

CIRCULAR

SEBI/HO/IMD/IMD-RAC/P/CIR/2025/54

April 11, 2025

To,

All Mutual Funds

All Asset Management Companies (AMCs)

All Trustee Companies/ Board of Trustees of Mutual Funds

All Registrar and Share Transfer Agents (RTAs)

All Recognized Stock Exchanges

All Recognized Clearing Corporations

All Depositories

Association of Mutual Funds in India (AMFI)

Madam/ Sir,

<u>Subject: Specialized Investment Funds ('SIF') – Application and Investment</u> Strategy Information Document (ISID) formats

- 1. As stipulated in Regulation 49Y(1) of the SEBI (Mutual Funds) Regulations 1996 ('MF Regulations') for launching of investment strategies, Mutual Funds are required to launch Investment Strategies in accordance with the procedure applicable to the schemes of the Mutual Funds, as laid down in Regulation 28 of the MF Regulations.
- SEBI vide Circulars dated February 27, 2025 ('SIF Circular') and April 09, 2025 specified the Regulatory Framework for Specialized Investment Funds, which, interalia, provides the eligibility criteria for a registered Mutual Fund to establish Specialized Investment Fund, including disclosures in Investment Strategy Information Document ('ISID').
- 3. Pursuant to the above and to ensure uniformity and efficient processing of applications, it has been decided that registered Mutual Funds intending to establish Specialized Investment Funds are required to submit their applications as per the format provided at **Annexure I** to this Circular.



- 4. In terms of Clause 11 of Annexure A of the SIF Circular, the format of ISID is provided at **Annexure II** to this Circular.
- 5. This Circular shall come into force with effect from the date of this Circular.
- 6. This Circular is issued in exercise of the powers conferred by Section 11(1) of the Securities and Exchange Board of India Act, 1992 read with Chapter VI-C of the SEBI (Mutual Funds) Regulations 1996 to protect the interest of investors in securities and to promote the development of, and to regulate the securities market.
- 7. This Circular is available at www.sebi.gov.in under the link "Legal ->Circulars".

Yours faithfully,

Anupma Chadha
General Manager
Investment Management Department
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anupmac@sebi.gov.in



ANNEXURE I

Format of application by mutual funds for grant of approval to establish Specialized Investment Fund (SIF)

Instruction for filling up form: -

- 1 Applicants must submit a completed application form together with supporting documents to the Board.
- 2 This application form should be filled in accordance with the SEBI (Mutual Funds)
 Regulations, 1996 and circulars issued thereunder.
- 3 An incomplete application shall be liable to be rejected.
- 4 All entries by AMCs must be typed and legible.
- In case any further details are required to be submitted, the same shall be given on separate sheets attached to the application form.
- The application must be signed by the competent person having authority to do so and all signatures must be in original.

1.	Proposed brand name of		
	the SIF		
2.	Name of Mutual Fund		
3.	Assets Under	Financial Year (FY)	Amount (in crore)
	Management (AUM) over		
	the preceding 3 years		
	certified by scheme		
	statutory auditor.		
		Average AUM cro	re
4.	Details of action initiated/	Provide complete inform	ation of the action taken/
	taken against the	initiated and the current s	tatus of the same.
	sponsor/asset		
	management company		



	('AMC') under section 11,	
	11B, and/or Section 24 of	
	the SEBI Act, 1992 during	
	the last 3 years.	
	-	Name of CIO
5.	Details of Chief	Name of CIO:
	Investment Officer (CIO)	Qualification:
	proposed to be appointed	Experience in fund management (brief): <i>Details</i>
	for SIF in case applicant	need to be mentioned in bio data to be submitted in
	opts Route 2	the prescribed format.
	Average AUM managed	Please mention the value of assets managed by CIO
	by the CIO	on behalf of clients in India/ abroad, provided the
		said assets are regulated by a financial regulator
		and/or such assets are located in a country that is a
		member of Financial Action Task Force (FATF) and
		a country that is a signatory to International
		Organization of Securities Commission's (IOSCO)
		Multilateral Memorandum of Understanding
		(MMOU).
6.	Details of additional fund	Name of Fund Manager:
0.	manager to be appointed	Qualification:
	for SIF in case applicant	Experience in fund management (brief): <i>Details</i>
	• •	. ,
	opts Route 2	need to be mentioned in bio data to be submitted in
		the prescribed format.
	Average AUM managed	Please mention the value of assets managed by
	by the additional fund	fund manager on behalf of clients in India/ abroad,
	manager	provided the said assets are regulated by a financial
		regulator and/or such assets are located in a
		country that is a member of Financial Action Task
		Force (FATF) and a country that is a signatory to
		, , , , , , , , , , , , , , , , , , , ,



	International	Organization	of	Securities
	Commission's (I	OSCO) Multilater	al Men	norandum of
	Understanding (MMOU).		

