

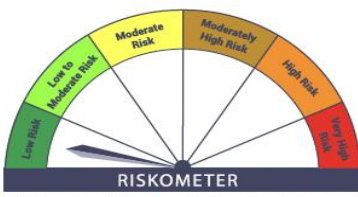
DRAFT SCHEME INFORMATION DOCUMENT

Groww Arbitrage Fund

Consolidated
Standard Observation 1

(An open ended equity scheme investing in arbitrage opportunities)

Consolidated
Std Obs 25

This product is suitable for investors who are seeking*:	Scheme Riskometer#	Benchmark Riskometer
- Investing predominantly in arbitrage opportunities between cash and derivative market and arbitrage opportunities within derivative segment - Long-term capital growth	Consolidated Std Obs 3  The Scheme Risk-o-meter is at Low risk	As per AMFI Tier 1 Benchmark i.e. Nifty 50 Arbitrage TRI  The Benchmark Risk-o-meter is at Low Risk.

*Investors should consult their financial advisers if in doubt about whether the product is suitable for them.

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

Offer of Units of Rs. 10 each during the New Fund Offer and continuous offer for Units at NAV based Prices

New Fund Offer Opens on: _____

New Fund Offer Closes on: _____

Scheme re-opens on: _____

The subscription list may be closed earlier by giving at least one day's notice in one daily newspaper, however the NFO period shall be open for minimum 3 working days. The Trustee reserves the right to extend the closing date of the New Fund Offer Period, subject to the condition that the subscription list of the NFO period shall not be kept open for more than 15 days.

Name of Mutual Fund	Groww Mutual Fund
Name of Asset Management Company	Groww Asset Management Limited (CIN: U65991KA2008PLC180894) Registered Office: Vaishnavi Tech Park, South Tower, 3rd Floor, Survey No.16/1 and 17/2, Ambalipura Village, Varthur Hobli, Bellandur, Bangalore South, Bangalore- 560103, Karnataka, India
Name of Trustee Company	Groww Trustee Limited (CIN: U65991KA2008PLC183561) Registered Office: Vaishnavi Tech Park, South Tower, 3rd Floor, Survey No.16/1 and 17/2, Ambalipura Village, Varthur Hobli, Bellandur, Bangalore South, Bangalore- 560103, Karnataka, India.
Corporate Office	505 – 5th Floor, Tower 2B, One World Centre, Near Prabhadevi Railway Station, Lower Parel, Mumbai – 400013, Maharashtra, Tele-+91 22 69744435
Website	www.growwmf.in

The particulars of the Scheme have been prepared in accordance with Securities and Exchange Board of India (Mutual Funds) Regulations 1996, (hereinafter 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 Scheme Information Document.

The Scheme Information Document sets forth concisely the information about the scheme that a prospective investor ought to know before investing. Before investing, investors should also ascertain about any further changes to this Scheme Information Document after the date of this Document from the 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 Groww Mutual Fund, Standard Risk Factors, Special Considerations, Tax and Legal issues and general information on <https://www.growwmf.in/downloads/sai>

SAI is incorporated by reference (is legally a part of the Scheme Information Document). For a free copy of the current SAI, please contact your nearest Investor Service Centre or log on to our website.

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

This Scheme Information Document is dated December 30, 2025.

TABLE OF CONTENTS	PAGE NO.
SECTION I	
I. HIGHLIGHTS / SUMMARY OF THE SCHEME	4
II. INFORMATION ABOUT SCHEME	19
A. HOW WILL SCHEME ALLOCATE ITS ASSETS	18
B. WHERE WILL THE SCHEME INVEST	21
C. WHAT ARE THE INVESTMENT STRATEGIES	23
D. HOW WILL THE SCHEME BENCHMARK ITS PERFORMANCE	25
E. WHO MANAGES THE SCHEME?	26
F. HOW IS THE SCHEME DIFFERENT FROM EXISTING SCHEMES OF THE MUTUAL FUND?	27
G. HOW HAS THE SCHEME PERFORMED	27
H. ADDITIONAL SCHEME RELATED DISCLOSURES	27
III. OTHER DETAILS	29
A. COMPUTATION OF NAV	29
B. NEW FUND OFFER (NFO) EXPENSES	30
C. ANNUAL SCHEME RECURRING EXPENSES	30
D. LOAD STRUCTURE	33
SECTION II.	35
I. INTRODUCTION	35
A. DEFINITION & INTERPRETATION	35
B. RISK FACTORS	35
C. RISK MITIGATION STRATEGIES	40
II. INFORMATION ABOUT SCHEME	42
A. WHERE WILL THE SCHEME INVEST?	42
B. WHAT ARE THE INVESTMENT RESTRICTIONS?	49
C. FUNDAMENTAL ATTRIBUTES	52
D. INDEX METHODOLOGY (FOR INDEX FUNDS, ETFS AND FOFS HAVING ONE UNDERLYING DOMESTIC ETF)	53
E. PRINCIPLES OF INCENTIVE STRUCTURE FOR MARKET MAKERS (FOR ETFS)	53
F. FLOORS AND CEILING WITHIN A RANGE OF 5% OF THE INTENDED ALLOCATION AGAINST EACH SUB CLASS OF ASSET	53
G. OTHER SCHEME SPECIFIC DISCLOSURES	53
III. OTHER DETAILS	63
A. In case of Fund of Funds scheme, details of benchmark, investment objective, investment strategy, term, year wise performance, top 10 holding/ link to top 10 holding of the underlying fund should be provided	63
B. Periodic disclosures such as half yearly disclosures, half yearly results, annual report	63
C. Transparency/NAV disclosure	64
D. Transaction charges and stamp duty	64
E. Associate transactions	64
F. Taxation	64
G. Rights of unitholders	67
H. List of Official Points of Acceptance	67
I. 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	67

