or other legal requirements.

Mutual Fund investments are subject to market risks and the Investors should review/study the SID, the SAI and the addenda thereto issued from time to time carefully in its entirety before investing and should not construe the contents hereof or regard the summaries contained herein as advice relating to legal, taxation or financial/investment matters. There can be no assurance or guarantee that the Scheme objectives will be achieved and the investment decisions made by the AMC may not always be profitable.

Subject to the approval of Board of Directors of the AMC and Trustee Company and immediate intimation to SEBI, a restriction on redemptions may be imposed by the Scheme under certain exceptional circumstances, which the AMC / Trustee believe that may lead to a systemic crisis or event that constrict liquidity of most securities or the efficient functioning of markets. Please refer to the paragraph "Restrictions, if any, on the right to freely retain or dispose of Units being offered " for further details in respective Scheme Information Document.

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.

The tax benefits described in the Scheme Information Document and Statement of Additional Information are as available under the present taxation laws and are available subject to relevant conditions. The Unitholders/ investors should be aware that the relevant fiscal rules or their interpretation may change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of an investment in the Scheme will endure indefinitely. In view of the individual nature of tax consequences, each Unitholder / investor is advised to consult his / her own professional tax advisor.

In the event of substantial investments made by the AMC or the Sponsor or its Shareholders or their affiliates/associates or group companies, 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 Unitholders/ investors to redeem their units.

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 Unitholder/ investor, the AMC shall have absolute discretion to report such suspicious transactions to FIU-IND and / or to freeze the folios of the Unitholder/ investor(s), reject any application(s) / redemptions / allotment of units and effect mandatory redemption of unit holdings of the investor(s) at the applicable NAV subject to payment of exit load, if any.

The Mutual Fund may disclose details of the investor's/ Unitholder's account and transactions there under 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 Unitholder. The Fund may also disclose such details to regulatory and statutory authorities/bodies as may be required or necessary.

Statements in the SID are, except where otherwise stated, based on the law practiced currently in India, and are subject to changes therein.

Foreign Account Tax Compliance Act and Common Reporting Standards requirements

As a part of various ongoing tax and regulatory developments around the globe [e.g. information exchange laws such as Foreign Account Tax Compliance Act ('FATCA') and Common Reporting Standard ('CRS')], financial institutions like Old Bridge Mutual Fund ('Old Bridge MF' or 'the Fund') are being cast with additional investor and counterparty account related due diligence requirements.

The Central Board of Direct Taxes (CBDT) has notified Rules 114F to 114H, as part of the Income-tax Rules, 1962, which Rules require Indian financial institutions such as the Banks, Mutual Funds, etc. to seek additional personal, tax and beneficial owner information and certain certifications and documentation from all our investors and counterparties. According to the FATCA-CRS Rules, financial institutions in India are required to report tax information about account holders that are tax resident of U.S. and other foreign countries, to the CBDT/ Indian Government which will, in turn, relay that information to the US Internal Revenue Service (IRS) and governments of other foreign countries.

These developments have resulted in compliance and reporting obligations on Financial Institutions like Old Bridge MF. In relevant cases, information will have to be reported to tax authorities/appointed agencies. In this respect, Old Bridge MF would rely on the relevant information provided by its Registrar and would also use its discretion. Towards compliance, the Fund may also be required to provide information to any institutions such as withholding agents for the purpose of ensuring appropriate withholding from the account or any proceeds in relation thereto. Old Bridge MF may also have to comply with other similar laws as and when applicable.

Prospective investors and Unit holders will therefore be required to comply with the request of the Fund to furnish such information / documentation / declarations as and when deemed necessary by the Investment Manager in accordance with Applicable Laws. In case prospective investor / Unit holder fails to furnish the relevant information / documentation / declarations in accordance with Applicable Laws, the Fund reserves the right to reject the application or redeem the Units held directly or beneficially and may also require reporting of such accounts and/or levy of withholding

tax on payments made to the Unit holders / investor and/or take any other action/s in accordance with Applicable Laws. FATCA-CRS provisions are relevant not only at on-boarding stage of Unit holders but also throughout the life cycle of investment with the Fund. Unit holders therefore should intimate to the Fund/the Investment Manager, any change in their status with respect to any FATCA-CRS related information / documentation / declarations provided by them previously, including but not limited to any declarations provided in respect of residency of the Unit holders for tax purposes promptly, i.e. within 30 days. Further, if the Fund and/or the Investment Manager is required by Applicable Laws, to provide information regarding the Fund and/or the unit holders / investors to any regulatory authority and/or the Fund Investments and/or income therefrom, and the Fund and/or the Investment Manager complies with such request in good faith, whether or not it was in fact enforceable, they shall not be liable to the Unit holders / investors or to any other party as a result of such compliance or in connection with such compliance.

Prospective investors / Unit holders should consult their own advisors to understand the implications of FATCA-CRS provisions/requirements. Please note that Old Bridge MF will be unable to provide advice to any investor or counterparty about their tax status or FATCA/CRS classification relevant to their account. It is the responsibility of the investor or counterparty to ensure that they record their correct tax status / FATCA/ CRS classification. Investor/ counterparty may seek advice from their tax advisor in this regard. The onus to provide accurate, adequate and timely inputs in this regard would be that of the investor or counterparty. Any changes in earlier information provided must be intimated within 30 days of such change.

Investors are requested to provide all the necessary information / declarations to facilitate compliance, considering India's commitment to implement CRS and FATCA under the relevant international treaties.

VI. HOW TO APPLY?

This section must be read in conjunction with the Section "Units and Offer" of the SID.

1. 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 www.oldbridgemf.com. In respect of New Fund Offer (NFO) of Schemes/Plan(s), an investor can subscribe to the NFO through Applications Supported by Blocked Amount (ASBA) facility by applying for the Units offered under the Option(s)/Plan(s) of the Scheme(s) in the ASBA Application Form and following the procedure as prescribed in the form. For details, please refer to the Section "Additional mode of payment through Applications Supported by Blocked Amount (ASBA) facility".
2. Applications must be completed in Block Letters in English.
3. Applications filled up and duly signed by the applicant and in case of joint applicants by all joint applicants should be submitted along with the cheque/draft/other payment instrument or instruction to a designated ISC /Official Point of acceptance of AMC or the Registrar as specified. Signatures should be in English or in any Indian Language. Applications on behalf of minors should be signed by their Guardian. In case of a HUF, the Karta should sign the application form on behalf of the HUF. Investor who cannot sign and in case required to provide a thumb impression will have to contact the AMC for the additional documentation/information required. For investments through Constituted Attorney, the Power of Attorney has to be signed by the Applicant and Constituted Attorney. The signature in the Application Form needs to clearly indicate that the signature is on behalf of the applicant by the Constituted Attorney.
4. All cheques and bank drafts must be drawn in favour of "a Specific Scheme" and crossed "A/c Payee only". A separate cheque or bank draft must accompany each application/each scheme. Investors must use separate application forms for investing simultaneously in more than one Plan of the Scheme subject to the minimum subscription requirements under each Plan. If the amount mentioned on the application is different from the amount mentioned on the accompanying cheque or bank / demand draft or the amount is not mentioned in the application form, then the amount on the cheque will be treated as the application amount and the application will be processed

accordingly. In case the name of the Scheme/Plan mentioned on the application form differs from the name mentioned on the accompanying payment instrument, then the application will be treated as an application for the Scheme/Plan mentioned on the application form.

5. All cheques and bank drafts accompanying the application form should contain the application form number / folio number, scheme name and name of first investor on its reverse.
6. In order to protect the interest of Investors from fraudulent encashment of cheques, the current SEBI Regulations, have made it mandatory for Investors to mention in their Application / Redemption request, their bank name, branch, address, account type and account number. The Registrar/AMC may ask the investor to provide a blank cancelled cheque or its photocopy for the purpose of verifying the bank account number.
7. PAN issued by the Income Tax authorities is used as the sole identification number for all investors transacting in the securities market including mutual funds, irrespective of the amount of transaction. Thus, all investors (including resident and non-resident investors) are required to provide valid PAN, along with a certified copy of the valid PAN card for all transactions in Units of the schemes of the Fund irrespective of the amount of transaction.

PAN will not be required in case of Systematic Investment Plans (SIPs) where aggregate of installments in a financial year i.e. April to March does not exceed Rs 50,000/- (hereafter referred to as "Micro Investments"). This exemption will be applicable only to investments by Individuals & Non-Resident Indian. Accordingly, where the aggregate of the lumpsum investment (fresh & additional purchase) and micro SIP installments by an investor based on the rolling 12month period/in a financial year i.e. April to March does not exceed Rs. 50,000/-, it shall be exempt from the requirement of PAN. However, requirements of Know Your Customer (KYC)/ Central KYC Registry (CKYC) shall be mandatory.

Accordingly, investors seeking the above exemption from PAN still need to submit the KYC Acknowledgment i.e. PAN Exempt KYC Reference No (PEKRN) / KYC Identification No. (KIN) acknowledgement issued by KRA / CKYC, irrespective of the amount of investment. For the purpose of identifying Micro Investments, the value of investments at the Investor level (first holder) will be aggregated based on the unique ID number mentioned on the KYC Acknowledgment / KIN No. and such aggregation shall be done irrespective of the number of folios/ accounts under all the schemes of the Fund which the investor had invested. This exemption will be available only to Micro investment made by the individuals being Indian citizens (including NRIs, Joint holders*, minors acting through guardian and sole proprietary firms not having PAN). Person of Indian Origin (PIO), Hindu Undivided Family (HUF) and other categories of investors will not be eligible for this exemption.

*In case of joint holders, first holder must not possess a PAN.

PAN requirement is also exempt for investors residing in the state of Sikkim, Central Government, State Government, and the officials appointed by the courts e.g. Official liquidator, Court receiver etc. (under the category of Government). However, this would be subject to verifying the veracity of the claim of the specified organizations or residents of Sikkim, by collecting sufficient documentary evidence in support of their claim for such an exemption. Please refer to the application form for details of the document(s) which are required to be submitted in such cases.

The detailed procedures/requirements for accepting PAN exempt investments shall be as specified by the AMC / Trustee from time to time and their decision in this behalf will be final and binding.

8. Cash Investments in mutual funds: The AMC would not accept cash for investment in the scheme.
9. Know Your Client ("KYC") formalities under the Prevention of Money Laundering Act, 2002 ("PMLA") and the related guidelines issued by SEBI are required to be completed by investors for all fresh investments / applications irrespective of the amount of investment.

KYC requirements will have to be complied with for any amount of investment for the following transactions:

- a. New / Additional Purchases
- b. Switch Transactions
- c. New SIP Registrations
- d. New STP Registrations

Income Distribution cum Capital Withdrawal (IDCW) reinvestment transactions of any amount will not be subject to the KYC Compliance requirements.

Please refer to para on "Prevention of Money Laundering - Know Your Customer (KYC) Compliance" under section "Legal Information" for detailed procedures and other information related to KYC compliances.

Ultimate Beneficial Owner

As a part of Client Due Diligence (CDD) Process under Prevention of Money Laundering Act, 2002 (hereinafter referred to as "PML Act") read with Prevention of Money Laundering Rules, 2005 as amended from time to time each of the SEBI registered intermediary, which interalia includes Mutual Funds, is required to obtain sufficient information from their clients in order to identify and verify the identity of persons who beneficially own or control the securities account. Providing information about beneficial ownership is mandatory for all categories of investors except (i) Individuals and (ii) a Company, which is listed on a stock exchange or is a majority owned subsidiary of such a Company.

Further pursuant to SEBI Master Circular No. SEBI/HO/MIRSD/ MIRSD-SEC-5/P/CIR/2023/022 dated February 03, 2023 on AML/CFT Obligations and Guidelines on identification of Beneficial Ownership has prescribed its guidelines for identification of Beneficial Ownership to be followed by the intermediaries for determination of beneficial owners. Further, AMFI vide its circular no. 62/2015-16 dated September 18, 2015 has issued best practice guidelines to be followed by AMC's for identification of beneficial ownership. A 'Beneficial owner' is defined as a natural person or persons who ultimately own, control or influence a client and / or person on whose behalf a transaction is being conducted, and includes a person who exercise ultimate effective control over a legal person or arrangement. In this regard, all categories of investors (including all new / existing investors / unitholders) (except individuals, companies listed on a stock exchange or majority-owned subsidiary of such companies) are mandatorily required to provide details about beneficial ownership for all investments. Failing which the Fund reserves the right to reject applications/ subscription requests / additional subscription requests (including switches) / restrict further investments or seek additional information from investors who have not provided the requisite information on beneficial ownership. In the event of change in beneficial ownership, investors are requested to immediately update the details with the Fund/Registrar.

In order to comply with the above Act/Rules/Regulations & Guidelines, the following CDD process is being implemented by Old Bridge Mutual Fund.

I. Applicability:

Providing information about beneficial ownership will be applicable to the subscriptions received from all categories of investors except Individuals and a Company listed on a stock exchange or is a majority owned subsidiary of such a Company.

Proof of Identity of the UBO such as Name/s, Address & PAN/Passport together with self-attested copy* along with the 'Ultimate Beneficial Ownership' declaration form is required to be submitted to Old Bridge AMC/its RTA. (* Original to be shown for verification and immediate return.)

In case of any change in the beneficial ownership, the investor should immediately intimate Old Bridge AMC/ its Registrar/KRA, as may be applicable, about such changes.

II. Identification Process:

(A) For Investors other than Individuals or Trusts:

- (i) If the investor is an unlisted company, partnership firm or unincorporated association/body of individuals, the beneficial owners are the natural person/s who is/are acting alone or together, or through one or more juridical person and exercising control through ownership or who ultimately has a controlling ownership interest.
- (ii) Controlling ownership interest means ownership of/entitlement to:
 - a. more than 10% of shares or capital or profits of the juridical person, where juridical person is a company.

- b. more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership firm; or
 - c. more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.
- (iii) In cases, where there exists doubt as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity details should be provided of the natural person who is exercising control over the juridical person through other means (i.e. control exercised through voting rights, agreement, arrangements or in any other manner).
- (iv) In case no natural person is identified under any of the above criteria, the person who holds the position of senior managing official shall be provided.

(B) For Investor which is a Trust:

In case of a Trust, the settler of the trust, the trustee, the protector and the beneficiaries with 15% or more interest in the trust or any other natural person exercising ultimate effective control over the trust through a chain of control or ownership shall be considered as beneficial owner.

(C) For Foreign Investors:

The Know Your Client requirements in case of foreign investors viz. Foreign Portfolio Investor (FPI), Sub accounts and Qualified Foreign Investors (QFIs) as specified in SEBI Circular No. CIR/MIRSD/11/2012 dated September 5, 2012, shall be considered for the purpose of identification of beneficial ownership of the investor.

For collection of information/documentation from investors/Unitholders:

SEBI has prescribed uniform Know Your Client (KYC) requirements vide Circular No(s). CIR/MIRSD/16/2011 dated August 22, 2011 and MIRSD/SE/Cir-21/2011 dated October 5, 2011 to be used by the concerned registered intermediaries. Further, the intermediaries are also advised vide SEBI Circular No. CIR/MIRSD/07/2013 dated September 12, 2013 read with the guidance on KYC requirements issued by SEBI to follow a risk-based approach towards KYC requirements of Eligible Foreign Investors (EFI)/Foreign Portfolio Investors (FPIs) by classifying them into Category I, II and III. Further, SEBI vide circular dated April 10, 2018, (a) reviewed and specified the changes in requirements for identification and verification of Beneficial Owners and (b) reviewed the KYC requirements for FPIs and provided certain clarifications on their documentation requirements.

SEBI has also notified the SEBI KYC Registration Agency (KRA) Regulations, 2011 and have issued guidelines under these regulations from time to time.

Subscriptions from U.S. Persons and Residents of Canada

Old Bridge Mutual Fund restricts subscriptions from U.S. Persons (including NRIs and all persons residing in U.S., U.S. Corporations or other entities organised under the laws of U.S.) and Residents of Canada in the Schemes of Old Bridge Mutual Fund.

U.S. Persons and Residents of Canada are requested to note the following:

1. No fresh purchases (including Systematic Investment Plans, Systematic Transfer Plans and IDCW Transfer Plans)/additional purchases/switches in any Schemes of Old Bridge Mutual Fund would be allowed.

2. If an existing Unit Holder(s) subsequently becomes a U.S. Person or Resident of Canada, then such Unit Holder(s) will not be able to purchase any additional Units in any of the Schemes of Old Bridge Mutual Fund;
3. All existing registered Systematic Investment Plans, Systematic Transfer Plans and IDCW Transfer Plans along with related mandates would cease from the effective date;
4. In case AMC/ Old Bridge Mutual Fund subsequently identifies, that the subscription amount has been received from U.S. Person(s) or Resident(s) of Canada, then Old Bridge Asset Management Private Limited/ Old Bridge Mutual Fund at its discretion shall redeem all the units held by such person from the Scheme at applicable Net Asset Value.

However, transactions from U.S. Persons and Residents of Canada meeting following requirements will be accepted:

1. 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
2. FPIs

These investors need to submit a physical transaction request along with such documents as may be prescribed by the AMC/ the Trustee/ the Fund from time to time.

The AMC reserves the right to put the transaction requests on hold/reject the transaction request/reverse allotted units, as the case may be, as and when identified by the AMC, which are not in compliance with the terms and conditions notified in this regard.

The Trustee / the AMC /the Fund reserve the right to change/ modify the above provisions at a later date.

Mode of Payment:

1. Resident Investors

Investors may make payments for subscription to the Units of the Scheme by local cheque/bank draft, drawn on any bank branch or RTGS/NEFT and/or such other electronic transfer of funds in favour of MF Collection account. Cheques/demand drafts should be drawn in favour of "Old Bridge _____" as provided in the Scheme Information Document (SID) of respective schemes and must be crossed "Account Payee Only".

The cheque/demand draft should be payable at the Centre where the application is lodged. The cheque/demand draft should be drawn on any Bank which is situated at and is a member/sub-member of the Bankers' Clearing House. Cheques/demand drafts drawn on a Bank not participating in the Clearing House will not be accepted.

Payments by Stock invest/out-station and/or post-dated cheques will not be accepted.

Investors may please note that in case any application is made through Demand Draft (DD), Demand Draft charges will not be reimbursed by the AMC. The Demand Draft charges shall be borne by investors.

For the payments made through Demand Draft, the amount should be debited from the registered bank account with Old Bridge Mutual Fund. The investor requires to submit any of the following documents along with such pre-funded instruments: (i) a proof of debit to the investor's bank account in the form of a bank manager's certificate with details of account holder's Name, bank account number and PAN as per bank records, if available; or (ii) a copy of the acknowledgement from the bank, wherein the instructions to debit carry the bank account details and name of the investor as an account holder are available; or (iii) a copy of the passbook/bank statement evidencing the debit for issuance of a DD.

The Trustee shall have absolute discretion to accept/reject any application for purchase of Units, if in the opinion of the Trustee, increasing the size of Scheme's Unit capital is not in the general interest of the Unit holders, or the Trustee for any other reason believes it would be in the best interest of the Schemes or its Unit holders to accept/reject such an application.

Mode of Payment for SIP:

In case of SIP transaction where, the mode of payment is through Standing Instructions/ Direct Debit facility (offered by select banks) or NACH, investors are not required to do an initial purchase transaction for the minimum amount as applicable. However, investors are required to submit SIP request at least 30 days prior to the date of first instalment.

Investors shall be required to submit a cancelled cheque or a photocopy of a cheque of the bank account for which the debit mandate is provided. SIP facility shall be available on any date of the month for SIP registrations. In case the date chosen for SIP falls on a Non-Business Day or on a date which is not available in a particular month, the SIP will be processed on the immediate next Business Day. In addition, investors are requested to peruse and understand the instructions mentioned on specific application forms and scheme specific Scheme Information Documents.

In addition to existing facility available for payments through Direct Debits/ Standing Instructions for investments in SIP, the unit holders can now also make payment of SIP instalments through NACH facility. NACH is a centralized system, launched by National Payments Corporation of India (NPCI) with an aim to consolidate multiple NACH mandates. This facility will enable the unit holders of the Fund to make SIP investments through NACH by filling up the SIP Registration cum mandate form. A Unique number will be allotted to every mandate registered under NACH called as Unique Mandate Reference Number ("UMRN") which can be used for SIP transactions. The NACH facility shall be available subject to terms and conditions contained in the SIP registration Mandate Form and as prescribed by NPCI from time to time.

Applications accompanied by cheques/drafts not fulfilling the above criteria are liable to be rejected.

2. Non-Resident Indians (NRI)/Persons of Indian Origin (PIO), Foreign Portfolio Investment (FPI) Overseas Citizen of India (OCIs)

a. Repatriation Basis:

In the case of NRIs/ PIOs/OCIs, payment may be made either by inward remittance through normal banking channels or out of funds held in his Non - Resident (External) Rupee Account (NRE) / Foreign Currency (Non- Resident) Account (FCNR). In case Indian rupee drafts are purchased abroad or from Foreign Currency Accounts or Non-resident Rupee Accounts an account debit certificate from the Bank issuing the draft confirming the debit shall also be enclosed.

FPI shall pay their subscription either by inward remittance through normal banking channels or out of funds held in Foreign Currency Account or Non- Resident Rupee Account maintained by the FPI with a designated branch of an authorised dealer in accordance with the relevant exchange management regulations.

b. Non-Repatriation Basis:

In the case of NRIs/PIOs/OCIs, payment may be made either by inward remittance through normal banking channels or out of funds held in his NRE / FCNR / Non-Resident Ordinary Rupee Account (NRO). In case Indian rupee drafts are purchased abroad or from Foreign Currency Accounts or Non-resident Rupee Accounts an account debit certificate from the Bank issuing the draft confirming the debit shall also be enclosed.

Application incomplete in any respect (other than mentioned above) will be liable to be rejected:

In order to protect investors from frauds, it is advised that the Application Form number / folio number, scheme name and name of the first investor should be written overleaf the cheque / draft, before they are handed over to any courier / messenger / distributor / ISC.

In order to protect investors from fraudulent encashment of cheques, Regulations require that cheques for Redemption of Units specify the name of the Unit Holder and the bank name and account number where payments are to be credited. Hence, all applicants for Purchase of Units must provide a bank name, bank account number, branch address and account type in the Application Form.

Returned cheque(s) are liable not to be presented again for collection, and the accompanying Application Form is liable to be rejected. In case the returned cheque(s) are presented again, the necessary charges may be debited to the Investor.

Application on behalf of minor accounts:

Minor shall be the sole Unitholder in an account. Joint holders will not be registered.

- Guardian in the folio on behalf of the minor should either be a natural guardian (i.e. father or mother) or a court appointed legal guardian, and should mandatorily submit requisite documentation to the AMC evidencing the relationship/status of the guardian.
- 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.

However, in terms of Clause 17.6.1 of Master Circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023, read with SEBI circular SEBI/HO/IMD/DF3/CIR/P/201916624 Dt.24/12/2019 & SEBI circular SEBI/HO/IMD/POD-II/CIR/P/2023/0069 dated May 12, 2023 the following process shall be applicable for Investments made in the name of a Minor through a Guardian -

- i. Payment for investment by means of Cheque, Demand Draft or any other 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 only.
- ii. 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. No further transactions shall be allowed till the status of the minor is changed to major.
- iii. In case of existing systematic transactions, system controls are built at the account set up stage of Systematic Investment Plan (SIP), Systematic Transfer Plan (STP) and Systematic Withdrawal Plan (SWP) on the basis of which, the standing instruction is suspended when the minor attains majority, till the status is changed to major.

Further AMFI vide best practice guidelines dated March 28, 2022, clarified that - Wherever the minor's PAN has been provided in the MF folio:

- Where Guardian in the folio is a natural guardian, TDS should be paid against / quoting the PAN of Guardian.
- Where Guardian in the folio is a court appointed guardian (other than one of the parents), TDS should be paid against / quoting the minor's PAN

Change in guardian

In case of change of natural parent / legal guardian of a minor Unitholder, the new parent/ legal guardian must submit the documents prescribed by the AMC/Mutual Fund, including the following:

- a. No Objection Certificate (NoC) or Consent Letter from existing parent or Court Order appointing new legal guardian for the benefit of the minor Unitholder.
- b. KYC Acknowledgement Letter of new parent / legal guardian

Change of Status from Minor to Major:

Prior to the minor unit holder attaining the age of majority, the AMC/ Mutual Fund will send a notice to the minor unit holder at the registered correspondence address /email id advising such minor unit holder to submit, on attaining the age of majority, an application form along with prescribed documents to change the status of the folio/s from 'minor' to 'major'. Upon attainment of majority by the minor unit holder, the folio/s should be regularized forthwith. The AMC may specify such procedures for regularisation of the Folio/s, as it may deem appropriate from time to time. Till the receipt of such intimation/information from the minor turned major Unit holder, existing contract as signed by the parent/legal guardian of the minor Unit holder will continue. However, from the date of attainment of majority, Folio/s of the minor unit holder will be frozen for operation by the representing guardian and all transactions will be suspended. No transactions will be permitted in the Folio(s) till the regularization of the Folio/s in a manner prescribed by the AMC / Mutual Fund. The AMC/ Mutual Fund will register standing instructions like SIP/ STP etc. for a folio held by a minor unit holder from the parent/ legal guardian only till the date when the minor unit holder attains the age of majority, even though the instructions may be for a period beyond that date.

Application under Power of Attorney /Body Corporate/ Registered Society/ Partnership/ Sole Proprietorship Account.

Every investor, depending on the category under which he/she/ it falls, is required to provide the relevant documents along with the application form as may be prescribed by AMC.

In case of an application under the Power of Attorney or by a limited company, body corporate, registered society or partnership etc., the relevant Power of Attorney or the relevant resolution or authority to make the application as the case may be, or duly certified copy thereof, along with the memorandum and articles of association/bye-laws must be lodged at the Registrar's Office at the time of submission of application.

In case an investor has issued Power of Attorney (POA) for making investments, switches, redemptions etc. under his/her folio, both the signature of the investor and the POA holder have to be clearly captured in the POA document to be accepted as a valid document. At the time of making redemption / switches the fund would not be in a position to process the transaction unless, POA holder's signature is available in the POA.

Original or certified true copies of the following documents should be submitted by Companies/Bodies Corporate/PSUs/Banks and Financial Institutions along-with the application form:

- Board resolution authorizing the investment.
- List of authorized officials to make such investment along with the specimen signature of such authorized officials.
- KNOW YOUR CLIENT(KYC), FATCA, CRS & Ultimate Beneficial Ownership (UBO) Self Certification

The onus of authentication of the documents shall be on the Investors and the AMC/Fund will accept and act on these in good faith wherever the documents are not expressly authenticated. Submission of these documents by such Investors shall be full and final proof of the corporate investors' authority to invest and the AMC/Fund shall not be liable under any circumstances for any defects in the documents so submitted.

In case of fresh/additional purchases from the sole proprietorship account, the AMC shall process the application after matching the name and signature of the applicant on the application form/transaction slip and the payment instrument/cheque. In case the name of an applicant mentioned in the application form/transaction slip differs from the name on payment instrument/cheque, then the AMC may process the application and allot units at the applicable Net Asset Value, after obtaining self-declaration certificate from the applicant, as prescribed by the AMC. In case the self-declaration is not furnished by the applicant, the AMC reserves the right to process/reject the application form without any reference to the applicant after carrying out necessary diligence, as deemed appropriate by the AMC.

Restriction on Acceptance of Third-Party Payments for Subscription of Units

- i. When payment is made through instruments issued from an account other than that of the beneficiary investor, the same is referred to as Third-Party payment. In case of payments from a joint bank account, the first holder of the mutual fund folio has to be one of the joint holders of the bank account from which payment is made.
- ii. The Asset Management Company shall not accept subscriptions with Third-Party payments except in the following exceptional situations:
 - a. Payment by Employer on behalf of employee under Systematic Investment Plans or lump sum / one-time subscription through Payroll deductions or deduction out of expense reimbursements.
 - b. Custodian on behalf of a Foreign Portfolio Investor (FPI) or a client.
 - c. Payment by a Corporate to its Agent/Distributor/Dealer (similar arrangement with Principal agent relationship), on account of commission or incentive payable for sale of its goods/ services, in the form of the Mutual Fund Units through SIP or lump sum/one-time subscription.
 - d. Payment by an AMC to an empanelled Distributor on account of commission/incentive etc. in the form of the Mutual Fund units of the schemes managed by such AMC through SIP or lump sum/ one-time subscription, subject to compliance with SEBI Regulations and Guidelines issued by AMFI, from time to time

Documents to be obtained for exceptional cases:

Investors submitting their applications through the above mentioned 'exceptional cases' are required to comply with the following, without which applications for subscriptions for units will be rejected / not processed / refunded.

- i. Mandatory KYC for all investors (guardian in case of minor) and the person making the payment i.e. third party. In order for an application to be considered as valid, investors and the person making the payment should attach their valid KYC Acknowledgement Letter to the application form.
- ii. Submission of a separate, complete and valid 'Third Party Payment Declaration Form' from the investors (guardian in case of minor) and the person making the payment i.e. third party. The said Declaration Form shall, *inter-alia*, contain the details of the bank account from which the payment is made and the relationship with the investor(s). Please contact the nearest OPA/ISC of Old Bridge Mutual Fund or visit our website www.oldbridgemf.com for the said Declaration Form.

The application for third party payments based on above cases is at the sole discretion of the AMC and is subject to change.

In addition, AMC reserves the right to ask for cancelled cheque leaf or copy of bank statement / pass book page mentioning bank account number, account holders' name and address or such other document as AMC may require for verifying the source of funds to ensure that funds have come from the drawer's account only.

Adoption of a safe mode of writing a cheque

In order to avoid fraud, the investors shall make the payment instrument (cheque, demand draft, pay order, etc) favouring "XYZ Scheme A/c First Investor name" or "XYZ Scheme A/c Permanent Account Number".

Process to identify Third-Party payments:

The following process shall be followed for identifying Third-Party Cheques:

An investor at the time of his/her purchase must provide the details of his pay-in bank account (i.e. account from which a subscription payment is made) and his pay-out bank account (i.e. account into which redemption / IDCW proceeds are to be paid).

Identification of third-party cheques by the AMC / Mutual Fund / Registrar and Transfer Agent (RTA) will be on the basis of either matching of pay-in bank account details with pay-out bank account details or by matching the bank account number / name / signature of the first named applicant / investor with the name / account number / signature available on the cheque. If the name is not pre-printed on the cheque or signature on the cheque does not match, then the first named applicant / investor should submit any one of the following documents:

- i. a copy[#] of the bank passbook or a statement of bank account having the name and address of the account holder and account number;
- ii. a letter (in original) from the bank on its letterhead certifying that the investor maintains an account with the bank, along with information like bank account number, bank branch, account type, the MICR code of the branch & IFSC Code (where available).

In respect of (ii) above, it should be certified by the authorized signatory of the bank with his / her full signature, name, employee code, bank seal and contact number.

[#] Investors should also bring the original documents along with the documents mentioned in (i) above to the ISCs / Official Points of Acceptance of Old Bridge Mutual Fund. The copy of such documents will be verified with the original documents to the satisfaction of the AMC / Mutual Fund / R&TA. The original documents will be returned across the counter to the investor after due verification.

Investors should note that where the bank account numbers have changed on account of the implementation of core banking system at their banks, any related communication from the bank towards a change in bank account number should accompany the application form for subscription of units.

- a. If the subscription is settled with pre-funded instruments such as Pay Order, Demand Draft issued against debit to investor's bank account, Banker's cheque, etc., the AMC will accept any one of following as a valid supporting document:
 - i. a proof of debit to the investor's bank account in the form of a bank manager's certificate with details of account holder's Name, bank account number and PAN as per bank records, if available.
 - ii. a copy of the acknowledgement from the bank, wherein the instructions to debit carry the bank account details and name of the investor as an account holder are available.
 - iii. a copy of the pass book/bank statement evidencing the debit for issuance of a DD

- b. A pre-funded instrument issued by the Bank against Cash shall not be accepted for investments of Rs.50,000/- or more. This also should be accompanied by a certificate from the banker giving name, bank account number, address and PAN (if available) of the person who has requested for the demand draft.
- c. If payment is made by RTGS, NEFT, bank transfer, etc., a copy of the instruction to the bank stating the account number debited must accompany the purchase application.

The above broadly covers the various modes of payment for mutual fund subscriptions. The above list is not a complete list and is only indicative in nature and not exhaustive. Any other method of payment, as introduced by the Mutual Fund, will also be covered under these provisions.

In case the application for subscription does not comply with the above provisions, the AMC /Trustee retains the sole and absolute discretion to reject / not process such application and refund the subscription money and shall not be liable for any such rejection.

Mode of Holding

An application can be made by up to a maximum of three applicants. Applicants must specify the 'mode of holding' in the Application Form.