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Name	
Designation – Authorised Signatory –	



Appendix 1

Rationale for compliance with the eligibility requirements

...... (name of the mutual fund) meets the requirements of the eligibility criteria stipulated in Route 1 (Sound Track Record)/ Route 2 (Alternate Route) for grant of approval to establish Specialized Investment Fund (SIF), in accordance with SEBI Circular SEBI/HO/IMD/IMD PoD1/P/CIR/2025/26 dated February 27, 2025 as mentioned below:

[Route 1- Sound Track Record]

Regulatory Reference to	Justification on how	Supporting Documents
SEBI Circular	the Mutual Fund	(reference can be given to
SEBI/HO/IMD/IMD	complies with the	the list of enclosures:
PoD1/P/CIR/2025/26	requirement	Appendix 2)
dated February 27, 2025		
Para 1.1.1.1 (i)-		Copy of certificate of
		registration as mutual fund
Mutual Fund has been in		
operation for a minimum		Certificate from Scheme
period of 3 years and has		Statutory Auditor on the
an average asset under		average Assets Under
management ('AUM') of		Management over the
not less than INR 10,000		preceding 3 financial years
crores, in immediately		
preceding 3 years		
Para 1.1.1.1 (ii)-		Undertaking from the Trustee
		Company of Mutual Fund
No action has been		
initiated or taken against		
the sponsor/asset		
management company		



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[Route 2: Alternate Route]

[Notic 2. Alternate Notic]	
Para 1.1.1.2 (i) (a)	Bio data of Chief Investment Officer (CIO) in
A Chief Investment Officer	, ,
	the prescribed format
('CIO') for the SIF with an	Undertaking from the AMC
experience of fund	on average AUM managed
management of at least 10	by CIO
years and has managed an	Self-certified undertaking
average AUM of not less	from the CIO on the
than INR 5,000 crores	average AUM managed
Para 1.1.1.2 (i) (b)	Bio data of Fund Manager
	in the prescribed format
An additional Fund Manager	Undertaking from the AMC
for the SIF with experience of	on average AUM managed
fund management of at least	by Fund Manager
3 years and has managed an	Self-certified undertaking
average AUM of not less	from the Fund Manager on
than INR 500 crores	the average AUM
	managed
Para 1.1.1.2 (ii)	Undertaking from the Trustee
	Company of Mutual Fund
No action has been initiated	
or taken against the	
sponsor/AMC under section	
11, 11B, and/or Section 24 of	



the SEBI Act, 1992 during	
the last 3 years	

Appendix 2:

List of documents to be enclosed

Name of Document	Particulars			
Annexure xx	Copy of certificate of registration as mutual fund			
Route 1: Sound Track record				
Annexure xx	Certificate from Scheme Statutory Auditor on the average			
	Assets Under Management over the preceding 3 financial			
	years			
Annexure xx	Undertaking from the Trustee Company of Mutual Fund			
	regarding action initiated/ taken against the sponsor/asset			
	management company ('AMC') under section 11, 11B,			
	and/or Section 24 of the SEBI Act, 1992 during the last 3			
	years.			
Route 2: Alternate Rou	ute			
Annexure xx	Bio data of Chief Investment Officer (CIO) in the format			
	prescribed for 'Bio data of Key Personnel' in SEBI Master			
	Circular for Mutual Funds dated June 27, 2024 along with			
	identity proof.			
Annexure xx	Undertaking from the AMC that the CIO appointed for SIF			
	has managed an average AUM of not less than INR 5,000			
	crores.			
Annexure xx	Self-certified undertaking from the CIO that he/she has			
	managed an average AUM of not less than INR 5,000 crores.			
Annexure xx	Self-certified fit and proper person declaration by the CIO as			
	per Schedule II of the SEBI (Intermediaries) Regulations,			
	2008.			



Bio data of additional fund manager of SIF in the format	
prescribed for 'Bio data of Key Personnel' in SEBI Master	
Circular for Mutual Funds dated June 27, 2024 along with	
identity proof	
Undertaking from the AMC that the Fund manager	
appointed for SIF has managed an average AUM of not	
less than INR 500 crores.	
Self-certified undertaking from the Fund manager	
appointed for SIF that he/she has managed an average	
AUM of not less than INR 500 crores.	
Self-certified fit and proper person declaration by the fund	
manager as per Schedule II of the SEBI (Intermediaries)	
Regulations, 2008.	
Undertaking from the Trustee Company of Mutual Fund	
regarding action initiated/ taken against the sponsor/asset	
management company ('AMC') under section 11, 11B,	
and/or Section 24 of the SEBI Act, 1992 during the last 3	
years.	
Undertaking from AMC that it shall maintain a separate	
website/ dedicated webpage exclusively for SIF and that	
there would be clear differentiation between the SIF's	
offerings and the regular Mutual Fund Offerings	
Organizational structure of SIF indicating details of	
resources being shared	

