

## REPORT ON IMPLEMENTATION STATUS OF STEWARDSHIP CODE FOR FY 2020-21

(In pursuance of Principle 6 of Stewardship Code introduced by SEBI vide its circular no. CIR/CFD/CMD1/ 168 /2019 dated December 24, 2019)

Principle No.	Particulars of Principles of Stewardship Code	Status	Reason/ Justification for deviation or non-implementation
1.	Comprehensive policy on the discharge of stewardship responsibilities, publicly disclose it, review and update it periodically	Implemented  AMC has formulated a comprehensive policy on Stewardship Code w.r.t discharge of stewardship responsibilities which has been reviewed/approved by the Board of AMC and Board of Trustees. The same has also been disclosed on the website of AMC.	
2.	Policy on managing conflicts of interest in fulfilling stewardship responsibilities and publicly disclose it	Implemented  The comprehensive policy on the Stewardship code formulated by the AMC contains a clear policy on how to manage conflicts of interest in fulfilling stewardship responsibilities.  Reasonable steps have been undertaken by AMC to avoid actual or potential conflict of interest situations while investing the funds of Shriram Mutual Fund.	
3.	Policy on monitoring investee companies	Implemented  The comprehensive policy on the Stewardship code formulated by the AMC contains a clear policy on continuous monitoring of investee companies  The Fund Management team and/or Research team has reviewed and monitored closely the various developments at the investee company such as financial research / corporate actions / significant events / development etc. by using publicly available information, research and industry information, etc.	
4.	Policy on intervention in investee companies along with a clear policy	Implemented  The comprehensive policy on the	

	for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors, which should be disclosed	Stewardship code formulated by the AMC contains a clear policy on intervention in investee companies in cases, where any act/omission of the investee company is considered material, in the opinion of AMC, on a case to case basis along with a clear policy for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors.	
5.	Policy on voting and disclosure of voting activity	<p>Implemented</p> <p>The comprehensive policy on the Stewardship code formulated by the AMC contains the policy on voting and disclosure of voting activity. AMC has also formulated a separate voting policy in line with the other relevant SEBI guidelines/circulars issued in this regard and the said policy has also been disclosed on the website of the AMC.</p> <p>AMC has reviewed all voting proposals, routine as well as non-routine, and performed its duties in a responsible manner keeping in mind the best interests of Shriram Mutual Fund investors, in line with the regulatory requirement. Rationale for voting on each resolution has been recorded and reported to Board of AMC and also to the Board of Trustees.</p>	