If an application is made by one Unit Holder only, then the mode of holding will be considered as 'Single'. If an application is made by more than one investor, they have an option to specify the mode of holding as either 'Jointly' or 'Anyone or Survivor'.

In either of the cases referred above i.e. application made by one investor/more than one investor, the Fund shall not entertain requests for including any other person as a joint holder once the application has been accepted.

If the mode of holding is specified as 'Jointly', all instructions to the Fund would have to be signed by all the Unit Holders, jointly. The Fund will not be empowered to act on the instruction of any one of the Unit Holders in such cases. If the mode of holding is specified as 'Anyone or Survivor', an instruction signed by any one of the Unit Holders will be acted upon by the Fund. It will not be necessary for all the Unit Holders to sign. If an application is made by more than one investor and the mode of holding is not specified, the mode of holding would be treated as joint. The Fund will not be empowered to act on the instruction of any one of the Unit Holders in such cases.

In all cases, all communication to Unit Holders (including account statements, statutory notices and communication, etc.) will be addressed to the first-named Unit Holder. All payments, whether for redemptions, IDCWs, etc will be made favouring the first-named Unit Holder. The first named Unit Holder shall have the right to exercise the voting rights associated with such Units as per the applicable guidelines.

Investors should carefully study the paragraphs on "Transfer and Transmission" and "Nomination Facility" before ticking the relevant box pertaining to the mode of holding in the Application Form.

Option to hold Units in Dematerialized (demat) form

Investors shall have an option to receive allotment of Mutual Fund units in their demat account while subscribing to the Units of the Scheme in terms of the guidelines/ procedural requirements as laid by the Depositories from time to time.

Investors desirous of having the Units of the Scheme in dematerialized form should contact the ISCs of the AMC/Registrar.

Where units are held by investor in dematerialized form, the demat statement issued by the Depository Participant would be deemed adequate compliance with the requirements in respect of dispatch of statements of account.

In case investors desire to convert their existing physical units (represented by statement of account) into dematerialized form or vice versa, the request for conversion of units held in physical form into Demat (electronic) form or vice versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. In case the units are desired to be held by investor in dematerialized form, the KYC performed by Depository Participant shall be considered compliance of the applicable SEBI norms.

Units held in Demat form are freely transferable in accordance with the provisions of SEBI (Depositories and Participants) Regulations, as may be amended from time to time. Transfer can be made only in favour 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 Depository Participant in requisite form as may be required from time to time and transfer will be affected in accordance with such rules / regulations as may be in force governing transfer of securities in dematerialized mode.

For details, Investors may contact any of the Investor Service Centres of the AMC.

Account Statements

The Account Statement is non-transferable. Dispatch of account statements to NRIs/FPI will be subject to applicable regulations, if required. In case of Unit holder who have provided their e-mail address the Fund will provide the Account Statement only through e-mail message, subject to Regulations and unless otherwise required. In cases where the email does not reach the Unit holder, the Fund / its Registrar & Transfer Agents will not be responsible, but the Unit holder can request for fresh statement. The Unit holder shall from time to time intimate the Fund / its Registrar & Transfer Agent about any changes in his e-mail address. In case of Unit Holders holding units in the dematerialized mode, the Fund will not send the account statement to the Unit Holders. The statement provided by the Depository Participant will be equivalent to the account statement. The Unit holder may request for a physical account statement by writing/calling the AMC/ISC/Registrar. In case of specific request received from the Unit Holders, the AMC/Fund will provide the Account Statement to the Investors within 5 business days from the receipt of such request.

Consolidated Account Statement

Consolidated is an account statement detailing all the transactions and holding at the end of the month including transaction charges paid to the distributor, across all schemes of all mutual funds, CAS issued to investors shall also provide the total purchase value/cost of investment in each scheme.

Further, CAS issued for the half-year (September/ March) shall also provide

1. The amount of actual commission paid by AMC/Mutual Fund to distributors (in absolute terms) during the half-year period against the concerned investor's total investments in each scheme.
2. The scheme's average Total Expense Ratio (in percentage terms) along with the break up between Investment and Advisory fees, Commission paid to the distributor and Other expenses for the period for each scheme's applicable plan (regular or direct or both) where the concerned investor has actually invested in.

Further, whenever distributable surplus is distributed, a clear segregation between income distribution (appreciation on NAV) and capital distribution (Equalization Reserve) shall be suitably disclosed in the CAS.

The word transaction will include purchase, redemption, switch, IDCW pay-out, IDCW reinvestment, systematic investment plan, systematic withdrawal plan and systematic transfer plan.

a. For Unitholders not holding Demat Account:

CAS for each calendar month shall be issued, on or before 15th day of succeeding month by the AMC.

The AMC shall ensure that a CAS for every half yearly (September/ March) is issued, on or before 21st day of succeeding month, detailing holding at the end of the six months, across all schemes of all mutual funds, to all such investors in whose folios no transaction has taken place during that period.

The AMC shall identify common investors across fund houses by their Permanent Account Number (PAN) for the purposes of sending CAS. In the event the account has more than one registered holder, the first named Unit Holder shall receive the Account Statement.

The AMC will send statement of accounts by e-mail where the Investor has provided the e-mail id. Additionally, the AMC may at its discretion send Account Statements individually to the investors.

b. For Unitholders holding Demat Account:

SEBI vide its circular no. CIR/MRD/DP/31/2014 dated November 12, 2014 read with other applicable circulars issued by SEBI from time to time, in order to enable a single consolidated view of all the investments of an investor in Mutual Fund and securities held in demat form with Depositories, has required Depositories to generate and dispatch a single CAS for investors having mutual fund investments and holding demat accounts.

In view of the aforesaid requirement, for investors who hold demat account, for transactions in the schemes of Old Bridge Mutual Fund, a CAS, based on PAN of the holders, will be sent by Depositories to investors holding demat account, for each calendar month within 15th day of the succeeding month to the investors in whose folios transactions have taken place during that month.

CAS will be sent by Depositories every half yearly (September/March), on or before 21st day of succeeding month, detailing holding at the end of the six months, to all such investors in whose folios and demat accounts there have been no transactions during that period.

CAS sent by Depositories is a statement containing details relating to all financial transactions made by an investor across all mutual funds viz. purchase, redemption, switch, IDCW pay-out, IDCW reinvestment, systematic investment plan, systematic withdrawal plan, systematic transfer plan (including transaction charges paid to the distributor) and transaction in dematerialized securities across demat accounts of the investors and holding at the end of the month.

In case of demat accounts with nil balance and no transactions in securities and in mutual fund folios, the depository shall send account statement in terms of regulations applicable to the depositories. Investors whose folio(s)/demat account(s) are not updated with PAN shall not receive CAS.

Consolidation of account statement is done on the basis of PAN. Investors are therefore requested to ensure that their folio(s)/demat account(s) are updated with PAN. In case of multiple holding, it shall be PAN of the first holder and pattern of holding.

For Unit Holders who have provided an e-mail address to the Mutual Fund or in KYC records, the CAS is sent by e-mail. However, where an investor does not wish to receive CAS through email, option is given to the investor to receive the CAS in physical form at the address registered in the Depository system.

Investors who do not wish to receive CAS sent by depositories have an option to indicate their negative consent. Such investors may contact the depositories to opt out. Investors who do not hold demat account continue to receive Consolidated Account Statement sent by RTA/AMC, based on the PAN, covering transactions across all mutual funds as per the current practice.

In case an investor has multiple accounts across two depositories; the depository with whom the account has been opened earlier will be the default depository.

The dispatch of CAS by the depositories constitute compliance by the AMC/ the Fund with the requirement under Regulation 36(4) of SEBI (Mutual Funds) Regulations. However, the AMC reserves the right to furnish the account statement in addition to the CAS, if deemed fit in the interest of investor(s).

Investors whose folio(s)/demat account(s) are not updated with PAN shall not receive CAS. Investors are therefore requested to ensure that their folio(s)/demat account(s) are updated with PAN.

For folios not included in the CAS (due to non-availability of PAN), the AMC shall issue monthly account statement to such Unit holder(s), for any financial transaction undertaken during the month on or before 15th of succeeding month by mail or email.

For folios not eligible to receive CAS (due to non-availability of PAN), the AMC shall issue an account statement detailing holding across all schemes at the end of every six months (i.e. September/March), on or before 21st day of succeeding month, to all such Unit holders in whose folios no transaction has taken place during that period shall be sent by mail/e-mail.

Additional facilities for Subscription/Redemption/Switch of Units

Transactions through Electronic Mode

The Mutual Fund may allow subscriptions of Units by electronic mode including through the various web sites with which the AMC would have an arrangement from time to time.

Subject to the investor fulfilling certain terms and conditions as stipulated by AMC from time to time, the AMC, Mutual Fund, Registrar or any other agent or representative of the AMC, Mutual Fund, the Registrar may accept transactions through any electronic mode as permitted by SEBI or other regulatory authorities.

For details investors are advised to refer to the SID of the respective Scheme(s) of the Mutual Fund.

Online Transactions

Investors can avail of the online facility which enables them to transact online on www.oldbridgemf.com / Mobile application. For details and applicable terms and conditions for such transactions investors are advised to refer to 'SID' of the respective Scheme(s) of the Mutual Fund and the website of the Asset Management Company i.e. www.oldbridgemf.com.

TRANSACTIONS THROUGH MFU PLATFORM

The AMC has entered into an Agreement with MF Utilities India Private Limited (MFUI), for usage of MF Utility (MFU) - a shared services initiative of various Asset Management Companies, which acts as a transaction aggregator for transacting in multiple Schemes of various Mutual Funds with a single form and a single payment instrument.

All the authorized Point of Service (POS) and website/mobile application of MFUI (as updated from time to time) shall be eligible to be considered as 'official points of acceptance' for all financial and non-financial transactions pertaining to Scheme(s) of Old Bridge Mutual Fund ("the Fund") either physically or electronically. The list of POS of MFUI published on the website of MFUI at www.mfuindia.com as may be updated from time to time will be considered as Official Point of Acceptance for transactions (OPAT) for the Scheme(s) of the Fund. The Online Transaction Portal of MFU i.e. www.mfuonline.com and the POS locations of MFUI will be in addition to the existing OPATs for the Scheme(s) of the Fund .

The applicability of NAV shall be based on time stamping as evidenced by confirmation slip given by POS of MFUI and also the realisation of funds in the Bank account of Old Bridge Mutual Fund (and not at the time of realization of funds in the bank account of MFUI) within the applicable cut-off time. The Uniform cut-off time as prescribed by SEBI and as mentioned in the SID / KIM of respective scheme(s) shall be applicable for applications received on the portal of MFUI. However, investors should note that transactions through MFUI shall be subject to the eligibility of the investors, any terms & conditions as stipulated by MFUI / the Fund/ the AMC from time to time and any law for the time being in force.

Investors are requested to note that, MFUI will allot a Common Account Number (CAN), a single reference number for all investments in the Mutual Fund industry, for transacting in multiple schemes of various Mutual Funds through MFU and to map existing folios, if any. Investors can create a CAN by submitting the CAN Registration Form (CRF) and necessary documents at the authorised MFUI Points of Service (POS). The AMC and /or its Registrar and Transfer Agent (RTA) shall provide necessary details to MFUI as may be needed for providing the required services to investors/distributors through MFU. Investors are requested to visit the websites of MFUI i.e. www.mfuindia.com to download the relevant forms. Investors transacting through MFU shall be deemed to have consented to exchange of information viz. personal and/or financial (including the changes, if any) between the Fund /the AMC and MFUI and/or its authorized service providers for validation and processing of transactions carried out through MFU.

For details on carrying out the transactions through MFU or any queries or clarifications related to MFU, investors are requested to contact the Customer Care of MFUI on +91 22 6134 4316 -Monday to Saturday between 8 a.m. to 8 p.m.

Transaction through Stock Exchange infrastructure using services of Distributor/ SEBI Registered Investment Advisor:

Investors may enter into an agreement with certain distributors/ Registered Investment Advisers (RIAs) / Portfolio Managers (with whom AMC also has a tie up) referred to as "Channel Distributors" who provide the facility to investors to transact in units of mutual funds through various modes such as their website/ other electronic means or through Power of Attorney/agreement/ any such arrangement in favour of the Channel Distributor, as the case may be.

MF Distributor registered with AMFI or RIAs, will be eligible to use NMF-II platform of NSE (in addition to other intermediaries) and / or of BSE StAR MF platform of BSE and/ or platform of to purchase and redeem units of schemes of the Fund.

In addition to the guidelines specified for transacting through MFSS/BSE StAR MF / Platform above, following guidelines shall be applicable for transactions executed through MF Distributors/ RIAs on NMF-II / BSE StAR MF / Platform:

1. MF distributors/RIAs shall not handle pay out/pay in of funds as well as units on behalf of investor. Pay in will be directly received by recognized clearing corporation and pay-out will be directly made to investor account. In the same manner, units shall be credited and debited directly from the demat account of investors.
2. Transactions only in physical (non-demat) transactions will be permitted through NMF-II / BSE StAR MF / Platform.

The facility of transacting in mutual fund schemes through stock exchange infrastructure is available subject to such operating guidelines, terms and conditions as may be prescribed by the respective Stock Exchanges from time to time.

A. SPECIAL PRODUCTS/ FACILITIES OFFERED BY THE AMC/ SCHEME

SYSTEMATIC INVESTMENT PLAN (SIP)

If the SIP period is not specified by the unit holder then the SIP enrolment will be deemed to be for perpetuity and processed accordingly.

Systematic Investment Plan (SIP)

Investors can undertake investing on a specified periodic basis and aim to take advantage from rupee cost averaging through SIP in the scheme.

The following SIP frequency will be available to the investors:

w

Frequency	Specified date	Minimum amounts per installments	Minimum number of installments
Daily	Monday to Friday	2500	6
Weekly	Any day (Monday to Friday) * (If no day is selected Monday will be the default day)	2500	6
Fortnightly	1st and 16th day of each month, as applicable* (1st and 16th of the month will be the default date).	2500	6
Monthly (Default Frequency)	Any date (1st to 28th of the month) * (10th will be the default day)	2500	6
Quarterly	Any date (1st to 28th of the month) * (10th will be the default date)	2500	6
Half Yearly	Any date (1st to 28th of October /April month) * (10th will be the default date)	2500	6
Yearly	Any date (1st to 28th of the April month) * (10th will be the default date)	2500	6

The applicability of the minimum amount of instalment mentioned is at the time of registration only. In case SIP date falls on a non-business day or on a day that is not available in the particular month, the instalment would be processed on next business day.

Investors can subscribe for SIP by using NACH facilities offered by the Banks. The cheque for investment in the scheme should be in favour of "Old Bridge Focused Equity Fund" and crossed "Account Payee Only", and the cheques must be payable at the Center where the applications are submitted to the Investor services Centers.

In case of fresh/additional subscription, if the name of the scheme on the application form/transaction slip differs with the name on the Cheque/Demand Draft, then the AMC would allot units under the scheme mentioned on the application form/ transaction slip. In case of fresh/additional subscription, if the scheme name is not mentioned on the application form/transaction slip, then the units will be allotted under the scheme mentioned on the Cheque/Demand Draft. The option that would be considered in such cases if not specified by the customer would be the default option of the Scheme. However, in case additional subscription is under the same scheme as fresh subscription, then the AMC reserves the right to allot units in the option under which units were allotted at the time of fresh subscription.

Further, Investors/ unitholders subscribing for SIP are required to submit SIP request at least 21 business days prior to the date of first debit date and SIP start date shall not be beyond 21 business days from the date of submission of request for SIP. Units would be allotted for the amount net of bank charges, if any. On receipt of the post-dated cheque, the Registrar/AMC would send a letter to the investor confirming that the name has been included in the SIP. The cheque would be presented on the dates mentioned on the cheque and units would be allotted accordingly. A fresh Account Statement / Transaction Confirmation would be mailed to the investor indicating the new balance in the Account. An investor would have the right to discontinue the SIP, subject to giving 21 business days prior notice to the subsequent date of SIP instalment.

Terms and conditions

If the investor fails to mention the scheme name in the SIP Mandate Form, then the AMC reserves the right to register the SIP as per the scheme name available in the main application.

In case SIP date is not selected, then the SIP will be registered on 10th (default date) of each Month/Quarter/Half year/ Annual, as applicable. Further if multiple SIP dates are opted for or if the selection is not clear, then the SIP would be registered for 10th of each Month/Quarter Half year/ Annual, as applicable.

If the Investor has not mentioned the SIP start Month, SIP would commence from the next applicable month, subject to completion of 21 business days' time from the receipt of SIP request.

In case the SIP 'End period' is incorrect or not mentioned by the Investor in the SIP form, then 40 years from the start date would be considered as default End Period.

For SIP applications received during NFO Period, the SIP start date would be at least 21 business days after the NFO allotment date.

SIP TOP UP Facility:

Investors can opt for SIP TOP UP facility with Fixed Top Up option or Variable Top Up option wherein the amount of the SIP could be increased at fixed intervals. In case the investor opts for both options, the Variable Top Up option would be triggered.

The Fixed TOP UP amount shall be for minimum Rs. 500/- and in multiples of Rs. 1/- thereafter.

Variable TOP UP would be available in at 5%, 10% and 15% and such other denominations (over and above 5%, 10% and 15%) as opted by the investor in multiples of 5%. An investor can also TOP UP the SIP in amount terms by keeping minimum top up of Rs. 500.

The frequency is fixed at Yearly and Half Yearly basis. In case the TOP UP facility is not opted by ticking the appropriate box and frequency is not selected, the TOP UP facility may not be registered.

In case of Quarterly SIP, only the Yearly frequency is available under SIP TOP UP.

The AMC reserves the right to introduce / change the SIPs at such other frequencies or on any dates as the AMC may feel appropriate from time to time.

The AMC reserves the right to change / modify the terms and conditions of the SIP facility or withdraw the facility at a later date.

SIP Top-Up facility shall be available to all the investors.

Top-Up Cap amount or Top-Up Cap month-year:

Top-Up Cap amount: Investor has an option to freeze the SIP Top-Up amount once it reaches a fixed predefined amount. The fixed pre-defined amount should be same as the maximum amount mentioned by the investor in the bank mandate. In case of difference between the Cap amount and the maximum amount mentioned on Bank mandate, then amount which is lower of the two amounts shall be considered as the default amount of SIP Cap amount.

Top-Up Cap month-year: It is the date from which SIP Top-Up amount would cease and last SIP instalment including Top-Up amount would remain constant from Cap date till the end of SIP tenure. Investor shall have flexibility to choose either Top-Up Cap amount or Top-Up Cap month- year. In case of multiple selection, Top-Up Cap amount would be considered as default selection.

All the investors of the scheme subscribing the facility under SIP Variable Top - Up feature are hereby requested to select either Top - Up Cap amount or Top - Up Cap month - year. In case of no selection, the SIP Variable Top - Up amount would be capped at a default amount of Rs. 10 lakhs.

Under the said facility, SIP amount would remain constant from Top - Up Cap date/ amount till the end of SIP Tenure.

The AMC reserves the right to change / modify the terms and conditions of the SIP Top-Up facility or withdraw the facility at a later date.

Micro Systematic Investment Plan (Micro SIP):

Micro SIP/PAN Exempt Investments In line with SEBI letter no. OW/16541/2012 dated July 24, 2012 addressed to AMFI, Investments in the mutual fund schemes including investments through Systematic Investment Plans (SIPs) up to Rs. 50,000/- per investor per year shall be exempted from the requirement of PAN.

The investor will have the facility of investing by Micro SIP under the current SIP facility. The Minimum Investment amount per instalment would be as per applicable minimum investment amount of the scheme. The total investment under Micro SIP cannot exceed Rs. 50,000/-.

Micro Investment: If the investment amount (fresh subscription & additional subscription) and Micro SIP installments by an investor in a financial year i.e April to March does not exceed Rs. 50,000/-, it shall be exempt from the requirement of PAN. However, requirements of Know Your Customer (KYC) shall be mandatory. Accordingly, investors seeking the above exemption for PAN need to submit the KYC Acknowledgement, irrespective of the amount of investment. This exemption will be available only to Micro investment made by the individuals being Indian citizens (including NRIs, Joint holders, minors acting through guardian and sole proprietary firms). PIOs, HUFs, QFIs and other categories of investors would not be eligible for availing this exemption.

SIP Top-Up facility shall not be available in case of Micro-SIP.

The AMC reserves the right to change / modify the terms and conditions of the Micro -SIP facility or withdraw the facility at a later date.

Mode of Payment for SIP:

In case of SIP with payment mode as Standing Instruction / NACH, Investors are required to submit a cancelled cheque or a photocopy of a cheque of the bank account for which the debit mandate is provided.

Investors are requested to note that holding of units through Demat Option is also available. The units would be allotted based on the applicable NAV and would be credited to investors' Demat account on T + 2 days basis upon realization of funds.

The investors shall note that for holding the units in demat form, the provisions laid down in the SID and SEBI Regulations, procedural requirements as laid by the Depositories (NSDL/CDSL) shall be applicable. In case the investor wishes to convert the units held in non-demat mode to demat mode or vice versa at a later date, such request along with the necessary form should be submitted to their Depository Participant(s). Units held in demat form would be freely transferable, subject to the applicable regulations and the guidelines as may be amended from time to time. Investors/unitholders subscribing for SIP are required to submit SIP request at least 21 business days prior to the date of first debit date and SIP start date shall not be beyond 100 days from the date of submission of request for SIP.

Facility of National Automated Clearing House (NACH) Platform in Systematic Investment Plan (SIP):

In addition to existing facility available for payments through Postdated cheques/Standing Instructions for investments in SIP, the NACH facility can also be used by the investors to make payment of SIP installments. NACH is a centralized system launched by National Payments Corporation of India (NPCI)

with an aim to consolidate multiple Electronic Clearing Service (ECS) mandates. This facility would enable the investors of the scheme to make SIP investments through NACH by filling up the SIP Registration cum mandate form. A Unique number will be allotted to every mandate registered under NACH called as Unique Mandate Reference Number (“UMRN”) which can be used for SIP transactions. The NACH facility shall be available subject to terms and conditions contained in the Easy Pay Debit Mandate Form and as prescribed by NPCI from time to time.

SIP Pause facility:

Investors shall have an option to temporarily pause the SIP installments for a specified period of time. Upon expiry of the specified period, the SIP installments would re-start automatically.

The terms and conditions of SIP Pause facility are as follows:

1. Under this Facility, investor has an option to temporarily pause their registered Monthly SIP facility for a period of six (6) months by submitting prescribed application form at any of the Official Points of Acceptance of Old Bridge Mutual Fund or by submitting application in other modes made available by AMC.
2. The SIP Pause facility can be availed by investor only two times during the entire tenure of SIP.
3. The valid application to avail the Facility should be submitted to AMC at least 10 calendar days prior to the next Monthly SIP instalment date (i.e. excluding the request date and the next SIP instalment date). Investor cannot cancel the SIP Pause facility once requested.
4. The SIP Pause facility is only available under Monthly frequency. SIP pause facility is available only for investors with instalment amounts equal to or greater than SIP's greater than Rs. 1,000/-SIP Pause facility can only be availed by investors who has completed 6 valid SIP installments.
5. The SIP shall restart automatically from the immediate next eligible instalment after the completion of specified pause period.
6. This facility is not available for the SIPs sourced/registered through MF Utilities India Private Limited. (“MFUI”), Stock Exchange Platforms of NSE & BSE and Channel partner platforms, as for such SIPs, the SIP mandates are registered by respective entities or for SIPs which are registered by investors as Standing Instructions with their Banks.
7. For Top-up SIP facility, the top-up frequency would remain unchanged even if there is a pause in SIP instalment. SIP tenure end date will not be extended and subsequent STP / SWP will be rejected if there is no unit balance in the said scheme.
8. In case of multiple SIPs registered in a scheme, SIP Pause facility will be made applicable only for those SIP installments whose SIP date, frequency, amount and Plan is specified clearly in the form.
9. AMC/Fund reserves the right to amend the terms and conditions of the SIP Pause facility and/or withdraw the said facility.

SIP cancellation:

Pursuant to AMFI communication no. 35P/MEM-COR/100/2023-24 dated January 03, 2024, on 'Uniformity in Cancellation of SIPs', Investors are requested to note that SIP will be auto cancelled by the AMC in case of 3 consecutive failed debit attempts for SIPs with daily, weekly, fortnightly, monthly frequencies/intervals. In case of bi-monthly, quarterly or longer intervals/frequencies SIPs, the same shall stand cancelled upon 2 consecutive failed debit attempts.

The AMC/RTA shall send a communication to the investor after 1st failed debit attempt, mentioning that the SIP will cease in case of 3 consecutive rejections and another communication after cancellation of SIP intimating the cancellation to the investor.

The AMC will cancel the SIP mandate within 10 calendar days from the date of receipt of a valid cancellation request from the investor. The existing instructions/mandate would continue till the date that when it is confirmed the SIP has been cancelled.

Purchase/Redemption of Units Through Stock Exchange Infrastructure

The investors can subscribe to / switch / redeem the Units of the Scheme under platform of National Stock Exchange ("MFSS", "NMFII") and "BSE StAR MF" platform of BSE Ltd. Please contact any of the Investor Service Centers (ISCs) of the Mutual Fund to understand the detailed process of transacting through this facility.

Transaction through Stock Exchange infrastructure using services of Distributor/ SEBI Registered Investment Advisor:

Investors may enter into an agreement with certain distributors/ Registered Investment Advisers (RIAs) / Portfolio Managers (with whom AMC also has a tie up) referred to as "Channel Distributors" who provide the facility to investors to transact in units of mutual funds through various modes such as their website/ other electronic means or through Power of Attorney/agreement/ any such arrangement in favour of the Channel Distributor, as the case may be.

MF Distributor registered with AMFI or RIAs, will be eligible to use NMF-II platform of NSE (in addition to other intermediaries) and / or of BSE StAR MF platform of BSE and/ or platform of to purchase and redeem units of schemes of the Fund.

In addition to the guidelines specified for transacting through MFSS/BSE StAR MF / Platform above, following guidelines shall be applicable for transactions executed through MF Distributors/ RIAs on NMF-II / BSE StAR MF / Platform:

a) MF distributors/RIAs shall not handle pay out/pay in of funds as well as units on behalf of investor. Pay in will be directly received by recognized clearing corporation and pay-out will be directly made to investor account. In the same manner, units shall be credited and debited directly from the demat account of investors

b) Transactions only in physical (non-demat) transactions will be permitted through NMF-II / BSE StAR MF / Platform.

The facility of transacting in mutual fund schemes through stock exchange infrastructure is available subject to such operating guidelines, terms and conditions as may be prescribed by the respective Stock Exchanges from time to time.

Systematic Transfer Plan (STP)

Investors can opt for the Systematic Transfer Plan by investing a lumpsum amount in one scheme of the Fund and providing a standing instruction to transfer sums at following intervals into any other scheme (as may be permitted by the Scheme Information Document of the respective schemes) of the Fund.

STP Frequency	Cycle Date	Minimum Amount (in Rs.)	Minimum Instalment
Daily	Monday to Friday	1,000/-	6
Weekly	Monday to Friday	1,000/-	6
Fortnight	Alternate Wednesday	1,000/-	6
Monthly	1 st , 7 th , 10 th , 15 th or 25 th	1,000/-	6
Quarterly	1 st , 7 th , 10 th , 15 th or 25 th	3,000/-	2

In case Day of Transfer has not been indicated under Weekly frequency, Wednesday shall be treated as Default day. Further, in case of Monthly and Quarterly Frequency, if the STP date and Frequency has not been indicated, Monthly frequency shall be treated as Default frequency and 10th shall be treated as Default Date.

In case none of the frequencies have been selected then Monthly frequency shall be treated as Default frequency and 10th shall be treated as Default Date.

Investors could also opt for STP from an existing account by quoting their account / folio number. A minimum period of 7 working days shall be required for registration under STP.

Units will be allotted /redeemed at the applicable NAV of the respective dates of the Scheme in which such investments/withdrawals are sought from the Scheme.

The requests for discontinuation of STP shall be subject to an advance notice of 15 days before the next due date for STP and it will terminate automatically if all Units are liquidated or withdrawn from the account or upon the Funds' receipt of notification of death or incapacity of the Unit holder.

The AMC reserves the right to introduce STPs at any other frequencies or on any other dates as the AMC may feel appropriate from time to time. In the event that such a day is a Holiday, the transfer would be affected on the next Business Day.

Further, in case of a last STP, where the balance amount is less than the STP amount, the entire amount will be transferred to the transferee scheme.

For further details/ clarifications investors may contact the distributor(s) or the ISCs of the AMC.

Investments through systematic routes:

1. In case of Systematic Investment Plan (SIP) / Systematic Transfer Plan (STP) etc. registered prior to the Effective Date without any distributor code under the Regular Plan, installments falling on or after the Effective Dates will automatically be processed under the Direct Plan. Thus, requirement of minimum of 30 installments shall be considered from the date of initial investment in the scheme.
2. Investors who had registered for Systematic Investment Plan facility prior to the Effective Date with distributor code and wish to invest their future installments into the Direct Plan, shall make a written request to the Fund in this behalf. The Fund will take at least 15 days to process such requests. Intervening installments will continue in the Regular Plan.

In case of (a) and (b) above, the terms and conditions of the existing registered enrolment shall continue to apply.

In case of Systematic Transfer Facilities (registered with Distributor Code) were registered under the Regular Plan prior to the Effective Date the future installments shall continue under the Regular Plan.

In case such investors wish to invest under the Direct Plan through these facilities, they would have to cancel their existing enrolments and register afresh for such facilities.

The AMC reserves the right to introduce / change the STPs at such other frequencies or on any dates as the AMC may feel appropriate from time to time.

The AMC reserves the right to change / modify the terms and conditions of the STP facility or withdraw the facility at a later date.

Systematic Withdrawal Plan (SWP)

Existing Unitholders have the benefit of availing the choice of SWP on pre-specified dates. The SWP allows the Unitholder to withdraw a specified sum of money each month/quarter from his investments in the Scheme.

The amount thus withdrawn by redemption will be converted into Units at Applicable NAV based prices and the number of Units so arrived at will be subtracted from the Units balance to the credit of that Unitholder.

Unitholders may start the facility/change the amount of withdrawals or the period of withdrawals by giving 15 days written intimation/notice. The SWP may be terminated on a written notice of 15 days by a Unitholder and it will terminate automatically if all the Units are liquidated or withdrawn from the account or the holdings fall below the SWP instalment amount.

There are four options available under SWP viz. Monthly option, quarterly option, Half Yearly and Yearly option. The details of which are given below:

	Monthly Option	Quarterly Option	Half-yearly Option	Yearly Option
Minimum value of SWP	Rs.1000/-			
Additional amount in multiples of	Re.1			
Dates of SWP	1/5/10/15/25*			
Minimum No. of SWP	Six	Four	Four	Two

* In the event that such a day is a holiday, the withdrawals would be affected on the next business day. Exit Load, if any, is applicable to SWP.

The AMC reserves the right to accept SWP applications of different amounts, dates and frequency. Unitholders can enroll themselves for the facility by submitting the duly completed Systematic Withdrawal enrolment Form at any of the Investor Service Centers (ISCs)/Official Points of Acceptance (OPAs). The AMC / Trustee reserves the right to change / modify the terms and conditions under the SWP prospectively at a future date. The AMC reserves the right to introduce / change the SWP at such other frequencies or on any dates as the AMC may feel appropriate from time to time.

Switching Options

(a) Inter - Scheme Switching option

Unit holders under the Scheme have the option to Switch part or all of their Unit holdings in the Scheme to any other scheme offered by the Mutual Fund from time to time. The Mutual Fund also provides the Investors the flexibility to Switch their investments from any other scheme(s) / plan (s) offered by the Mutual Fund to this Scheme. This option will be useful to Unit holders who wish to alter the allocation of their investment among the scheme(s) / plan(s) of the Mutual Fund in order to meet their changed investment needs.

The Switch will be effected by way of a Redemption of Units from the Scheme at Applicable NAV, subject to Exit Load, if any and reinvestment of the Redemption proceeds into another scheme offered by the Mutual Fund at Applicable NAV and accordingly the Switch must comply with the Redemption rules of switch out Scheme and the Subscription rules of the switch in scheme. However, no load will be charged for switches between equity schemes.

(b) Intra -Scheme Switching option

Unit holders under the Scheme have the option to Switch their Unit holdings from one option to another option (i.e. Growth to IDCW and vice-a-versa). The Switches would be done at the Applicable NAV based prices and the difference between the NAVs of the two options will be reflected in the number of Units allotted.

Switching shall be subject to the applicable "Cut off time and Applicable NAV" stated elsewhere in the Scheme Information Document.

In case of "Switch" transactions from one scheme to another, the allocation shall be in line with Redemption pay-outs.