ANNEXURE II

1. STANDARD OFFER DOCUMENTS

A. INVESTMENT STRATEGY INFORMATION DOCUMENT (ISID)

Front Cover Page

INVESTMENT STRATEGY INFORMATION DOCUMENT SECTION 1

NAME OF THE INVESTMENT STRATEGY (Type of Investment Strategy)

- 1. Name and type of the Investment strategy to be aligned with SEBI Circular on Regulatory framework for Specialised Investment Funds (SIF).
- 2. In accordance with SEBI Circulars on Potential Risk Class (PRC) Matrix for debt schemes, type of investment strategy to include PRC description and table. As per SEBI Circulars on Potential Risk Class (PRC) Matrix for debt schemes, the PRC matrix along with the mark for the cell in which the scheme resides shall be disclosed on front page of ISID.
- 3. Product Labelling and Risk- band of the Investment Strategy and Benchmark should be disclosed
- 4. In case the investment strategy is listed/proposed to be listed (close ended / interval investment strategies etc.), the Scrip Code issued by the stock exchange after listing to be mentioned below the name of the investment strategy.

This product is suitable for investors who are seeking	Risk-band*	Benchmark Risk- band (as applicable)
	Risk band Level 1	Risk band Level 1
	••	••
	Risk band Level 5	Risk band Level 5

^{*}The Risk Band shall be as specified by AMFI.

The above product labelling assigned during the New Fund Offer (NFO) is based on internal assessment of the characteristics of the investment strategy or model portfolio and the same may vary post NFO when the actual investments are made

Offer of units of Rs... each for cash during the New Fund Offer and Continuous offer for Units at NAV based prices

	New Fund Offer Opens on:	
	New Fund Offer Closes on:	
	Investment strategy re-opens on:	
Name of SIF	:	
Name of the mutual f	und:	
Name of Asset Manag	gement Company :	
Name of Trustee Com	ipany :	
Addresses, Website of	f the entities (including SIF)	

The particulars of the investment strategy have been prepared in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations 1996, (herein after referred to as SEBI (MF) Regulations) as amended till date and circulars issued thereunder filed with SEBI, along with a Due Diligence Certificate from the AMC. The units being offered for public subscription have not been approved or recommended by SEBI nor has SEBI certified the accuracy or adequacy of the Investment Strategy Information Document.

The Investment Strategy Information Document sets forth concisely the information about the investment strategy that a prospective investor ought to know before investing. Before investing, investors should also ascertain about any further changes to this Investment Strategy Information Document after the date of this Document from the SIF/Mutual Fund / Investor Service Centres / Website / Distributors or Brokers.

The investors are advised to refer to the Statement of Additional Information (SAI) for details of ______ SIF, Mutual Fund, Standard Risk Factors, Special Considerations, Tax and Legal issues and general information on www.______. (website address).

SAI is incorporated by reference (is legally a part of the Investment Strategy Information Document). For a free copy of the current SAI, please contact your nearest Investor Service Centre or log on to our website (give reference to both the SIF website and mutual fund website)

The Investment strategy Information Document (Section I and II) should be read in conjunction with the SAI and not in isolation.

Investors are advised to note that investments in Specialized Investment Fund involves relatively higher risk including potential loss of capital, liquidity risk and market volatility. Please read all investment strategy related documents carefully before making the investment decision.

This Investment Strategy Information Document is dated	·
Note: The wording in italics is explanatory commentary/instructions.	

Instructions:

- i. SIF is free to add any other disclosure, which in the opinion of the Trustees or the Asset Management Company (AMC) is material for the investor, provided that such information is not presented in an incomplete, inaccurate or misleading manner. Care should be taken to ensure that inclusion of such information does not, by virtue of its nature, or manner of presentation, obscure or impede understanding of any information that is required to be included under the Investment Strategy Information Document.
- ii. Care should be taken to ensure that the information is presented in the Investment Strategy Information Document in simple language and in a clear, concise and easily understandable manner.
- iii. The investment strategy shall not have a name or title which may be deceptive or misleading. Name of the investment strategy should be consistent with its statement of investment policy and the investment strategy name should be in line with SEBI circular on Regulatory framework for Specialised Investment Funds (SIF).
- iv. The type of the investment strategy would mean whether the strategy is an equity oriented investment strategy, debt oriented investment strategy or hybrid investment strategy, etc. and whether the investment strategy is open-ended, close-ended or interval and the investment strategy type should be in line with SEBI circular on Regulatory framework for Specialised Investment Funds (SIF).
- v. Investment Strategy Information Document has two sections- Section I and Section II. While Section I contains investment strategy specific information that is dynamic, Section II contains elaborated provisions (including references to applicable Regulations/circulars/guidelines) with reference to information/disclosures provided in Section I.