SECTION I

Part I. HIGHLIGHTS/SUMMARY OF THE SCHEME

	Sr. No.	Title	Description
Consolidated Std Obs.1	I.	Name of the scheme	Groww Arbitrage Fund
	II.	Category of the Scheme	Arbitrage Fund
	III.	Scheme type	An open ended equity scheme investing in arbitrage opportunities
Consolidated Std Obs.7	IV.	Scheme code	The Scheme code will be added at the time of launch
Consolidated Std Obs.5	V.	Investment objective	The primary investment objective of the scheme is to generate long term growth of capital by predominantly investing in arbitrage opportunities present between the cash and derivative markets, as well as within the derivative segment, complemented by investments in debt securities and money market instruments. However, there can be no assurance that the investment objective of the scheme will be realized.
	VI.	Liquidity details: Listing details	The Scheme will offer units for purchases/switch-ins and redemptions/switch-outs at NAV based prices on all business days on an ongoing basis. Repurchase of Units will be at the NAV prevailing on the date the units are tendered for repurchase. As per SEBI (MF) Regulations, the Mutual Fund shall dispatch redemption proceeds within 3 working Days of receiving a valid redemption request. A penal interest of 15% per annum or such other rate as may be prescribed by SEBI from time to time, will be paid in case the redemption proceeds are not made within 3 working Days from the date of receipt of a valid redemption request. The Scheme being open ended, the units are not proposed to be listed on any stock exchange and no transfer facility on the exchange is provided. However, the Trustee reserves the right to list the units as and when open-end Schemes are permitted to be listed under the SEBI (MF) Regulations, and if the Trustee considers it necessary in the interest of unit holders of the Scheme.
Consolidated Std Obs.25	VII.	Benchmark (Total Return Index)	• As per AMFI benchmark Nifty 50 Arbitrage TRI Justification The Trustees have adopted Nifty 50 Arbitrage TRI as the benchmark index. The Scheme performance would be benchmarked against Nifty 50 Arbitrage Total Return Index which measure the performance of arbitrage strategies. The index measures performance of portfolio involving investment in equity and equivalent short position equity futures, etc. and hence it is most suited for comparing performance of the Scheme SEBI Master Circular dated June 27, 2024(hereinafter referred to as Master Circular of Mutual Fund), as per clause 1.9 of Master

		Circular of Mutual Fund requires mutual funds to adopt first tier benchmarks for schemes as notified by AMFI. Accordingly, the benchmark is selected from the benchmarks notified by AMFI for the category of scheme. The performance will be benchmarked to the Total Returns Variant of the Index. The AMC/ Trustee reserves the right to change the benchmark for evaluation of performance of the Scheme from time to time in conformity with the investment objectives and appropriateness of the benchmark subject to SEBI (MF) Regulations, and other communication in this regard., if any. Second Tier Benchmark: Not Applicable
VIII.	NAV disclosure	The AMC will calculate and disclose the first NAVs of the Scheme not later than 5 Business Days from the date of allotment of units under the NFO. The AMC shall update the NAVs on the website of the Mutual Fund https://www.growwmf.in/nav and on the website of Association of Mutual Funds in India - AMFI (www.amfiindia.com) by 11.00 p.m. on every Business Day. Further Details in Section II.
IX.	Applicable timelines	<u>Timeline for -</u> <u>Dispatch of redemption proceeds:</u> The redemption or repurchase proceeds shall be dispatched to the unitholders within 03 working days from the date of redemption or repurchase. In case of exceptional situations, additional time for redemption payment may be taken. This shall be in line with AMFI letter dated January 16, 2023. <u>Dispatch of IDCW:</u> The IDCW warrants shall be dispatched to the unitholders within 07 working days of the date of declaration of the IDCW. In case of Unit holders having a bank account with certain banks with which the Mutual Fund would have an arrangement from time to time, the IDCW proceeds shall be electronically credited to their account. In case of specific request for IDCW by warrants/cheques/demand drafts or unavailability of sufficient details with the Fund, the IDCW will be paid by warrant/cheques/demand drafts and payments will be made in favour of the unitholder (registered holder of the Unit or, if there are more than one registered holder, only to the first registered holder) with bank account number furnished to the Fund. Please note that it is mandatory for the unitholders to provide the bank account details as per SEBI guidelines.
X.	Plans and Options Plans/Options and sub options under the Scheme	The Scheme will have Regular Plan and Direct Plan** with a common portfolio and separate NAVs. Investors should indicate the

		Plan for which the subscription is made by indicating the choice in the application form. Each of the above Regular and Direct Plan under the scheme will have the following Options / Sub-options: (1) Growth Option and (2) Income Distribution cum Capital Withdrawal (IDCW) Option. The IDCW Option shall have only Reinvestment of IDCW and Payout of IDCW Option. The default option for the unitholders will be Regular Plan - Growth Option if he is routing his investments through a distributor and Direct Plan – Growth option if he is a direct investor. If the unit holders selects IDCW option but does not specify the sub-option then the default sub-option shall be Reinvestment of IDCW. Investors subscribing under Direct Plan of the Scheme will have to indicate “Direct Plan” against the Scheme name in the application form i.e. “Groww Arbitrage Fund - Direct Plan”. Treatment for investors based on the applications received is given in the table below: Investors should also indicate “Direct” in the ARN column of the application form. If the application is received incomplete with respect to not selecting Regular/Direct Plan, the application will be processed as under: <table><tr><th>Scenario</th><th>Broker Code mentioned by the investor</th><th>Plan mentioned by the investor</th><th>Default Plan to be captured</th></tr><tr><td>i.</td><td>Not mentioned</td><td>Not mentioned</td><td>Direct Plan</td></tr><tr><td>ii.</td><td>Not mentioned</td><td>Direct</td><td>Direct Plan</td></tr><tr><td>iii.</td><td>Not mentioned</td><td>Regular Plan</td><td>Direct Plan</td></tr><tr><td>iv.</td><td>Mentioned</td><td>Direct</td><td>Direct Plan</td></tr><tr><td>v.</td><td>Direct</td><td>Not mentioned</td><td>Direct Plan</td></tr><tr><td>vi.</td><td>Direct</td><td>Regular Plan</td><td>Direct Plan</td></tr><tr><td>vii.</td><td>Mentioned</td><td>Regular Plan</td><td>Regular Plan</td></tr><tr><td>viii.</td><td>Mentioned</td><td>Not mentioned</td><td>Regular Plan</td></tr></table> In cases of wrong/ invalid/ incomplete ARN codes mentioned on the application form, the application shall be processed under Regular Plan. The AMC shall contact and obtain the correct ARN code within 30 calendar days of the receipt of the application form from the investor/ distributor. In case, the correct code is not received within 30 calendar days, the AMC shall reprocess the transaction under Direct Plan from the date of application without any exit load. **DIRECT PLAN: Direct Plan is only for investors who purchase /subscribe Units in a Scheme directly with the Mutual Fund or through	Scenario	Broker Code mentioned by the investor	Plan mentioned by the investor	Default Plan to be captured	i.	Not mentioned	Not mentioned	Direct Plan	ii.	Not mentioned	Direct	Direct Plan	iii.	Not mentioned	Regular Plan	Direct Plan	iv.	Mentioned	Direct	Direct Plan	v.	Direct	Not mentioned	Direct Plan	vi.	Direct	Regular Plan	Direct Plan	vii.	Mentioned	Regular Plan	Regular Plan	viii.	Mentioned	Not mentioned	Regular Plan
Scenario	Broker Code mentioned by the investor	Plan mentioned by the investor	Default Plan to be captured																																			
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vii.	Mentioned	Regular Plan	Regular Plan																																			
viii.	Mentioned	Not mentioned	Regular Plan																																			