Transactions Through Electronic Platform(S) of KFin Technologies Limited

Investors will be allowed to transact through <https://mfs.kfintech.com/mfs/>, an electronic platform provided by M/s. KFin Technologies Ltd., Registrar & Transfer Agent, in Schemes of Old Bridge Mutual Fund ("Fund"). The facility will also be available through mobile application of KFin Technologies Limited. The uniform cut off time as prescribed under the SEBI (Mutual Funds) Regulations, 1996 and as mentioned in SID and KIM of the Scheme will be applicable for transactions received through the above electronic platform and the time of receipt of transaction recorded on the server(s) of KFin Technologies Limited will be reckoned as the time for the purpose of determining applicability of NAV, subject to credit of funds to bank account of scheme, wherever applicable.

The facility is subject to operating guidelines, terms and conditions as may be prescribed by KFin Technologies Limited or as may be specified by Old Bridge AMC from time to time. For operating guidelines and terms and conditions, investors are requested to visit <https://mfs.kfintech.com/mfs/>.

Time of receipt of transaction recorded on the server(s) of KFin Technologies Limited will continue to be reckoned for electronic transactions received through AMC website/ Distributor website/ applications etc subject to credit of funds to bank account of scheme, wherever applicable.

Online Transactions Through Website of Old Bridge Mutual Fund

Facility of online transactions is available on the official website of Old Bridge Mutual Fund i.e. www.oldbridgemf.com. Consequent to this, the said website is declared to be an “OPA” for applications for subscriptions, redemptions, switches and other facilities. The Uniform Cut -off time as prescribed by SEBI and as mentioned in the SID(s) of respective schemes shall be applicable for applications received on the website. However, investors should note that transactions on the website shall be subject to the eligibility of the investors, any terms & conditions as stipulated by Old Bridge Mutual Fund/ Old Bridge Asset Management Private Limited from time to time and any law for the time being in force. The AMC reserves the right to modify the terms and conditions or to discontinue the facility at any point of time.

Investment can also be done through Old Bridge Mutual Fund Mobile Application.

MFCentral

As per the SEBI circular no SEBI/HO/IMD/IMD- II DOF3/P/CIR/2021/604 dated July 26, 2021, to comply with the requirements of RTA inter- operable Platform for enhancing investors' experience in Mutual Fund transactions / service requests, the QRTA's, KFin Technologies Limited (Kfintech) and Computer Age Management Services Limited (CAMS) have jointly developed MFCentral - A digital platform for Mutual Fund investors. MFCentral is created with an intent to be a one stop portal / mobile app for all Mutual fund investments and service related needs that significantly reduces the need for submission of physical documents by enabling various digital / physical services to Mutual fund investors across fund houses subject to applicable T&Cs of the Platform. MFCentral will be enabling various features and services in a phased manner. MFCentral may be accessed using <https://mfcentral.com> and a Mobile App in future with a view to comply with all provisions of the aforesaid circular and to increase digital penetration of Mutual funds, Old Bridge Mutual Fund (“the Fund”) designates MFCentral as its Official point of acceptance (ISC –Investor Service Center). Any registered user of MFCentral, requiring submission of physical document as per the requirements of MFCentral, may do so at any of the designated Investor Service centers or collection centers of Kfintech or CAMS. The AMC reserves the right to modify the terms and conditions or to discontinue the facility at any point of time.

Designate email server as an Official Point of Acceptance of Transaction

Old Bridge Asset Management Private Limited (“the AMC”) has designated it's email server as an Official Point of Acceptance (“OPA”) for all financial transactions for the schemes of Old Bridge Mutual Fund (“the Fund”). Accordingly, investors / unit holders can send the financial transactions viz. purchase, switch and redemption including systematic transactions through their registered email id to transaction@oldbridgemf.com ('Designated Email').

Operational Guidelines for Email Transactions

1. All Purchase, Redemption and Switch transactions including systematic transactions shall be accepted on the Designated Email ID
2. No Non Commercial Transaction Request shall be accepted through email.
3. Below table gives the criteria for a valid transaction request on the said email ID:

Purchase Transactions	Redemption Transactions
Transaction must be initiated from the investors registered email ID only** and shall be accompanied with a duly signed transaction slip. Transactions initiated from an unregistered email ID shall be accepted only if it is accompanied with a duly signed transaction slip (signed by all unitholders as per mode of holding). For such requests, it is recommended to mark a CC to the investors registered email ID.	
If the Mode of Holding (MoH) is Joint, it shall be accompanied with a duly signed transaction slip (Signed by all unitholders as per mode of holding).	
All the relevant information such as Folio Number, PAN, Scheme Name, Amount / Units, Bank Account, etc. should be mentioned with the transaction request. AMC reserves the right to reject or process the transaction based on necessary validations. The AMC reserves the right to make an outbound call to the investor to validate the transaction request.	
In case of multiple transactions, separate email transaction requests are to be initiated.	
The time of receipt of the email transaction request on transaction@oldbridgemf.com shall be considered as the time stamp and shall be used for determining the applicable NAV. Email transactions shall not be physically time-stamped and there shall be no specific TSM No. assigned to the transaction.	
Transaction request must be accompanied with the Relevant payment proof(s).	Transaction request may be accompanied with a duly signed transaction slip (if MoH is Joint)

****For new investors:**

- A. Investor must be KYC compliant.
- B. Purchase requests shall be accepted from the email ID mentioned on the application form. The said email ID must not be of an empanelled distributor or of any 3rd party.
- C. Transactions initiated by a Distributor / RIA must be accompanied with a duly signed transaction slip with a mandatory CC to the investor email ID mentioned on the application form.
- D. The transaction request must be accompanied with duly signed application form (signed as per MoH)
 - Self-attested copy of PAN card (of all unitholders)
 - Scan of cancelled cheque copy for the bank account to be registered
 - All other documents as mentioned in the SID / KIM of the scheme
 - Payment proof(s) - Payment modes must be electronic only i.e., NEFT/ RTGS / Bank Transfer.
4. The AMC reserves the right to change/add the email id(s) from time to time, and the same shall be updated on its website.
5. The AMC reserves the right to request additional documents if required before processing the transaction.
6. The AMC reserves the right to accept / reject any transaction after carrying out the necessary validations.
7. The AMC may acknowledge the receipt of email transaction request by way of auto-reply or customized reply, however this shall in no way be construed as acceptance / final processing of the transaction request.
8. The AMC shall act in good faith and shall take necessary steps in connection with the email requests received regardless of the value involved and the same shall be binding on the Investor. The AMC will be held harmless for any loss if any, suffered by the Investor for processing such transactions.
9. Investor shall indemnify the AMC from and against all claims, liability, loss, damage, cost and expenses incurred by the AMC arising out of or relating to:
 - a. AMC acting pursuant to, in accordance with or relying upon any email
 - b. requests received or AMC not processing the email requests for any reason.
 - c. Any unauthorised or fraudulent email request received by the AMC.
 - d. The Investor also agrees and undertakes to execute any other documents
 - e. indemnifying the AMC.

B. DEFAULT SCENARIOS AVAILABLE TO INVESTORS UNDER PLANS/ OPTIONS OF THE SCHEME.

1. Plans under the Scheme:

In terms of Para 2.5 of the Master Circular, direct investments by investors, viz. where the investment is not routed through distributors but made directly by the investors, are required to have a separate plan (i.e. Direct Plan) and a separate NAV. Expenses such as distribution expenses, brokerage or commission payable to distributors will not be charged to the investment made via direct investment and hence the Direct Plan will have a lower expense ratio.

Accordingly the Schemes have two Plans - Regular Plan & Direct Plan*, with a common portfolio and separate NAVs. Regular Plan is for investors who wish to route their investment through any distributor. Direct Plan is for investors who wish to invest directly without routing the investment through any distributor.

* Direct Plan: Brokerage / Commission paid to distributors and distribution expenses will not be charged under the Direct Plan. Direct 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. Investors may please note that the Direct Plan under the Scheme is meant for investors who understand the capital market, mutual funds and the risks associated therewith. The risks associated with the investments in the schemes of mutual funds may vary depending upon the investment objective, asset allocation and investment strategy of the Schemes and the investments may not be suited for all categories of investors. The AMC believes that investors investing under the Direct Plan of the Scheme are aware of the investment objective, asset allocation, investment strategy, risks associated therewith and other features of the Scheme and has taken an informed investment decision

2. Default Plan

Scenario	ARN Code mentioned by the investor	Plan mentioned by the investor	Default Plan to be captured
1	Not mentioned	Not mentioned	Direct Plan
2	Not mentioned	Direct Plan	Direct Plan
3	Not mentioned	Regular Plan	Direct Plan
4	Mentioned	Direct Plan	Direct Plan
5	Direct	Not mentioned	Direct Plan
6	Direct	Regular Plan	Direct Plan
7	Mentioned	Regular Plan	Regular Plan
8	Mentioned	Not mentioned	Regular Plan

3. Treatment of transactions received under Regular Plan with invalid ARN

In terms of AMFI Best Practices Guidelines Circular No. 111/2023-24 dated February 02, 2024, Invalid ARNs shall include the following situations –

“Invalid ARNs” shall include the following situations –

1. ARN validity period expired
2. ARN cancelled /terminated
3. ARN suspended
4. ARN Holder deceased
5. Nomenclature change, as required pursuant to IA Regulations, not complied by the MFD
6. MFD is debarred by SEBI
7. ARN not present in AMFI ARN database
8. ARN not empanelled with an AMC

Transactions received in Regular Plan with Invalid ARN shall be processed in Direct Plan of the same Scheme (even if reported in Regular Plan), applying the below logic:

Transaction Type	Primary ARN			SUB distributor ARN		EJIN*	Execution Only Mentioned	Regular Plan / Direct Plan
	Valid	Invalid	Empanelled	Valid	Invalid			
Lump Sum/Registration							Yes	
	Y		Y				Y	Regular
	Y		N	Not applicable				Direct
	Y		Y	N.A.	N.A.	N.A.	N	Regular*
	Y		Y	Y		Y		Regular
		Y						
	Y		Y	Y			Y	Regular
	Y		Y		Y			Direct
Trigger	Y			Not applicable				Regular
		Y		Not applicable				Direct

Note:

1. *If the EUIN is invalid/missing, the transactions shall be processed in Regular plan, and the distributor/investor shall be given 30 day period from the date of the transaction for remediation of the EUIN. In such cases, the investor to be advised to either provide a different EUIN linked to the ARN who would be engaged in servicing the investor OR switch to Direct Plan. The commission shall not be paid to the ARN holder if the Switch transaction does not happen, or fresh EUIN is not provided within 30 days. The commission may be paid if the fresh EUIN is provided by client within 30 days.
2. For SIP & STP facilities, the ARN validity shall be verified / validated at the time of registration. For instances where the registration details not available in RTA records the transaction shall be treated as lumpsum purchase for validations. Distributors must reconcile the active / inactive SIPs with RTA's at regular intervals.
3. SIPs registered under ARN of deceased to continue till end of SIP registration period or investor's request as per AMFI guidelines; No fresh transactions or SIPs to be booked under the ARN of deceased MFD post cancellation of ARN at AMFI.
4. Only Sub-distributor's ARN with valid "ARN-" values in the transaction will be considered for validation of Sub- distributor ARN for all types of transactions (lumpsum/SIP/STP).
5. If the ARN is invalid as on date of SIP / STP registration, such registration and future transactions thereunder will be processed under DIRECT plan.
6. Transactions other than the physical mode which are found to be not in order basis above matrix, will be rejected at the time of upload / submission for following reasons:
 - a. To give opportunity for the intermediary / platform to rectify details before submitting transactions or to report transactions as DIRECT.
 - b. If these transactions are accepted and processed as DIRECT, the intermediary placing the transaction will not be receiving reverse feeds and hence will not be able to reconcile.

Since the validation cannot be carried out at the time of acceptance or transactions received in physical form, , the same will be done at the time of processing the transaction, and if found to be invalid, the transaction will be processed under DIRECT.
7. Transactions received from the stock exchange platforms in Demat mode with invalid ARN shall be rejected instead of processing in Direct Plan for following reasons –
 - a. Settlement of units will fail at clearing corporation due to mismatch of ISIN.
 - b. If the RTA processes the transaction in DIRECT Plan, the AMC will face issues with corporate action wherein the clearing corporation will not be able to reconcile and credit the units.
 - c. The distributor/broker will not be able to download the reverse feed/mail back report for the transactions reported by the respective distributor in case if we process under Direct Plan.
8. Dividend reinvestment transactions, being a corporate action, will be excluded from the above validation.

4. Treatment of transactions received through distributors whose AMFI registration/ARN has been suspended temporarily or terminated permanently by AMFI

Investors may please note the following provisions, pertaining to treatment of purchase/switch/Systematic Investment Plan (SIP)/Systematic Transfer Plan (STP) transactions received through distributors whose AMFI registration/ARN has been suspended temporarily or terminated permanently by AMFI:

- a) During the period of suspension, no commission shall be accrued or payable to the distributor whose ARN is suspended. Accordingly, during the period of suspension, commission on the business canvassed prior to the date of suspension shall stand forfeited, irrespective of whether the suspended distributor is the main AMFI Registration Number ("ARN") holder or a sub-distributor.
- b) All Purchase and Switch transactions, including SIP/STP registered prior to the date of suspension and fresh SIP/STP registrations received under the ARN code of a suspended distributor during the period of suspension, shall be processed under "Direct Plan" of the respective scheme and shall be continued under Direct Plan of the respective scheme perpetually*. A suitable intimation in this regard shall be sent to the investor informing them of the suspension of the distributor.

*Note: If the AMC receives a written request/instruction from the unitholder to shift to Regular Plan under the ARN of the distributor post the revocation of suspension of ARN, the same shall be honored.

- c) All Purchase and Switch transactions including SIP/STP transactions received through the stock exchange platforms through a distributor whose ARN is suspended shall be rejected.
- d) In case where the ARN of the distributor has been permanently terminated, the unitholders have the following options:
 - Switch their existing investments under the Regular Plan to Direct Plan (Investors may be liable to bear capital gains taxes as per their individual tax position for such transactions); or
 - Continue their existing investments under the Regular Plan under ARN of another distributor of their choice.

5. Default Option

Growth Option in case Growth Option or Income Distribution cum Capital Withdrawal (IDCW) Option is not indicated.

Payout Option / facility in case Payout of IDCW Option / facility or Reinvestment of IDCW Option / facility is not indicated.

6. Default - Redemption

Where Units under a Scheme are held under both Regular and Direct Plans and the redemption / Switch request pertains to the Direct Plan, the same must clearly be mentioned on the request (along with the folio number), failing which the request would be processed from the Regular Plan. However, where Units under the requested Option are held only under one Plan, the request would be processed under such Plan.

Existing Investments

Investors wishing to transfer their accumulated unit balance held under Regular Plan (through lumpsum / systematic investments made with or without Distributor code) to Direct Plan will have to switch /redeem their investments (subject to applicable Exit Load, if any) and apply under Direct Plan.

7. Transactions without Scheme/Option Name

In case of fresh/additional purchases, if the name of the Scheme/Plan on the application form/transaction slip differs with from the name on the Cheque/Demand Draft, then the AMC will process the application and allot units at the applicable Net Asset Value, under the Scheme/Plan which is mentioned on the application form/transaction slip duly signed by the investor(s). The AMC reserves the right to call for other additional documents as may be required, for processing such transactions. The AMC also reserves the right to reject such transactions.

The AMC thereafter shall not be responsible for any loss suffered by the investor due to the discrepancy of a Scheme/Plan name mentioned in the application form/transaction slip and Cheque/Demand Draft. In case of fresh purchases, if the Plan name is not mentioned on the application form/transaction slip, then the units will be allotted under the Plan mentioned on the Cheque/Demand Draft. The Plan/Option that will be considered in such cases if not specified by the customer will be the default option of the Plan as per the SID.

8. Redemption/Switch Requests when both units and amount mentioned

If an investor submits a redemption/switch request mentioning both the Number of Units and the Amount to be redeemed/switched in the transaction slip, then the AMC reserves the right to process the redemption/switch for the Number of units and not for the amount mentioned.

If an investor submits a redemption/switch request by mentioning Number of Units or Amount to be redeemed and the same is higher than the balance Units/Amount available in the folio under the Scheme, then the AMC reserves the right to process the redemption/switch request for the available balance in the folio under the Scheme of the investor.

9. Multiple Requests

In case an investor makes multiple requests in a transaction slip i.e. redemption/switch and Change of Address or redemption/switch and Change of Bank Mandate or any combination thereof, but the signature is appended only under one such request, then the AMC reserves the right to process the request under which signature is appended and reject the rest where signature is not appended.

VII. RIGHTS OF UNIT HOLDERS OF THE SCHEME

1. Unit holders of the Scheme have a proportionate right in the beneficial ownership of the assets of the Scheme.
2. When the Mutual Fund declares an Income Distribution cum Capital Withdrawal (IDCW)/dividend under a scheme, IDCW/ dividend warrants shall be dispatched to the Unit Holders within 7 working days from the record date of IDCW/dividend. Consolidated Account Statement ('CAS') at mutual fund industry level for each calendar month will be issued on or before 15th day of succeeding month to all unit holders having financial transactions and who have provided valid Permanent Account Number (PAN). For folios not included in the CAS, the AMC shall issue a monthly account statement to the unit holders, pursuant to any financial transaction done in such folios; the monthly statement will be send on or before 15th day of succeeding month. In case of a specific request received from the unit holders, the AMC shall provide the account statement to the unit holder within 5 business days from the receipt of such request. If a Unit holder so desires the Mutual Fund shall issue a Unit certificate (non- transferable) within 5 Business Days of the receipt of request for the certificate.
3. The Mutual Fund shall dispatch redemption or repurchase proceeds within 3 working days of accepting the valid redemption or repurchase request. For schemes investing at least 80% of total assets in such permissible overseas investments, 5 Working Days of accepting the valid redemption

or repurchase request. Further, in case of exceptional scenarios as prescribed by AMFI vide its communication no. AMFI/ 35P/ MEM-COR/ 74 / 2022-23 dated January 16, 2023, read with clause 14.1.3 of SEBI Master Circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023 (SEBI Master Circular), the AMC may not be able to adhere with the timelines prescribed above.

4. The Trustee is bound to make such disclosures to the Unit holders as are essential in order to keep the unitholders informed about any information known to the Trustee which may have a material adverse bearing on their investments.
5. The appointment of the AMC for the Mutual Fund can be terminated by majority of the Directors of the Trustee Board or by 75% of the Unit holders of the Scheme.
6. 75% of the Unit holders of a Scheme can pass a resolution to wind- up a Scheme.
7. The Trustee shall obtain the consent of the Unit holders:
 - whenever required to do so by SEBI, in the interest of the Unit holders.
 - whenever required to do so if a requisition is made by three- fourths of the Unit holders of the Scheme.
 - when the majority of the trustees decide to wind up a scheme in terms of clause (a) of sub regulation (2) of regulation 39 of SEBI (Mutual Funds) Regulations, 1996 or prematurely redeem the units of a close ended scheme.
8. The trustees shall ensure that no change in the fundamental attributes of any scheme, the fees and expenses payable or any other change which would modify the scheme and affect the interest of the unit holders is carried out by the asset management company, unless it complies with sub-regulation (26) of regulation 25 of SEBI (Mutual Funds) Regulations, 1996.
9. In specific circumstances, where the approval of unitholders is sought on any matter, the same shall be obtained by way of a postal ballot or such other means as may be approved by SEBI.

VIII. INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS

The Securities and Exchange Board of India (SEBI) has established Investment Valuation Norms and Accounting Policies in accordance with the SEBI (Mutual Funds) Regulations, 1996, which have been amended over time. The Eighth Schedule of the regulations (regulation 47) and circulars issued by SEBI describe the norms, methodology, and guiding principles for determining the value of investments held by Mutual Fund schemes. These Valuation Norms must be adhered to when evaluating securities.

As per Clause 6.1.3 of Master Circular No. SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023, the AMC has constituted an in-house valuation committee to review the systems and practices of valuation of securities.

Every year, the Valuation Committee review the investment policies. The Head – Compliance documents the results and conversations of the gathering. If there is a change to the current valuation policies, it should be suggested by the Valuation Committee and approved by the Board of Old Bridge Asset Management Private Limited (OBAMPL) and Old Bridge Mutual Fund Trustee Private Limited (OBMFTPL).

This policy outlines the procedures and manner to be used for determining the value of instruments and investments by OBAMPL. It further sets out the criteria to be utilized for accounting valuation., and it is subject to review and revision as needed.

I. EQUITY AND EQUITY RELATED SECURITIES

A. TRADED SECURITIES

1. Equity and Equity related securities:

OBAMPL has selected National Stock Exchange (NSE) will act as the Principal Stock Exchange for all of its equity and equity related securities held by the schemes. The Stock Exchange to be utilized for valuation is specified in the scheme offer document. When it comes to Index Funds, the Principal Stock Exchange will be the Exchange on which the benchmark index has been created.

- a) Traded securities shall be valued at the day's closing price on the NSE.
- b) When, on a particular day a security is not traded on NSE, the closing price of the security on the Bombay Stock Exchange Limited (BSE). Will be considered for valuation. When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the National Stock Exchange or the Bombay Stock Exchange, as the case may be, on the earliest previous day may be used, provided such date is not more than thirty days prior to the valuation date
- c) If the equity securities are not traded on any stock exchange for a period of thirty days prior to the valuation date, the scrip must be treated as 'non-traded' scrip and should be valued as non-traded security as per the norms given separately by us in Equity Section Non-Traded and also in case of equity securities not listed on any stock exchange, the scrip is to be valued as per the norms given separately in Equity Section Non-Traded.
- d) For Index Funds, valuation shall be done at the closing prices of the underlying index.

2. Derivatives - Equity/Index Options and Futures:

a) Equity/Index Options

- i. Market values of traded option contracts shall be determined with respect to the exchange on which it is contracted originally, i.e., if an option contracted on the NSE would be valued at the closing price on the NSE.
- ii. The Exchanges give daily settlement prices in respect of all derivatives positions. These settlements prices would be adopted for valuing the positions, which are not traded.

b) Equity/Index Futures

- i. Market values of traded futures contracts shall be determined with respect to the exchange on which contracted originally, i.e., if futures position contracted on the NSE would be valued at the Settlement price on the NSE.
- ii. The Exchanges give daily settlement prices in respect of all derivatives positions. These settlements prices would be adopted for valuing the positions, which are not traded.

B. NON-TRADED/THINLY TRADED SECURITIES

1. Application Money for Primary Market Issue:

Application money should be valued at cost up to 30 days from the closure of the issue or traded price whichever is earlier. If the security is not allotted / traded within 30 days from the closure of the issue, application money is to be valued as per the directives of valuation committee, which shall be ratified in the next board meeting. Rationale of valuing such application money should also be recorded.

2. Thinly Traded Equity/Non-Traded:

Thinly Traded:

When trading in an equity/equity related security (such as convertible debentures, equity warrants, etc.) in a month is both less than ₹ 5,00,000 and the total volume is less than 50,000 shares, it shall be considered as a thinly traded security and valued accordingly. In order to consider a security as a thinly traded security, the volumes traded only on the NSE and the BSE shall be considered.

If the share is not listed on the stock exchanges which provide such information, then it will be obligatory on the part of the Fund to make its own analysis in line with the above criteria to check whether such securities are thinly traded which would then be valued accordingly.

Further, thinly traded securities would be monitored on calendar month basis and not on rolling basis. i.e., If a security in holding has been classified as thinly traded according to the criteria mentioned above, it would be fairly valued ignoring the primary and secondary stock exchange prices. This fair valuation would continue for the entire month even though, the volumes and value might have exceeded the limit in the current month.

In case trading in an equity security is suspended for trading on the stock exchange up to 30 days, then the last traded price would be considered for valuation of that security. If an equity security is suspended for trading for more than 30 days, then it would be considered as non-Traded and valued accordingly.

Non-Traded:

If the equity securities are not traded on NSE and BSE for a period of thirty days prior to the valuation date, the scrip must be treated as 'non-traded' scrip.

Equity Shares:

Based on the latest available audited Balance Sheet, net worth shall be calculated as follows:

- i. Net Worth per share = [Share Capital + Reserves (excluding Revaluation Reserves) – Misc. expenditure and Debit Balance in P&L A/c] / No. of Paid-up Shares. This shall be computed based on the latest available audited balance sheet.
- ii. Average capitalization rate (P/E ratio) for the industry based upon either NSE or BSE data (which should be followed consistently and changes, if any noted with proper justification thereof) shall be taken and discounted by 75% i.e., only 25% of the industry average P/E shall be taken as capitalization rate (P/E ratio). Earnings per share (EPS) of the latest audited annual accounts will be considered for this purpose.
- iii. The value as per the net worth value per share and the capital earning value calculated as above shall be averaged and further discounted by 10% for thinly so as to arrive at the fair value per share.
- iv. In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalized earning.
- v. In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero.
- vi. In case an individual security accounts for more than 5% of the total assets of the scheme, an independent valuer shall be appointed for the valuation of the said security.
- vii. To determine if a security accounts for more than 5% of the total assets of the scheme, it should be valued by the procedure above and the proportion which it bears to the total net assets of the scheme to which it belongs would be compared on the date of valuation.

Convertible Debentures:

In respect of convertible debentures and bonds, the non-convertible and convertible portion would be valued separately. The non-convertible portion would be valued on the same basis as is applicable to a debt instrument. The convertible component would be valued based on the same basis as would be applicable to an equity instrument.

If after conversion, the resultant equity instrument would be traded pari-passu with an existing equity instrument which is traded, the value of the later instrument can be adopted after an appropriate discount for the non-tradability of the instrument during the period preceding the conversion while valuing such instruments, the fact whether conversion is optional should also be factored in. The appropriate discount applied should be approved and factored in.

The value of the optional conversion shall be determined as follows:

- If the option to exercise rests with the issuer, the lower of the value when exercised or value when not exercised shall be taken.
- If the option to exercise rests with the investor, the higher of the value when exercised or value when not exercised shall be taken. The valuation shall be approved by the Valuation Committee.

3. Unlisted Equity:

These guidelines are similar to the guidelines issued by SEBI for non-traded / thinly traded securities mentioned above only except the following:

Computation of Net worth per share as lower of (a) and (b): a)

- Net worth of the company = Paid up share capital + Reserves other than Revaluation reserve – Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses.
- Net worth per share = (Net worth of the company / Number of paid-up shares). b)
- Net worth of the company = Paid up capital + Consideration on exercise of Option/Warrants received/receivable by the company + free reserves other than Revaluation reserve – Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses.
- Net worth per share = (Net worth of the company/{Number of paid-up shares + number of shares that would be obtained on conversion/exercise of outstanding warrants and options}). If the net worth of the company is negative, the share should be marked down to Zero.
 - c. The lower of (1) and (2) above shall be used for calculation of Net Worth per share and for further calculation in (c) below.
 - d. Average capitalisation rate (P/E ratio) for the industry based upon either BSE or NSE data (which shall be followed consistently and changes, if any, noted with proper justification thereof) shall be taken and discounted by 75 per cent. i.e. only 25 per cent of the industry average P/E shall be taken as capitalisation rate (P/E ratio). Earnings per share (EPS) of the latest audited annual accounts will be considered for this purpose.

- Computation of fair value per share to be considered for valuation at 15 % discount for unlisted security

$$[(\text{Net worth per share} + \text{Capitalised value of EPS}) / 2] * 0.85 \text{ All}$$

calculations shall be based on audited accounts.

- In case the latest balance sheet i.e., balance sheet prepared within nine months from the close of the accounting year of the company, is not available (unless the accounting year is changed) the shares should be valued as zero.
- If the Net Worth of the company is negative, the share would be marked down to zero
- At the discretion of the AMC/valuation committee and with the approval of the trustees, unlisted equity scrip may be valued at a price lower than the value derived using the aforesaid methodology.

4. Suspended Security:

- In case trading in an equity security is suspended for trading on the stock exchange, the last traded price would be considered for valuation of that security upto 30 days.
- If an equity security remains suspended for trading on the stock exchange for more than 30 days, then it would be considered as non-traded and valued accordingly.

5. Non-Traded Rights Entitlements:

- a) Until they are traded, post the rights renunciation period, the value of the “rights” entitlement would be calculated as per the SEBI prescribed formula stated below:

$$V_r = n/m * (P_{ex} - P_{of})$$

where

V_r = Value of Rights

n = Number of rights offered

m = Number of original shares held

P_{ex} = Ex-right price

P_{of} = Rights Offer price

Ratio of Rights i.e. (n/m where n = No. of Rights offered and m = No. of original shares held) will be adjusted in the quantity directly while booking the Rights and hence not considered again for valuation.

- b) Where the rights are not treated pari-passu with the existing shares, suitable adjustments would be made to the value of rights. Where it is decided not to subscribe for the rights but to renounce them and renunciations are being traded, the rights would be valued at the renunciation value.
- c) In case original shares on which the right entitlement accrues are not traded on the Stock Exchange on an ex-right basis, right entitlement should not be recognised as investments.
- d) Where right entitlements are not traded and it was decided not to subscribe the rights, the right entitlements have to be valued at zero.
- e) In case the rights offer price is greater than the ex-rights price, the value of the rights share is to be taken as zero.
- f) Post Allotment of the rights entitlement, it will be valued in line with the normal valuation methodology for valuation of equities.

6. Non-Traded Warrants:

Warrants can be valued at the value of the share which would be obtained on exercise of the Warrant after applying appropriate discount as decided by valuation committee prorated on a monthly basis after reducing the exercise price / issuance price from the closing price of the underlying cash equity security.

If the amount payable on exercise of the warrants is higher than the value of the share, the value of the warrants should be taken as zero.

Value of warrant = (Value of underlying shares – exercise price).

7. Non-Traded Preference Shares:

Non-traded preference shares shall be valued in good faith depending upon the type of the preference Share and after considering illiquidity discount, if any. Valuation of non-traded preference shares would depend on the terms of issue of preference shares. i.e., convertible/non-convertible.

- Convertible preference shares should be valued like convertible debentures
- Non-convertible preference shares should be valued like non-convertible debentures.
- In case, dividend is not received, it would be treated as NPA.

8. Shares on De-merger

On de-merger following possibilities arise which influence valuation:

Both the shares are traded immediately on de-merger: In this case, shares of both the Companies are valued at respective traded prices.

Shares of only one company continued to be traded on de-merger: In case one entity is demerged into two or more entities and one of those entities continues to be listed, the value of unlisted entity(ies) will be difference between the closing price of the security on the ex-date (after demerger) and closing price of the security on previous trading day (before demerger) that continues to be listed. The difference in price of two dates will be the valuation price of the unlisted entity(ies) proportionately, till they are listed and traded on a stock exchange. The cost price of new entity/entities would be derived proportionately from the cost price of parent entity.

In case the value of the traded security of de-merged entity is equal to or in excess of the value of that entity before de-merger, then the security of the non-traded entity will be valued at zero.

In case an unlisted security is not listed within a period of 30 days from the ex-date, the valuation price derived for the demerged security will be reviewed on expiry of 30 days.

Both the shares are not traded on de-merger: The price of the shares of the Company one day prior to ex-date of de-merger will be bifurcated over the de-merged shares in the ratio of cost of shares of each demerged entity or on the basis of net assets transferred if the same is available from the Company and any other relevant factors.

In case shares of both the companies are not traded for more than 30 days, these are to be treated as unlisted security and valued accordingly.

On merger/demerger, in case the company specifies any regulations/ method for cost bifurcation or valuation the same will be adopted. In case the above methodology does not derive the fair valuation of de-merged entities; the same may be determined by the Valuation Committee on case- to-case basis.

Merger/ Amalgamation:

Valuation of resulting company would be determined by valuation of merging / amalgamating company immediately prior to the ex-date of merger / amalgamation

- In case merging / amalgamating companies being listed, valuation of resulting companies would be summation of valuation of entities immediately prior to merger date. Further if listed company merges into an unlisted surviving company, then the surviving company should be valued at the traded value of merging company immediately before merger.
- Example:

1. If Company A and Company B merge to form a new Company C then Company C would be valued at the price equals to A+B
2. If Company A which is a listed company merges into Company B which is an unlisted company would be valued at traded price of A immediately before merger.
 - In case, one of the merging / amalgamating companies being unlisted, valuation of resulting companies would be valued on the principles of fair valuation as guided by the valuation committee.
 - If the above companies remained unlisted for more than 3 months, illiquidity discount on the derived prices may be applied on the basis of the market capitalization of the issuer viz. at 5% ,10% and 15%, for Large cap, Mid cap, Small cap respectively.
 - In case of the above listed, Valuation committee may decide fair value other than guided above, post considering facts on a case to case basis. Further guidance from valuation committee would be sought for any exceptional cases not covered above.

9. Partly Paid-up Equity Shares:

Non-traded: Uncalled liability per share shall be reduced from the value of fully paid share, if traded, to derive price of non-traded partly paid shares.