PART I. HIGHLIGHTS/SUMMARY OF THE INVESTMENT STRATEGY

Sr. No.	Title	Description	
I.	Name of the Investment Strategy	(As per SEBI Circular on Regulatory Framewo for Specialised Investment Funds (SIF)	
II.	Category of the Investment Strategy	As per SEBI circular on Regulatory Framework for Specialised Investment Funds)	
III.	Type of Investment Strategy • Open ended/ close/interval investment strategies to PRC description in the investment strategies to terms of Clause 17.5 of SEBI Master Circumutual Funds dated June 27, 2024.		
IV.	Investment strategy code	(To be disclosed after obtaining investment strategy code)	
V.	Investment objective	Clear and concise Investment objective to be stated in ISID and must be true to the investment strategy label. It shall contain the following statement "There is no assurance that the investment objective of the Investment strategy will be achieved.	
VI.	Liquidity/listing details	Provide Liquidity provisions on ongoing basis. Listing details only to be provided if the investment strates intends to list immediately after NFO	
VII.	Benchmark (Total Return Index)	·	
VIII.	Subscription frequency		
IX.		Equity Oriented Investment Strategies- Daily or any lesser redemption frequency as may be decided by AMC Debt Oriented Investment Strategies- Once in a week or any lesser redemption frequency as may be decided by AMC Hybrid Investment Strategies- Two Times in a week or any lesser redemption frequency as may be	

X.	NAV disclosure	Mention only the Daily Disclosure timings on AMFI and AMC website. Further Details in Section II.
XI.	Applicable timelines	Timeline for Dispatch of redemption proceeds, Dispatch of IDCW (if applicable) etc.
XII.	Plans and Options Plans/Options and sub	Plan- Direct Plan/Regular Plan Options under each Plan(s)
	options under the Investment strategy	Growth Income Distribution cum Capital Withdrawal (IDCW) (include facilities if applicable) • Including Default option/ facility (as applicable) For detailed disclosure on default plans and options, kindly refer SAI.
XIII.	Load Structure	Exit Load:
XIV.	Minimum Application Amount/switch in	During NFO:On continuous basis:
XV.	Minimum Additional Purchase Amount	
XVI.	Minimum Redemption/switch out amount	Rs The redemption will be subject to compliance with provisions mentioned under "Minimum investment threshold"
XVII.	Notice Period	(Maximum duration of notice period shall not exceed 15 working days.)

XVIII.	New Fund Offer Period This is the period during which a new investment strategy sells its units to the investors.	NFO opens on: NFO closes on: Minimum duration to be 3 working days and will not be kept open for more than 15 days Any changes in dates will be published through notice on AMC SIF website i.e	
XIX.	New Fund Offer Price: This is the price per unit that the investors have to pay to invest during the NFO.	price per unit	
XX.	Segregated portfolio/side pocketing disclosure	Confirmation/disclosure statement only. For Details, kindly refer SAI	
XXI.	Swing pricing disclosure	Confirmation/disclosure statement only. For Details, kindly refer SAI	
XXII.	Stock lending/short selling	Confirmation/disclosure statement only. For Details, kindly refer SAI	
XXIII.	How to Apply	Summary of process only. Details in section II	
XXIV.	Investor services	Contact details for general service requests:Contact details for complaint resolution:	
XXV.	Specific attribute of the investment strategy (such as lock-in, duration in case of close ended schemes as applicable)		
XXVI.	Special product/facility available during the NFO and on ongoing basis	Briefly describe the facilities/products Available Facilities like: • Systematic Investment Plan • Systematic Transfer Plan • Systematic Withdrawal Plan • For further details of above special products / facilities, For Details, kindly refer SAI	

XXVII.	Weblink	A weblink wherein TER for last 6 months, Daily TER as	
		well as investment strategy factsheet shall be made	
		available (when applicable)	

DUE DILIGENCE BY THE ASSET MANAGEMENT COMPANY

It is confirmed that:

