

Report on Compliance with Stewardship Code for the financial year 2021-22

SEBI vide its circular No. CIR/CFD/CMD168/2019 dated December 24, 2019 ("SEBI Circular") has mandated all Alternative Investment Funds (AIF) to follow the Stewardship Code in relation to the schemes' investments in listed equities of companies ("Investee Companies").

As per Principle 6 of the Stewardship Code, AIF should provide a periodic report to the ultimate beneficiaries (unitholders) on discharge of stewardship responsibilities, as a part of public disclosures.

Accordingly, the status report on compliance with the stewardship code during the financial year 2021-22 is mentioned below:-

Sl. No.	Principles of Stewardship Code	Status (Complied, Deviation, Partly Complied, Not Complied)	Comments
1.	Formulation of Policy, its Disclosure and Review	Complied	The Company has formulated the comprehensive Stewardship Code in accordance with the provision of the SEBI Circular. The Code has been disclosed on the Company's website.
2.	Managing Conflict of Interest	Complied	The Company has a comprehensive Conflict of Interest Policy as per SEBI circular no. CIR/MIRSD/5/2013 dated August 27, 2013.
3.	Monitoring Investee Companies	Complied	The Company is monitoring the investee companies on an ongoing basis through regular interactions with company's management, research material and through other means.
4.	Intervention in Investee Companies and Collaboration with Institutional Investors	Complied	The Stewardship Code includes guiding principle for intervention in investee companies and on collaboration with other institutional investors. During the financial year 2021-22, there were no instances which required intervention.
5.	Policy on voting	Complied	The Fund has adopted Voting Policy which governs the votes cast by the Fund. The Policy are made available on the website.
6.	Reporting	Complied	A report on implementation of stewardship code is made available on the website.