If the fully paid-up shares are not traded, the valuation principles for valuing non- traded equity shares shall be followed for valuing the fully paid up on-traded shares (with suitable illiquidity discounts) and then reduced by the uncalled liability per share to arrive at the value of non-traded partly paid shares

Thinly Traded: Partly paid shares should be valued at the lower of the following two prices:

- Current closing price per share of fully paid-up shares less uncalled amount per share of partly paid shares, and,
- Closing price of the partly paid share if it has not been traded on any particular valuation day (not exceeding the last 30 days).

10. Infrastructure Investment Trust (InvIT) and Real Estate Investment (ReIT):

- When units of InvITs and ReITs are not traded on any stock exchange on a particular valuation day, the value at which these were traded on the selected stock exchange or any other stock exchange, as the case may be, on any day immediately prior to valuation day, shall be considered for valuation provided that such date is not more than thirty days prior to the valuation date.
- Where units of InvITs and ReITs are not traded on any stock exchange for a continuous period of 30 days then the valuation for such units of InvITs and ReITs will be determined by the Valuation Committee in consultation with the Internal Auditors or independent valuation agencies as deemed appropriate by the Valuation Committee from time to time.
- In addition to the above, if the valuation of units of InvITs and REITs is provided by the independent agency as approved by AMFI, AMC may get into an arrangement with such agency to provide security level price for Valuation.

11. To be listed equity shares and equity related instruments (pre-public offering):

Pending listing Such securities shall be valued as below:

- At cost, up to 2 months from the date of allotment.
- Valued as unlisted equity shares after 2 months

12. Security Lending & Borrowing (SLB):

Security Lending & Borrowing (SLB) will be valued on the basis of cost-plus amortization.

13. Other Instruments:

In case of any other type of capital corporate action event, the same shall be valued at fair price on case-to-case basis after obtaining necessary approval from board/valuation committee.

II. INVESTMENT GRADE MONEY MARKET AND DEBT SECURITIES

A. MONEY MARKET AND DEBT SECURITIES

Money Market and Debt instruments include CP, CD, Fixed Coupon Bonds, Zero Coupon Bonds and Pass-Through Certificates, Floating rate security (FRN), BRDS, etc.

Money Market and Debt Instruments shall be valued at average of security level prices obtained from valuation agencies.

- In case security level prices given by valuation agencies are not available for a new security (which is currently not held by any Mutual Fund), then such security may be valued at purchase yield on the date of allotment / purchase.
- Abnormal situations and market disruptions where current market information may not be obtainable / adequate for valuation of securities, valuation Committee shall be responsible for monitoring these kinds of events. Abnormal situations and market disruptions cases shall be reported to the board from time to time.
- Any change in the policy on account of clarification or communication from AMFI or internal shall be communicated to the board from time to time.

B. OTHER MONEY MARKET AND DEBT SECURITIES

1. Government Securities

Central Government Securities (CGs), State Development Loans (SDLs), Treasury Bill, Cash Management Bill, etc. shall be valued on the basis of security level prices obtained from valuation agencies.

2. Deposits

Deposits with banks shall be valued at cost plus accrual basis. In case of any prepayment penalty, accrual rate would be the rate applicable for that period less any prepayment penalty.

3. Tri-Party Repo (TREPS)/Reverse Repo/Corporate Bond Repo with Residual Maturity (tenure of repo) of upto 30 days:

Securities shall be valued at cost plus accrual basis. Whenever a security moves from 31 days' residual maturity to 30 days' residual maturity, the price as on 31st day shall be used for amortization from 30th day.

4. Tri-Party Repo (TREPS)/Reverse Repo/Corporate Bond Repo with Residual Maturity (tenure of repo) of above 30 days:

Securities shall be valued at average of security level prices obtained from valuation agencies.

In case security level prices given by valuation agencies are not available (which is currently not held by any Mutual Fund), then such securities will be valued at purchase yield on the date of purchase.

5. Securities purchased on Private Placement Basis:

In case of securities purchased on private placement basis, if the security prices are provided by valuation agencies it should be valued or prices accordingly

In case the security is purchased on private placement basis, the same would be valued at Purchase Yield on the date of purchase. Subsequently valuation would be carried out at average of security level prices obtained from valuation agencies.

6. Securities with Put/Call Options:

The option embedded securities would be valued as follows:

a) *Securities with call option:*

The securities with call option shall be valued at the lower of the value as obtained by valuing the security to final maturity and valuing the security to call option. In case there are multiple call options, the lowest value obtained by valuing to the various call dates and valuing to the maturity date is to be taken as the value of the instrument.

b) *Securities with Put option:*

The securities with put option shall be valued at the higher of the value as obtained by valuing the security to final maturity and valuing the security to put option. In case there are multiple put options, the highest value obtained by valuing to the various put dates and valuing to the maturity date is to be taken as the value of the instrument.

c) *Securities with multiple put options present ab-initio*

In respect of valuation of securities with multiple put options present ab-initio wherein put option is factored into valuation of the security by the valuation agency. If put option is not exercised by the Fund, while exercising put option would have been in favour of the scheme:

- i. Justification for not exercising put option shall be provided by the MF to valuation agencies, OBAMPL and Trustee Board on or before last date of notice period.
- ii. Valuation agencies shall not take into account remaining put options for the purpose of valuation of security.

Put option shall be considered in favour of the scheme if the yield of valuation price ignoring put option is more than contractual yield/coupon rate by 30 bps.

d) *Securities with both Put and Call option on the same day:*

Only securities with put / call options on the same day and having the same put and call option price, shall be deemed to mature on such put / call date and shall be valued accordingly. In all other cases, the cash flow of each put / call option shall be evaluated and the security shall be valued on the following basis:

- i. Identify a 'Put Trigger Date', a date on which 'price to put option' is the highest when compared with price to other put options and maturity price.
- ii. Identify a 'Call Trigger Date', a date on which 'price to call option' is the lowest when compared with price to other call options and maturity price.
- iii. In case no Put Trigger Date or Call Trigger Date ("Trigger Date") is available, then valuation would be done to maturity price. In case one Trigger Date is available, then valuation would be done

as to the said Trigger Date. In case both Trigger Dates are available, then valuation would be done to the earliest date.

If the put option is not exercised by a Mutual Fund, while exercising the put option would have been in favour of the scheme;

- i. A justification for not exercising the put option shall be provided by the Mutual Fund to the Valuation Agencies, Board of OBAMPL and OBMFTPL on or before the last date of the notice period.
- ii. The Valuation Agencies shall not take into account the remaining put options for the purpose of valuation of the security.

The put option shall be considered as 'in favour of the scheme' if the yield of the valuation price ignoring the put option under evaluation is more than the contractual yield/coupon rate by 30 basis points.

7. AT-1 Bonds and Tier-2 Bonds:

SEBI, vide para 2 of SEBI circular No. SEBI/HO/IMD/DF4/CIR/P/2021/034 March 22, 2021, has specified the glide path for the purpose of valuation of existing as well as new bonds issued under Basel III framework w.r.t. implementation of para 8 of SEBI circular No. SEBI/HO/IMD/DF4/CIR/P/2021/032 dated March 10, 2021.

Further, AMFI, vide its letter No. 135/BP/91/2020-21, has issued the detailed guidelines under the directive of SEBI for being uniformly followed and implemented by all Mutual Funds.

III. OTHER SECURITIES

1. Mutual Fund Units

- Mutual Fund Units listed and traded would be valued at the closing traded price as on the valuation date.
- Unlisted Mutual Fund Units and listed but not traded Mutual Fund Units would be valued at the last declared NAV on AMFI website as on the valuation date

2. Interest Rate Futures (IRF)

- Market values of traded futures contracts shall be determined with respect to the exchange on which contracted originally, i.e., if futures position contracted on the NSE would be valued at the settlement price on the NSE. The price of the same futures contract on the BSE cannot be considered for the purpose of valuation, unless the futures contract itself has been contracted on the BSE.
- The Exchanges give daily settlement prices in respect of all derivatives positions. These settlements prices would be adopted for valuing the positions, which are not traded.

3. Commodities in case of Exchange Traded Fund:

Valuation of Gold as prescribed by SEBI Regulations:

The gold held by a gold exchange traded fund scheme shall be valued at the AM fixing price of London Bullion Market Association (LBMA) in US dollars per troy ounce for gold having a fineness of 995.0 parts per thousand, subject to the following:

- i. Adjustment for conversion to metric measures as per standard conversion rates;
- ii. Adjustment for conversion of US dollars into Indian rupees as per the RBI reference rate declared by the Financial Benchmarks India Limited (FBIL); and
- iii. Addition of –
 - a. Transportation and other charges that may be normally incurred in bringing such gold from London to the place where it is actually stored on behalf of the mutual fund; and
 - b. Notional customs duty and other applicable taxes and levies that may be normally incurred to bring the gold from London to the place where it is actually stored on behalf of the mutual fund:

Provided that the adjustment under clause (iii) above may be made on the basis of a notional premium that is usually charged for delivery of gold to the place where it is stored on behalf of the mutual fund:

Provided further that where the gold held by a gold exchange traded fund scheme has a greater fineness, the relevant LBMA prices of AM fixing shall be taken as the reference price under this sub-paragraph.

If the gold acquired by the gold exchange traded fund scheme is not in the form of standard bars, it shall be assayed and converted into standard bars which comply with the good delivery norms of the LBMA and thereafter valued in terms of paragraph (I)

Valuation process flow shall be as below:

- i. The process of valuing Gold shall be carried out in accordance with the guidelines set out by SEBI, with the fixing price available on the LBMA site.
- ii. The Valuation Committee of the AMC shall review and determine the Premium/Discount and fixing charges for the valuation of Gold on an ongoing basis
- iii. The LBMA Gold price is quoted in USD/Oz for 999 fineness and must be converted to Troy Ounces per kilogram for 995 purity using the NYMEX conversion factor. The fineness quotient must also be adjusted using the factor 0.995996 (0.995/0.999) if the gold is of 999 fineness.
- iv. The adjustment or conversion factor for ounce to kg is as below:

*for 995 purity it is 31.99

*for 999 purity it is 32.12

- v. To convert USD into INR, it must be multiplied by the INR reference rate provided by Financial Benchmarks India Pvt. Ltd. or a similar agency.
- vi. Custom duty is applied per Kg.
- vii. GST is excluded from the Valuation.

Valuation of Silver as prescribed by SEBI Regulations:

The Silver held by a Silver exchange traded fund scheme shall be valued at the AM fixing price of London Bullion Market Association (LBMA) in US dollars per troy ounce for Silver having a fineness of 999.0 parts per thousand, subject to the following:

- a. Adjustment for conversion to metric measures as per standard conversion rates;
- b. Adjustment for conversion of US dollars into Indian rupees as per the RBI reference rate declared by the Foreign Exchange Dealers Association of India (FEDAI); and
- c. Addition of –
 - i. Transportation and other charges that may be normally incurred in bringing such Silver from London to the place where it is actually stored on behalf of the mutual fund; and
 - ii. Notional customs duty and other applicable taxes and levies that may be normally incurred to bring the Silver from London to the place where it is actually stored on behalf of the mutual fund:

Provided that the adjustment under clause (iii) above may be made on the basis of a notional premium that is usually charged for delivery of Silver to the place where it is stored on behalf of the mutual fund:

Provided further that where the Silver held by a Silver exchange traded fund scheme has a greater fineness, the relevant LBMA prices of AM fixing shall be taken as the reference price under this sub-paragraph.

If the Silver acquired by the Silver exchange traded fund scheme is not in the form of standard bars, it shall be assayed and converted into standard bars which comply with the good delivery norms of the LBMA and thereafter valued in terms of paragraph (I)

Valuation process flow shall be as follows:

- i. The LBMA Silver Fixing for the day available on the LBMA site will be used for valuation.
- ii. The premium/discount and fixing charges for such valuation shall be reviewed and determined by the Valuation Committee of the AMC.
- iii. The quoted LBMA Silver price is in USD/Oz for 999 fineness, and Troy ounces per kilogram shall be used for conversion to Kilograms, the applicable conversion factor of Troy ounces per kilogram shall be used for 999 purity.
- iv. The conversion or adjustment of ounce to kg will be as below
*for 999 purity it is 32.1507
- v. This USD amount will be multiplied with the INR reference rate provided by Financial Benchmarks India Pvt. Ltd. or any other similar agency.
- vi. Custom duty shall be fixed on a per kilogram basis
- vii. GST shall be excluded from the valuation.

If the LBMA AM fixing or FBIL reference rate is not published on any given day, the most recently available rate shall be utilized to compute the value of goods such as Silver and Gold.

4. Foreign Equity

Valuation of Investment made in Foreign Equity

On the Valuation Day, the securities issued outside India and listed on the stock exchanges outside India shall be valued at the closing price on the stock exchange at which it is listed or at the last available traded price. However, in case a security is listed on more than one stock exchange, the AMC reserves the right to determine the stock exchange, the price of which would be used for the purpose of valuation of that security. The stock exchange once selected would be used consistently till changed by recording the reasons in writing by Board of AMC.

In case a security is not traded on valuation day, the last traded price/last available price would be used for valuation till T - 30 days. In case security is not traded for more than 30 days, the same would be valued on a fair value basis by the Valuation Committee of the AMC.

On the Valuation Day, all assets and liabilities denominated in foreign currency will be valued. The source for the price will be taken in the following order of preference: (a) FBIL, (b) Reuters, or (c) any other standard reference rate. In case any exchange rate is not available on the valuation day, the last available rate would be used for valuation.

The Trustees reserve the right to change the source for determining the exchange rate. The exchange gain / loss resulting from the aforesaid conversion shall be recognized as unrealized exchange gain / loss in the books of the Scheme on the day of valuation. Further, the exchange gain / loss resulting from the settlement of assets / liabilities denominated in foreign currency shall be recognized as realized exchange gain / loss in the books of the scheme on the settlement of such assets / liabilities.

The procedure for valuing investments in foreign equities is outlined as follows:

1. Select the most appropriate stock exchange for all equity and equity-related securities held by the schemes.
2. The closing prices of securities available will be taken for valuation. If these prices are unavailable, the last traded price will be considered
3. The following will be source for prices (a) Reuters, and for FX rate it will be FBIL / Reuters In

addition to the above the accounting / valuation for currency rates is given below:

1. When investing a certain portion of the fund overseas, the purchase of foreign currency will be accounted for as the cost of purchase, thus creating an FX position in the portfolio.
2. When investing in or selling securities, the record of the purchase or sale will be logged in the portfolio currency of Indian Rupees (INR). The cost of the purchase or sale, including brokerage and other fees, will be converted to INR at the agreed exchange rate.
3. At the time of settlement, the difference between the FX reference rate on the trade date and the actual FX rate used for settlement will be classified as a gain or loss due to fluctuation in foreign exchange.
4. Every day, when the closing prices and the currency rates are received, they will be applied to the portfolio, and the unrealized capital gain and FX gain will be calculated separately. The closing time for the currency rate will be 5.00 p.m., and the source for the price will be determined in the following order of preference: (a) RBI, (b) Reuters, or (c) any other standard reference rate.

Valuation of ADR/GDR

Mutual Fund can invest in ADRs/GDRs in line with the SEBI Circular dated September 1, 1999 and September 30, 1999. Exchange to be considered for valuation of ADRs/GDRs is to be approved by the AMC Board. Process of valuation would be as follows:

i. Receiving last quoted price

The closing prices of securities available will be taken for valuation. If these prices are unavailable, the last traded price will be considered

If the security is not traded on those days, the price of the previous day should be used, provided that the price is not more than 30 days old.

Thus, the closing prices of securities available will be taken for valuation. If these prices are unavailable, the last traded price from the following sources will be used: (a) FBIL, (b) Reuters, or (c) any other standard reference rate. In the event that no price is available on the valuation day, the last closing price will be used

ii. Converting the price in Indian Rupees (INR)

Conversion of ADR/GDR prices from foreign currency to Indian Rupees should be undertaken using the closing exchange rate of the date of valuation. The closing price in INR should then be used for valuation. As an alternative, the closing price of the security can be converted to INR at the closing exchange rate of the day on which the prices are considered. The source for the price will be the RBI, Reuters, or any other standard reference rate, in that order of preference.

5. Market Linked Debenture and all OTC Derivatives including Interest Rate SWAPS (IRS)/Forward Rate Agreements (FRA):

Irrespective of the residual maturity, securities shall be valued at average of security level prices obtained from valuation agencies.

6. Convertible Debentures and Bonds:

As per Eighth Schedule of SEBI (Mutual Fund) Regulation method of valuation of convertible debentures is prescribed and will be followed by Old Bridge Mutual Fund In respect of convertible debentures and bonds, the non-convertible and convertible components shall be valued separately. The non-convertible component should be valued on the same basis as would be applicable to a debt instrument. The convertible component should be valued on the same basis as would be applicable to an equity instrument. If, after conversion the resultant equity instrument would be traded pari passu with an existing instrument which is traded, the value of the latter instrument can be adopted after an appropriate discount of the non-tradability of the instrument during the period preceding the conversion while valuing such instruments, the fact whether the conversion is optional should also be factored in.

7. Illiquid Securities

- Aggregate value of “illiquid securities” of scheme, which are defined as nontraded, thinly traded and unlisted equity shares, shall not exceed 15% of the total assets of the scheme and any illiquid securities held above 15% of the total assets shall be assigned zero value.
- All funds shall disclose as on March 31 and September 30 the scheme-wise total illiquid securities in value and percentage of the net assets while making disclosures of half yearly portfolios to the unit holders. In the list of investments, an asterisk mark shall also be given against all such investments, which are recognized as illiquid securities.

8. Deviation from valuation guidelines

- As per the Principles of Fair Valuation specified in Eighth Schedule of SEBI (Mutual Funds) Regulations, 1996, AMCs are responsible for true and fairness of valuation and correct NAV. Considering the same, in case an AMC decides to deviate from the valuation price given by the valuation agencies, the detailed rationale for each instance of deviation shall be recorded by the AMC.
- The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued I the price as per the valuation agencies and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.
- The rationale for deviation along-with details shall also be disclosed immediately and prominently, under a separate head on the website of AMC.
- Further, while disclosing the total number of instances of deviation in the monthly and half-yearly portfolio statements, AMCs shall also provide the exact link to their website for accessing the information.

9. Money Market and Debt securities rated below Investment Grade/Default

- A money market or debt security shall be classified as “below investment grade” if the long-term rating of the security issued by a SEBI registered Credit Rating Agency (CRA) is below BBB- or if the short-term rating of the security is below A3.
- A money market or debt security shall be classified as “Default” if the interest and / or principal amount has not been received, on the day such amount was due or when such security has been downgraded to “Default” grade by a CRA. In this respect, Mutual Funds shall promptly inform

to the valuation agencies and the CRAs, any instance of non-receipt of payment of interest and / or principal amount (part or full) in any security.

Para 2.0 of SEBI Circular No. SEBI/HO/IMD/DF4/CIR/P/2019/41 dated March 22, 2019 provides for valuation of money market and debt securities at prices provided by the valuation agencies notified by AMFI. Till the time scrip level valuation is not available from the agency's securities are to be valued on the basis of indicative haircuts provided by the agencies. These haircuts shall be updated and refined as and when there is availability of material information which impacts the haircuts. During this period if there are trades in the security it may be considered for valuation if it is lower than the price post standard haircut. The minimum trade size in such cases will be determined by the valuation agencies.

The current indicative haircuts as determined by the valuation agencies and communicated by AMFI are:

For senior, secured securities

Rating/ sector	Infrastructure, Regal Estate, Hotels, Loan against shares and Hospitals	Other Manufacturing and Financial Institutions	Trading, Gems Jewellery and Others
BB	15%	20%	25%
B	25%	40%	50%
C	35%	55%	70%
D	50%	75%	100%

For subordinated, unsecured or both

Rating/ sector	Infrastructure, Regal Estate, Hotels, Loan against shares and Hospitals	Other Manufacturing and Financial Institutions	Trading, Gems Jewellery and Others
BB	25%	25%	25%
B	50%	50%	50%
C	70%	70%	70%
D	100%	100%	100%

In terms of the above circular, the determination of whether the rating is below investment grade will be performed by considering the most conservative rating on the instrument if it is rated by more than one rating agency.

The AMC may deviate from the indicative haircuts and/or the valuation price for money market and debt securities rated below investment grade provided by the valuation agencies subject to the following:

- i. The detailed rationale for deviation from the price post haircuts or the price provided by the valuation agencies shall be recorded by the AMC.
- ii. The rationale for deviation along with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued I the price post haircuts or the average of the price provided by the valuation agencies (as applicable) and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.
- iii. The rationale for deviation along with details shall also be disclosed to investors under a separate head on the website. Further, the total number of such instances shall also be disclosed in the monthly and half-yearly portfolio statements for the relevant period along with an exact link to the website wherein the details of all such instances of deviation are available.

10. Changes in terms of Investment

While making any change to terms of an investment, Mutual Funds shall adhere to the following conditions:

- Any changes to the terms of investment, including extension in the maturity of a money market or debt security, shall be reported to valuation agencies and SEBI registered Credit Rating Agencies (CRAs) immediately, along with reasons for such changes.
- Any extension in the maturity of a money market or debt security shall result in the security being treated as “Default”, for the purpose of valuation.
- If the maturity date of a money market or debt security is shortened and then subsequently extended, the security shall be treated as “Default” for the purpose of valuation.
- Any put option inserted subsequent to the issuance of the security shall not be considered for the purpose of valuation and original terms of the issue will be considered for valuation.

11. Approach for traded and non-traded money market and debt securities

SEBI, vide circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019 on Valuation of money market and debt securities, has laid down the broad principles for considering traded yields for the purpose of valuation of money market and debt securities. In this regard, the following are the areas identified for issuing standard guidelines.

- a. Waterfall mechanism for valuation of money market and debt securities
- b. Definition of tenure buckets for similar maturity
- c. Process for determination of similar issuer
- d. Recognition of trades and outlier criteria
- e. Process for construction of spread matrix

Part A: Valuation of Money Market and Debt Securities other than G-Secs

a) *Waterfall Mechanism for valuation of money market and debt securities:* The following shall be the broad sequence of the waterfall for valuation of money market and debt securities:

- i. Volume Weighted Average Yield (VWAY) of primary reissuances of the same ISIN (whether through book building or fixed price) and secondary trades in the same ISIN
- ii. VWAY of primary issuances through book building of same issuer, similar maturity (Refer Note 1 below)
- iii. VWAY of secondary trades of same issuer, similar maturity
- iv. VWAY of primary issuances through fixed price auction of same issuer, similar maturity
- v. VWAY of primary issuances through book building of similar issuer, similar maturity (Refer Note 1 below)
- vi. VWAY of secondary trades of similar issuer, similar maturity.
- vii. VWAY of primary issuance through fixed price auction of similar issuer, similar maturity
- viii. Construction of matrix (polling may also be used for matrix construction)
- ix. In case of exceptional circumstances, polling for security level valuation (Refer Note 2 below)

Note 1

Except for primary issuance through book building, polling shall be conducted to identify outlier trades. However, in case of any issuance through book building which is less than INR 100 Cr, polling shall be conducted to identify outlier trades.

Note 2

Some examples of exceptional circumstance would be stale spreads, any event/news in particular sector/issuer, rating changes, high volatility, corporate action or such other event as may be considered by valuation agencies. Here stale spreads are defined as spreads of issuer

which were not reviewed/updated through trades/primary/polls in same or similar security/issuers of same/similar maturities in waterfall approach in last 6 months. Further, the exact details and reasons for the exceptional circumstances which led to polling shall be documented and reported to AMCs. Further, a record of all such instances shall be maintained by AMCs and shall be subject to verification during SEBI inspections.

Note 3

All trades on stock exchanges and trades reported on trade reporting platforms till end of trade reporting time (excluding Inter-scheme transfers) should be considered for valuation on that day.

Note 4

It is understood that there are certain exceptional events, occurrence of which during market hours may lead to significant change in the yield of the debt securities. Hence, such exceptional events need to be factored in while calculating the price of the securities. Thus, for the purpose of calculation of VWAY of trades and identification of outliers, on the day of such exceptional events, rather than considering whole day trades, only those trades shall be considered which have occurred post the event (on the same day).

The following events would be considered exceptional events:

- i. Monetary/ Credit Policy
- ii. Union Budget
- iii. Government Borrowing/ Auction Days
- iv. Material Statements on Sovereign Rating
- v. Issuer or Sector Specific events which have a material impact on yields
- vi. Central Government Election Days
- vii. Quarter end days

In addition to the above, valuation agencies may determine any other event as an exceptional event. All exceptional events along-with valuation carried out on such dates shall be documented with adequate justification.

b) Definition of tenure buckets for Similar Maturity

When a trade in the same ISIN has not taken place, reference should be taken to trades of either the same issuer or a similar issuer, where the residual tenure matches the tenure of the bond to be priced. However, as it may not be possible to match the exact tenure, it is proposed that tenure buckets are created and trades falling within such similar maturity be used as per table below.

Residual Tenure of Bond to be priced	Criteria of similar maturity
Upto 1 month	Calendar Weekly Bucket
< 1 month to 3 months	Calendar Fortnightly Bucket
< 3 months to 1 year	Calendar Monthly Bucket
< 1 year to 3 years	Calendar Quarterly Budget
< 3 years	Calendar Half-yearly or Greater Bucket

In addition to the above:

- i. In case of market events, or to account for specific market nuances, valuation agencies may be permitted to vary the bucket in which the trade is matched or to split buckets to finer time periods as necessary. Such changes shall be auditable. Some examples of market events / nuances include cases where traded yields for securities with residual tenure of less than 90 days and more than 90 days are markedly different even though both may fall within the same maturity bucket, similarly for less than 30 days and more

than 30 days or cases where yields for the last week v/s second last week of certain months such as calendar quarter ends can differ.

- ii. In the case of illiquid/ semi liquid bonds, it is proposed that traded spreads be permitted to be used for longer maturity buckets (1 year and above). However, the yield should be adjusted to account for steepness of the yield curve across maturities.
- iii. The changes/ deviations mentioned in clauses a and b, above, should be documented, along with the detailed rationale for the same. Process for making any such deviations shall also be recorded. Such records shall be preserved for verification.

c) *Process for determination of similar issuer*

Valuation agencies shall determine similar issuers using one or a combination of the following criteria. Similar issuer does not always refer to issuers which trade at same yields, but may carry spreads amongst themselves & move in tandem or they are sensitive to specific market factor/s hence warrant review of spreads when such factors are triggered.

- o Issuers within same sector/industry and/or
- o Issuers within same rating band and/or
- o Issuers with same parent/ within same group and/or
- o Issuers with debt securities having same guarantors and/or
- o Issuers with securities having similar terms like Loan Against Shares (LAS)/ Loan Against Property (LAP)

The above criteria are stated as principles and the final determination on criteria, and whether in combination or isolation shall be determined by the valuation agencies. The criteria used for such determination should be documented along with the detailed rationale for the same in each instance. Such records shall be preserved for verification. Similar issuers which trade at same level or replicate each other's movements are used in waterfall approach for valuations. However, similar issuer may also be used just to trigger the review of spreads for other securities in the similar issuer category basis the trade/news/action in any security/ies within the similar issuer group.

d) *Recognition of trades and outlier criteria*

i. *Volume criteria for recognition of trades (marketable lot)*

The following volume criteria shall be used for recognition of trades by valuation agencies:

Parameter	Minimum Volume Criteria for marketable lot	
Primary	₹ 25 Cr for both Bonds/NCD/CP/CD and other money market instruments	
Secondary	₹ 25 Cr for CP/CD, T-Bills and other money market instruments	
Secondary	₹ 5 Cr for Bonds/NCO/G-Secs	

ii. *Outlier criteria*

It is critical to identify and disregard trades which are aberrations, do not reflect market levels and may potentially lead to mispricing of a security or group of securities. Hence, the following broad principles would be followed by valuation agencies for determining outlier criteria.

- a. Outlier trades shall be classified on the basis of liquidity buckets (Liquid, Semi-liquid, Illiquid). Price discovery for liquid issuers is generally easier than that of illiquid

issuers and hence a tighter pricing band as compared to illiquid issuers would be appropriate.

- b. The outlier trades shall be determined basis the yield movement of the trade, over and above the yield movement of the matrix. Relative movement ensures that general market movements are accounted for in determining trades that are outliers. Hence, relative movement over and above benchmark movement shall be used to identify outlier trades.
- c. Potential outlier trades which are identified through objective criteria defined above will be validated through polling from market participants. Potential outlier trades that are not validated through polling shall be ignored for the purpose of valuation.
- d. The following criteria shall be used by valuation agencies in determining Outlier Trades

Liquidity Classification	Bps Criteria (Yield movement over Previous Day yield after accounting for yield movement of matrix)		
	Upto 15 days	15-30 days	< 30 days
Liquid	30 bps	20 bps	10 bps
Semi-liquid	45 bps	35 bps	20 bps
Illiquid	70 bps	50 bps	35 bps

The above criteria shall be followed consistently and would be subject to review on a periodic basis by valuation agencies and any change would be carried in consultation with AMFI.

- e. In order to ensure uniform process in determination of outlier trades the criteria for liquidity classification shall be as detailed below:

Liquidity classification criteria - liquid, semi-Liquid and Illiquid definition

Valuation agencies shall use standard criteria for classifying trades as Liquid, Semi-Liquid and illiquid basis the following two criteria

- Trading Volume
- Spread over reference yield

Such criteria shall be reviewed on periodic basis in consultation with AMFI.

Trading Volume (Traded days) based criteria:

Number of unique days an issuer trades in the secondary market or issues a new security in the primary market in a calendar quarter

- Liquid $\geq 50\%$ of trade days
- Semi liquid $\geq 10\%$ to 50% trade days
- Illiquid $< 10\%$ of trade days

Spread based criteria:

Spread over the matrix shall be computed and based on thresholds defined, issuers shall be classified as liquid, semi liquid and illiquid. For bonds thresholds are defined as upto 15 bps for liquid; $>15-75$ bps for semi-liquid; > 75 bps for illiquid. (Here, spread is computed as average spread of issuer over AAA Public Sector Undertakings/Financial Institutions/Banks matrix), For CP/ CD- upto 25 bps for liquid; $>25- 50$ bps for semiliquid; > 50 bps for illiquid. (Here, spread is computed as average spread of issuer over AI+/AAA CD Bank matrix).

The thresholds shall be periodically reviewed and updated having regard to the market.

The best classification (liquid being the best) from the above two criteria (trading volume and spread based) shall be considered as the final liquidity classification of the issuer. The above classification shall be carried out separately for money market instruments (CP/ CDs) and bonds.

e) *Process for construction of spread matrix*

Valuation agencies shall follow the below process in terms of calculating spreads and constructing the matrix:

Steps	Detailed Process
Step 1	Segmentation of corporates: The entire corporate sector is first categorised across following four sectors i.e., all the corporates will be catalogued under one of the below mentioned bucket: 1) Public Sector Undertakings/Financial Institutions/Banks; 2) Non-Banking Finance Companies -except Housing Finance Companies; 3) Housing Finance Companies; 4) Other Corporates
Step 2	Representative issuers – For the aforesaid 4 sectors, representative issuers (Benchmark Issuers) shall be chosen by the valuation agencies for only higher rating (i.e., “AAA” or AA+). Benchmark/Representative Issuers will be identified basis high liquidity, availability across tenure in AAA/AA+ category and having lower credit/liquidity premium. Benchmark Issuers can be single or multiple for each sector. It may not be possible to find representative issuers in the lower rated segments however, in case of any change in spread in a particular rating segment, the spreads in lower rated segments should be suitably adjusted to reflect the market conditions. In this respect, in case spreads over benchmark are widening at a better rated segment, then adjustments should be made across lower rated segments, such that compression of spreads is not seen at any step. For instance, if there is widening of spread of AA segment over the AAA benchmark, then there should not be any compression in spreads between AA and A rated segment and so on.
Step 3	Calculation of benchmark curve and calculation of spread – 1) Yield curve to be calculated for representative issuers for each sector for maturities ranging from 1 month till 20 years and above. 2) Waterfall approach as defined in Part A (1) above will be used for construction of yield curve of each sector. 3) In the event of no data related to trades/primary issuances in the securities of the representative issuer is available, polling shall be conducted from market participants 4) Yield curve for Representative Issuers will be created on daily basis for all 4 sectors. All other issuers will be pegged to the respective benchmark issuers depending on the sector, parentage and characteristics. Spread over the benchmark curve for each security is computed using latest available trades/primaries/polls for respective maturity bucket over the Benchmark Issuer. 5) Spreads will be carried forward in case no data points in terms of trades/primaries/polls are available for any issuer and respective benchmark movement will be given
Step 4	1) The principles of VWAY, outlier trades and exceptional events shall be applicable while constructing the benchmark curve on the basis of trades/primary issuances. 2) In case of rating downgrade/credit event/change in liquidity or any other material event in Representative Issuers, new Representative Issuers will

	<p>be identified. Also, in case there are two credit ratings, the lower rating to be considered.</p> <p>3) Residual tenure of the securities of representative issuers shall be used for construction of yield curve.</p>
--	---

Part B: Valuation of G-Secs (T-Bill, Cash management bills, G-Sec and SOL)

The following is the waterfall mechanism for valuation of Government securities:

- VWAY of last one hour, subject to outlier validation
- VWAY for the day (including a two quote, not wider than 5 bps on NDSOM), subject to outlier validation
- Two quotes, not wider than 5 bps on NDSOM, subject to outlier validation
- Carry forward of spreads over the benchmark
- Polling etc.