			the stock exchange and is not available for investors who route their investments through a Distributor.
Consolidated Std Obs.47	XI.	Load Structure	Exit Load: Nil
	XII.	Minimum Application Amount/switch in	- During NFO: Rs. 500 and in multiples of Re. 1/-thereafter. Units will be allotted in the whole figures and the balance amount will be refunded, Even if it falls below the minimum amount. - On continuous basis: Minimum of Rs.500/- and in multiples of Re.1/- thereafter.
	XIII.	Minimum Additional Purchase Amount	During NFO Period: Rs. 500 per application and in multiples of Re. 1 thereafter. Units will be allotted in whole figures and the balance amount will be refunded. For continuous basis- Additional Purchase - Minimum of Rs.500/- and in multiples of Re.1/- thereafter.
Consolidated Std Obs.36	XIV.	Minimum Redemption/switch amount	The minimum switch amount / redemption amount shall be Rs. 500 or 'any number of units' as requested by the investor at the time of the request. The Minimum Application and redemption amount mentioned above shall not be applicable to the mandatory investments made in the Scheme pursuant to the provisions of clause 6.10 of Master Circular of Mutual Fund, as amended from time to time. There is no minimum balance requirement.
	XV.	New Fund Offer Period This is the period during which a new scheme 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 website i.e. www.growwmf.in
Consolidated Std Obs.34	XVI.	New Fund Offer Price: This is the price per unit that the investors have to pay to invest during the NFO.	Rs. 10 per unit
	XVII.	Segregated portfolio/side pocketing disclosure	AMC may create segregated portfolio in the scheme. For details, kindly refer SAI
Consolidated Std Obs.53	XVIII	Swing pricing disclosure	Not applicable
	XIX.	Stock lending/short selling Std Obs.6	Subject to SEBI (MF) Regulations, 1996 and in accordance with Clause 12.11 in Master Circular of Mutual Fund on Securities Lending Scheme, and framework for short selling and borrowing and lending of securities, the Scheme intends to engage in Stock Lending. For Details, kindly refer SAI

XX.	How to Apply and other details	Investors can subscribe for the Units of the Scheme by completing the Application Form and delivering it at any Investor Service Centre or Collection Centre. KYC complied investor/ Investors who are able to provide necessary information and/or documents to perform KYC can perform a web-based transaction to purchase units of the Scheme on website of the Groww Mutual Fund i.e. https://gmf.kfintech.com or through any other electronic mode introduced from time to time. For further details provided in Section II.
XXI.	Investor services	Investors can enquire about NAVs, Unit Holdings, Valuation, IDCWs, etc. or lodge any service request at the investor support number of AMC 8050180222. Investors can also address their queries to the below details: Investor Support Number – 8050180222 Investor Support Email Id – support@growwmf.in In case investor's query is not resolved satisfactorily, then he/she can address the query to the Investor Relations Officer: Mr. Krishnam Thota (Investor Relations Officer) Corporate Office - 505 – 5th Floor, Tower 2B, One World Centre, Near Prabhadevi Railway Station, Lower Parel, Mumbai – 400013, Maharashtra, Tele- +91 22 69744435 Email: iro@growwmf.in In order to protect confidentiality of information, the service representatives at the AMC's branches/ KFin Technologies Limited ISCs may require personal information of the investor for verification of his identity. The AMC will at all times endeavor to handle transactions efficiently and to resolve any investor grievances promptly. Investor grievances should be addressed to the ISC of the AMC, or at KFin Technologies Limited's ISC directly. All grievances received at the ISC of the AMC will then be forwarded to KFin Technologies Limited, if required, for necessary action. The complaints will closely be followed up with KFin Technologies Limited by the AMC to ensure timely redressal and prompt investor service. KFin Technologies Ltd. Selenium, Tower B, Plot number 31 & 32, Financial District, Nanakramguda, Serilingampally Mandal, Hyderabad- 500032. The investors are further requested to take note that, a common Online Dispute Resolution Portal ("ODR Portal") has been introduced to provide investors / unit holders with a mechanism to redress their grievances. The ODR Portal allows investors / unitholders with additional mechanism to resolve the grievances through online conciliation and online arbitration. The link to access ODR Portal is https://smartodr.in/login

XXII	Specific attribute of the scheme (such as lock in, duration in case of target maturity scheme/close ended schemes) (as applicable)	Not Applicable. The Scheme is an open ended Arbitrage Fund
XXIII	Special product/facility available during the NFO and on ongoing basis	Switching and Systematic Investment Plan are available during the NFO. The Special Products / Facilities available under the Scheme, are: - Systematic Investment Plan [SIP] - Systematic Transfer Plan [STP] - Systematic Withdrawal Plan [SWP] - IDCW Sweep Facility - Transactions by Email - Transactions through Electronic Mode - K-TRACK for transaction in the units of Groww Mutual Fund towards additional purchase, redemption or switch - Transactions through Stock Exchange Platform for Mutual Funds - Transactions Through MF Utility ("MFU") - Registration of Multiple Bank Accounts in respect of an Investor Folio - MFCentral as Official Point of Acceptance of Transactions (OPAT) - Choti SIP For further details of above special products / facilities, For Details, kindly refer SAI. <u>i. Systematic Investment Plan (SIP):</u> This facility enables investors to save and invest periodically over a longer period of time. It is a convenient way to “invest as you earn” and affords the investor an opportunity to enter the market regularly, thus averaging the acquisition cost of Units. The conditions for investing in SIP will be as follows: <u>SIP Frequency:</u> <u>SIP Installments and Amount –</u> <u>Daily – Rs. 100 and in multiples of Re.1 thereafter</u> <u>Weekly – Rs. 100 and in multiples of Re.1 thereafter</u> <u>Monthly – Rs. 500 and in multiples of Re.1 thereafter</u> <u>Quarterly - Rs. 500 and in multiples of Re.1 thereafter</u> <u>Minimum No. of SIP instalments:</u> <u>Minimum number of installments for each frequency are -</u> <u>Daily – 180 instalments</u> <u>Weekly – 24 instalments</u> <u>Monthly - 12 instalments</u> <u>Quarterly – 4 instalments</u> <u>Frequency / Date:</u> <u>Daily - Every business day</u> <u>Weekly - 1, 8, 15 & 22</u> <u>Monthly - Any day between 1st and 28th of the month</u>