- (i) The Investment Strategy Information Document submitted to SEBI is in accordance with the SEBI (Mutual Funds) Regulations, 1996 and the guidelines and directives issued by SEBI from time to time.
- (ii) All legal requirements connected with the launching of the Investment strategy as also the guidelines, instructions, etc., issued by the Government and any other competent authority in this behalf, have been duly complied with.
- (iii) The disclosures made in the Investment Strategy Information Document are true, fair and adequate to enable the investors to make a well informed decision regarding investment in the Investment Strategy.
- (iv) The intermediaries named in the Investment Strategy Information Document and Statement of Additional Information are registered with SEBI and their registration is valid, as on date.
- (v) The contents of the Investment Strategy Information Document including figures, data, yields etc. have been checked and are factually correct
- (vi) A confirmation that the AMC has complied with the compliance checklist applicable for Investment Strategy Information Document other than cited deviations/ that there are no deviations from the regulations
- (vii) Notwithstanding anything contained in this Investment Strategy Information Document, the provisions of the SEBI (Mutual Funds) Regulations, 1996 and the guidelines there under shall be applicable.
- (viii) The Trustees have ensured that the (name of the Investment Strategy) approved by them is a new product offered by (name of the SIF) and is not a minor modification of any existing Investment Strategy.

Date:	Name:
Place:	Designation:

PART II. INFORMATION ABOUT THE INVESTMENT STRATEGY

A. HOW WILL THE INVESTMENT STRATEGY ALLOCATE ITS ASSETS?

This includes asset allocation table giving the broad classification of assets and indicative exposure level in percentage terms. The asset allocation should be consistent with the investment objective of the Investment Strategy and SEBI circular on Regulatory framework for Specialised Investment Funds (SIF).

Instruments	Indicative allocations (% of total assets)	
	Minimum	Maximum

- Percentage of investment in overseas securities, derivatives for non-hedging purposes, stock lending, securitized debt, Debt instruments with special features (AT 1 and AT 2 Bonds), Debt Instruments with SO / CE, ReITs and InVITs, Tri-party repos, other mutual funds, repo/ reverse repo transactions in corporate debt securities, Credit Default Swaps, covered call option etc). to be indicated.
- In case the Investment Strategy does not intend to invest in these securities, negative confirmation in a table format should be provided for securities / instruments in which the Investment Strategy will not invest.
- Cumulative gross exposure limits to be adhered in terms of SEBI Circular on Regulatory framework for Specialised Investment Funds (SIF)
- Any other information/disclosure to be added as per applicable Consolidated checklist of standard observations.

<u>Indicative Table</u> (Actual instrument/percentages may vary subject to applicable SEBI circulars)

Sl. no	Type of Instrument	Percentage of exposure	Circular references*
1.	Securities Lending	1	
2.	Derivatives for non- hedging and other than for portfolio rebalancing purposes		
3.	Securitized Debt		
4.	Overseas Securities		
5.	ReITS and InVITS		
6.	Debt instruments with special features (AT1 and AT2 Bonds)		
7.	Debt Instruments with SO / CE		
8.	Tri-party repos		
9.	Repo/ reverse repo transactions in corporate debt securities		
10.	Credit Default Swaps		

11.	Any other instrument	

*SEBI circular references (wherever applicable) in support of exposure limits of different types of asset classes in asset allocation shall be provided.

Timelines for deployment of funds collected by Asset Management Companies (AMCs) in New Fund Offer (NFO) as per asset allocation of the scheme as per SEBI circular dated February 27, 2025

Portfolio rebalancing: AMC to refer to Clause 1.14.1.2, Clause 2.9, Clause 3.5.3.11 and Clause 3.6.7 of SEBI Master Circular for Mutual Funds and applicable clause of Consolidated checklist of standard observations for active and passive breach/es.

B. WHERE WILL THE INVESTMENT STRATEGY INVEST?

This includes only a list of all instruments in which the Investment Strategy will invest. (Detailed definition and applicable regulations/guidelines for each instrument shall be included in Section II)

Investment in overseas securities shall be made in accordance with the requirements stipulated by SEBI and RBI from time to time.

Any other information/disclosure to be added as per applicable Consolidated checklist of standard observations.

C. WHAT IS THE INVESTMENT APPROACH?

Information about investment approach and risk control should be included in simple terms. Investment approach shall match the asset allocation pattern of the investment strategy.

Further, details on generic concepts such as macroeconomic trends may not be provided unless there are investment approaches derived specifically from these concepts.

Disclosure for derivatives to be provided in summary form. For detailed derivative strategies, please refer to SAI.

Further, Portfolio turnover policy, particularly for equity oriented investment strategies shall also be disclosed. In discussing the investment approaches, the investment strategy shall briefly discuss in the ISID the probable effect of such approaches on the rate of the total portfolio turnover of the investment strategy, if such effects are significant and also other consequences which will result from the higher portfolio turnover rate e.g. higher brokerage and transaction cost.