Note:

1. VWAY shall be computed from trades which meet the marketable lot criteria stated in Part A of these Guidelines.
2. Outlier criteria: Any trade deviating by more than +/- 5 bps post factoring the movement of benchmark security shall be identified as outlier. Such outlier shall be validated through polling for inclusion in valuations. If the trades are not validated, such trades shall be ignored.

The aforesaid provisions related to Waterfall approach for valuation of debt and money market securities prescribed by SEBI circular dated September 24, 2019 and AMFI circular dated November 18, 2019 shall be effective from the date of implementation of the requirements of the circular by the Valuation agencies.

12. Treatment of upfront fees on trades

- Upfront fees on all trades (including primary market trades), by whatever name and manner called, shall be considered by the valuation agencies for the purpose of valuation of the security.
- Details of such upfront fees shall be shared by the AMCs on the trade date to the valuation agencies as part of the trade reporting to enable them to arrive at the fair valuation for that date.
- For the purpose of accounting, such upfront fees shall be reduced from the cost of the investment in the scheme that made the investment.
- In case upfront fees are received across multiple schemes, then such upfront fees shall be shared on a pro-rata basis across such schemes.

13. Investment in partly paid debentures

- a) Mutual Fund schemes shall make investment in partly paid debentures only when payment of the remaining amount is linked to clear, pre-defined events (i.e., is subject to conditions precedent). For avoidance of doubt any event which is purely time based shall not be considered as a pre-defined event. Such conditions precedent should be clearly outlined in the Agreement for subscription of the debentures/ Offer Document for the issue, as the case may be. Conditions precedent mean the clearly defined obligations/ events that need to be fulfilled before calling upon the investor to make payment for the remaining portion of the subscription. Such obligations/ events, to name a few, could include achievement of certain milestones linked with the object for which the debentures were issued or linked to the enhancement of credit rating of the Issuer or linked to other financial or operating parameters of the Issuer or linked to

the happening of an event. AMCs shall not resort to the practice of investing in partly paid debentures without any condition precedent.

- There should not be any linkages across schemes while investing in partly paid debentures. For example: if the agreement for partly paid debentures also envisages investment in any other type of instrument such as a commercial paper, then the AMC should ensure that subscription to the residual part of the issue/ the investment in the other instrument is made by the scheme which made the original investment in partly paid debentures.
 - While investing in partly paid debentures, AMCs shall ensure that interest of one set of unitholders/ schemes is not compromised at the cost of another.
 - All regulatory limits have to be complied with at the time of each such part payment.
 - In order to avoid a situation where a MF scheme is unable to honor future part payments, AMCs should avoid excessive concentration in partly paid debentures.
- b) Any investment in partly paid debentures has to be disclosed in the monthly portfolio disclosures of the scheme. This should include, inter-alia, the amount that has been contracted but not yet paid by the scheme, the dates of such future pay-ins, triggers for future pay-ins as well as any other detail that in the fund house's view may be of material interest to its investors.

14. Valuation of stressed issuers and perpetual bonds

Financial stress on the issuer and capability to repay borrowings shall be reflected in valuation of securities from trigger date.

Maturity of all perpetual bonds shall be treated as 100 years from the date of issuance for the purpose of valuation.

15. Securities not covered under the current valuation policy

In case of securities purchased by mutual fund does not fall within the current framework of the valuation of securities then the mutual fund shall report immediately to AMFI regarding the same. Further, at the time of investment AMCs shall ensure that the total exposure in such securities does not exceed 5% of the total AUM of the scheme.

AMFI has been advised that the valuation agencies should ensure that the valuation of such securities gets covered in the valuation framework within six weeks from the date of receipt of such intimation from mutual fund.

In the interim period, till AMFI makes provisions to cover such securities in the valuation of securities framework, the mutual funds shall value such securities using their proprietary model which has been approved by their independent trustees and the statutory auditors.

16. Investment in new type of securities

Investment in new type of securities/assets by the Old Bridge MF scheme shall be made only after establishment of the valuation methodologies for such securities with the approval of the Board of the OBAMPL.

17. Inter-scheme transfers

a) Debt Securities:

- AMCs shall seek prices for IST of any money market or debt security (irrespective of maturity), from the valuation agencies.
- AMFI, in consultation with valuation agencies shall decide a turn-around-time (TAT), within which IST prices shall be provided by the agencies.
- If prices from the valuation agencies are received within the pre-agreed TAT, an average of the prices so received shall be used for IST pricing.
- If price from only one valuation agency is received within the agreed TAT, that price may be used for IST pricing.
- If prices are not received from any of the valuation agencies within the agreed TAT, AMCs may determine the price for the IST, in accordance with Clause 3 (a) of Seventh Schedule of SEBI (Mutual Funds) Regulations, 1996.

Clause 3 (a) - such transfers are done at the prevailing market price for quoted instruments on spot basis.

b) Equity Securities:

Inter-scheme transfer of equity securities would be affected at the prevailing spot market price of the security at the time the transfer is affected. For this purpose, at the time of affecting the inter-scheme transfer, a record of the prices for the security quoted in the relative stock exchange (i.e., NSE/BSE) or through the Bloomberg Terminal would be obtained, which would indicate the date, time and the currently quoted price. The price given in the quotation of the stock exchange would be the effective price for the inter-scheme transfer.

18. Review of valuation policies

The implemented valuation policies and procedures shall be regularly reviewed (at least once in a Financial Year) by an independent auditor to seek to ensure their continued appropriateness.

19. Consideration of price of same/similar securities

CRISIL and ICRA shall consider the price of same/similar securities under Scrip Level Valuation as per the methodology discussed and agreed with the AMFI.

20. Inter-day NAV computation methodology in case of debt ETF

SEBI, vide circular no. SEBI/HO/IMD/IMD-I/DOF5/P/CIR/2021/0606 dated 30 July 2021 has clarified that for transactions by Authorised Participants / Large investors, directly with AMCs, intra-day NAV, based on the executed price at which the securities representing the underlying index or underlying commodity(ies) are purchased / sold, shall be applicable.

Refer Annexure-1 for detailed Intra-day NAV computation methodology in case of Debt ETF.

21. Abnormal Events

Following are the illustrative types of events which could be classified as Abnormal situations and market disruptions where current market information may not be obtainable / adequate for valuation of securities: -

- Significant volatility in the capital markets.
- Natural disasters or public disturbances that force the markets to close unexpectedly.
- Major policy announcements by the Central Bank, the Government or the Regulator.
- Large redemptions.

Valuation Committee shall be responsible for monitoring abnormal situations. Under above mentioned abnormal situations and market disruptions, Valuation Committee shall seek the guidance of the OBAMPL Board/committee of the Board of Directors appointed for this purpose in deciding the appropriate methodology for Valuation of affected securities. Any such abnormal situations shall be reported to the board of the AMC at the subsequent meeting.

If the above-mentioned policies and procedures of valuation do not result in fair/ appropriate valuation, the Old Bridge Asset Management Private Limited shall deviate from the above-mentioned policies and procedures in order to value the assets/securities at fair value.

Any deviation from the disclosed valuation policy and procedures may be with appropriate reporting to Board of Trustees and the Board of the Asset Management Company and appropriate disclosures to investors.

ANNEXURE - 1

INTRA-DAY NAV COMPUTATION METHODOLOGY IN CASE OF DEBT ETF

OBAMPL shall follow the following procedure to compute the intra-day NAV of Debt ETF as per aforesaid circular. The same will be applicable for all ongoing subscription/redemption transactions received through Authorized Participants and Large Investors.

1. OBAMPL will execute the trade in index/similar securities (subject to regulatory limits) for valid large investor / Authorised participant transactions.
2. Trade shall be executed for the entire basket subscribed/redeemed by investor.
3. Executed trade value (at clean price) (brokerage and other transaction charges shall be appropriately adjusted) will be considered to compute the Intra-day NAV for the transaction.
4. In case of executed trade settlement at T+1 or more, the interest accrual amount shall be recovered/paid from/to investor from the trade date to settlement date.
5. Cash component will be the difference of number of basket subscribed/redeemed by investor, multiplied by value of per unit creation size as per previous day's NAV and total market value of securities (as per previous day's valuation prices) executed on the date of transaction.
6. The sum of amounts as mentioned in point 3, 4 and 5 will be divided by number of units subscribed/redeemed by investor to arrive at Intra-day NAV applicable for the transaction.
7. Additionally, Old Bridge Mutual Fund shall also recover the statutory levy and incidental charges, if any pertain to transaction from the investor.
8. In case of trade execution in new security (new in Mutual Fund universe) where previous day's SLV prices are not available, shall be obtained from valuation agencies to compute previous day's market value for executed securities. In case price is received from one valuation agency only, such price

will be considered. Trade executed price will be used in case if previous day's valuation prices are not received from both the valuation agencies.

COMPUTATION OF NAV

A. POLICY FOR COMPUTATION OF NAV

A mutual fund's NAV is an indicator of its market value. Therefore, NAV can be viewed to assess the current performance of a mutual fund. It is mandatory, as per SEBI guidelines, that all mutual funds publicly display their NAV by updating it on the AMC & AMFI website on every business day.

The AMC will calculate and disclose the first NAV of the newly launched scheme not later than 5 Business Days from the allotment of Units. Subsequently, the Net Asset Value (NAV) per Unit of the Scheme will be computed and disclosed at the close of every Business Day. The NAV of the scheme is computed by dividing the net assets of the Scheme by the number of Units outstanding under the Scheme on the valuation date. The AMC 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. In case of any conflict between the Principles of Fair Valuation and valuation guidelines specified by SEBI, the Principles of Fair Valuation shall prevail. The NAV's are declared after reducing the expense ratio as there are various expenses involved with respect to mutual fund scheme. The expense ratio includes management fees charges, operating costs, transfer agent costs, custodian and audit charges, and distribution and marketing expenses amongst others. NAV of Units of under the Scheme shall be calculated as shown below:

NAV (Rs.) per unit = (Market or Fair Value of the Scheme's Investments + Current Assets - Current Liabilities and Provisions) / No. of Units outstanding under each Scheme.

B. POLICY FOR COMPUTATION OF NAV IN FOREIGN SECURITIES

Please refer to the provisions of Valuation of Investment made in Foreign Equity mentioned in Statement of Additional Information.

C. PROCEDURE IN CASE OF DELAY IN DISCLOSURE OF NAV

The AMC shall update the NAVs on its website www.oldbridgemma.com and of the Association of Mutual Funds in India - AMFI (www.amfiindia.com) before 11.00 p.m. on every Business Day. Further, AMC shall extend the facility of sending latest available NAVs to unitholders through SMS, upon receiving a specific request in this regard.

In case of any delay, the reasons for such delay would be explained to AMFI in writing. If the NAVs are not available before the commencement of Business Hours on the following day due to any reason, the Mutual Fund shall issue a press release giving reasons and explaining when the Mutual Fund would be able to publish the NAV.

IX. TAX & LEGAL & GENERAL INFORMATION

A. Taxation on investing in Mutual Funds

The information furnished below outlines briefly the key income-tax implications applicable to the unit holders of the Scheme and to the Mutual Fund based on relevant provisions of the Income-tax Act, 1961 [as amended by the Finance Act, 2023 (FA 2023)] (collectively called 'the relevant provisions').

The information given is included only for general purpose and is based on advise received by the Asset Management Company (AMC) regarding the law and practice currently in force in India and the Investors / Unit holders should be aware that the relevant fiscal rules or their explanation may change. As is the case with any investment, there can be no assurance that the tax position or the proposed tax position prevailing at the time of an investment in the Scheme will endure indefinitely.

In view of the individual nature of tax consequences, each Investor / Unit holder is advised to consult his / her own professional tax advisor. The tax information contained in SAI alone is not sufficient and should not be used for the development or implementation of an investment strategy or construed as investment advice.

A. INCOME-TAX BENEFITS TO THE MUTUAL FUND

Old Bridge Mutual Fund is a Mutual Fund registered with the Securities & Exchange Board of India (SEBI) and, hence, the entire income of the Mutual Fund is exempt from income-tax in accordance with the provisions of Section 10(23D) of the Income-tax Act, 1961 (the Act).

The Mutual Fund will receive all income without any deduction of tax at source under the provisions of Section 196(iv) of the Act.

However, the Mutual Fund shall be liable to pay securities transaction tax (STT) in respect of certain transactions (refer Note 1).

B. INCOME-TAX BENEFITS TO THE UNIT HOLDERS

Tax on Income Distribution Cum Capital Withdrawal (IDCW) [also known as dividend income] distributed by the Mutual Fund.

Currently, the IDCW (also known as dividend income) is taxable in the hands of the unitholders at the applicable tax slab rates (Refer Note 2 for tax rates) and also, subject to withholding of taxes at source by Mutual Fund:

Particulars	Tax implications in IDCW received by unit holders	Withholding of Taxes by Mutual Fund
Resident (Individuals / Non-corporates / Corporates)	Taxed in the hands of unitholders at applicable rate under the provisions of the Act	10% under section 194K of the Act*
Non-residents (Individuals / Non-corporates / Corporates/ Foreign Portfolio Investors) **	Taxed in the hands of unitholders at the rate of 20% under section 115A/115AD of the Act (plus applicable surcharge and cess)	20% (plus applicable surcharge and cess) under section 196A/196D^ of the Act

* As per provision of section 194K of the Act, where the amount of income credited or paid in a financial year, in aggregate, does not exceed INR 5,000, no withholding is required to be carried out.

** As per the provisions of section 196A of the Act which is specifically applicable in case of non- resident unitholders, the Mutual Fund shall have to deduct TDS at the rate of 20% (plus applicable surcharge and cess) on IDCW (i.e. also known as dividend income) credited or paid or at a lower tax rate, if any, specified under the provisions of the Double Taxation Avoidance Agreement ('DTAA') between India and the country of residence of the unitholder. In order to avail the lower tax rate under the DTAA, the unit holder shall be required to furnish a tax residency certificate issued by the Revenue Authorities of the country of which the unit-holder is resident along with Form 10-F and such other information and documents as may be prescribed.

^ Section 196D of the Act provides for deduction of tax on income of FPI from securities as referred to in section 115AD(1)(a) of the Act (other than interest referred in section 194LD of the Act) at the rate of 20 percent. Section 196D of the Act also provides that tax shall be deducted on the above income, at the rate of 20 percent or the rates provided in the relevant DTAA, whichever is lower, provided the FPI furnishes a tax residency certificate and such other information and documents as may be prescribed.

Categories of Mutual Fund as per the provisions of the Act

Explanation to section 112A of the Act provides that:

“(a) **equity-oriented fund** means a fund set up under a scheme of a mutual fund specified under clause (23D) of section 10 and, –

- (i) in a case where the fund invests in the units of another fund which is traded on a recognised stock exchange¹, –
- (a) a minimum of ninety per cent of the total proceeds of such fund is invested in the units of such other fund; and
 - (b) such other fund also invests a minimum of ninety per cent of its total proceeds in the equity shares of domestic companies listed on a recognised stock exchange; and

(ii) in any other case, a minimum of sixty-five per cent of the total proceeds of such fund is invested in the equity shares of domestic companies listed on a recognized stock exchange.

Provided that the percentage of equity shareholding or unit held in respect of the fund, as the case may be, shall be computed with reference to the annual average of the monthly averages of the opening and closing figures.”

The mutual funds schemes other than the one defined above are collectively referred to as ‘other than equity-oriented mutual funds’ which *inter-alia* include the following:

- Liquid Funds / Money Market Funds / Income Funds (Debt Funds) / Gilt Funds
- Hybrid Fund (Equity exposure < 65%)
- Gold ETFs / Bond ETF / Liquid ETF
- Fund Of Funds (Domestic) other than Fund of funds as defined under the “Equity Oriented Fund” as defined above
- Fund Of Funds Investing Overseas
- Infrastructure Debt Funds
- Specified mutual funds as defined under section 50AA of the Act (Equity exposure < 35%)

Tax on Capital Gains on transfer of Mutual Fund Units

As per the provisions of section 2(42A) of the Act, a unit of an equity oriented Mutual Fund, held by the investor as a capital asset, is considered to be a short-term capital asset, if it is held for 12 months or less from the date of its acquisition by the unit holder. A unit of other than equity-oriented Mutual Fund is considered to be a short-term capital asset, if it is held for 36 months or less from the date of its acquisition by the unit holder.

Accordingly, if the unit of the equity-oriented Mutual Fund or other than equity-oriented mutual fund is held for a period of more than 12 months or 36 months respectively, it is treated as a long-term capital asset.

¹ Popularly known as “Fund of Funds”

Long Term Capital Gains - Equity-oriented Mutual Fund All Unit Holders

With effect from 1 April 2018, the exemption on long term capital gains on sale of Units as provided in clause (38) of section 10 of the Act has been withdrawn and section 112A of the Act for taxability of long-term capital gain arising from transfer of a long-term capital asset being a unit of equity- oriented fund has been introduced.

Under the provisions of section 112A of the Act, long term capital gain arising from transfer of a long-term capital asset shall be taxed @10% on entire capital gains exceeding Rs. 1,00,000. The said tax rate shall be increased by applicable surcharge and cess (Refer Note 3). The tax rate of 10% will be applicable to such long-term capital gains, if long term capital asset is in the nature of a unit of an equity-oriented fund and STT has been paid on transfer of such capital asset.

Further, the third proviso to section 48 of the Act, provides that the:

1. The long-term capital gains will be computed without giving effect to the first and second provisos to section 48, i.e. inflation indexation in respect of cost of acquisition and cost of improvement, if any, and the benefit of computation of capital gains in foreign currency in the case of a non-resident, will not be allowed.
2. Section 55(2) (ac) of the Act provides the mode of computation of cost of acquisition in respect of the long-term capital asset being an equity share in a company or unit of an equity-oriented fund or unit of business trust acquired by the assessee before the 1st day of February, 2018, shall be deemed to be the higher of –
 - a. the actual cost of acquisition of such asset; and
 - b. the lower of –
 - c.
 - i. the fair market value of such asset; *and
 - ii. the full value of consideration received or accruing as a result of the transfer of the capital asset.

*Fair market value has been defined to mean –

1. in a case where the capital asset is listed on any recognized stock exchange, the highest price of the capital asset quoted on such exchange on the 31st day of January, 2018. However, where there is no trading in such asset on such exchange on the 31st day of January, 2018, the highest price of such asset on such exchange on a date immediately preceding the 31st day of January, 2018 when such asset was traded on such exchange shall be the fair market value.
2. in a case where the capital asset is a unit of an equity oriented mutual fund and is not listed on recognized stock exchange, the net asset value of such asset as on the 31st day of January, 2018.

In case of individuals/ HUFs, being residents, where the total taxable income excluding long-term capital gains is below the maximum amount not chargeable to tax (refer note 2), then the difference between the current maximum amount not chargeable to tax and total income excluding long-term capital gains, shall be adjusted from long-term capital gains. Therefore, only the balance long term capital gains will be liable to income-tax at the rate of 10 percent, plus health and education cess.

STT is not deductible while computing capital gains.

Long Term Capital Gains - Other than equity-oriented Mutual Fund

Taxability in the hands of FPI unit holders

Long-term capital gains arising on sale / repurchase of other than equity-oriented mutual fund units shall be taxed at the rate of 10% under Section 115AD of the Act. The said tax rate shall be increased by applicable surcharge and health and education cess (refer Note 3). Such gains shall be calculated without inflation index and currency fluctuations.

Taxability in the hands of Specified overseas financial organisations ('offshore funds')

As per the provisions of section 115AB of the Act, long-term capital gains arising on sale / repurchase of units of other than equity-oriented mutual fund purchased in foreign currency shall be liable to tax at the concessional rate of 10%. The said tax rate shall be increased by applicable surcharge and health and education and cess (refer Note 3). However, such gains shall be computed without the benefit of cost indexation where the gross total income of the offshore fund consists only of income from units or income by way of long-term capital gains arising from the transfer of units.

Taxability in the hands of Unit holders other than FPI and offshore funds

Long-term capital gains arising on sale / repurchase of units of other than equity-oriented mutual fund shall be chargeable under Section 112 of the Act, at concessional rate of tax, at 20%. The said tax rate shall be increased by applicable surcharge and health and education cess (refer note 3).

The following amounts shall be deductible from the full value of consideration, to arrive at the amount of capital gains:

- Cost of acquisition of Units as adjusted by Cost Inflation Index notified by the Central Government, and
- Expenditure incurred wholly and exclusively in connection with such transfer.

In case of individuals/ HUFs, being residents, where the total taxable income excluding long-term capital gains is below the maximum amount not chargeable to tax (refer note 2), then the difference between the current maximum amount not chargeable to tax and total income excluding long-term capital gains, shall be adjusted from long-term capital gains. Therefore, only the balance long term capital gains will be liable to income-tax at the rate of 20 percent, plus health and education cess.

In case of Unlisted units of mutual funds:

Further, long-term capital gains arising out of the transfer of unlisted units of mutual funds in case of non-resident unit holders, shall be subject to tax at the rate of 10% (plus applicable surcharge and health and education cess – Refer Note 3) without giving effect to indexation and foreign exchange fluctuation benefit.

Short-term Capital Gains - Equity-oriented Mutual Fund Taxability in

the hands of All unit holders

As per Section 111A of the Act, short-term capital gains arising from the sale of a unit of an equity-oriented fund is taxed at 15% provided such transaction of sale is chargeable to STT.

The said tax rate shall be increased by applicable surcharge and cess (Refer Note 3).

In case of individuals/ HUFs, being residents, where the total taxable income excluding short-term capital gains is below the maximum amount not chargeable to tax (refer note 2), then the difference

between the current maximum amount not chargeable to tax and total income excluding short-term capital gains, shall be adjusted from short-term capital gains. Therefore, only the balance short term capital gains will be liable to income-tax at the rate of 15 percent, plus health and education cess.

Short-term Capital Gains - Other than equity-oriented mutual fund Taxability

in the hands of FPI unit holders

Short-term capital gains arising on sale / repurchase of units of other than equity-oriented mutual fund shall be taxed at the rate of 30% (as increased by applicable surcharge and education cess, if any (refer Note 3)).

Taxability in the hands of unitholders other than FPI

Short-term capital gains arising on sale / repurchase of units of other than equity-oriented mutual fund shall be taxed at following rates (as increased by applicable surcharge and education cess, if any (refer Note 3)).

Investors	Tax rate (refer note 2)
Individual, HUF, AOP, BOI	Slab rate
Firm	30%
Resident company	30%/25%/22%/15% (detail in Note 2)
Foreign company	40%

In case of individuals/ HUFs, being residents, where the total taxable income excluding short-term capital gains is below the maximum amount not chargeable to tax (refer note 2), then the difference between the current maximum amount not chargeable to tax and total income excluding short-term capital gains, shall be adjusted from short-term capital gains. Therefore, only the balance short term capital gains will be liable to income-tax at the slab rates, plus health and education cess.

Relief under double taxation avoidance agreement (DTAA)

Section 90 of the Act provides that where a double taxation avoidance agreement (DTAA) has been executed between the Government of India and the Government of any other country, the provisions of the Act will apply to the extent they are more beneficial to the non-resident unit holder. Section 90(4) of the Act provides that a tax payer, not being a resident, to whom a DTAA applies, shall not be entitled to claim any relief under such DTAA unless a certificate of it being a resident in a country outside India i.e. a Tax Residency Certificate ('TRC') is obtained from the Government / Revenue Authorities of that country. Further, in addition to the TRC, in order to claim the benefit of lower tax rate specified under the Article of the DTAA, information as per Form 10F or such other specified Form / document as may be required under the Act is to be furnished.

Capital gains in respect of Specified mutual funds as defined under section 50AA of the Act

As per Finance Act, 2023, new Section 50AA of the Act is introduced which states that the gains from transfer or redemption or maturity of unit of a Specified Mutual Fund acquired on or after 1 April 2023, will be taxed as **deemed short-term capital gains** at applicable rates irrespective of the period of holding. Accordingly, even if the units of such specified mutual fund are held for a period of more than 36 months, upon transfer or redemption or maturity of such units, short term capital gains tax would apply.

Specified Mutual Fund means a Mutual Fund, **where not more than 35% of its total proceeds is invested in the equity shares of domestic companies**. The percentage of equity shareholding held in respect of

the Specified Mutual Fund shall be computed with reference to the annual average of the daily closing figures.

Tax Deduction at Source on capital gains

Resident Unit holders

No tax is required to be deducted at source from capital gains arising to resident investors at the time of repurchase or redemption of the units. Please note that withholding under section 194K of the Act is not applicable on capital gains arising on redemption of units of mutual fund.

Foreign Portfolio Investors ('FPI')

Under Section 196D of the Act, no deduction shall be made from any income by way of capital gains, in respect of transfer of units referred to in Section 115AD of the Act.

Specified overseas financial organizations ('offshore funds')

As per section 196B of the Act, income-tax is deductible on long-term capital gains arising on sale / repurchase of units of other than equity oriented mutual fund purchased in foreign currency, at the rate of 10 per cent. The said tax rate shall be increased by applicable surcharge and cess (refer Note 3). Income-tax is deductible on short-term capital gains arising on sale / repurchase of such units at the rate of 40 per cent plus applicable surcharge and cess (refer Note 3) in case of foreign companies; and 30 per cent plus applicable surcharge and cess (refer Note 3) in case of non-corporate Unit holders.

Non-resident Unit holders other than FPI and Offshore Funds

Income-tax is deductible at source on short-term capital gains arising on sale / repurchase of units of equity oriented mutual fund at the rate of 15% plus applicable surcharge and health and education cess (refer Note 3).

Income-tax is deductible on long-term capital gains arising on sale / repurchase of unit of equity-oriented fund referred to above at the rate of 10 % plus applicable surcharge and cess (refer Note 3).

Tax at source on long-term capital gains arising on sale / repurchase of units of other than equity-oriented mutual fund it shall be deducted at the rate of 20 per cent in case of listed units (capital gains to be calculated with indexation) and 10 per cent in case of unlisted units (capital gains to be calculated without indexation). Surcharge on income-tax will be levied as applicable and cess (refer Note 3).

Tax is deductible on short-term capital gains arising on sale / repurchase of units at the marginal rates, viz. at 30 per cent in case of individuals (assuming the individual falls in the highest tax bracket) and other non-corporate Unit holders; and at 40 per cent in case of corporate Unit holders (being non-resident). Surcharge on income-tax will be levied as applicable and cess (refer Note 3).

However, in case of such other non-resident unit holder who is a resident of a country with which India has signed a DTAA (which is in force), income-tax is payable at the rate provided in the Act or the rate provided in the said agreement, whichever is more beneficial to such other non-resident unit holder which can be claimed in the return of income to be filed by such investors. In order to avail the lower tax rate under the DTAA, the unit holder shall be required to furnish a tax residency certificate issued by the Revenue Authorities of the country of which the unit-holder is resident along with Form 10-F and such other information and documents as may be prescribed.

If the non-resident unit holder produces a nil or lower withholding certificate from the income tax authorities, then tax shall be deducted at such rates mentioned in the certificate during the validity of the certificate.

Exemption of long-term capital gain from income tax by investing in residential house property

As per the provisions of Section 54F of the Act and subject to the conditions specified therein, in case of an individual or a HUF, capital gains arising on transfer of a long-term capital asset (not being a residential house) shall not chargeable to tax, if the entire consideration received on such transfer is invested within the prescribed period in one residential house property. Thus, if the consideration on transfer / redemption of mutual funds is invested within the prescribed period in one residential house, then long term capital gains arising from such transfer / redemption (subject to upper ceiling of Rs 10 crores) would not be chargeable to tax. Each Investor is advised to consult his / her or its own professional tax advisor before taking the benefit under this provision.

Certain deductions available under Chapter VI-A of the Act (Equity Linked Savings Schemes)

Equity Linked Savings Schemes (ELSS) are schemes formulated under the Equity Linked Savings Scheme (ELSS), 2005, issued by the Central Government.

Accordingly, any investment made by an assessee in the ELSS of the Fund up to a sum of Rs. 150,000/- in a financial year would qualify for deduction under Section 80C of the Act.

An “assessee” as per ELSS 2005 means:—

- (i) an individual; or
- (ii) a Hindu undivided family; or
- (iii) an association of persons or a body of individuals consisting, in either case, only of husband and wife governed by the system of community of property in force in the State of Goa and Union Territories of Dadra and Nagar Haveli and Daman and Diu by whom, or on whose behalf, investment is made;

Note-

Section 115BAC of the Act provides an optional tax regime for the taxpayers like individual and HUF, where taxpayers are given an option to pay taxes at a concessional rate (slab rates) from Financial year (FY) 2020-21 onwards. Any individual/ HUF opting to be taxed under such tax regime from FY 2020-21 onwards will have to forgo certain exemptions and deductions. Since, individuals/ HUF opting for the optional tax regime are not eligible for Chapter VI-A deductions, the investment in ELSS Funds cannot be claimed as deduction from the total income.

Minimum Alternate Tax (All Corporate investors)

Section 115JB(1) of the Act provides that, if the tax payable by a company on the total income computed as per the provisions of the Act is less than 15 per cent of its 'book profit', then notwithstanding anything contained in any other provision of the Act, the 'book profit' shall be deemed to be the total income of the tax payer, and the amount of tax payable shall be the amount of income-tax at the rate of 15 per cent (plus applicable surcharge and health and education cess) on such total income. This tax prescribed on book profits under section 115JB is commonly referred to as MAT.

MAT provisions shall not be applicable and shall be deemed to have never been applicable to a foreign company:

- i. if such foreign company is a resident of a country or specified territory with which the Government of India has entered into a DTAA or such other agreement as specified in Section 90 A (1) of the Act, and the foreign company does not have a permanent establishment in India in accordance with the provisions of such agreement; or
- ii. if the foreign company is a resident of a country with which India does not have an agreement as stated above and the foreign company is not required to seek registration under any law for the time being in force relating to companies.

Further, the provisions of this aforementioned section shall not be applicable and shall be deemed never to have been applicable to an assessee being a foreign company where its total income comprises solely of profits and gains from business referred to in section 44B, 44BB, 44BBA or 44BBB of the Act and such income has been offered to tax at the rates specified in those sections.

Further, MAT shall not be applicable to resident companies opting taxation under section 115BAA and section 115BAB (Refer Note 2).

Deduction for the Securities Transaction Tax

As per the Finance Act, 2008 deduction in respect of STT paid is allowed in the computation of business income. This is subject to the condition that such income from taxable securities transaction is included under the head "profit and gains from business and profession".

Religious and Charitable Trusts

Investments in Units of the Mutual Fund will rank as an eligible form of investment under Section 11(5) of the Act read with Rule 17C of the Income-tax Rules, 1962 (Rules), for Religious and Charitable Trusts.

Set off of Capital losses

The long-term capital loss suffered on sale / repurchase of units shall be available for set off against long-term capital gains arising on sale of other assets and balance unabsorbed long-term capital loss shall be carried forward for set off only against long-term capital gains in subsequent years.

Short-term capital loss suffered on sale / repurchase of units shall be available for set off against both long-term and short-term capital gains arising on sale of other assets and balance unabsorbed short-term capital loss shall be carried forward for set off against capital gains in subsequent years.

Such carry forward is admissible maximum upto eight assessment years.

Each Investor is advised to consult his / her or its own professional tax advisor before claiming set off of long-term capital loss arising on sale of units of an equity-oriented fund/ other than equity-oriented fund referred to above, against long-term capital gains arising on sale of other assets.

Bonus stripping

Additionally, as per section 94(8) of the Act, wherein in case of securities and units purchased within a period of three months prior to the record date for entitlement of bonus and sold within nine months after the record date, the loss arising on transfer of original securities and units shall be ignored for the purpose of computing the income chargeable to tax. The loss so ignored shall be treated as cost of acquisition of such bonus units.

Furnishing of Permanent Account Number (PAN)

As per the provisions of the section 206AA of the Income-tax Act, 1961, any person whose receipts are subject to deduction of tax at source shall mandatorily furnish his PAN to the deductor failing which the deductor shall deduct tax at source at higher of the following rates:

- a. the rate prescribed in the Act;
- b. at the rates in force (this takes into account the rates as per the DTAA)
- c. at the rate of 20%

The provisions of Section 206AA of the Act shall not apply to anon-resident investor if he receives income in the nature of interest, royalty, fees for technical services, dividend or transfer of any capital asset and provides a copy of a tax residency certificate obtained from the Revenue Authorities / Government of its country along with such other information as prescribed under Rule 37BC of the Income-tax Rules instead of the PAN. In view of the same, a non-resident is technically required to have a PAN or such other document as may be prescribed under the provisions of the Act and non-availability of the same may result in withholding tax at higher rate. However, if PAN or such other document prescribed as stated above is available, then the beneficial rates as per DTAA (if applicable) can be availed subject to deductee being eligible for DTAA benefits.