		<u>Quarterly - Any day between 1st and 28th of the quarter</u> <u>(In case any of these days fall on a non-business day, the transaction will be effected on the next business day of the Scheme).</u> <u>Registration period:</u> There must be at least 30 days between the first SIP cheque and subsequent due date of Auto Debit [NACH clearing]; In case of the auto debit facility, the default options (where auto debit period, frequency and SIP date are not indicated) will be as follows: • SIP auto debit period: The SIP auto debit will continue till 5 years. • SIP date: 15th of the month (commencing 30 days after the first SIP instalment date); and • SIP frequency: Monthly The load structure prevailing at the time of submission of the SIP application [whether fresh or extension] will apply for all the instalments indicated in such application; All the cheques/ payment instructions [including the first cheque/payment instruction] shall be of equal amounts in case of SIP applications; Investors may also choose to invest any lump sum amount along with the first SIP instalment by way of a single cheque/ payment instruction. Investors will have the right to discontinue the SIP facility at any time by sending a written request to any of the Official Point(s) of Acceptance. Notice of such discontinuance should be received at least 30 days prior to the due date of the next debit. On receipt of such request, the SIP facility will be terminated. It is clarified that if the Fund fails to get the proceeds for three consecutive Instalments out of a continuous series of Instalments submitted at the time of initiating a SIP), the AMC reserves the right to discontinue the SIP. <u>ii. Systematic Transfer Plan (STP)</u> This facility enables unitholders to transfer a fixed specified amount from one open-ended scheme of the Fund (source scheme) to another open-ended scheme of the Fund (target scheme), in existence at the time of availing the facility of STP, at applicable NAV, subject to the minimum investment criteria of the target scheme. Investors can opt for the Systematic Transfer Plan by investing a lump sum amount in one scheme of the fund and providing a standing instruction to transfer sums at regular intervals. Investors could also opt for STP from an existing account by quoting their account / folio number. However, units marked under lien or pledged in the source scheme shall not be eligible for STP. The conditions for investing in STP will be as follows: STP Frequency : Daily, Weekly, Monthly and Quarterly; Minimum STP instalment amount: Rs. 500/- per instalment and in multiples of Re.1/- thereafter for Daily/ Weekly/ Monthly/ Quarterly; Minimum No. of STP instalments Daily - 6 instalments <u>Weekly - 6 instalments</u> <u>Monthly - 6 instalments</u> <u>Quarterly - 6 instalments</u>
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		<u>STP Dates:</u> Daily – Every business day Weekly option - Any day from Monday to Friday Monthly/ Quarterly option – 2nd, 8th, 15th or 23rd of the month/ of any month in the quarter Registration period: A minimum period of 7 calendar days shall be required for registration under STP. • If no day is selected, the default day will be Friday. • If the STP date falls on a holiday, the transaction will be processed on the next working day. The default options (where the period, frequency and STP date are not indicated) will be as follows: • STP period: 6 instalments. • STP date: 15th of every month; and • STP frequency: Monthly Unitholder may change the amount (but not below the minimum specified amount) / frequency by giving written notice to any of the Official Point(s) of Acceptance at least 7 calendar days prior to next STP execution date. Units will be allotted/ redeemed at the applicable NAV of the respective dates of the Scheme on which such investments/withdrawals are sought from the Scheme. The STP may be terminated on a written notice of 7 calendar days by a unitholder of the Scheme. The STP will be automatically terminated if all units are liquidated or withdrawn from the source scheme or pledged or upon receipt of intimation of death of the unitholder. No minimum balance is required in the Transferee scheme for registration of STP. <u>iii. Systematic Withdrawal Plan (SWP)</u> This facility enables unitholders to withdraw a fixed sum (subject to tax deduction at source, if applicable) by redemption of units in the unitholder's account at regular intervals through a one-time request. The conditions for investing in SWP will be as follows: SWP Frequency : Monthly; Quarterly Minimum SWP instalment amount: Monthly: Rs. 500/- and in multiples of Re.1/- thereafter; Quarterly – Rs.500/- and in multiples of Re.1 thereafter Minimum No. of SWP instalments: Monthly - 12 instalments Quarterly – 4 installments SWP Dates: 2nd, 8th, 15th or 23rd of every month as the STP date (in case any of these days fall on a non-business day, the transaction will be effected on the next business day of the Scheme). <u>Registration period:</u> A minimum period of 7 calendar days shall be required for registration under SWP. The default options (where the period, frequency and SWP date are not indicated) will be as follows: • SWP period: The SWP will continue till 5 years. • SWP frequency : Monthly
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	• SWP date: 15th of every month. If 15th is a holiday, the SWP will be processed on the next business day. Unit holder may change the amount (but not below the minimum specified amount) / frequency by giving written notice to any of the Official Point(s) of Acceptance at least 7 calendar days prior to next SWP execution date. The SWP may be terminated on a written notice of 7 calendar days by a unitholder of the Scheme. SWP will be automatically terminated if all units are liquidated or withdrawn from the Scheme or pledged or upon receipt of intimation of death of the unitholder. No minimum balance is required in the Transferee scheme for registration of SWP. iv. <u>IDCW Sweep Facility</u> IDCW Sweep facility shall be in addition to the existing IDCW Payout and IDCW Reinvestment Option. Default IDCW Option shall be IDCW Payout. Under IDCW Sweep Facility, Unit holders can opt for switching the IDCW earned under any Schemes (Source Scheme) of Groww Mutual Fund into any other Schemes (Target Scheme) of Groww Mutual Fund. The IDCW (net of applicable DDT, if any) shall be swept subject to minimum investment eligibility requirements of the Target Scheme at applicable NAV based prices. The minimum amount for sweep out to be Rs. 500/-. In case the sweep amount is less than Rs. 500/-, the IDCW amount shall be reinvested in the Source scheme. This facility shall be processed on the record date of the IDCW declared under the Source Scheme. Further, this facility shall not allow for switch of partial IDCW or switch of IDCW to multiple schemes. In case the investor fails to specify his preference of Option for the Target scheme into which the IDCW has to be swept, Sweep-in amount shall be invested in default plan / option as mentioned in Scheme Information Document (SID) of Target scheme. The Load Structure prevailing at the time of submission of the STP/SWP application will apply for all the installments indicated in such application. The AMC reserves the right to introduce STP/SWP/ IDCW Sweep Facility at any other frequencies or on any other dates as the AMC may feel appropriate from time to time. v. <u>Transactions by Email:</u> In order to facilitate quick processing of transaction and / or instruction of investment of investor the Mutual Fund / AMC / Trustee may (at its sole discretion and without being obliged in any manner to do so and without being responsible and /or liable in any manner whatsoever), accept and process any application, supporting documents and /or instructions submitted by an investor/ Unit holder by email at growwmf.inv@groww.in and the investor/Unit holder voluntarily and with full knowledge takes and assumes any and all risk associated therewith. The Mutual Fund / AMC/ Trustee shall have no obligation to check or verify the authenticity or accuracy of email purporting to have been sent by the investor and may act thereon as if the same has been duly given by the investor.
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		In all cases the investor will have to immediately submit the original documents / instruction to AMC/ Mutual Fund/ Official Points of Acceptance unless indemnified by the investor. vi. <u>Transactions through Electronic Mode:</u> The Mutual Fund may (at its sole discretion and without being obliged in any manner to do so and without being responsible and /or liable in any manner whatsoever), allow transactions in Units by electronic mode (web/ electronic transactions) including transactions 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 including web transactions and as permitted by SEBI or other regulatory authorities from time to time. vii. <u>'K-TRACK' for transaction in the units of Groww Mutual Fund towards additional purchase, redemption or switch:</u> Investor may take note of additional facility for transaction in Groww Mutual Fund through K-TRACK; mobile application provided by KFin Technologies Limited. Investors may execute additional purchase, redemption or switch transaction through K-TRACK mobile application. viii. <u>Transactions through Stock Exchange Platform for Mutual Funds</u> - Mutual Fund Distributor registered with Association of Mutual Funds in India (AMFI) and who has been permitted by the concerned recognised stock exchange will be eligible to use NMF-II platform of National Stock Exchange of India Ltd. ('NSE') and/or of BSE Star MF platform of Bombay Stock Exchange ('BSE') to purchase and redeem units of schemes of the Fund directly from Groww Mutual Fund in physical (non-demat) mode and/or demat (electronic) mode. - MF distributors 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 payout will be directly made to investor's account. In the same manner, units shall be credited and debited directly from the demat account of investors. - Non-demat transactions are also permitted through stock exchange 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. ix. <u>Transactions Through MF Utility ("MFU"):</u> The AMC has entered into an Agreement with MF Utilities India Private Limited ("MFUI"), a "Category II - Registrar to an Issue" under SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, for usage of MF Utility ("MFU") a "Shared Services" initiative formed by the Asset Management Companies of SEBI registered Mutual Funds under the aegis of Association of Mutual Funds in India