D. HOW WILL THE INVESTMENT STRATEGY BENCHMARK ITS PERFORMANCE?

Benchmark (Total Returns Index):

The AMC shall appropriately select any of broad market indices available, as a benchmark index depending on the investment objective and portfolio of the investment strategy.

- Equity oriented investment strategies shall be compared against a suitable broad market index such as BSE Sensex or NSE Nifty or BSE 100 or CIRISL 500 etc
- Debt oriented investment strategies shall be compared with a suitable broad market index that is a representative of the fund's portfolio.
- Hybrid investment strategies shall be compared with suitable broad market benchmark wherever available

The name and the justification (specific to the investment strategy objective) for the use of benchmark index with which the performance of the investment strategy can be compared with.

E. WHO MANAGES THE INVESTMENT STRATEGY?

Name, age, educational qualification and experience of the fund manager to the Investment strategy to be disclosed. The experience of the fund manager should include last 10 years' experience and also the name of other investment strategies under his /her management.

Fund manager adequate expertise and experience is required for commodity based investment strategies and overseas investments as per applicable SEBI circulars.

F. HOW IS THE INVESTMENT STRATEGY DIFFERENT FROM EXISTING INVESTMENT STRATEGIES OF THE SIF?

<u>Provide a reference list of existing investment strategies and a functional website link that contains detailed comparative table.</u>

G. HOW HAS THE INVESTMENT STRATEGY PERFORMED (if applicable)

	Compounded	Investment	Benchmark
	Annualised	Strategy Returns	Returns %
strategy, this is not applicable	Returns	%	
hence give the statement- "This			

investment strategy is a new strategy and does not have any performance track record"]

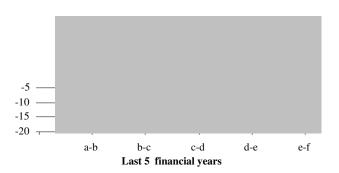
Or

[In case of an investment strategy in existence, the return figures shall be given for that investment strategy only. For an investment strategy which is in existence for more than 1 year, the returns given will be Compounded Annualised Returns and for investment strategy which is in existence for less than 1 year, the returns would be absolute returns since inception.

Absolute returns for each financial year for the last 5 years shall be represented by means of a bar diagram as per the adjacent format.]

Returns for the last	
1 year	
Returns for the last	
3 years	
Returns for the last	
5 years	
Returns since	
inception	

Absolute Returns for each financial year for the last 5 years



H. ADDITIONAL INVESTMENT STRATEGY RELATED DISCLOSURES

- i. Investment Strategy's portfolio holdings (top 10 holdings by issuer and fund allocation towards various sectors to be provided through a functional website link that contains detailed description.)
- ii. Functional website link for Portfolio Disclosure -.
- iii. Portfolio Turnover Rate particularly for equity oriented Investment Strategies shall also be disclosed.
- iv. Aggregate investment in the Investment Strategy by:

Sr. No.	Category of Persons	Net Value	
1.	O_{J}	Units	NAV per unit
	Manager(s)		

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

v. Investments of AMC in the Investment Strategy – Details to be provided vide functional website link.

The AMC shall not invest in any of the Investment Strategies unless full disclosure of its intention to invest has been made in the ISID and that the AMC shall not be entitled to charge any fees on such investment

PART III- OTHER DETAILS

A. COMPUTATION OF NAV

Disclosure pertaining to illustration on computation of NAV and Methodology for calculation of sale and re-purchase price of the units of Investment Strategy.

Disclosure to the effect that the repurchase price shall not be lower than 95% of the NAV. For other details such as policies w.r.t computation of NAV, rounding off, investment in foreign securities, procedure in case of delay in disclosure of NAV etc. refer to SAI

B. NEW FUND OFFER (NFO) EXPENSES

These expenses are incurred for the purpose of various activities related to the NFO like sales and distribution fees paid marketing and advertising, registrar expenses, printing and stationary, bank charges etc. Details of source for meeting these expenses may be disclosed. AMC to ensure that no NFO expenses will be / were charged to the Investment Strategy.

C. ANNUAL RECURRING EXPENSES

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

The AMC has estimated that upto _____ % of the daily average net assets of the Investment Strategy will be charged to the Investment Strategy as expenses (*Give slab wise break up depending on the assets under management. Give plan/option wise break up if the expense structures are different*). For the actual current expenses being charged, the investor should refer to the website of the SIF.