Manner of making Permanent Account Number (PAN) inoperative

Rule 114AAA of the Rules provides that where a taxpayer does not link his PAN with his Aadhaar number, then PAN of such a taxpayer shall become inoperative and consequences for not furnishing, intimating or quoting of PAN under the Act shall be applicable. However, PAN will again become operative as and when the taxpayer links it with the Aadhaar number.

In this regard, Central Board of Direct Taxes (CBDT) vide Notification No. 37/2017, F. No. 370133/6/2017-TPL, dated 11 May 2017 has clarified that provisions of section 139AA of the IT Act shall not apply to an individual who does not possess the Aadhaar number or the Enrolment ID and is a non-resident as per the Act.

Given that provisions of section 139AA of the Act does not apply to a non-resident, consequently, the provisions of Rule 114AAA of the Rules shall also not apply in respect of such non-resident.

Wealth-tax

The provisions of Wealth Tax Act cease to apply from A.Y 2016-17 i.e. there will be no wealth tax liability for F.Y 2015-16 onwards.

Gift Tax

Since the provision of Gift Tax Act, 1958 have ceased to apply with effect from October 1,1998, gift of units of mutual funds made on or after October 1,1998 will not be liable to Gift Tax under the Gift Tax Act, 1958. However, pursuant to the Finance Act, 2009, Section 56 of the Income Tax Act has been amended to provide that value of any property, including units of mutual funds, received without consideration or for inadequate consideration on or after October 1, 2009 (from the person or in situations other than those exempted under Section 56(2)(vii) of the Act) will be included in the computation of total income of the recipient and be subject to tax on the difference between the fair market value of such units and the consideration at which it is acquired. With effect from 1 April 2017, section 56(2)(vii) of the Act has now been replaced with section 56(2)(x) of the Act.

Note 1: Rates of STT in respect of Units equity-oriented mutual fund Schemes

Nature of Transaction	Payable by	Value on which tax shall be levied	Rates (%)
Delivery based sale transaction in units of equity-oriented fund entered in a recognized stock exchange	Seller	Value at which units are sold	0.001
Non-delivery-based sale transaction in equity shares or units of equity-oriented fund entered in a recognised stock exchange.	Seller	Value at which shares/units are sold	0.025
Sale of units of an equity-oriented fund to the mutual fund	Seller	Value at which units are sold	0.001
Purchase of units of equity-oriented mutual fund	Not Applicable	Not Applicable	NIL

Value of taxable securities transaction in case of units shall be the price at which such purchased or sold.

Note 2:

Rates of income-tax

Individuals, Hindu Undivided Families, Association of Persons, Body of individuals, Non-Resident Indian and PIOs*	Total income for a tax year	Tax
	<= Rs. 2.50 lacs	Nil (basic exemption limit#)
	> Rs. 2.5 lacs and <=Rs 5 lacs	5% of total income exceeding Rs 2.5 lacs
	> Rs 5 lacs and <=Rs 10 lacs	Rs. 12,500 /- plus 20% of amount exceeding Rs 5 lacs
	> Rs 10 lacs	Rs.1,12,500 /- plus 30% of amount exceeding Rs 10 lacs
# Basic exemption limit for resident individuals of the age of 60 years or more but less than 80 years is Rs. 3 lacs, for individuals of the age of 80 years or more (very senior citizens) is Rs. 5 lacs. An additional rebate upto Rs 12,500 /- is being provided for residential individuals whose income doesn't exceed Rs 5,00,000 /-		
Partnerships (including LLPs)	30%	
Domestic company (adopting the new taxation regime provided under Section 115BAA) ²	22%	
Domestic manufacturing company ³ (adopting the new taxation regime provided under Section 115BAB)	15%	
Domestic company having turnover/ gross receipt not exceeding Rs 400 crores in financial year 2021-22 [if it does not exercise to adopt the new taxation regime which has the basic tax rate of 22% / 15%]	25%	
Domestic Company (having turnover / gross receipt exceeding Rs 400 crores in FY 2019-20) [if it does not exercise to adopt the new taxation regime which has the basic tax rate of 22% / 15%]	30%	
Resident companies	30%/25%/ 22%/15%	
Foreign companies other than FPIs	40%	

*Section 115BAC of the Act provide individuals and HUFs for an option to pay taxes as per concessional tax slabs which are as follows:

Total income for a tax year	Tax Rate
<= Rs. 3 lacs	Nil (basic exemption limit)
> Rs. 3 lacs and <=Rs 6 lacs	5% of total income exceeding Rs 3 lacs
> Rs. 6 lacs and <=Rs 9 lacs	Rs 15,000 plus 10% of the amount by which the total income exceeds Rs 6 lacs

² Such companies would not be entitled to certain tax exemptions and deductions viz. 80G. Such companies would also not be subject to MAT. Such option once exercised, cannot be subsequently withdrawn.

³ Companies engaged in manufacturing of any article or thing incorporated on or before from 31st March 2024. Also, subject to other conditions stipulated under section 115BAB. Such companies would not be entitled to certain tax exemptions and deductions viz. section 80G. Such companies would also not be subject to MAT. Such option once exercised, cannot be subsequently withdrawn.

> Rs. 9 lacs and <=Rs 12 lacs	Rs 45,000 plus 15% of the amount by which the total income exceeds Rs 9 lacs
> Rs. 12 lacs and <=Rs 15 lacs	Rs 90,000 plus 20% of the amount by which the total income exceeds Rs 12 lacs
> Rs. 15 lacs	Rs 150,000 plus 30% of the amount by which the total income exceeds Rs 15 lacs

Rebate of lower of actual tax liability or Rs. 25,000 available in case of resident individuals having total income not exceeding Rs. 7 lacs. Further, marginal relief available, to the extent the income-tax payable on total income exceeds the total income above INR 7 lakhs.

Note - Any individual/ HUFs opting to be taxed under the above tax regime from FY 2023-24 onwards will have to forgo certain exemptions and deductions. Further, individuals and HUF who do not have business income or income from profession can opt for new tax regime on a year on year basis. However, taxpayers earning business income or income from profession can opt into the regime only once on irrevocable basis. Such option will apply to all subsequent tax years and in a case where such option is withdrawn by the taxpayer, he shall not be eligible to avail the concessional slab rates in subsequent years until he ceases to have business income or income from profession.

Note 3: Surcharge rate

Individual/ HUF/ AOP/ BOI (Residents and non-residents)

Income	Surcharge rate	Cess
(a) Rs.50 lakh to 1 crore (including dividend and capital gains income)	10%	4% on tax plus Surcharge, applicable in all cases
(b) Above Rs 1 crore upto Rs 2 crores (including dividend and capital gains income)	15%	
(c) Above Rs 2 crores upto Rs 5 crores (excluding dividend (dividend received from domestic companies only) and short capital gains income under section 111A and long-term capital gains under section 112 and 112A of the Act)	25%	
(d) Above Rs 5 crores (excluding dividend (dividend received from domestic companies only) and short-term capital gains income under section 111A and long-term capital gains under section 112 and 112A of the Act)	37%*	
(e) Above 2 crores [comprising of dividend income (dividend received from domestic companies only) and short-term capital gains income under section 111A and long-term capital gains under section 112 and 112A of the Act)] but not covered in point (c) and (d) above	15%	

*Please note that where the Assessee has opted for taxation under the new tax regime under section 115BAC of the Act, the surcharge rate shall not exceed 25%.

Companies

Income	Resident companies*	Foreign Company/ Corporate FPIs	Cess
Above Rs 1crore upto Rs 10 crores	7%	2%	4% on tax plus Surcharge, applicable in all cases
Above Rs 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.

In case of firm with total income exceeding Rs.1 crore, surcharge rate shall be 12%.

B. Legal Information

1. Nomination Facility

- i. Pursuant to Regulation 29A of the SEBI Regulations, the AMC provides an option to the Unit holder to nominate (in the manner prescribed under the SEBI Regulations), a person(s) in whom the Units held by him shall vest in the event of his death. Where the Units are held by more than one person jointly, the joint Unit holders may together nominate a person(s) in whom all the rights in the Units shall vest in the event of death of all the joint Unit holders. By provision of this facility the AMC is not in any way attempting to grant any rights other than those granted by law to the nominee(s).
- ii. A nomination in respect of the Units does not create an interest in the property after the death of the Unit holder. The nominee(s) shall receive the Units only as an agent and trustee for the legal heirs or legatees as the case may be. It is hereby clarified that the nominees(s) under the nomination facility provided herein shall not necessarily acquire any title or beneficial interest in the property by virtue of this nomination.
- iii. Nomination can be made only by individuals on their own behalf, either singly or jointly. Non- individuals including society, trust, body corporate, partnership firm, Karta of Hindu Undivided Family, holder of Power of Attorney cannot nominate.
- iv. Only the following categories of Indian Residents can be nominated: (a) individuals (b) minors through parent/legal guardian (c) religious and charitable trusts and (d) Central Government, State Government, a local authority or any person designated by virtue of his office.
- v. The Nominee shall not be a trust other than a religious or charitable trust, society, body corporate, partnership firm, Karta of Hindu Undivided Family or a Power of Attorney holder.
- vi. A non-resident Indian can be a Nominee subject to the exchange controls in force from time to time.
- vii. Minor(s) can be nominated and in that event, the name and address of the guardian of the minor nominee shall be provided by the Unit holder. Nomination can also be in favour of the Central Government, State Government, a local authority, any person designated by virtue of his office or a religious or charitable trust.
- viii. Nomination can be made for maximum of 3 nominees. In case of multiple nominees, the percentage of allocation / share in favour of each of the nominees should be indicated against their name and such allocation / share should be in whole numbers without any decimals making a total of 100 percent. In the event of Unit holders not indicating the percentage of allocation / share for each of the nominees, the Mutual Fund /the AMC, by invoking default option shall settle the claim equally amongst all the nominees.
- ix. Nomination in respect of the Units stands rescinded upon the Redemption of Units.
- x. Cancellation of nomination can be made only by those individuals who hold Units on their own behalf singly or jointly and who made the original nomination. On cancellation of the nomination the nomination shall stand rescinded and the Mutual Fund / AMC shall not be under any obligation to transfer the Units in favour of the nominee(s).
- xi. The nomination facility extended under the Scheme is subject to existing laws. The AMC shall, subject to production of such evidence which in their opinion is sufficient, proceed to effect the payment/transfer to the Nominee(s). Transfer of Units / payment to the nominee(s) of the sums shall discharge the Mutual Fund / AMC of all liability towards the estate of the deceased Unit holder and his/her/their successors/legal heirs.
- xii. The Fund, the AMC and the Trustee are entitled to be indemnified from the deceased Unit Holder's estate against any liabilities whatsoever that any of them may suffer or incur in connection with a nomination.
- xiii. Nomination will be mandatory for new folios/accounts opened by individuals especially with sole/single holding.
- xiv. Investors who do not wish to nominate must sign separately confirming their non-intention to nominate.
- xv. In case of joint holdings in a folio, all joint holders will be required to sign the request for nomination/cancellation of nomination, even if the mode of holding is not joint. The facility

to nominate will not be available in a folio held on behalf of a minor. Nomination form cannot be signed by Power of Attorney (PoA) holders.

- xvi. The facility to nominate will not be available in a folio held on behalf of a minor.
- xvii. Nomination shall be maintained at the folio or account level and shall be applicable for investments in all schemes in the folio or account.
- xviii. Every new nomination in a folio will over write the existing nomination.
- xix. In terms clause 17.16 of Master Circular, Investors subscribing to mutual fund units, will have the choice of:
 - Providing nomination in the format specified in fourth schedule of SEBI (Mutual Funds) Regulations, 1996 (or)
 - In case investor wishes to opt- out of nomination need to submit a signed Declaration form as provided by AMC.

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). In case of online option, instead of wet signature(s) of all the unit holder(s), AMCs shall validate the forms:

- a) Using e-Sign facility recognized under Information Technology Act, 2000; or
- b) 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.

AMC shall provide an option to unit holders to submit either nomination form or declaration to opt out of nomination. This shall be provided either in physical or online mode as per choice of unit holder. For physical form, the form shall carry wet signature of all unit holders. For online option, the form shall be signed using e-Sign facility as recognised under Information Technology Act, 2000, instead of wet signature.

AMC to ensure adequate systems in place for providing e-Sign facility and take all necessary steps to maintain confidentiality and safety of client records.

For Units of the Scheme(s) held in demat mode - the nomination details provided by the Unitholder to the Depository will be applicable to the Units of the Scheme. Such nomination including any variation, cancellation or substitution of Nominee(s) shall be governed by the rules and byelaws of the Depository

Investors may note that where the Units are transferred in favour of the nominee, the "Know Your Customer" norms, where applicable will have to be fulfilled by the nominee.

2. Prevention of Money Laundering - Know Your Customer (KYC) Compliance

- i. Prevention of Money Laundering Act, 2002 (hereinafter referred to as "Act") came into effect from July 1, 2005 vide Notification No. GSR 436(E) dated July 1, 2005 issued by Department of Revenue, Ministry of Finance, Government of India. Further, SEBI vide its circular reference number ISD/CIR/RR/AML/1/06 dated January 18, 2006 including amendments thereto mandated that all intermediaries including mutual funds should formulate and implement a proper policy framework as per the guidelines on anti-money laundering measures and also to adopt a Know Your Customer (KYC) policy. The intermediaries may, according to their requirements specify additional disclosures to be made by clients for the purpose of identifying, monitoring and reporting incidents of money laundering and suspicious transactions Undertaken by clients. SEBI vide Circular No. CIR/ISD/AML/3/2010 dated December 31, 2010 issued a 'Master Circular on Anti Money Laundering (AML) Standards/Combating the Financing of Terrorism (CFT)/Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002' which has been most recently updated on February 03, 2023 consolidating all the requirements/instructions/obligations of Securities Market Intermediaries issued under the various circulars issued by SEBI with regard to AML/CFT up to date, whereby all intermediaries are advised to take necessary steps to ensure compliance with the requirement of the PML Act inter alia for the maintenance and preservation of

records and reporting of information relating to cash and suspicious transactions to Financial Intelligence Unit-India (FIU-IND), New Delhi.

- ii. All investors shall complete a one-time process of KYC, which is mandatory for any amount of investment for the New / Additional Purchases, Switch Transactions, New SIP Registration, New STP Registrations.
- iii. The investor(s) should ensure that the amount invested in the scheme is through legitimate sources only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, Prevention of Money Laundering Act, Prevention of Corruption Act and / or any other applicable law in force and also any laws enacted by the Government of India from time to time or any rules, regulations, notifications or directions issued thereunder.
- iv. Investors should note that it is mandatory for all applications for subscription of any amount to quote the KYC Compliance Status of each applicant (guardian in case of minor) in the application for subscription and attach proof of KYC Compliance viz. KYC Acknowledgement Letter Printout of KYC Compliance Status downloaded from KRA website using the PAN Number.

*Valid only where investors who have already obtained the erstwhile Mutual Fund Identification Number (MIN) by submitting the PAN copy as the proof of identity.

- v. Applicants intending to apply for units through a Power of Attorney (PoA) must ensure that the issuer of the PoA and the holder of the PoA must mention their KYC Compliance Status and attach proof of KYC Compliance at the time of investment. In the event of non-compliance of KYC requirements, the Trustee / AMC reserves the right to freeze the folio of the investor(s) folio.
- vi. To ensure appropriate identification of the investor(s) under its KYC policy and with a view to monitor transactions for the prevention of money laundering, the AMC / the Mutual Fund reserves the right to seek information, record investor's telephonic calls and / or obtain and retain documentation for establishing the identity of the investor, proof of residence, source of funds, etc. It may re-verify identity and obtain any incomplete or additional information for this purpose.
- vii. The investor(s) and their attorney, if any, shall produce reliable, independent source documents such as photographs, certified copies of ration card/ passport/ driving license/PAN card, etc. and/or such documents or produce such information as may be required from time to time for verification of the identity, residential address and financial information of the investor(s) by the AMC/Mutual Fund.
- viii. If the investor(s) or the person making payment on behalf of the investor(s), refuses / fails to provide the required documents/ information within the period specified in the communication(s) sent by the AMC to the investor(s) then the AMC, after applying appropriate due diligence measures, believes that the transaction is suspicious in nature within the purview of the Act and SEBI circulars issued from time to time and/or on account of deficiencies in the documentation, shall have absolute discretion to report suspicious transactions to FIU-IND and / or to freeze the folios of the investor(s), reject any application(s) / allotment of units.
- ix. The KYC documentation shall also be mandatorily complied with by the holders entering the Register of Unitholders by virtue of operation of law e.g. transmission, etc. The Mutual Fund, AMC, Trustee and their Directors, employees and agents shall not be liable in any manner for any claims arising whatsoever on account of freezing the folios / rejection of any application / allotment of units due to non-compliance with the provisions of the Act, SEBI circular(s) and KYC policy and / or where the AMC believes that transaction is suspicious in nature within the purview of the Act and SEBI circular(s) and reporting the same to FIU-IND.

Know Your Customer (KYC) Procedure - KYC Registration Agency (KRA)

Investors may note that pursuant to SEBI Circular no. MIRSD/ Cir-26/ 2011 dated December 23, 2011, SEBI (KYC Registration Agency) Regulations, 2011 and SEBI Circular no. MIRSD/SE/Cir-21/2011 dated October 5, 2011, regarding uniformity in the Know Your Customer (KYC) process in the securities market and development of a mechanism for centralization of the KYC records to avoid duplication of KYC Process across the intermediaries in the securities market, with effect from January 1, 2012.

- a. SEBI has introduced a common KYC Application Form for all the SEBI registered intermediaries viz. Mutual Funds, Portfolio Managers, Depository Participants, Stock Brokers, Venture Capital Funds, Collective Investment Schemes, etc. New Investors are therefore requested to use the common KYC Application Form and carry out the KYC process including In-Person Verification (IPV) with any SEBI registered intermediaries including mutual funds.
- b. The Mutual Fund shall perform the initial KYC of its new investors and may undertake enhanced KYC measures commensurate with the risk profile of its investors. The Mutual Fund shall upload the details of the investors on the system of the KYC Registration Agency (KRA). Registrar & Transfer Agent (RTA) of the Mutual Fund may also undertake the KYC of the investors on behalf of the Mutual Fund. KRA shall send a letter to the investor within 10 working days of the receipt of the initial/updated KYC documents from the Mutual Fund, confirming the details thereof.
- c. Once the investor has done KYC with a SEBI registered intermediary, the investor need not undergo the same process again with another intermediary including mutual funds. However, the Mutual Fund reserves the right to carry out fresh KYC/additional KYC of the investor.
- d. It is mandatory for intermediaries including mutual funds to carry out In-Person Verification (IPV) of its new investors from January 1, 2012. The IPV carried out by any SEBI registered intermediary can be relied upon by the Mutual Fund. Old Bridge Asset Management Private Limited and NISM / AMFI certified distributors who are KYD compliant are authorised to undertake the IPV for Mutual Fund investors. Further, in case of any applications received directly (i.e. without being routed through the distributors) from the investors, the Mutual Fund may rely upon the IPV (on the KYC Application Form) performed by the scheduled commercial banks.
- e. Existing KYC compliant investors of the Mutual Fund can continue to invest as per the current practice.

Please refer to the paragraph "How to apply" for the process to complete KYC formalities.

Operationalisation of Central KYC Records Registry (CKYCR)

Central Registry of Securitisation and Asset Reconstruction and Security interest of India ("CERSAI") has been authorised by Government of India to act as Central KYC Records Registry under Prevention of Money-Laundering (Maintenance of Records) Rules, 2005 ("PMLA Rules").

SEBI vide its circular no. CIR/MIRSD/66/2016 dated July 21, 2016 and circular no. CIR/MIRSD/120/2016 dated November 10, 2016 has prescribed that the Mutual Fund/ AMC should capture KYC information for sharing with CKYCR as per the KYC template prescribed by CERSAI.

In accordance with the aforesaid SEBI circulars and AMFI best practice guidelines for implementation of CKYC norms with effect from February 1, 2017:

- a. Individual investors who have never done KYC process under KRA regime i.e. a new investor who is new to KRA system and whose KYC is not registered or verified in the KRA system shall be required to provide KYC details in the CKYC Form to the Mutual Fund/ AMC. The said form is available on Old Bridge Mutual Fund website www.oldbridgemf.com.
- b. Individual investor who fills old KRA KYC Form, should provide additional / missing information using Supplementary KYC Form or fill CKYC Form.
- c. Details of investors shall be uploaded on the system of CKYCR and a 14 digit unique KYC identifier ('KIN') will be generated for such customer.
- d. New investors, who have completed CKYC process & have obtained KIN may quote their KIN in the application form instead of submitting CKYC Form/ Supplementary KYC Form.

- e. AMC/ Mutual Fund shall use the KIN of the investor to download the KYC information from CKYCR system and update its records.
- f. If the PAN of investor is not updated on CKYCR system, the investor should submit self-certified copy of PAN card to the Mutual Fund/ AMC.

The AMC reserves the right to reject transaction application in case the investor(s) fails to submit information and/or documentation as mentioned above. In the event of non-compliance of KYC requirements, the Trustee / AMC reserves the right to freeze the folio of the investor(s).

Effective from April 1, 2024, KYC status for the investors who are new to Old Bridge MF should be "Validated" else the application needs to be submitted along with the duly completed Re-KYC form with valid proofs at the nearest ISC. Further, as per the New PAN validation process effective from April 30, 2024, name on the application should be mentioned as per Income Tax Department/ PAN Card.

In view of non-availability of source validation of passport and in view of facilitation of Aadhaar to NRIs by UIDAI, the provision of portability of KYC records has been relaxed for one year till April 30, 2025, by SEBI. Accordingly effective from May 15, 2024, Non-Resident Indian (NRI) Investors, can transact in Mutual Fund till April 30, 2025, if their KYC status is "Registered."

Investors are requested to note that PAN is mandatory for all financial transactions in schemes of the Fund, with respect to all unitholders in the folio. Accordingly, any financial transactions received without PAN, in respect of non PAN-exempt folios, shall be rejected.

As per SEBI Master Circular on KYC dated October 12, 2023, on KYC requirements and the changes advised by Income Tax Department in PAN validation process, effective from April 30, 2024, it is mandated for investors to quote their Name(s) and DOB/I as per PAN card/POI. The Mutual Funds are mandated to validate the Name and DOB/I against the PAN available with Income tax department. To avoid any failure in such validations, investors are requested to quote the Name(s) and DOB/I of all the holders including Guardian, Power of Attorney [POA] holders as per PAN card/Income Tax Department (ITD) records in all new application forms (physical and digital) and KYC forms.

Financial transactions (including subscription, redemptions, switches, and all types of systematic plans) and non-financial requests will not be processed if the Unitholders have not completed KYC requirements.

Unitholders are advised to use the applicable KYC Form for completing the KYC requirements and submit the form at the point of acceptance. Further, upon updation of PAN details with the KRA (KRA-KYC) / CERSAI (CKYC), the unit holders are requested to intimate the AMC/ Registrar and Transfer Agent their PAN information along with the folio details for updation in the records. For applicants who subscribe to the Units through Stock Exchange facility, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee/AMC. For Units held in demat form, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee/AMC.

How to Apply for eKYC?

eKYC is a paperless Aadhaar-based process for fulfilling your KYC requirements to start investing in Mutual Funds. SEBI has recently allowed Aadhaar-based KYC to be used for MF investments, for the convenience of investors. eKYC facility is an electronic, 100% paperless process for first time investors to Mutual Funds to complete their Know Your Customer (KYC) process using their PAN card, Aadhaar and Bank Account details. All first-time investors who have not completed their KYC or whose KYC has got rejected for some reason can complete KYC using this facility. Currently, this facility is only available for Resident Individual investors and not available for NRI, Non-individual and minor investors. Investors can start their investment journey as soon as E-KYC process is completed without any limitation on the amount which can be invested.

Who are required to be KYC Compliant?

All investors (both individual and non-individual) should be KYC compliant.

Any investment in the name of minors should be through a Guardian, who should be KYC compliant for the purpose of investing with a Mutual Fund. The Minor, upon attaining majority, should immediately apply for KYC compliance in order to be able to transact in his/her own capacity. Also, applicants/unit holders intending to apply for units/currently holding units and operating their Mutual Fund folios through a Power of Attorney (PoA) must ensure that the issuer of the PoA (i.e. the investor) and the holder of the PoA (i.e. the Attorney) must be KYC compliant. PoA holders are not permitted to apply for KYC compliance on behalf of the issuer of the PoA.

An individual becoming an investor on account of an operation of law, e.g., transmission of units upon death of a unit holder, the claimant eligible for entering into the register of Unit holders of the Mutual Fund will be required to be KYC compliant before such transfer can take place.

Implementation of the Prevention of Money-laundering (Maintenance of Records) Second Amendment Rules, 2017 with respect to seeding of Aadhaar number:

Pursuant to requirement under Prevention of Money Laundering (Maintenance of Records) Rules, 2005, as amended from time to time, proof of possession of Aadhaar can be accepted as a valid document for proof of address or proof of identity of investors, provided the investor redact or blackout his Aadhaar number while submitting the applications for investments.

The aforesaid guidelines will be subject to change as per the directives issued by the concerned regulatory/ government authority from time to time.

3. Transfer and Transmission Facility

- i. Units unless otherwise restricted or prohibited under the scheme shall be freely transferable by act of parties or by operation of law. Units held in demat form shall be freely transferable under the depository system and in accordance with the provisions of the SEBI (Depositories and Participants) Regulations, 1996. However, restrictions on transfer of Units of ELSS scheme during the lock in period shall continue to be applicable as per the ELSS guidelines. Further, transfer of units shall be subject to lock in period, as applicable to the respective scheme. If a person becomes a holder of the units consequent to operation of law, or upon enforcement of a pledge, the Mutual Fund will, subject to production of satisfactory evidence, effect the transfer, if the transferee is otherwise eligible to hold the units.
- ii. In case units are held in a single name by a unit holder, units shall be transmitted in favour of the nominee, where the unit holder has appointed a nominee, upon production of death certificate and other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- iii. If the unit holder has not appointed a nominee, the units shall be transmitted in favour of the unit holder's executor / administrator of estate / legal heir(s), as the case may be, on production of death certificate and other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- iv. In case units are held by more than one registered unit holder, then upon death of first unit holder, units shall be transmitted in favour of the second named holder on production of a death certificate and other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.
- v. The rights in the units will vest in the nominee upon the death of all joint unit holders upon the nominee producing a death certificate and other document to the satisfaction of the Mutual Fund, AMC/Trustee or Registrar.

Transmission Process:

- a. In case of transmission of Units, the transferee will have to comply with the applicable “Know Your Customer” Norms.
- b. In case of transmission of Units, the claimant(s) of Units will be required to submit the prescribed documents as may be applicable. Investors may refer to our website (www.oldbridgemma.com) or contact any of our investor service centres for the various documents required under different transmission scenarios.
- c. In case of transmission of Units to a claimant who is a minor, the prescribed documents like PAN, KYC, bank details, indemnity, etc. of the guardian will be required.
- d. If the amount involved in transmission exceeds Rs. 2 lakhs, the AMC/Mutual Fund may, on a case to case basis, seek additional documents from the claimant(s) of Units.
- e. Requests for redemption will not be accepted from a claimant pending completion of the transmission of units in his / her favour.

4. Duration of the Scheme and Winding Up

- i. Each closed-ended Scheme/ Plan will have a Maturity Date / Final Redemption Date and will be compulsorily and without any act by the unit holder(s) redeemed on Maturity Date / Final Redemption Date. On Maturity / Final Redemption Date of the Scheme/ Plan, the units will be redeemed at the Applicable NAV.
- ii. The Mutual Fund may convert the Scheme/ Plans under the Scheme after the Maturity Date / Final Redemption Date into an open-end Scheme/ Plan and this shall be in accordance with the SEBI Regulations.
- iii. The Units of close-ended Scheme/ Plan may be converted into open-ended scheme, a) If the SID of such scheme discloses the option and the period of such conversion; or b) The Unit holders are provided with an option to redeem their units in full.
- iv. A close-ended scheme shall be fully redeemed at the end of the maturity period. Provided that a close ended scheme may be allowed to be rolled over if the purpose, period and other terms of the roll over and all other material details of the scheme including the likely composition of assets immediately before the roll over, the net assets and net asset value of the scheme, are disclosed to the Unit holders and a copy of the same has been filed with SEBI. Provided further, that such roll over will be permitted only in case of those Unit holders who express their consent in writing and the Unit holders who do not opt for the roll over or have not given written consent shall be allowed to redeem their holdings in full at net asset value based price.
- v. A closed-ended Scheme/ Plan shall be wound up on the expiry of duration fixed in the Scheme/ Plan on the redemption of the Units unless it is rolled-over for a further period under sub-regulation (4) of regulation 33.
- vi. An Open-ended / Interval Scheme has a perpetual life.
- vii. Where the Scheme is a Close - Ended Schemes with automatic conversion into Open-Ended Scheme upon Maturity, such schemes will remain close - ended for the period mentioned in the SID and subsequently the scheme will automatically be converted into an open-ended scheme without any further reference from the Mutual Fund/ Trustee/ AMC/ Unit holders. Thereafter, the duration of the Scheme is perpetual.
- viii. However, in terms of the Regulations, an open-ended scheme may be wound up anytime, and close-ended scheme may be wound up at any time prior to the maturity date, after repaying the amount due to the unit holders under the following circumstances:
 - a. On happening of any event, which in the opinion of the Trustee, requires the Scheme concerned to be wound up, OR
 - b. If 75% of the unit holders of the Scheme concerned pass a resolution that the Scheme be wound up, OR
 - c. If SEBI so directs in the interests of unit holders.
 - d. In addition to the above, an open- ended scheme may also be wound up if the scheme/investment Plan fails to fulfil the condition of a minimum of 20 investors on an ongoing basis for each calendar quarter.

Where a Scheme is to be wound up pursuant to SEBI MF Regulation 39(2) the Trustees shall give notice within one day, disclosing of the circumstances leading to the winding up of the Scheme:

- to SEBI; and
- in two daily newspapers having circulation all over India, a vernacular newspaper circulating at the place where the mutual fund is formed.

Where a scheme is to be wound up pursuant to SEBI MF regulation 39(2) (a), the trustees shall obtain consent of the unit holders participating in the voting by simple majority on the basis of one vote per unit and publish the results of voting within forty-five days from the publication of notice under SEBI MF Regulation 39(3).

In case the trustees fail to obtain the required consent of the unitholders pursuant to SEBI MF Regulation 39(2)(a), the schemes shall be reopened for business activities from the second business day after publication of results of the voting.

Effect of winding up

On and from the date of the publication of the notice as stated above, the Trustees or the AMC as the case may be, shall (a) cease to carry on any business activities in respect of the Scheme(s) so wound up; (b) cease to create and/or cancel Units in the Scheme(s); (c) cease to issue and/or redeem Units in the Scheme(s).

5. Procedure and Manner of Winding Up

- i. The Trustee shall call a meeting of the Unit holders of the Scheme to consider and pass necessary resolutions by simple majority of Unit holders present and voting at the meeting for authorising the AMC or any other person / agency to take the steps for winding up of the Scheme.
- ii. Provided that a meeting shall not be necessary if the Scheme is wound up at the end of the maturity period.
- iii. The Trustee or the person authorised as above, shall dispose the assets of the Scheme concerned in the best interests of the Unit holders of the Scheme.
- iv. The proceeds of the sale made in pursuance of the above, shall in the first instance be utilised towards discharge of such liabilities as are properly due under the Scheme and after making appropriate provision for meeting the expenses connected with such winding up, the balance shall be paid to the Unit holders in proportion to their respective interests in the assets of the Scheme as on the date when the decision for the winding up was taken.
- v. On the completion of the winding up, the Trustee shall forward to SEBI and the Unit holders, a report on the winding up containing particulars such as circumstances leading to the winding up, the steps taken for disposal of assets of the Scheme before winding up, expenses of the Scheme for winding up, net assets available for distribution to the Unit holders and a certificate from the Auditors of the Mutual Fund.
- vi. Notwithstanding anything contained herein, the application of the provisions of SEBI Regulations in respect of disclosures of half-yearly reports and annual reports shall continue to be applicable until the winding up is completed or the Scheme ceases to exist.
- vii. After the receipt of report referred to the above under "Procedure and Manner of Winding up" if SEBI is satisfied that all measures for winding up of the Scheme have been complied with, the Scheme shall cease to exist.