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	(AMFI). MFU acts as a transaction aggregation portal for enabling transaction in multiple Schemes of various Mutual Funds with a single form and a single payment instrument. Both financial and non-financial transactions pertaining to Scheme(s) of Groww Mutual Fund ('the Fund') can be done through MFU at the authorized Points of Service ("POS") of MFUI. The details of POS with effect from the respective dates published on MFU website at www.mfuindia.com will be considered as Official Point of Acceptance (OPA) for transactions in the Scheme(s) of the Fund. Additionally, such transactions can also be carried out electronically on the online transaction portal of MFU at www.mfuonline.com as and when such a facility is made available by MFUI and that the same will be considered OPA for transactions in the Scheme(s) of the Fund. <u>The key features of MFU are:</u> 1. Investors will be required to obtain Common Account Number ("CAN") for transacting through MFU. 2. Investors can create a CAN by submitting the CAN Registration Form (CRF) and necessary documents at the Point of Service (POS) of MFU. The AMC and/ or CAMS, Registrar and Transfer Agent (RTA) of the Fund shall provide necessary details to MFU as may be needed for providing the required services to investors / distributors through MFU. 3. Investors will be allotted a CAN, a single reference number for all investments across Mutual Funds, for transacting in multiple Schemes of various Mutual Funds through MFU and to map existing folios, if any. 4. Currently, the transactions facilitated through MFU for the investors are: (i) CAN registration; (ii) Submission of documents to KRAs for KYC Registration; (iii) Financial transactions like Purchases, Redemptions and Switches, Registration of Systematic Transactions like Systematic Investments (SIP) using a single Mandate, Systematic Withdrawals (SWP) and Systematic Transfers (STP); (iv) Non-financial transactions (NFT) like Bank Account changes, facilitating change of address through KRAs etc. based on duly signed written requests from the Investors. 5. The CRF and other relevant forms for transacting thorough MFU can be downloaded from MFUI website at www.mfuindia.com or can be obtained from MFUI POS. 6. 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 / AMC and MFUI and / or its authorized service providers for validation and processing of transactions carried out through MFU. 7. 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 1800-266-1415 (during the business hours on all days except Sunday and Public Holidays) or send an email to clientservices@mfuindia.com. Investors of the Fund can also get in touch with Investor Service Centres (ISCs) of the AMC to know more about MFU.
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	8. For any escalations and post-transaction queries pertaining to Scheme(s) of the Fund, the Investors are requested to get in touch with the ISCs of the AMC. The transactions carried out through MFU shall be subject to the terms & conditions as may be stipulated by MFUI / Fund / the AMC from time to time. The terms & conditions of offering of the Scheme(s) of the Fund as specified in the Scheme Information Document (SID), Key Information Memorandum ('KIM') and Statement of Additional Information ('SAI') shall be applicable to transactions through MFU. x. <u>Registration of Multiple Bank Accounts in respect of an Investor Folio:</u> An Investor can register with the Fund upto 5 bank accounts in case of individuals and HUFs and upto 10 in other cases. Registering of Multiple Bank Accounts will enable the Fund to systematically validate the pay-in of funds and avoid acceptance of third party payments. For the purpose of registration of bank account(s), Investor should submit Bank Mandate Registration Form (available at the CSCs/ AMC Website) together with any of the following documents: Cancelled original cheque leaf in respect of bank account to be registered where the account number and names of the account holders are printed on the face of the cheque; or Bank statement or copy of Bank Pass Book page with the Investor's Bank Account number, name and address. The above documents will also be required for change in bank account mandate submitted by the Investor. The AMC will register the Bank Account only after verifying that the sole/ first joint holder is the holder/ one of the joint holders of the bank account. In case if a copy of the above documents is submitted, Investor shall submit the original to the AMC/ Service Centre for verification and the same shall be returned. In case of Multiple Registered Bank Account, Investor may choose one of the registered bank accounts for the credit of redemption/ IDCW proceeds (being —Pay-out bank account). Investor may however, specify any other registered bank accounts for credit of redemption proceeds at the time of requesting for the redemption. Investor may change such Pay-out Bank account, as necessary, through written instructions. However, if request for redemption is received together with a change of bank account (unregistered new bank account) or before verification and validation of new bank account, the redemption request would be processed to the currently registered default old bank account. Change of Bank Mandate: Investors are requested to note the following process shall be adopted for Change of Bank Mandate in the folio: - Investors shall submit duly filled in "Non-Financial Transaction Form & Multiple Bank Accounts Registration Form" along with the prescribed documents at any of the AMC branches / ISCs of Kfin. - Any unregistered bank account or a new bank account forming part of redemption request shall not be processed. - There shall be a cooling period of 10 calendar days for validation and registration of new bank account. Further, in case of receipt of redemption request during this cooling period, the validation of bank
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	mandate and dispatch of redemption proceeds shall be completed within a period of 03 working days from the date of receipt of redemption request. d) In the interim, redemptions / IDCW payments, if any, will be processed as per specified service standards and the last registered bank account information will be used for such payments to Unit holders. e) In case, the request for change in bank account information being invalid / incomplete / dissatisfactory in respect of signature mismatch/ document insufficiency/ not complying with any requirements as stated above, the request for such change will not be processed. Change of Address: For change of address, Investors should fill 'KYC change form' and submit it to any KYC Registration Agency (KRA) along with following documents: • Proof of new address (POA) and • Any other document/ form that the KRA may specify from time to time. The AMC reserves the right to collect proof of old address on a case to case basis while effecting the change of address. The self-attested copies of above stated documents shall be submitted along with original for verification at any of the AMC branches/Investor Service Centres (ISCs) of KFin. The original document shall be returned to the investors over the counter upon verification. In case the original of any document is not produced for verification, then the copies should be properly attested/verified by entities authorized for attesting/verification of the documents. List of admissible documents for POA & POI mentioned in paragraph 16.2.4.4(b) of Master Circular of Mutual Fund shall be considered. For further details please refer to paragraph on Registration of Multiple Bank Accounts, Change of Bank Mandate and Change of Address in respect of an Investor Folio in the SAI. The AMC reserves the right to alter/ discontinue all / any of the abovementioned special product(s)/ facility(ies) at any point of time. Further, the AMC reserves the right to introduce more special product(s)/ facility (ties) at a later date subject to prevailing SEBI Guidelines and Regulations. <u>xi. MFCentral as Official Point of Acceptance of Transactions (OPAT):</u> Pursuant to paragraph 16.6 of SEBI Master Circular of Mutual Fund, with respect to complying with the requirements of RTA interoperable Platform for enhancing investors' experience in Mutual Fund transactions / service requests, the QRTA's, Kfin Technologies Limited 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
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		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, Groww Mutual Fund designates MFCentral as its OPAT effective from September 24, 2021. 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 Centres/ Collection Centres of KFin Technologies Limited or CAMS. xii. Choti SIP: Investors can avail Choti SIP by investing via Systematic Investment Plan (“SIP”) in the schemes of the Fund with Rs. 250/- restricted to three SIP’s (only one each in upto three Asset Management Companies). For further details of above special products/facilities, kindly refer SAI.
XXIV	Weblink	An investor can visit https://www.growwmf.in/downloads/expense-ratio weblink for TER of last 6 months and https://www.growwmf.in/downloads/fact-sheet weblink for scheme factsheet.

