Disclosures under Stewardship Code

SEBI vide its circular ref. CIR/CFD/CMD1/168/2019 dated December 24, 2019 issued guidelines for Stewardship Code for Alternative Investment Funds (AIF).

In accordance with Principle 6 of the Stewardship Guidelines, AIF's should report periodically on their stewardship activities. Accordingly, the status of compliance with the Stewardship activities for the period 1st April 2022 to 31st March 2023 ('FY23') is mentioned below:

Principles of Stewardship Code	Status of Compliance	Reason / Justification for deviation or non- compliance of Principle of Stewardship Code
Principle 1 - Formulate a comprehensive policy on the discharge of their Stewardship responsibilities, publicly disclose it, review and update it periodically	Complied Stewardship Policy for FY23 has been approved by the Board of AMC in its meeting held on 18 th January 2022 and Board of Trustees in its meeting held on 21 st January 2022. The Policy is being disclosed on the website of AMC.	-
Principle 2 - Manage conflicts of interest	Complied Stewardship Policy covers aspects of conflict of interests in fulfilling stewardship responsibilities. Voting decisions are guided by voting policy. In all cases the voting decisions are based on the overall best interests of the investors. The voting policy and related disclosures are also disclosed on the website of AMC.	-
Principle 3 - Institutional investors should monitor their investee companies	Complied In accordance with Stewardship Policy, the investee companies were monitored for various activities which included performance of the companies, quality of company management / board, corporate governance, strategy, risk, shareholder rights and their grievances etc.	-
Principle 4 - Clear policy on intervention with investee companies and collaboration with other institutional investors	Complied Stewardship Policy includes guiding principle for intervention in investee companies and on	-

	collaboration with other institutional investors.	
Principle 5 - Clear policy on voting and disclosure of voting activity	Complied Voting Policy for FY23 has been approved by the Board of AMC in its meeting held on 18 th January 2022 and Board of Trustees in its meeting held on 21 st January 2022. Voting Policy is being disclosed on the website of AMC. Voting activity is being disclosed	-
	at such places and at such periodicity as defined by SEBI from time to time.	
Principle 6 - Report periodically on their stewardship activities	Complied AIF has reported its stewardship activities as per the guidelines issued by SEBI and as per Stewardship and Voting Policy.	-