6. Consolidation of Folios

In case an investor has multiple folios, the AMC reserves the right to consolidate all the folios into one folio, based on such criteria as may be determined by the AMC from time to time. In case of additional purchases in same scheme / fresh purchase in new scheme, if the investor fails to provide the folio number, the AMC reserves the right to allot the units in the existing folio, based on such integrity checks as may be determined by the AMC from time to time.

7. Miscellaneous

Investors may note that in case of fresh/additional purchases, if the name of the Scheme on the application form/transaction slip differs with the name on the Cheque/Demand Draft/payment instrument/transfer letter, then the AMC will allot units under the Scheme mentioned on the application form. In case of fresh/additional purchases, if the Scheme name is not mentioned on the application form/transaction slip, then the units will be allotted under the Scheme mentioned on the Cheque/Demand Draft/payment instrument/transfer letter. The Plan/Option that will be considered in such cases if not specified by the customer will be the default option of the Scheme as per the SID. However, in case additional purchase is under the same scheme as fresh purchase, then the AMC reserves the right to allot units in the option under which units were allotted at the time of fresh purchase.

8. Investor Having Multiple Accounts

The Mutual Fund has also provided a facility to the investors to register multiple bank accounts. By registering multiple bank accounts, the investors can use any of the registered bank accounts to receive redemption / IDCW proceeds. These account details will be used by the AMC / Mutual Fund / RTA for verification of instrument used for subscription to ensure that third party payments are not used for mutual fund subscription, except where permitted above. Investors are requested to avail the facility of registering multiple bank accounts by filling in the Application Form for Registration of Multiple Bank Accounts available at our ISCs/OPAs or on our website www.oldbridgemma.com. For details, please refer to the 'Multiple Bank Account Registration Form'.

9. Change in Bank Mandate

The process for change in bank mandate/address to be followed by unitholders is as follows:

- i. Updation of Bank Account in Customer's Folio shall be either through "Multiple Bank Account Registration Form" or a standalone separate "Change of Bank Mandate Form";
- ii. In case of standalone change of bank details, documents as entailed below should be submitted as a proof of new bank account details. Based on Old Bridge AMC's internal risk assessment, Old Bridge AMC may also consider collecting proof of old bank account and proof of identity of the clients, while effecting the change of bank account;
- iii. Customers are advised to register multiple bank accounts and choose any of such registered bank accounts for receipt of redemption proceeds;
- iv. Any unregistered bank account or new bank account forming part of redemption request shall not be entertained or processed;
- v. Such Investors, who have not already provided bank mandate at the time of making investment, are required to submit proof of new bank account details as entailed here below. Such investors are also required to submit valid Proof of Identity as prescribed under KYC guidelines along with Proof of Investment; and
- vi. Any change of Bank Mandate request received/processed few days prior to submission of a redemption request or on the same day as a standalone change request, Old Bridge AMC will continue to follow cooling period of 10 calendar days for validation of the same.

Investors are required to submit any one of the following documents in Original or produce originals for verification or copy attested by the Bank –

New Bank Account/Bank details Registration

- Cancelled original cheque of new bank mandate with first unit holder name and bank account number printed on the face of the cheque; OR
- Self - attested copy of bank statement; OR
- Bank Passbook with current entries not older than 3 months; OR
- Letter from the bank on its letterhead confirming the bank account holder with the account details, duly signed by the Branch Manager/authorised personnel.

AND Proof of Identity as prescribed under KYC guidelines along with Proof of Investment - only for such investors who have not registered their bank mandate at the time of making investment.

Change in Existing Bank Mandate:

- Cancelled original cheque with first unitholder name and bank account number printed on the face of the cheque; OR
- Original bank account statement or pass book; OR
- Original letter issued by the Bank on the letterhead confirming the bank account holder with the account details, duly signed by the Branch Manager; OR
- In case such Bank account is already closed, a duly signed and stamped original letter from such bank on the letter head of bank, confirming the closure of said account.

10. Change in Address

Investors / unit holders are requested to note that self- attested copies of the below mentioned documents shall be submitted along with a duly filled in 'Change of Address Form'.

I. KYC not complied folios

- Proof of new Address
- Proof of Identity (in case of PAN updated folios - only PAN card copy shall be accepted, and in other case PAN/other valid proof of identity shall be accepted)
- Based on Old Bridge AMC's internal risk assessment, Old Bridge AMC may also consider collecting proof of old address, while effecting change of address

II. KYC complied folios:

- Proof of new Address
- Any other document/form that the KYC Registration Agency (KRA) may specify from time to time or may be required under CKYCR process.

Copies of all documents submitted by the Investors should be self-attested and accompanied by originals for verification.

In case the original of any document is not produced for verification, then the copies should be properly attested/ verified by entities authorised for attesting / verification of the documents as per KYC guidelines.

11. Application with/without broker

Investors may note and follow the below-mentioned directions while applying for the units of the schemes of the Mutual Fund:

- i. In case where the Broker code is already printed in Application form / Transaction form / Purchase request form by the AMC / Registrar / Distributor: Where the Investor wishes to apply directly (i.e. not through existing broker / distributor), then the investor should strike off the broker code (printed) and should write "Direct Applications" or "Not Applicable (N.A.)" and countersign the same.
- ii. In case where the Broker code is not printed in Application form / Transaction form / Purchase request form:
In case of direct applications, the Investor should write in the space provided for the broker code "Direct Application" or "Not Applicable (N.A.)".
- iii. In case of change in broker, the investor will be required to strike off the old broker code and countersign near the new broker code, before submitting the application form / transaction form / purchase form to the designated ISC's/ OPA (Official points of Acceptance).

- iv. The Registrar and the AMC shall effect the application for changes in the broker code within the reasonable period of time from the time of receipt of written request from the investor at the designated ISC's / OPA. Decision of the Registrar/AMC in this regard shall be final and acceptable to all.
- v. All Unitholders who have invested/may invest through channel distributors and intend to make their future investments through the direct route, are advised to complete the procedural formalities prescribed by AMC from time to time.
- vi. Investors applying for units of the Schemes in Direct Plans of MF using advise of their stock-brokers and their stockbroker code must place trades via the Stock Exchange infrastructure if the stock broker does not have SEBI RIA registration.
- vii. Investors applying for units of the Schemes in Direct Plans of MF using advise of their stock-brokers and their stockbroker code can transact directly with MF or through any other platform if the stock broker has SEBI RIA registration.

12. Gift Facility

The Unitholder can, at any time after the allotment of Units, write to the ISC, requesting for a Gift Form to gift his/her Units by way of a transfer of Units to the extent permitted under the SEBI (MF) Regulations, 1996/applicable law(s) to a person eligible to be an investor as per the terms of the SID. The Mutual Fund may arrange to transfer the Units in accordance with the terms of the Gift Deed executed by the donor Unit holder out of his/her Unit balance in accordance with applicable law(s) and subject to the compliance with such documentary requirements by the donor Unitholder to the satisfaction of the Mutual Fund/AMC if the donee is otherwise eligible to hold units of mutual funds. Gift in favour of a NRI/PIO/OCI/QFI will be subject to permission, general or specific, as per the applicable laws under the Foreign Exchange Management Act, 1999. The transfer of unitholdings to the donee in accordance with the terms of the Gift Deed and a receipt thereof shall be a valid discharge of the AMC/Mutual Fund of its obligations towards the donor Unitholder. The donor Unitholder agrees to be liable/responsible for any loss that may result from a transfer of Units thereof made in good faith by the AMC/ Mutual Fund at the request of the Donor Unitholder/s. The facility of gifting of Units is not permitted if the Units are held in electronic/demat mode.

13. Pledge/Lien of Units

The Units standing to the credit of the Unit holder under the Scheme(s) (subject to completion of Lock-in Period, if any) may be offered by the Unitholder as security in favour of scheduled banks, financial institutions, nonbanking finance companies (NBFC's) or any other persons ("Lender") subject to applicable SEBI Regulations and other laws, provided such Lenders are eligible to hold the Units. Upon a specific authorisation request made by the Unitholder (to be signed by all Unitholders, in case the mode of holding is joint or either-or survivor) and completion of necessary documentary formalities, the Mutual Fund/AMC will instruct the Registrar to mark a pledge/lien on the Units in favour of the Lender on the Units as may be requested by the Unitholder. A standard form for this purpose is available on request from any of the ISCs. Disbursement/sanctioning of loans/facilities will be at the sole discretion of the Lender and the Mutual Fund/AMC assumes no responsibility thereof. The Unitholder will not be able to redeem/switch-out the Units that are pledged/lien marked in favour of the Lender until the Mutual Fund/AMC receives a written authorization from the Lender that the Unitholder has been absolved of the financial obligations and that the pledge/lien may be removed/vacated. As long as the Units are pledged/lien marked, the Lender will have complete authority to redeem/transact in respect of such Units. If by enforcing the pledge/lien, the Lender seeks to transfer the Units in its own name, then in such event the Mutual Fund/AMC shall be obliged to comply with the said request, provided the Lender or such other entity, as the case may be, is eligible to hold the units and all the necessary documentary evidence is made available to the satisfaction of the Mutual Fund/AMC. Upon such transfer, the Mutual Fund/ AMC shall be discharged of all its liabilities in respect of the Units towards the Unitholder. An intimation of the invocation of the pledge/lien will be sent to the Unitholder. The Mutual Fund/AMC thereafter shall not be responsible for any claims made and/or losses incurred by the Unitholder and/or any third party in this regard. In case the Units of close-ended scheme are under pledge/lien, then at the time of maturity of the scheme if the Units are still under pledge/lien, then on

the failure to receive any instructions from the Lender and the Unitholder, the Mutual Fund/AMC reserves the right to pay the maturity proceeds to the Unitholder, post intimation of such payment to the Lender, and AMC/Mutual Fund shall not be liable/responsible for any loss incurred by the Lender and/or the Unitholder on account of such payment. The AMC/Mutual Fund shall also not be liable/responsible for any delay in payment of the maturity proceeds in such an event. Upon such payment, the Mutual Fund/AMC will be discharged of all its liabilities towards such Unitholder. The distribution of income in the nature of IDCW payouts declared on Units under pledge/lien shall always be paid to the Unitholder. The Mutual Fund/AMC reserves the right to change the operational guidelines for this facility offered by the AMC from time to time.

C. GENERAL INFORMATION

1. Inter-Scheme Transfer of Investments

Transfers of investments from one scheme to another scheme in the Mutual Fund shall be allowed only if:

- a. Such transfers are done at the prevailing market price for quoted instruments on spot basis.

Explanation: "spot basis" shall have same meaning as specified by stock exchange for spot transactions.

- b. The securities so transferred are in conformity with the investment objective of the scheme to which such transfer has been made.

Pursuant to SEBI circular dated September 24, 2019 mutual funds shall not use their own trades for ISTs. Further, in accordance with the aforesaid circular prices for ISTs is provided by the valuation agencies and the average of the prices so received is used for IST pricing. If the prices are not received from any valuation agencies within the agreed TAT, the AMC may determine IST prices in accordance with clause 3(a) of Seventh Schedule of SEBI (MF) Regulation.

Inter Scheme Transfers are also required to comply with the guidelines specified by SEBI circular dated October 08, 2020. The guidelines prescribe additional safeguards to be ensured for ISTs of securities between schemes.

2. Aggregate investment in the Scheme under the following categories

In accordance with Paragraph on 'Scheme Related Disclosures' of SEBI Master Circular for Mutual Funds dated May 19, 2023, please find below the aggregate investment in the respective Scheme(s) by Board of Directors of Old Bridge Asset Management Private Limited (AMC) and Key Personnel as on May 31, 2024:

Scheme Name	Aggregate amount invested in the Scheme as on May 31, 2024_(market value in Rs.)		
	AMC's Board of Directors	Key personnel (excluding Fund Manager)	Fund Manager
Old Bridge Focused Equity Fund	1,92,70,343.90	63,27,166.65	1,87,10,800.58

3. Dematerialisation and Rematerialisation procedures

1) Application for allotment of units in Demat mode

Investors shall have an option to receive allotment of Mutual Fund units in their demat account while subscribing to the Units of the Scheme in terms of the guidelines/ procedural requirements as laid by the Depositories from time to time. Investors desirous of having the Units of the Scheme in dematerialized form should contact the ISCs of the AMC/Registrar. Where units are held by investor in dematerialized form, the demat statement issued by the Depository Participant would be deemed adequate compliance with the requirements in respect of dispatch of statements of account.

2) Process to convert the units held in SoA mode to Demat mode

In case investors desire to convert their existing physical units (represented by statement of account) into dematerialized form or vice versa, the request for conversion of units held in physical form into Demat (electronic) form or vice versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. In case the units are desired to be held by investor in dematerialized form, the KYC performed by Depository Participant shall be considered compliance of the applicable SEBI norms.

3) Process to convert the units held in Demat mode to Remat mode

If an investor wishes to get back the units in physical form, one needs to submit "Rematerialisation Request Form" in prescribed format to the DP. After necessary verification of records, the DP will forward the request through the respective Depository System to the Mutual Fund/ RTA . The MF/RTA will then print the SOA and dispatch the same to the registered address of the investor. The applicable rematerialisation charges if any, is payable to the DP for the said services.

4) Process to redeem the units held in Demat mode

Redemption requests for units held in demat mode must be submitted to DP or through Stock Exchange Platform, as applicable. One needs to submit a duly filled in Redemption Form (RF) to the DP. After necessary checking, the DP will forward the request to the concerned AMC/ RTA. In case the request is found valid, the redemption amount will be credited to the registered bank account of the investor directly by the AMC/RTA. In case of redemption of MF units through the stock broker, one needs to submit a Delivery Instruction Slip to the DP to transfer the Mutual Fund units to the designated CM pool account of the NSE Clearing limited / Indian Clearing Corporation Limited.

5) Switch-transaction permissible if the units are held in Demat

Switch transactions for units held in demat are processed through exchange/clearing corporation. The mechanism is same equivalent to redemption and subscription. Post processing of switch-out (redemption), switch-in (subscription) is processed and equivalent units are settled to clearing house for on-ward credit to the investor's DP account.

6) The procedure for change in investor's profile / bank account details etc. in respect of units held in demat mode (i.e., To whom the investor is required to approach, in case of such requests).

Any modifications of bank account, address, contact details etc in the demat folios, the investor needs to update through their respective Depository Participant (DP) for updation in demat account. DP follows prescribed guidelines for such profile modifications as formulated by respective Depositories (NSDL/CDSL) in their operating manual.

4. ASBA Disclosures

Additional mode of payment through Applications Supported by Blocked Amount (ASBA) facility:

Pursuant to SEBI Master Circular for Mutual Funds dated May 19, 2023 as amended from time to time (Master Circular) clause 14.8, an investor can subscribe to the New Fund Offer (NFO) through ASBA facility by applying for the Units offered under the Option(s)/Plan(s) of the Scheme(s) in the ASBA Application Form and following the procedure as prescribed in the form. ASBA is an application containing an authorization given by the Investor to block the application money in his specified bank account towards the subscription of Units offered during the NFO of the Scheme of Old Bridge Mutual Fund. Thus, for an investor who applies through ASBA facility, the application money towards the subscription of Units shall be debited from his specified bank account only if his/her application is selected for allotment of Units.

Benefits of Applying through ASBA facility:

1. Writing cheques and demand drafts is not required, as investor needs to submit ASBA application Form accompanying an authorization to block the account to the extent of application money towards subscription of Units. The balance money, if any, in the account can be used for other purposes by the investors.
2. Release/Unblocking of blocked funds after allotment is done instantaneously.
3. Unlike other modes of payment, ASBA facility prevents the loss of interest income on the application money towards subscription of Units as it remains in the bank account of the investor till the allotment is made.
4. Refunds of money to the investors do not arise as the application money towards subscription of Units gets blocked only on the allotment of Units.
5. The investor deals with the known intermediary i.e. his/her own bank.
6. The application form is simpler as the application form for ASBA will be different from the NFO application form.

ASBA Procedure:

1. An Investor intending to subscribe to the Units of the NFO through ASBA, shall submit a duly completed ASBA Application Form to a Self-Certified Syndicate Bank (SCSB), with whom his/her bank account is maintained.
2. The ASBA Application Form towards the subscription of Units can be submitted through one of the following modes
 - i. Submit the form physically with the Designated Branches (DBs) of the SCSB ("Physical ASBA"); or
 - ii. Submit the form electronically through the internet banking facility offered by the SCSB ("Electronic ASBA").
3. An acknowledgement will be given by the SCSB in the form of the counter foil or specifying the application number for reference. Such acknowledgement does not guarantee, in any manner that the investors will be allotted the Units applied for.
4. If the bank account specified in the ASBA Application Form does not have sufficient credit balance to meet the application money towards the subscription of Units, the Bank shall reject the ASBA Application form.
5. On acceptance of Physical or Electronic ASBA, the SCSB shall block funds available in the bank account specified to the extent of the application money specified in the ASBA Application Form.
6. The application money towards the Subscription of Units shall be blocked in the account until (i) Allotment of Units is made or (ii) Rejection of the application or (iii) Winding up of the Scheme, as the case may be.
7. SCSBs shall unblock the bank accounts for (i) Transfer of requisite money to the Mutual Fund / Scheme bank account against each valid application on allotment or (ii) in case the application is rejected.

8. The list of SCSBs and their DBs where ASBA application form can be submitted is available on the websites of BSE (www.bseindia.com), NSE (www.nseindia.com) and SEBI (www.sebi.gov.in) and shall also be given in the ASBA application form of respective schemes.

Note: No request for withdrawal of ASBA application form made during the NFO Period will be allowed.

Grounds for Technical Rejections of ASBA application forms:

ASBA Application Forms can be rejected, at the discretion of Registrar and Transfer Agent of Old Bridge Mutual Fund or SCSBs including but not limited on the following grounds:-

1. Applications by persons not competent to contract under the Indian Contract Act, 1872, including but not limited to minors, insane persons etc.
2. Mode of ASBA i.e. either Physical ASBA or Electronic ASBA, not selected or ticked.
3. ASBA Application Form without the stamp of the SCSB.
4. Application by any person outside India if not in compliance with applicable foreign and Indian laws.
5. Bank account details not given/incorrect details given.
6. Duly certified Power of Attorney, if applicable, not submitted along with the ASBA application form.
7. No corresponding records available with the Depositories matching the parameters namely (a) Names of the ASBA applicants (including the order of names of joint holders) (b) DP ID (c) Beneficiary account number or any other relevant details pertaining to the Depository Account.

Mechanism for Redressal of Investor Grievances:

All grievances relating to the ASBA facility may be addressed to the respective SCSBs, giving full details such as name, address of the applicant, number of Units applied for, counterfoil or the application reference given by the SCSBs, DBs or CBs, amount paid on application and the Designated Branch or the collection centre of the SCSB where the Application Form was submitted by the ASBA Investor. If the SCSB is unable to resolve the grievance, it shall be addressed to Investor Relations Officer of Old Bridge Mutual Fund

5. Portfolio Turnover Details

Portfolio turnover is defined as lesser of purchases and sales as a percentage of the average corpus of the Scheme during a specified period of time. In case of open-ended schemes, 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(s). Active asset allocation would impact portfolio turnover.

Scheme's Portfolio Turnover Ratio

Scheme name	Portfolio Turnover Ratio as on May 31, 2024
Old Bridge Focused Equity Fund	0.03

D. ASSOCIATE TRANSACTIONS

Underwriting obligations with respect to issues of Group/ Associate Companies:

Old Bridge Mutual Fund has not entered into any underwriting contracts in respect of any public issue made by any group / associate company of the Sponsor.

Subscription to issues lead managed by Group / Associate Companies:

No Scheme of Old Bridge has invested in any public issue lead managed by any Group/ Associate company of the Sponsor.

Investment in Sponsor and its Group Companies:

The AMC from time to time, for the purpose of conducting its normal business, may use the services of the Sponsor and the subsidiaries and other associates of the Sponsor. The AMC may utilise the services of the group companies and any other subsidiary or associate company of the Sponsor that may be established in case such an associate company is capable of providing the requisite services to the AMC. The AMC will conduct its business with the companies on commercial terms, on an arm's length basis and at prevailing market prices to the extent permitted under the applicable laws including the SEBI Regulations after an evaluation of the competitiveness of the pricing offered by the associate companies and services to be provided by them.

Disclosure regarding payment of commission for distribution of units and payment of brokerage for securities transactions (for the past three financial years) pursuant to SEBI Circular No. SEBI/IMD/CIR No. 18/198647/2010 dated March 15, 2010

i. Commission paid to associates/related parties/group companies of sponsor/AMC

Scheme Name	Name of associate/related parties/group companies of Sponsor/AMC	Nature of Association / Nature of relation	Period covered	Business given		Brokerage	
				Rs. Crores	% of total business received by the Fund	Rs. Crores	% of total commission paid by the Fund
Old Bridge Focused Equity Fund	Amit Jasani Financial Services Private Limited	Associate Company	January 2024 to March 2024	2.50	2.50	0.0048	3.42

- ii. Brokerage paid to associates/related parties/group companies of sponsor/AMC – Nil
- iii. Dealing with Associates – Nil
- iv. List of associates / Group Companies:
 - a. Old Bridge Capital Management Private Limited
 - b. Amit Jasani Financial Services Private Limited
 - c. Old Bridge Asset Management Private Limited
 - d. Old Bridge Mutual Fund Trustee Private Limited
 - e. Kenneth Andrade

E. Documents Available for Inspection

The following documents will be available for inspection at the office of the Mutual Fund at during business hours on any day (excluding Saturdays, Sundays and public holidays):

- Memorandum and Articles of Association of the AMC
- Investment Management Agreement
- Deed of Trust and amendments thereto, if any
- Mutual Fund Registration Certificate
- Agreement between the Mutual Fund and the Custodian
- Agreement with Registrar and Share Transfer Agents

- Consent of Auditors to act in the said capacity
- Consent of Legal Advisors to act in the said capacity
- Securities and Exchange Board of India (Mutual Funds) Regulations, 1996 and amendments from time to time thereto.
- Indian Trusts Act, 1882.

F. Investor Grievances Redressal Mechanism

Investors can lodge any service request or complaints or enquire about NAVs, Unit Holdings, Valuation, IDCW, etc by calling the investor line of the Registrar and Transfer Agent at 18003094034 (toll-free number) from 9.00 am to 7.00 pm (Monday to Saturday) or email – services@oldbridgemf.com. The service representatives may require personal information of the investor for verification of his / her identity in order to protect confidentiality of information. The AMC will at all times endeavour to handle transactions efficiently and to resolve any investor grievances promptly.

Any complaints should be addressed to Mr. Pawan Rathi, who has been appointed as the Investor Relations Officer and can be contacted at:

Address: 1705, ONE BKC, C – Wing, G – Block, Bandra Kurla Complex, Bandra – East, Mumbai – 400051, Phone no.: 022 69459999.

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.

If the investor’s complaint is not redressed satisfactorily, one may lodge a complaint with SEBI on SEBI’s portal, named, 'SCORES', which is a centralized web-based complaints redress system. SEBI takes up the complaints registered via SCORES (<https://scores.gov.in/scores/Welcome.html>) with the concerned mutual fund / intermediary for timely redressal. SCORES facilitates tracking the status of the complaint.

Investor Complaints history:

Scheme Name	Complaints received			Complaints redressed			Complaints pending		
	April 1, 2022 to March 31, 2023	April 1, 2023 to March 31, 2024	April 1, 2024 to March 31, 2025	April 1, 2022 to March 31, 2023	April 1, 2023 to March 31, 2024	April 1, 2024 to March 31, 2025	April 1, 2022 to March 31, 2023	April 1, 2023 to March 31, 2024	April 1, 2024 to March 31, 2025
Old Bridge Focused Equity Fund	NA	0	1	NA	0	1	NA	0	0

Introduction of Online Resolution of Disputes

Pursuant to SEBI Master Circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/145 dated August 11, 2023, a common Online Dispute Resolution ('ODR') Portal has been introduced. The ODR Portal allows investors with additional mechanism to resolve the complaints/disputes through online conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market. Investors can register

complaints/disputes against all Market Participants for resolution on the Online Dispute Resolution ('ODR') Portal i.e. <https://smartodr.in/login>.

For the purpose of aforesaid SEBI circular, Old Bridge Asset Management Private Limited ('the AMC') comes under the ambit of specified intermediaries / regulated entity of the securities market, referred to as "Market Participant" and accordingly, the AMC has enrolled itself on the ODR Portal. In this regard, investors are requested to note the following:

1. An investor shall first take up his/her/their grievance with the AMC by lodging a complaint directly with the AMC. If the grievance is not redressed satisfactorily, the investor may, in accordance with the SCORES guidelines, escalate the same through the SCORES Portal in accordance with the process laid out therein. After exhausting these options for resolution of the grievance, if the investor is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the ODR Portal.
2. Alternatively, the investor can initiate dispute resolution through the ODR Portal if the grievance lodged with the AMC was not satisfactorily resolved or at any stage of the subsequent escalations mentioned in the paragraph 1 above (prior to or at the end of such escalation/s). The AMC may also initiate dispute resolution through the ODR Portal after having given due notice of at least 15 calendar days to the investor for resolution of the dispute which has not been satisfactorily resolved between them.
3. Disputes between Investors and the AMC (including for any complaints/disputes arising on account of Mutual Fund Distributors of the Fund / AMC) arising out of latter's activities in the securities market, will be resolved in accordance with the aforesaid circular and by harnessing online conciliation and/or online arbitration as specified in the aforesaid circular. The AMC or the investors (or holders on account of nominations or transmission being given effect to) may also refer any unresolved issue of any service requests / service-related complaints for due resolution by harnessing online conciliation and/or online arbitration as specified in the aforesaid circular.
4. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in terms of the paragraph 1 above or SCORES guidelines as applicable or not pending before any arbitral process, court, tribunal, or consumer forum or are non-arbitrable in terms of Indian law. The dispute resolution through the ODR Portal can be initiated when within the applicable law of limitation (reckoned from the date when the issue arose/occurred that has resulted in the complaint/date of the last transaction or the date of disputed transaction, whichever is later).
5. The ODR Portal has necessary features and facilities to, inter alia, enrol the investors and the AMC, to file the complaint/dispute and to upload any documents or papers pertaining thereto. The ODR Institution that receives the reference of the complaint/dispute shall appoint a sole independent and neutral conciliator from its panel of conciliators. Investors are requested to refer to aforesaid SEBI circular for details on conciliation and arbitration proceedings and associated fees and charges. The said circulars along with the link to ODR portal are also made available on our website www.oldbridgemf.com

G. INFORMATION PERTAINING TO INVESTMENTS BY THE SCHEMES OF THE FUND.

1. DERIVATIVE STRATEGIES (OLD BRIDGE FOCUSED EQUITY FUND)

Derivatives are financial contracts of pre-determined fixed duration, like stock futures/options and index futures and options, whose values are derived from the value of an underlying primary financial instrument such as: interest rates, exchange rates, commodities, and equities.

The objectives of the various strategies include earning option premium/ hedge stock / portfolio against market gyrations.

The risks associated with derivatives are similar to those associated with underlying investments. The additional risks of using derivative strategies could be on account of:

- Illiquidity;
- Potential mis - pricing of the Futures/Options;
- Lack of opportunity;

- Inability of derivatives to correlate perfectly with the underlying (Indices, Assets, Exchange Rates);
- Cost of hedge can be higher than adverse impact of market movements;
- An exposure to derivatives in excess of the hedging requirements can lead to losses;
- An exposure to derivatives can also limit the profits from a genuine investment transaction;
- The prices which are seen on the screen need not be the same at which execution will take place.

For detailed risks associated with use of derivatives, please refer paragraph “Scheme Specific Risk Factors”. Exchange traded derivatives Contracts in stocks and indices in India are currently cash settled at the time of maturity.

Derivatives allowed for mutual funds are only exchange traded and not OTC.

Concepts and Examples of derivatives which may be used by the fund manager: **Futures**

Futures (Index & Stocks) are forward contracts traded on the exchanges & have been introduced both by BSE and NSE. Generally, futures of 1 month (near month), 2 months (next month) and 3 months (far month) are presently traded on these exchanges. These futures expire on the last working Thursday of the respective months.

Some strategies that employ stock futures and their objectives:

(a) Arbitrage

1. Selling spot and buying future: In case the Scheme holds the stock of a company “A” at say Rs. 100 while in the futures market it trades at a discount to the spot price say at Rs. 98, then the Scheme may sell the stock and buy the futures.

On the date of expiry of the stock future, the Scheme may reverse the transactions (i.e. buying at spot & selling futures) and earn a risk-free Rs. 2 (2% absolute) on its holdings without any dilution of the view of the fund manager on the underlying stock.

Further, the Scheme can still benefit from any movement of the price in the upward direction, i.e. if on the date of expiry of the futures, the stock trades at Rs. 110 which would be the price of the futures too, the Scheme will have a benefit of Rs 10 whereby the Scheme gets the 10% upside movement together with the 2% benefit on the arbitrage and thus getting a total return of 12%. The corresponding return in case of holding the stock would have been 10%.

2. Buying spot and selling future: Where the stock of a company “A” is trading in the spot market at Rs. 100 while it trades at Rs. 102 in the futures market, then the Scheme may buy the stock at spot and sell in the futures market thereby earning Rs. 2.

Buying the stock in cash market and selling the futures results into a hedge where the Scheme has locked in a spread and is not affected by the price movement of cash market and futures market. The arbitrage position can be continued till expiry of the future contracts when there is a convergence between the cash market and the futures market. This convergence enables the Scheme to generate the arbitrage return locked in earlier.

Risk: On the date of expiry, when the arbitrage is to be unwound, it is not necessary for the stock price and its future contract to coincide. There could be a discrepancy in their prices even a minute before the market closes. Thus, there is a possibility that the arbitrage strategy gets unwound at different prices.

(b) Buying/ Selling Stock future:

When the Scheme wants to initiate a long position in a stock whose spot price is at say, Rs.100 and futures is at 98, then the Scheme may just buy the futures contract instead of the spot thereby benefiting from a lower cost.

In case the Scheme has a bearish view on a stock which is trading in the spot market at Rs.98 and the futures market at say Rs. 100, the Scheme may subject to regulations, initiate a short position in the futures contract. In case the prices align with the view and the price depreciates to say Rs. 90, the

Scheme can square up the short position thereby earning a profit of Rs.10 vis- a-vis a fall in stock price of Rs. 8.

Risk: There is risk of not being 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 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. 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. The extent of loss is the same as in the underlying stocks.

(c) **Hedging:**

The Scheme may use exchange-traded derivatives to hedge the equity portfolio. Stock futures and options may be used to hedge the stocks in the portfolio.

Risk: This 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.

Option Contracts (Stock)

An Option gives the buyer the right, but not the obligation, to buy (call) or sell (put) a stock at an agreed-upon price during a certain period of time or on a specific date.

Options are used to manage risk or as an investment to generate income. The price at which underlying security is contracted to be purchased or sold is called the Strike Price. Options that can be exercised on or before the expiration date are called American Options while, Options that can be exercised only on the expiration date are called European Options.

Options Risk/Return Pay-off Table

	Stock Options	Buy Call	Sell Call	Buy Put	Sell Put
1	View on underlying	Positive	Negative	Negative	Positive
2	Premium	Pay	Receive	Pay	Receive
3	Risk Potential	Limited to premium paid	Unlimited	Limited to premium paid	Unlimited
4	Return Potential	Unlimited	Premium Received	Unlimited	Premium Received

Note: The above table is for the purpose of explaining concept of options contract. As per the current Regulations, the Scheme(s) cannot write option or purchase instrument with embedded write option except for the covered call strategy.

Option contracts are of following two types - Call and Put:

Call Option:

A call option gives the buyer, the right to buy specified quantity of the underlying asset at the set strike price on or before expiration date and the seller (writer) of call option however, has the obligation to sell the underlying asset if the buyer of the call option decides to exercise the option to buy.

Put Option:

A put option gives the buyer the right to sell specified quantity of the underlying asset at the set strike price on or before expiration date and the seller (writer) of put option however, has the obligation to buy the underlying asset if the buyer of the put option decides to exercise his option to sell.

Risk:

The options buyer's risk is limited to the premium paid. 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 call option bears a risk of loss if the value of the underlying asset increases above the exercise price. 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.

Stock Options:

Stock options are termed to be an efficient way of buying / selling a stock compared to buying / selling a portfolio of physical shares representing an index for ease of execution and settlement. The participation can be done by buying / selling a call/put option.

The risk are also different when stock futures are bought/sold visa- a- vis stocks options as in case of a stock future there is a mark to market variation and the risk is much higher as compared to buying an option, where the risk is limited to the extent of premium paid.

The illustration below explains how one can gain using stock call / put option.