DUE DILIGENCE BY THE ASSET MANAGEMENT COMPANY

It is confirmed that:

- i. The Scheme Information Document submitted to SEBI is in accordance with the SEBI (MF) Regulations and the guidelines and directives issued by SEBI from time to time.
- ii. All legal requirements connected with the launching of the Scheme 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 Scheme Information Document are true, fair and adequate to enable the investors to make a well informed decision regarding investment in the Scheme.
- iv. The intermediaries named in the Scheme Information Document and Statement of Additional Information are registered with SEBI and their registration is valid, as on date.
- v. The contents of the Scheme 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 Scheme Information Documents and other than cited deviations/ that there are no deviations from the regulations
- vii. Notwithstanding anything contained in this Scheme Information Document, the provisions of the SEBI (MF) Regulations and the guidelines there under shall be applicable.
- viii. The Trustees have ensured that Groww Arbitrage Fund approved by them is a new product offered by Groww Mutual Fund and is not a minor modification of any existing scheme/fund/product.

Date: December 30, 2025

Place: Mumbai

Sd/-

Name: Hemal Zaveri

Designation: Compliance Officer

Part II. INFORMATION ABOUT THE SCHEME

SO 19

A. HOW WILL THE SCHEME ALLOCATE ITS ASSETS?

Under normal circumstances, the asset allocation will be as follows:

SO 14

Instruments	Indicative allocations (% of total assets)	
	Minimum	Maximum
Equity & Equity related instruments including derivatives	65%	100%
Debt & Money Market instruments# including the margin money deployed in derivative transactions	0%	35%
Units issued by InvITs	0%	10%

The Asset Allocation portion shall also include subscription and redemption cash flow which may be undeployed due to various reasons (dividend from underlying securities, rebalancing or balances for running cost of the scheme, residual amount due to execution on rounding off etc).

Subject to SEBI (MF) Regulations and in accordance with Clause 12.11 in Master Circular of Mutual Fund on Securities Lending Scheme, and framework for short selling and borrowing and lending of securities, the Scheme intends to engage in Stock Lending.

#Money Market instruments includes commercial papers, commercial bills, treasury bills, Government securities having an unexpired maturity up to one year, call or notice money, certificate of deposit, usance bills, and any other like instruments as specified by the Reserve Bank of India from time to time.

Consolidated
Std Obs.13
SO 12

In line with Para 4.5 of SEBI Master Circular of Mutual Fund, Securities in which investment is made for the purpose of ensuring liquidity (debt and money market instruments) are those that fall within the definition of liquid assets which includes Cash, Government Securities, T-bills and Repo on Government Securities.

The Scheme shall adhere to the following limits should it engage in Stock Lending:

- (a) Not more than 20% of the net assets can generally be deployed in Stock Lending
- (b) Not more than 5% of the net assets can generally be deployed in Stock Lending to any single approved intermediary i.e. broker.

The Scheme does not intend to undertake/ invest/ engage in

Consolidated
Std Obs.18

Debt Instruments with special features (AT 1 and AT 2 Bonds)

Debt Instruments with SO/CE

Structured obligation/Credit enhancements

Credit default swap

- Unrated Debt instruments

Consolidated
Std Obs.20

The Scheme may use derivatives for such purposes as may be permitted by the SEBI (MF) Regulations, including for the purpose of hedging and portfolio balancing, based on the opportunities available and subject to guidelines issued by SEBI from time to time. The margin money deployed on derivative positions would be included in Debt & Money Market Instruments. Exposure to derivatives for non-hedging purpose will be restricted to 50% of net assets of the scheme.

Consolidated
Std Obs.17

The cumulative gross exposure to equity, derivatives, debt instruments and money market instruments will not exceed 100% of the net assets of the scheme in accordance with Clause 12.24 of SEBI Master Circular of Mutual Fund.

Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure. SEBI vide letter dated November 3, 2021 has clarified that Cash Equivalent shall consist of Government Securities, T-Bills and Repo on Government Securities having residual maturity of less than 91 days.

Debt securities include, but are not limited to, Debt securities of the Government of India, State and Local Governments, Government Agencies, Statutory Bodies, Public Sector Undertakings, Public Sector Banks or Private Sector Banks or any other Banks, Financial Institutions, Development Financial Institutions, and Corporate Entities, collateralized debt securities or any other instruments as may be prevailing and permissible under the SEBI (MF) Regulations as amended from time to time).

The Debt Securities (including money market instruments) referred to above could be fixed rate or floating rate, listed, unlisted, privately placed, unrated among others, as permitted by SEBI (MF) Regulations. Pending deployment of funds of a Scheme in securities in terms of investment objectives of the Scheme a mutual fund can invest the funds of the Scheme in short term deposits of scheduled commercial banks in terms of Clause 12.16 of SEBI Master Circular of Mutual Fund.

Further, the Scheme may, for meeting liquidity requirements invest in units of money market/liquid schemes of Groww Mutual Fund and/or any other mutual fund provided that aggregate inter-scheme investment made by all schemes under the same management or in schemes under the management of any other asset management company shall not exceed 5% of the net asset value of the mutual fund in accordance with Clause 4 of Seventh Schedule of SEBI (MF) Regulations. The AMC shall not charge any investment management fees with respect to such investment.