Expense Head	% p.a. of daily Net Assets* (Estimated p.a.)
Investment Management & Advisory Fee	
Audit fees/fees and expenses of trustees	
Custodial Fees	
Registrar & Transfer Agent Fees including cost of providing account	
statements / IDCW / redemption cheques/ warrants	
Marketing & Selling Expenses including Agents Commission and	
statutory advertisement	
Costs related to investor communications	
Costs of fund transfer from location to location	
Cost towards investor education & awareness	
Brokerage & transaction cost pertaining to distribution of units	
Goods & Services Tax on expenses other than investment and advisory fees	
Goods & Services Tax on brokerage and transaction cost	
Other Expenses (to be specified as per Reg 52 of SEBI MF Regulations)	
Maximum Total expenses ratio (TER) permissible under Regulation	
52 (6) (c)	
Additional expenses under Regulations 52(6A)(c)	
Additional expenses for gross new inflows from specified cities	

*Impact of TER on returns of both Direct plan and Regular plan through an illustration may be provided.

Any other information/disclosure to be added as per applicable Consolidated checklist of standard observations.

D. LOAD STRUCTURE

Exit Load is an amount which is paid by the investor to redeem the units from the Investment Strategy. Load amounts are variable and are subject to change from time to time. For the current applicable structure, please refer to the website ofSIF (www.----) or may call at (toll free no.) or your distributor.

Type of Load	Load chargeable (as %age of NAV)
Exit	To be prescribed by respective AMC

Section II

I. Introduction

A. Definitions/interpretation

Functional website link that contains detailed description

B. Risk factors

- Investment Strategy specific risk factors

Include risk factors associated with investment in various instruments in which the investment strategy intends to invest as indicated in asset allocation section.

C. Risk mitigation strategies

II. Information about the investment strategy:

A. Where will the investment strategy invest – In terms of Regulation 49Z of SEBI MF Regulations, detailed description of the instruments as permitted under Regulation 43(1) for mutual fund schemes (including overview of debt markets in India, if applicable) mentioned in Section I

B. What are the investment restrictions?

All the investment restrictions as contained in Regulation 49AA and Seventh Schedule to SEBI (Mutual Funds) Regulations, 1996 and circulars issued thereunder, applicable to the investment strategy should be incorporated.

Further in case the fund follows any internal norms vis-à-vis limiting exposure to a particular scrip or sector, etc. apart from the aforementioned investment restrictions the same needs to be disclosed.

C. Fundamental Attributes

Following are the Fundamental Attributes of the investment strategy, in terms of Clause 1.14 of SEBI Master Circular for Mutual Funds:

- (i) Type of investment strategy:
 - Open ended/Close ended/Interval investment strategy
 - o Equity Oriented/ Debt Orineted/ Hybrid Investment strategy

(ii) Investment Objective

- Main Objective Growth/Income/Both.
- o Investment pattern The Tentative Equity/Debt/Money Market portfolio break-up with minimum and maximum asset allocation, while retaining the option to alter the asset allocation for a short term period on defensive considerations.
- (iii) Terms of Issue

- o Liquidity provisions such as listing, repurchase, redemption.
- o Aggregate fees and expenses charged to the investment strategy.
- o Any safety net or guarantee provided.

In accordance with Regulation 18(15A) of the SEBI (MF) Regulations and Clause 1.14.1.4 of SEBI Master Circular for Mutual Funds, the Trustees shall ensure that no change in the fundamental attributes of the investment strategy or the trust or fee and expenses payable or any other change which would modify the investment strategy thereunder and affect the interests of Unitholders is carried out unless:

- SEBI has reviewed and provided its comments on the proposal
- A written communication about the proposed change is sent to each Unitholder and an advertisement is given in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where the Head Office of the Mutual Fund is situated; and
- The Unitholders are given an option for a period of atleast 30 calendar days to exit at the prevailing Net Asset Value without any exit load.
- D. Floors and ceiling within a range of 5% of the intended allocation against each sub class of asset, as per clause 13.6.2 of SEBI master circular for mutual funds dated June 27, 2024 (only for close ended debt investment strategies- if applicable)

E. Other Investment Strategy Specific Disclosures:

E. Otner Investment Strategy Specific	Disclosures:
Listing and transfer of units	
Dematerialization of units	
Minimum Target amount	
(This is the minimum amount	
required to operate the investment	
strategy and if this is not collected	
during the NFO period, then all	
the investors would be refunded	
the amount invested without any	
return.)	
Redemption and subscription	
frequency of the investment	
strategy	
Notice period of the investment	
strategy	
Maximum Amount to be raised	
(if any)	
Dividend Policy (IDCW)	
Allotment (Detailed procedure)	Mention, the procedure for allotment and dispatch of
	account statements/unit certificates. Indicate the time
	period. Mention the number of days within which the
	statement shall be dispatched to the unitholders who