Call Option

Suppose an investor buys a Call option on 1 lot of "Stock A" (Lot Size: 50 units)

- "Stock A" 1 Lot Size: 50 units
- Spot Price (S): 17,500
- Strike Price (x): 17,600 (Out-of-Money Call Option)
- Premium: 100

Total Amount paid by the investor as premium $[50 \times 100] = 5,000$

There are two possibilities i.e. either the stock moves up over the strike price or remains below the strike price.

Case 1- The stock goes up

- An investor sells the Stock Option described above before expiry:

Suppose "Stock A" moves up to 17,600 in the spot market and the premium has moved to Rs 200 and there are 15 days more left for the expiry. The investor decides to reverse his position in the market by selling his 1 "Stock A" call option as the option now is In the Money.

His gains are as follows:

- "Stock A" Spot: 17,600
- Current Premium: Rs.200
- Premium paid: Rs.100
- Net Gain: $Rs.200 - Rs.100 = Rs.100$ per unit
- Total gain on 1 lot of "Stock A" (50 units) = $Rs. 5,000 (50 \times 100)$

In this case the premium of Rs.200 has an intrinsic value of Rs.100 per unit and the remaining Rs.100 is the time value of the option.

- An investor exercises the "Stock A" Option at expiry

Suppose "Stock A" moves up to 17,700 in the spot market on the expiry day and the investor decides to reverse his position in the market by exercising the "Stock A" call option as the option now is 'in The Money'.

His gains are as follows:

- "Stock A" Spot: 17,700
- Premium paid: Rs.100
- Exercise Price: 17,550
- Receivable on exercise: $17,700 - 17,550 = 150$ • Total Gain: $Rs. 2,500 \{(150 - 100) \times 50\}$

In this case the realised gain is only the intrinsic value, which is Rs.50, and there is no time value. Case

2 - "Stock A" moves to any level below 17,550

Then the investor does not gain anything but on the other hand his loss is limited to the premium paid:

Net Loss is Rs. 5,000 (Loss is capped to the extent of Premium Paid)

(Rs 100 Premium paid * Lot Size: 50 units).

Put Option

Suppose an investor buys a Put option on 1 lot of "Stock A". • "Stock A" Lot Size: 50 units

- Spot Price (S): 17,500
- Strike Price (x): 17,450 (Out-of-Money Put Option)
- Premium: 30
- Total Amount paid by the investor as premium $[50 \times 30] = \text{Rs. } 1,500$

There are two possibilities i.e. either "Stock A" moves over the strike price or moves below the strike price.

Let us analyze these scenarios.

Case 1 - "Stock A" goes down

- An investor sells "Stock A" Option before expiry:

Suppose "Stock A" moves down to 17,400 in the spot market and the premium has moved to Rs. 80 and there are 15 days more left for the expiry. The investor decides to reverse his position in the market by selling his 1 "Stock A" Put Option as the option now is In The Money.

His gains are as follows:

- "Stock A" Spot: 17,400
- Premium paid: Rs.30
- Net Gain: $\text{Rs. } 80 - \text{Rs. } 30 = \text{Rs. } 50$ per unit
- Total gain on 1 lot of "Stock A" (50 units) = $\text{Rs. } 2,500 (50 \times 50)$

In this case the premium of Rs.80 has an intrinsic value of Rs.50 per unit and the remaining Rs.30 is the time value of the option.

An investor exercises "Stock A" Option at expiry (It is an European Option)

Suppose "Stock A" moves down to 17,400 in the spot market on the expiry day and the investor decides to reverse his position in the market by exercising "Stock A" Put Option as the option now is In The Money.

His gains are as follows:

- "Stock A" Spot: 17,400
- Premium paid: Rs.30
- Exercise Price: 17,450
- Gain on exercise: $17,450 - 17,400 = 50$
- Total Gain: $\text{Rs. } 1,000 \{(50 - 30) \times 50\}$

In this case the realised amount is only the intrinsic value, which is Rs.50, and there is no time value in this case.

Case 2 - If "Stock A" stays over the strike price which is 17,450, in the spot market then the investor does not gain anything but on the other hand his loss is limited to the premium paid.

- "Stock A" Spot: $> 17,450$
- Net Loss $\text{Rs. } 1,500$ (Loss is capped to the extent of Premium Paid) ($\text{Rs } 30 \text{ Premium paid} \times \text{Lot Size: } 50$ units).

Covered Call Strategy

The covered call strategy is a strategy where a fund manager writes call options against an equivalent long position in an underlying stock thereby giving up a part of the upside from the long position. The strategy allows the fund manager to earn premium income from the option writing in addition being able to capture the remaining part of the upside.

Illustration – Covered Call strategy using stock call options:

Suppose a fund manager buys equity stock of ABC Ltd. For Rs. 1000 and simultaneously sells a call option on the same stock at a strike price of Rs. 1100. The scheme earns a premium of say, Rs. 50. Here, the fund manager does not think that the stock price will exceed Rs. 1100.

Scenario 1: Stock price exceeds Rs. 1100

The call option will get exercised and the fund manager will sell the stock to settle his obligation on the call at Rs. 1100 (earning a return of 10% on the stock purchase price). Also, the scheme has earned a premium of Rs. 50.

Net Gain –

$\text{Rs. } 1100$ (strike price) – $\text{Rs. } 1000$ (stock purchase price) + $\text{Rs. } 50$ (premium earned) = $\text{Rs. } 150$ Scenario 2:

Stock prices stays below Rs. 1100

The call option will not get exercised and will expire worthless. The premium earned on call option will generate alpha for the scheme.

Net Gain – $\text{Rs. } 50$ (premium earned).

Benefits of using Covered Call Strategy in Mutual Funds:

The covered call strategy can be followed by the Fund Manager in order to hedge risk thereby resulting in better risk adjusted returns of the Scheme. The strategy offers the following benefits:

- a) Hedge against market risk - Since the fund manager sells a call option on a stock already owned by the mutual fund scheme, the downside from fall in the stock price would be lower to the extent of the premium earned from the call option.
- b) Generating additional returns in the form of option premium in a range bound market. Thus, a covered call strategy involves gains for unit holders in case the strategy plays out in the right direction.

Risk associated with covered calls:

The risk associated with covered calls is the loss of upside, i.e. if the shares are assigned (called away), the option seller forgoes any share price appreciation above the option strike price. Please refer risk factors section on detail derivatives risk factors.

For details of risk factors relating to use of Derivatives, the investors are advised to refer to Scheme Specific Risk Factors:

2. **Swing Pricing - Not Applicable for Equity Schemes**
3. **Provisions On Creation of Segregated Portfolio/Side Pocketing**

The AMC may create a segregated portfolio of debt and money market instruments in a mutual fund scheme in case of a credit event and to deal with liquidity risk.

In this regard, the term 'segregated portfolio' shall mean a portfolio comprising of debt or money market instrument affected by a credit event, that has been segregated in a mutual fund scheme and the term 'main portfolio' shall mean the scheme portfolio excluding the segregated portfolio. The term 'total portfolio' shall mean the scheme portfolio including the securities affected by the credit event.

A segregated portfolio may be created in a mutual fund scheme in case of a credit event at issuer level i.e. downgrade in credit rating by a SEBI registered Credit Rating Agency (CRA), as under:

- a. Downgrade of a debt or money market instrument to 'below investment grade', or
- b. Subsequent downgrades of the said instruments from 'below investment grade', or
- c. Similar such downgrades of a loan rating.

In case of difference in rating by multiple CRAs, the most conservative rating shall be considered. Creation of segregated portfolio shall be based on issuer level credit events as detailed above and implemented at the ISIN level.

The AMC may also create a segregated portfolio of unrated debt and money market instruments of an issuer that does not have any outstanding rated debt or money market instruments in case of 'actual default' of either the interest or principal amount.'

Process for creation of segregated portfolio

1. The AMC shall decide on creation of segregated portfolio on the day of credit event, as per the process laid down below:
 - i. The AMC shall seek approval of Trustees, prior to creation of the segregated portfolio.
 - ii. The AMC shall immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors. It shall also be disclosed that the segregation shall be subject to trustee approval. Additionally, the said press release shall be prominently disclosed on the website of the AMC.
 - iii. The AMC shall ensure that till the time the Trustee approval is received, which in no case shall exceed 1 business day from the day of credit event, the subscription and redemption in

the scheme shall be suspended for processing with respect to creation of units and payment on redemptions.

2. Upon receipt of approval from Trustees:
 - i. The segregated portfolio shall be effective from the day of credit event.
 - ii. The AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information shall also be submitted to SEBI.
 - iii. An e-mail or SMS should be sent to all unit holders of the scheme.
 - iv. The NAV of both segregated and main portfolio shall be disclosed from the day of the credit event.
 - v. All existing investors in the scheme as on the day of the credit event shall be allotted equal number of units in the segregated portfolio as held in the main portfolio.
 - vi. No redemption and subscription shall be allowed in the segregated portfolio. However, in order to facilitate exit to unit holders in segregated portfolio, AMC shall enable listing of units of segregated portfolio on the recognized stock exchange within 10 working days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests.
3. If the trustees do not approve the proposal to segregate portfolio, the AMC shall issue a press release immediately informing investors of the same.
4. Notwithstanding the decision to segregate the debt and money market instrument, the valuation shall take into account the credit event and the portfolio shall be valued based on the principles of fair valuation (i.e. realizable value of the assets) in terms of the relevant provisions of SEBI (Mutual Funds) Regulations, 1996 and Circulars issued thereunder.
5. All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as per the existing circular on applicability of NAV as under:
 - a. Upon trustees' approval to create a segregated portfolio –
 - Investors redeeming their units will get redemption proceeds based on the NAV of main portfolio and will continue to hold the units of segregated portfolio.
 - Investors subscribing to the scheme will be allotted units only in the main portfolio based on its NAV.
 - b. In case trustees do not approve the proposal of segregated portfolio, subscription and redemption applications will be processed based on the NAV of total portfolio.
6. In order to enable the existing as well as the prospective investors to take informed decision, the following shall be adhered to:
 - a. A statement of holding indicating the units held by the investors in the segregated portfolio along with the NAV of both segregated portfolio and main portfolio as on the day of the credit event shall be communicated to the investors within 5 working days of creation of the segregated portfolio.
 - b. Adequate disclosure of the segregated portfolio shall appear in all scheme related documents, in monthly and half-yearly portfolio disclosures and in the annual report of the mutual fund and the scheme.
 - c. The Net Asset Value (NAV) of the segregated portfolio shall be declared on daily basis.
 - d. The information regarding number of segregated portfolios created in a scheme shall appear prominently under the name of the scheme at all relevant places such as SID, KIM-cum-Application Form, advertisement, AMC and AMFI website, etc.
 - e. The scheme performance required to be disclosed at various places shall include the impact of creation of segregated portfolio. The scheme performance should clearly reflect the fall in NAV to the extent of the portfolio segregated due to the credit event and the said fall in NAV along with recovery(ies), if any, shall be disclosed as a footnote to the scheme performance.

- f. The disclosures at paragraph (d) and (e) above regarding the segregated portfolio shall be carried out for a period of at least 3 years after the investments in segregated portfolio are fully recovered/ written-off.
- g. The investors of the segregated portfolio shall be duly informed of the recovery proceedings of the investments of the segregated portfolio. Status update may be provided to the investors at the time of recovery and also at the time of writing-off of the segregated securities.
7. In order to ensure timely recovery of investments of the segregated portfolio, the Trustees to the fund would continuously monitor the progress and take suitable action as may be required.
8. TER for the Segregated Portfolio:
- AMC shall not charge investment and advisory fees on the segregated portfolio. However, TER (excluding the investment and advisory fees) can be charged, on a pro-rata basis only upon recovery of the investments in segregated portfolio.
 - The TER so levied shall not exceed the simple average of such expenses (excluding the investment and advisory fees) charged on daily basis on the main portfolio (in % terms) during the period for which the segregated portfolio was in existence.
 - The legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio in proportion to the amount of recovery. However, the same shall be within the maximum TER limit as applicable to the main portfolio. The legal charges in excess of the TER limits, if any, shall be borne by the AMC.
 - The costs related to segregated portfolio shall in no case be charged to the main portfolio.

Investors may also note that the process followed by the AMC/Trust regarding creation of segregated portfolios shall be in accordance with the provisions laid down by SEBI in this regard, from time to time.

Numerical illustration explaining how segregated portfolios will work:

Total Assets under Fixed Income instruments: Rs. 10 lakhs and Total 2 investors in the scheme:

Investors	Units	Amount (Rs.)		Portfolio	Value (Rs.)
A	30,000	3,75,000		Portfolio 1	5,00,000
B	50,000	6,25,000		Portfolio 2	3,00,000
				Portfolio 3	2,00,000
Total	80,000	10,00,000			10,00,000

NAV Rs. 12.50 per unit

Credit Event: Security 2 downgrades and value falls from Rs. 3,00,000 to Rs. 280,000

Post Segregation (Main Portfolio):

Investors	Units	Amount (Rs.)		Portfolio	Value (Rs.)
A	30,000	2,62,500		Portfolio 1	5,00,000
B	50,000	4,37,500		Portfolio 3	3,00,000
Total	80,000	7,00,000			7,00,000

NAV of main portfolio Rs. 8.75 per unit

Post Segregation (Segregated Portfolio):

Investors	Units	Amount (Rs.)		Portfolio	Value (Rs.)
A	30,000	1,05,000		Portfolio 2	2,80,000
B	50,000	1,75,000		-	-
Total	80,000	2,80,000			2,80,000

NAV of main portfolio Rs. 3.50 per unit

Investors	Units	Main Portfolio	Segregated Portfolio	Amount (Rs.)
A	30,000	2,62,500	1,05,000	3,67,500
B	50,000	4,37,500	1,75,000	6,12,500
Total	80,000	7,00,000	2,80,000	9,80,000

Notes:

- Investors who invest / subscribe to the units of the scheme post creation of segregated portfolio shall be allotted units in the Main Portfolio only.
- Investors redeeming their units post creation of segregated portfolio will get redemption proceeds based on NAV of main portfolio and will continue to hold units in Segregated portfolio.
- No redemption and / or subscription shall be allowed in the Segregated Portfolio.
- Units of Segregated portfolio shall be listed on a recognised stock exchange

In order to ensure timely recovery of investments of the segregated portfolio, trustees shall ensure that:

- The AMC puts in sincere efforts to recover the investments of the segregated portfolio.
- Upon recovery of money, whether partial or full, it shall be immediately distributed to the investors in proportion to their holding in the segregated portfolio. Any recovery of amount of the security in the segregated portfolio even after the write off shall be distributed to the investors of the segregated portfolio.
- An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated portfolio is placed in every trustee meeting till the investments are fully recovered/ written-off.
- The trustees shall monitor the compliance of this circular and disclose in the half-yearly trustee reports filed with SEBI, the compliance in respect of every segregated portfolio created.

In order to avoid mis-use of segregated portfolio, trustees shall ensure to have a mechanism in place to negatively impact the performance incentives of Fund Managers, Chief Investment Officers (CIOs), etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of the AMC, including claw back of such amount to the segregated portfolio of the scheme.

4. Stock Lending by the Mutual Fund

Subject to the SEBI Regulations as applicable from time to time, the Mutual Fund may, engage in Stock Lending. Stock Lending means the lending of stock to another person or entity for a fixed period of time, at a negotiated compensation. The securities lent will be returned by the borrower on the expiry of the stipulated period.

Subject to the SEBI Regulations, Old Bridge Mutual Fund may engage in securities lending. Such lending shall be made when, in view of the fund manager, it could provide reasonable returns commensurate with risks associated with such lending and shall be made in accordance with the investment objective of the Scheme(s)

The Scheme(s) may lend securities from its portfolio in accordance with the Regulations and applicable SEBI guidelines. Securities lending shall enable the Scheme(s) to earn income in the form of lending fees that may partially offset its expenses and thereby reduce the effect these expenses have on the Scheme's ability to provide investment returns that correspond generally to the performance of its Benchmark Index. The Scheme(s) will pay administrative and other expenses fees in connection with the lending of securities. The Scheme(s) will comply with the guidelines for securities lending specified by SEBI/ Clearing House of stock exchange(s).

Percentage (%) of net assets upto which the Scheme can lend securities and limit for lending to any single counterparty will be disclosed in the Scheme Information Document of respective scheme(s).

The AMC will comply with limits on securities lending as mentioned in respective SIDs and will also comply with all reporting requirements. Further, the Trustee shall carry out periodic review as required by SEBI guidelines. Various risk associated with securities lending, such as counter - party risks, liquidity and other market risks are described under risk factors of Scheme Information Document(s). In accordance with the Mutual Fund Regulations and guidelines issued by SEBI, the scheme may also engage in stock borrowing as may be permitted from time to time. The Scheme may also enter into 'Repo/Reverse Repo' transactions, as may be permitted from time to time. AMC may participate in repo in corporate debt securities by ensuring necessary compliance with SEBI circular dated November 11, 2011 and November 15, 2012. Stock borrowing means the borrowing of stock from another person or entity for a fixed period of time, at a negotiated compensation. The securities borrowed will be returned to the lender on expiry of the stipulated period.

The AMC in the interests of the investors, may increase exposure in stock lending activities as deemed fit from time to time.

5. Borrowing by the Mutual Fund

The Mutual Fund is allowed to borrow to meet the temporary liquidity needs of the schemes for the purpose of repurchase, redemption of units or payment of interest or IDCW to the unit holders, provided that the Mutual Fund shall not borrow more than 20% of the net assets of each scheme and the duration of such borrowing shall not exceed a period of six months. The Mutual Fund may enter into necessary arrangements for raising of such borrowings from any of its Sponsor/Associate/Group companies/Commercial Banks in India or any other entity at market related rates prevailing at the time and applicable to similar borrowings after approval by the Trustee. The security for such borrowings, if required, will be as determined by the Trustee, subject to permissible Regulations. Borrowing cost shall be adjusted against the portfolio yield of the Scheme(s) and borrowing costs in excess of portfolio yield, if any, shall be borne by the AMC.

6. Unclaimed Redemption and Dividend Amount

The unclaimed Redemption amount and IDCW amounts (the funds) may be deployed by the Mutual Fund in money market instruments and separate plan of Liquid scheme/Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts only. Investors who claim the unclaimed 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 will make a continuous effort to remind the investors through letters to take their unclaimed amounts. The details of such unclaimed redemption/IDCW amounts are made available to investors upon them providing proper credentials, on website of Mutual Funds and AMFI along with the information on the process of claiming the unclaimed amount and the necessary forms/documents required for the same.

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. Further, the investment management fee charged by the AMC for managing the said unclaimed amounts shall not exceed 50 basis points.

7. Suspension/Restriction of the Subscription / repurchase/ redemption facility of Units of Scheme(s)

Subject to the approval of the Boards of the AMC and of the Trustee and subject also to necessary communication of the same to SEBI, the determination of the NAV of the Units of a Scheme and the Subscription of / Switch-into the Units of Scheme(s) of the Fund, may be temporarily suspended in any of the conditions described below:

- a. When one or more stock exchanges or markets which provide the basis of valuation for a substantial portion of the assets of the Scheme is closed otherwise than for ordinary holidays.
- i. When, as a result of political, economic or monetary events or any other circumstances outside the control of the Trustee and the AMC, the disposal of the assets of the Scheme is not considered to be reasonably practicable or might otherwise be detrimental to the interests of the Unit Holders.
 - ii. In the event of breakdown in the means of communication used for the valuation of investments of the Scheme, so that the value of the securities of the Scheme cannot be accurately or reliably arrived at.
 - iii. If, in the opinion of the AMC, extreme volatility of markets causes or might cause, prejudice to the interests of the Unit Holders of the Scheme.
 - iv. In case of natural calamities, war, strikes, riots and bandhs.
 - v. In case of any other event of force majeure or disaster that in the opinion of the AMC affects the normal functioning of the AMC or the Registrar.
 - vi. During the period of Book Closure.
 - vii. If so directed by SEBI.

In any of the above eventualities, the time limits for processing requests for subscription of Units of the Scheme(s) will not be applicable.

However, suspension or restriction of repurchase/ redemption facility under any scheme of the Mutual Fund shall be made applicable only after the approval from the Board of Directors of the AMC and the Trustee Company. The approval from the AMC Board and the Trustees giving details of circumstances and justification for the proposed action shall also be informed to SEBI.

AMC reserves the right to suspend /restrict subscription(s) in to the Scheme temporarily or indefinitely, if the AMC views that increasing the Scheme's size further may prove detrimental to the existing unit holders of the Scheme. An order/ request to purchase Units is not binding on and may be rejected by the Trustee, the AMC or their respective agents, unless it has been confirmed in writing by the AMC or its agents and (or) payment has been received.

Further, subject to the approval of the Boards of the AMC and of the Trustee and subject also to necessary communication of the same to SEBI, the redemption of / switch-out of Units of Scheme(s) of the Fund, may be temporarily suspended/ restricted. In accordance with clause 1.12 of Master Circular as may be amended from time to time and subject to prevailing regulations, restriction on/suspension of redemptions / switch-out of Units of the Scheme(s) of the Fund, may be imposed when there are circumstances leading to 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;
- 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).

Restriction on / suspension of redemption of Units of the Scheme(s) may be imposed for a specified period of time not exceeding 10 working days in any 90 days period.

When restriction on / suspension of redemption of Units of the Scheme(s) is imposed, the following procedure shall be applied

- i. No redemption / switch-out requests upto Rs. 2 lakhs shall be subject to such restriction.

- ii. Where redemption / switch-out requests are above Rs. 2 lakhs, the AMC shall redeem the first Rs. 2 lakhs without such restriction and remaining part over and above Rs. 2 lakhs shall be subject to such restriction.

In addition to the above, the AMC / Trustee may restrict / suspend redemptions / switch-out of Units of the Scheme(s) pursuant to direction/ approval of SEBI. In any of the above eventualities, the time limits for processing requests for redemption of Units will not be applicable.

H. Underwriting by the Mutual Fund

Subject to SEBI Regulations, the Scheme may enter into underwriting agreements after the Mutual Fund obtains a certificate of registration in terms of the Securities and Exchange Board of India (Underwriters) Rules and Securities and Exchange Board of India (Underwriters) Regulations, 1993 authorising it to carry on activities as underwriters. The capital adequacy norms for the purpose of underwriting shall be the net assets of the respective Scheme/ Plans and the underwriting obligation of the respective Scheme/ Plans shall not at any time exceed the total net asset value of the respective Scheme/ Plans.

I. Soft Dollar Arrangements

In terms of Clause 10.1.15 of Master Circular No. SEBI/HO/ IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023, soft dollar arrangements between the AMCs and brokers should be limited to only benefits (like free research report, etc.) that are in the interest of investors and the same should be suitably disclosed.

The AMC does not have any soft dollar arrangement with brokers. Generally, the brokers in addition to execution also provide (i) research (ii) arranging conference and meeting for all their clients wherein the representatives of all their clients are invited by broker to attend such conference and meeting (iii) sales coverage i.e. having designated sales staff to attend to queries from the AMC or arranging meetings for the AMC's research staff with the broker's analysts. The commission paid to the broker is one composite percentage figure and is not split in to two parts, one representing the cost for execution and the other part representing the cost for research and other services. The Research services / report received from the Brokers are used for the benefit of all the respective schemes for executing trade in such scheme which are in the interest of the investors of the Fund. The AMC presently does not do any proprietary trading. No Broker currently empanelled by the AMC is affiliated to the AMC. The soft dollar is policy is available on the website of the AMC.

J. TRANSACTION CHARGES AND STAMP DUTY

In accordance with Para 10.5 of SEBI Master Circular on Mutual Funds dated May 19, 2023 on Transaction Charges, the AMC will deduct Transaction Charges on purchase/subscription of Rs.10,000/- and above made through a valid ARN Holder i.e. AMFI registered distributors/ intermediaries, provided such distributor has opted to receive the Transaction Charges. Further, distributors have an option either to opt in or opt out of levying transaction charge based on type of the product. Such Transaction Charges collected by the AMC will be paid to the ARN Holder through whom the investment has been made. However, no Transaction Charges will be imposed for investments made directly with the Fund.

Transaction charges shall be deducted for Applications for purchase/ subscription received through distributor/ agent as under (only if that distributor / agent has opted to receive the transaction charges):

Investor Type	Transaction Charges
New Investor (First Time Mutual Fund Investor)	Transaction charge of Rs.150/- for per purchase / subscription of Rs. 10,000 and above will be deducted from the subscription amount and paid to the distributor/agent of the first time investor. The balance of the subscription amount shall be invested.

Existing Investor	Transaction charge of Rs.100/- for per purchase / subscription of Rs. 10,000 and above will be deducted from the subscription amount and paid to the distributor/agent of the first time investor. The balance of the subscription amount shall be invested.
-------------------	--

The transaction charges and the net investment amount and the number of units allotted will be clearly mentioned the Account Statement issued by the Mutual Fund.

Unit holders are requested to note that, pursuant to Notification No. S.O. 1226(E) and G.S.R. 226(E) dated March 30, 2020, issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I Transactions of Chapter IV of Notification dated February 21, 2019, issued by Legislative Department, Ministry of Law and Justice, Government of India on the Finance Act, 2019, a stamp duty @0.005% of the transaction value would be levied on applicable mutual fund transactions, with effect from July 1, 2020. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase/switch in transactions (including Reinvestment of Income Distribution cum capital withdrawal option) to the Unit holders would be reduced to that extent.

Transaction charges shall not be deducted if:

- The distributor of the investor has not opted for any transaction charges;
- The amount per purchases /subscriptions is less than Rs. 10,000/-;
- The transaction pertains to other than purchases/ subscriptions relating to new inflows such as Switch/STP/ DTP, etc.
- Purchases/Subscriptions made directly with the Fund through any mode (i.e. not through any distributor/agent).
- Subscription made through Exchange Platform irrespective of investment amount.

X. DISCLOSURES AND REPORTS BY THE FUND

1. ACCOUNT STATEMENT/CONSOLIDATED ACCOUNT STATEMENT

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).

- On acceptance of the application for subscription, an allotment confirmation specifying the number of units allotted by way of e- mail and/or SMS within 5 business days from the date of receipt of transaction request/ allotment will be sent to the Unit Holders registered e-mail address and/or mobile number.
- In case of Unit Holders holding units in the dematerialized mode, the Fund will not send the account statement to the Unit Holders. The statement provided by the Depository Participant will be equivalent to the account statement.
- For those Unit holders who have provided an e-mail address, the AMC will send the account statement by e-mail.

The Unit holder may request for a physical account statement by writing/calling the AMC/ISC/Registrar. In case of specific request received from the Unit Holders, the AMC/Fund will provide the Account Statement to the Investors within 5 business days from the receipt of such request.

Consolidated Account Statement (CAS)

Consolidated account statement for each calendar month shall be issued, on or before 15th day of succeeding month, detailing all the transactions and holding at the end of the month including transaction charges paid to the distributor, across all schemes of all mutual funds, to all the investors in whose folios transaction has taken place during that month. The AMC shall identify common investors across fund houses by their permanent account number (PAN) for the purposes of sending CAS.

In the event the account has more than one registered holder, the first named Unitholder shall receive the CAS.

- The transactions viz. purchase, redemption, switch, systematic withdrawal plan, carried out by the Unitholders shall be reflected in the CAS on the basis of PAN.
- The CAS shall not be received by the Unit holders for the folio(s) not updated with PAN details. The Unit holders are therefore requested to ensure that the folio(s) are updated with their PAN.
- Pursuant to SEBI Circular no. CIR /MRD /DP /31/2014 dated November 12, 2014, Depositories shall generate and dispatch a single consolidated account statement for investors (in whose folio the transaction has taken place during the month) having mutual fund investments and holding demat accounts.
- Based on the PANs provided by the asset management companies / mutual funds' registrar and transfer agents (AMCs/MF-RTAs, the Depositories shall match their PAN database to determine the common PANs and allocate the PANs among themselves for the purpose of sending CAS. For PANs which are common between depositories and AMCs, the Depositories shall send the CAS. In other cases (i.e. PANs with no demat account and only MF units holding), the AMCs/ MF-RTAs shall continue to send the CAS to their unit holders as is being done presently in compliance with the Regulation 36(4) of the SEBI (Mutual Funds) Regulations.
- Where statements are presently being dispatched by email either by the Mutual Funds or by the Depositories, CAS shall be sent through email. 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 in the Depository system.

Half Yearly Consolidated Account Statement

- A consolidated account statement detailing holding across all schemes at the end of every six months (i.e. September/ March), on or before 21st day of succeeding month, to all such Unitholders holding units in non- demat form in whose folios no transaction has taken place during that period shall be sent by email.
- The half yearly consolidated account statement will be sent by e-mail to the Unit holders whose e-mail address is registered with the Fund, unless a specific request is made to receive the same in physical mode.

Account Statement for demat account holders

In case of Unit Holders holding units in the dematerialized mode, the AMC will not send the account statement to the Unit Holders. The demat statement issued by the Depository Participant would be deemed adequate compliance with the requirements in respect of dispatch of statements of account. In case of Unit Holders holding units in the dematerialized mode, the AMC will not send the account statement to the Unit Holders. The demat statement issued by the Depository Participant would be deemed adequate compliance with the requirements in respect of dispatch of statements of account.

Option to Hold Units in Dematerialized (Demat) Form

Investors shall have an option to receive allotment of Mutual Fund units in their demat account while subscribing to the Scheme in terms of the guidelines/ procedural requirements as laid by the Depositories (NSDL/CDSL) from time to time. The Applicants intending to hold Units in demat form will be required to have a beneficiary account with a Depository Participant (DP) of the NSDL/CDSL and will be required to mention in the application form DP's Name, DP ID No. and Beneficiary Account No. with the DP at the time of purchasing Units.

Investors desirous of having the Units of the Scheme in dematerialized form should contact the ISCs of the AMC/Registrar.

In case investors desire to convert their existing physical units (represented by statement of account) into dematerialized form or vice versa, the request for conversion of units held in physical form into Demat (electronic) form or vice versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. In case the units are desired to be held by investor in dematerialized form, the KYC performed by Depository Participant shall be considered compliance of the applicable SEBI norms.

Further, demat option shall also be available for SIP transactions. Units will be allotted based on the applicable NAV as per Scheme Information Document and will be credited to investors Demat Account on weekly basis on realization of funds.

For details, Investors may contact any of the Investor Service Centers of the AMC.

2. HALF YEARLY DISCLOSURES/ PORTFOLIO DISCLOSURES/FINANCIAL RESULTS

The AMC shall disclose portfolio of the Scheme (along with ISIN) as on the last day of the month/ half year on the website www.oldbridgemma.com and of the Association of Mutual Funds in India – AMFI (www.amfiindia.com) within 10 days from the close of each month/ half year (i.e. 31st March and 30th September) respectively in a user-friendly and downloadable spreadsheet format. In case of unitholders whose email addresses are registered, AMC will send via email both the monthly and half yearly portfolio. Further, AMC shall publish an advertisement, in an all India edition of one national English daily newspaper and in one Hindi newspaper, every half year disclosing the hosting of the half-yearly statement of its scheme's portfolio on the website of the Mutual Fund and AMFI. AMC will provide a physical copy of the statement of its Scheme's portfolio without charging any cost, on specific request received from a unitholder.

3. HALF YEARLY RESULTS

The Mutual Fund shall within one month from the close of each half year, that is on 31st March and on 30th September, host a soft copy of its unaudited financial results on the website of the AMC and AMFI. The mutual fund shall publish an advertisement disclosing the hosting of such financial results on their website, in atleast one English daily newspaper having nationwide circulation and, in a newspaper, having wide circulation published in the language of the region where the Head Office of the Mutual Fund is situated.

The unaudited financial results will also be displayed on the website of the AMC and AMFI.

4. ANNUAL REPORT

Scheme wise Annual Report or an abridged summary thereof shall be mailed to all unitholders within four months from the date of closure of the relevant financial year i.e. 31st March each year as under:

- by email to the unitholders whose email address is available with the Mutual Fund.
- in physical form to the unitholders whose email address is not available with the Fund and/or to those Unit holders who have opted / requested for the same.

An advertisement shall also be published in all India edition of at least two daily newspapers, one each in English and Hindi, disclosing the hosting of the scheme wise annual report on the website of the AMC www.oldbridgemma.com and AMFI website www.amfiindia.com. The physical copy of the scheme wise annual report or abridged summary shall be made available to the investors at the registered office of the AMC.

The AMC shall also provide a physical copy of abridged summary of the annual report without charging any cost, on specific request received from the unitholder. A copy of scheme wise annual report shall also be made available to unitholders on payment of nominal fees.

Notwithstanding anything contained in this Statement of Additional Information, the provisions of the SEBI (Mutual Funds) Regulations, 1996 and the guidelines thereunder shall be applicable.

For and on behalf of Board of Directors of
Old Bridge Asset Management Private Limited

Sd/-
Ruchi Pandey
Chief Executive Officer

Place: Mumbai
Dated: October 30, 2024