The Scheme may invest in Foreign Securities (including units/securities issued by overseas mutual funds) up to 10% of the net assets of the Scheme in compliance with SEBI Circular(s) / guideline(s) pertaining to overseas investments by mutual funds, as amended from time to time.

The Scheme shall invest in Foreign Securities as per the limits available to 'Ongoing Schemes' in terms of Clause 12.19 of SEBI Master Circular. Further, it is clarified that the above specified limit would be considered as soft limit(s) for the purpose of reporting only by mutual funds on monthly basis in the format prescribed by SEBI

Investments in Scheme by AMC, Sponsor & Associates

Subject to the SEBI (MF) Regulations, the AMC and investment companies managed by the Sponsor(s), their associate companies and subsidiaries may invest either directly or indirectly, in the Scheme during the NFO and/or on ongoing basis. However, the AMC shall not charge any investment management fee on such investment in the Scheme, in accordance with sub-regulation 3 of Regulation 24 of the SEBI (MF) Regulations and shall charge fees on such amounts in future only if the SEBI (MF) Regulations so permit. The associates, the Sponsor, subsidiaries of the Sponsor and/or the AMC may acquire a substantial portion of the Scheme's units and collectively constitute a major investment in the Schemes. The AMC reserves the right to invest its own funds in the Scheme as may be decided by the AMC from time to time and required by applicable regulations and also in accordance with Clause 6.11 of SEBI Master Circular of Mutual Fund regarding minimum number of investors in the Scheme. In terms of SEBI notification dated August 5, 2021 and as per Regulation 25, sub-regulation 16A of SEBI (MF) Regulations, the asset management company shall invest such amounts in such schemes of the mutual fund, based on the risks associated with the schemes, as may be specified by the Board from time to time. In case of NFO, AMC's investment shall be made during the allotment of units and shall be calculated as a percentage of the final allotment value excluding AMC's investment pursuant to this circular.

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

SO 15

Sl. no	Type of Instrument	Percentage of exposure	Circular references*
1.	Securities Lending	20%	Para 12.11 of SEBI Master Circular of Mutual Funds
2.	Equity Derivatives for non-hedging purposes	0%	Paragraph 12.25 of SEBI Master Circular
3.	Securitized Debt	20%	Para 12.15 of SEBI Master Circular
4.	Overseas Securities	20%	Paragraph 12.19 of SEBI Master Circular
5.	InVITS	10%	Clause 13 of the Seventh Schedule of SEBI (Mutual Funds) Regulations, 1996 and Paragraph 12.21 of SEBI Master Circular

SO 4

Consolidated
Std Obs. 22
& 24**Rebalancing due to passive breach**

As per para 2.9 of SEBI Master Circular of Mutual Fund, as may be amended from time to time, in the event of deviation from mandated asset allocation or any other deviation resulting due to passive breaches (occurrence of instances not arising out of omission and commission of the AMC), the fund manager shall rebalance the portfolio of the Scheme within 30 Business Days. In case the portfolio of the Scheme is not rebalanced within the period of 30 Business Days, justification in writing, including details of efforts taken to rebalance the portfolio shall be placed before the Investment Committee of the AMC. The Investment Committee, if it so desires, can extend the timeline for rebalancing up to sixty (60) Business Days from the date of completion of mandated rebalancing period. Further, in case the portfolio is not rebalanced within the aforementioned mandated plus extended timelines the AMC shall comply with the prescribed restrictions, the reporting and disclosure requirements as specified in para 2.9. of SEBI Master Circular of Mutual Fund. Further, pursuant to SEBI no. SEBI/HO/IMD/PoD2/P/CIR/2025/92 dated June 26, 2025, the above referred rebalancing provisions shall be applicable for all types of passive breaches.

Consolidated
Std Obs.
23 & 24**Rebalancing of deviation due to short term defensive consideration**

Any alteration in the investment pattern will be for a short term on defensive considerations as per Para 1.14.1.2 of SEBI Master Circular of Mutual Fund; the intention being at all times to protect the interests of the Unit Holders and the Scheme shall endeavor to rebalance the portfolio within 30 calendar days. It may be noted that no prior intimation/indication will be given to investors when the composition/asset allocation pattern under the Scheme undergoes changes within the permitted band as indicated above.

B. WHERE WILL THE SCHEME INVEST?

Following should be enabled as per SEBI guidelines –

1. Equity and Equity Related Instruments:

- Equity shares
- Equity related instruments such as convertible bonds, convertible debentures, equity warrants, convertible preference shares, etc.
- Equity Derivatives
 - Futures
 - Options

- ADRs / GDRs issued by Indian company's subject to necessary regulatory requirements
- Foreign Equity and Equity Related Instrument

Consolidated
Std Obs.
29

2. Debt & Money Market Instruments:

- Certificate of Deposits (CD)
- Commercial Papers (CP)
- Treasury Bills (T-Bills)
- Commercial Usance Bills
- Repo
- Treps and repo
- Securities created and issued by the Central and State Governments
- NCD
- Securitized Assets
- Pass through Certificate (PTC)

Debt derivative instrument

- Interest Rate Swap
- Forward Rate Agreement
- Interest Rate Futures

Government securities having an unexpired maturity upto one year

- Index derivatives

3. Foreign Securities

4. Units of Mutual Fund Schemes

5. Investment in Units issued by InvITs

6. Short selling and securities lending as permitted by SEBI from time to time REITs and InvITs.

Any other instruments, as may be permitted by RBI / SEBI / such other Regulatory Authority, from time to time, subject to Regulatory approvals. The securities mentioned above could be listed or permitted unlisted, privately placed, secured or unsecured, rated or un-rated and of any maturity, as enabled under SEBI (MF) Regulations / circulars/ RBI. The securities may be acquired from primary market/ Initial Public Offer (IPO), secondary market operations, private placement or negotiated deals.

(Detailed definition and applicable regulations/guidelines for each instrument is included in Section II)

C. WHAT ARE THE INVESTMENT STRATEGIES?

Consolidated
Std Obs.27,
SO 07

- The scheme follows an active investment strategy.
- The scheme aims to generate returns by strategically investing in arbitrage opportunities between spot and future prices of exchange traded equities and the arbitrage opportunities available within the equity or the derivative segment. If, in the opinion of the Fund Manager, suitable arbitrage opportunities are unavailable, the scheme may predominantly invest in short-term debt and money market securities.
- Some of the arbitrage strategies that may be adopted by the fund manager from time to time include:

Cash Future Arbitrage : Arbitrage captures the spread, between the price of a stock in the spot market and in the futures market on a market neutral basis. If the price of a stock in the futures market is higher than in the spot market, after adjusting for taxes and other costs the Scheme may buy the stock in the spot market and sell the same stock in equal quantity in the futures market simultaneously. This enables the fund to earn the cost of carry between the stock and the futures of the stock. If the futures are quoting at a discount to the price in the cash market before the expiry the trade may be reversed by buying the futures and selling the shares in the cash market which will enhance the profit

potential to the extent of discount between future as compared to cash market. Normally the price between cash and future segments tend to converge on the expiry day. The cash and future trade would be reversed on the expiry day to book the locked arbitrage profit.