	subscribe to the units when the investment strategy is open for continuous subscription after NFO as per the applicable guidelines.
Refund	If application is rejected, full amount will be refunded within 5 working days of closure of NFO. If refunded later than 5 working days @ 15% p.a. for delay period will be paid and charged to the AMC.
Who can invest This is an indicative list and investors shall consult their financial advisor to ascertain whether the investment strategy is suitable to their risk profile.	
Who cannot invest	
How to Apply (details)	Details regarding- availability of application form from either the Investor Service Centers (ISCs)/Official Points of Acceptance (OPAs) of AMC or may be downloaded from the website of AMC (Provide website link) should be specified. Please refer to the SAI and Application form for the instructions. A link for the list of official points of acceptance, collecting banker details etc. Name, address and contact no. of Registrar and Transfer Agent (R&T), email id of R&T, website address of R&T, official points of acceptance, collecting banker details etc. on back cover page. To inform investors that it is mandatory to mention their bank account numbers in their applications/requests for redemption.
The policy regarding reissue of repurchased units, including the maximum extent, the manner of reissue, the entity (the investment strategy or the AMC) involved in	•
the same.	
Restrictions, if any, on the right to	
freely retain or dispose of units	
being offered.	
Cut off timing for subscriptions/ redemptions/ switches	
This is the time before which your	
application (complete in all	

respects) should reach the official	
points of acceptance.	
Where can the applications for	Please refer the AMC website/SIF website (Provide website
purchase/redemption switches be submitted?	link) at the following link for the list of official points of acceptance, collecting banker details etc.
	To inform investors that it is mandatory to mention their bank account numbers in their applications/requests for redemption.
Minimum amount for	
purchase/redemption/switches	
Minimum threshold requirement	
and consequences of non-	
maintenance Accounts Statements	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). A Consolidated Account Statement (CAS) detailing all the transactions across all SIFs (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 15th of the succeeding month. Half-yearly CAS shall be issued at the end of every six months (i.e. September/ March) on or before 21st day of succeeding month, to all investors providing the prescribed details across all investment strategies of SIFs and securities held in dematerialized form across demat accounts, if applicable
Dividend/ IDCW	For further details, refer SAI. The payment of dividend/IDCW to the unitholders shall be
	made within seven working days from the record date.
Redemption	The redemption or repurchase proceeds shall be dispatched to the unitholders within three working days from the date of redemption or repurchase.
	For list of exceptional circumstances refer Clause 14.1.3 of SEBI Master Circular for Mutual Funds dated June 27, 2024

	For investment strategies investing atleast 80% of total assets in permissible overseas investments (as per Clause 12.19 of SEBI Master Circular for Mutual Funds), the transfer of redemption or repurchase proceeds to the unitholders shall be made within five working days from the date of redemption or repurchase.
Bank Mandate	
Delay in payment of redemption / repurchase proceeds/dividend	The Asset Management Company shall be liable to pay interest to the unitholders at rate as specified vide clause 14.2 of SEBI Master Circular for Mutual Funds dated June 27, 2024 for the period of such delay
Unclaimed Redemption and Income Distribution cum Capital Withdrawal Amount	
Disclosure w.r.t investment by minors	
Any other disclosure in terms of Consolidated Checklist on Standard Observations	

III. Other Details

- A. Periodic Disclosures such as Half yearly disclosures, half yearly results, annual report
 - Specify timelines of these disclosures and details of where they are disclosed. (such as "Refer to AMC website, SIF website, SAI, AMFI website for further details etc. Provide a functional link for each respective field")
 - Portfolio disclosures
 - Any disclosure in terms of Consolidated Checklist on Standard Observations
- B. Scenario Analysis for Derivatives Positions (As specified by AMFI)
- C. Liquidity risk management tools and its applicability
- D. Transparency/NAV Disclosure (Details with reference to information given in Section I)
- **E.** Transaction charges and stamp duty- Indicate only the amount of transaction charges and stamp duty applicable. Details to be provided in SAI.
- **F. Associate Transactions** Please refer to Statement of Additional Information (SAI)
- **G. Taxation** For details on taxation please refer to the clause on Taxation in the SAI apart

from the following:

	Resident Investors	Non resident Investors	Mutual Fund/SIF
Tax on dividend			
Capital gain			
Long Term:			
Short Term:			

- H. Rights of Unitholders- Please refer to SAI for details.
- **I. List of official points of acceptance:** Details to be uploaded and updated on a functional website link to the website of SIF
- J. Penalties, Pending Litigation or Proceedings, Findings of Inspections or Investigations For Which Action May Have Been Taken Or Is In The Process Of Being Taken By Any Regulatory Authority
 - AMCs to ensure real time updation of data on the said link.
 - Any disclosure in terms of Consolidated Checklist on Standard Observations