Rolling over of the futures transaction:

Rolling over of the futures transaction means:

- 1) Unwinding the short position in the futures and simultaneously selling futures of a subsequent month
- 2) Holding onto the spot position.

There could also be instances of unwinding both the spot and the future position before the expiry of the current month future if it proves advantageous or to meet redemption

Dividend Arbitrage: Usually during the period prior to dividend declaration, the stock futures/options market can provide a profitable opportunity. Generally, the stock price declines by the dividend amount when the stock goes ex dividend.

Buy-back arbitrage: When the company announces the buy back of its own shares, there could be opportunities due to the price differential in buy back price and traded price.

Nifty Spot-Nifty Futures: The pricing of Nifty Futures is derived from the Nifty. When the two go out of sync, there arises opportunities. The cost of carry binds the futures price to the price of the underlying asset.

For instance, the price of the Nifty futures at any given point in time should typically be more than the level of Nifty at that point of time. Cash and carry trades at times provide higher return than the prevailing interest rates. There is an opportunity to exploit by buying the index futures and selling the portfolio comprising index stocks. The cash received upon the sale is reinvested at the risk free rate of return till the expiration of the futures contract. The arbitrage profits come in at the expiration of the futures contract when the position is unwound by buying back the index stocks, or until expiry if the rates converge. The same strategy can be replicated with stock futures also.

Derivatives Option: The Scheme may use equity and index options **primarily as part of hedged or arbitrage strategies**, such as conversions/reversals, box spreads, covered calls, protective puts or other risk-controlled structures that keep directional market exposure limited.

The Fund Manager may also use options to manage volatility and to fine-tune hedges around cash–futures arbitrage positions.

The risk in using options is that the Fund Manager's views on volatility or relative pricing may not materialise. In such cases, the option premium paid (in case of long options) may be lost, and option positions may be closed at a loss, subject always to the overall risk controls of the Scheme.

The Scheme will not take uncovered / naked option positions and will ensure that all derivative positions are covered by adequate underlying exposure or cash / cash equivalents as per SEBI (Mutual Funds) Regulations and applicable circulars.

There are various possible combinations of strategies which may be adopted in a specific situation. The Fund Manager may apply such other arbitrage strategies as may be available/permissible under regulations from time to time.

Event / calendar / inter-market arbitrage – only partly covered index/stock spot vs index/stock futures.

- Index futures vs stock futures
- **Calendar spread:** futures of same stock with different expiries
- **ADR/GDR vs underlying** (where available)
- **Merger, open offer, demerger, OFS/rights, other corporate actions**
- **Inter-exchange arbitrage** (NSE/BSE)

Intra-Derivative Arbitrage and Basis Trades

- Arbitrage between **index futures and stock futures**, where mispricing exists between an index and a basket of underlying stocks.
- **Calendar spread arbitrage**, i.e., exploiting price differentials between futures of the same stock or index with different expiries.
- **Inter-exchange arbitrage** where the same security is traded on more than one recognised stock exchange, subject to liquidity and costs.
- **Index spot–futures arbitrage** (e.g., between an equity index level and its futures), where cost-of-carry relationships permit a market-neutral trade through buying/selling the index futures and taking offsetting positions in the underlying index constituents or suitable substitutes.

Rolling Over of Futures Positions

- Rolling over involves **unwinding the near-month futures position** and simultaneously **entering into a futures position of a subsequent month**, while generally retaining the corresponding spot position. Depending on relative valuations across expiries (calendar spreads), the Scheme may also unwind both spot and futures positions before expiry if such action is considered advantageous or to meet redemption requirements.
- **Debt and Money Market Investments**
- When, in the opinion of the Fund Manager, suitable arbitrage opportunities are not sufficiently available, the Scheme may **predominantly invest the incremental net inflows in short-term debt and money market instruments** until such time as attractive arbitrage opportunities re-emerge.
- The Scheme may invest in a range of debt and money market instruments such as **Treasury Bills, Government securities, State Development Loans, corporate bonds, Non-Convertible Debentures**

(NCDs), Certificates of Deposit (CDs), Commercial Papers (CPs), units of overnight / liquid schemes, Triparty Repo (TREPS), repo / reverse repo in Government securities and such other instruments as may be permitted by SEBI / RBI from time to time.

- The debt portfolio will be managed with an emphasis on **high credit quality and relatively short duration**, consistent with the objective of providing liquidity for arbitrage positions and redemptions.

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.

Portfolio Turnover Policy

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. Portfolio turnover in the scheme will be a function of market opportunities. The scheme is open-end scheme. It is expected that there would be a number of subscriptions and repurchases on a daily basis. Consequently, it is difficult to estimate with any reasonable measure of accuracy, the likely turnover in the portfolio. The AMC will endeavour to optimise portfolio turnover to optimise risk adjusted return keeping in mind the cost associated with it. A high portfolio turnover rate is not necessarily a drag on portfolio performance and may be representative of arbitrage opportunities that exist for securities held in the portfolio rather than an indication of change in AMC's view on a security etc. However, the AMC will take advantage of the opportunities that present themselves from time to time because of the inefficiencies in the securities markets

Risk Management and Regulatory Compliance

The Scheme will at all times comply with the investment restrictions specified in the SEBI (Mutual Funds) Regulations, 1996 and the guidelines / circulars issued thereunder, including those relating to investment in derivatives, single-issuer and sector exposure limits, and borrowing restrictions.

The arbitrage positions will be constructed so as to avoid uncovered short positions in equities or derivatives. The Scheme will not seek to create leveraged positions except to the extent permitted under the SEBI (Mutual Funds) Regulations and only as arising from standard arbitrage trades where both legs (cash and derivatives) are in place. The examples of strategies set out above are illustrative and not exhaustive. The Fund Manager may deploy any other arbitrage or hedged strategy that is in line with the investment objective of the Scheme and permitted under the applicable regulations from time to time.

D. HOW WILL THE SCHEME BENCHMARK ITS PERFORMANCE?

Benchmark (Total Returns Index): Tier 1: Nifty 50 Arbitrage TRI

The Scheme performance would be benchmarked against Nifty 50 Arbitrage Total Return Index which measure the performance of arbitrage strategies. The index measures performance of portfolio involving investment in equity and equivalent short position equity futures, etc. and hence it is most suited for comparing performance of the Scheme.

As per clause 1.9 of Master Circular of Mutual Fund requires mutual funds to adopt first tier benchmarks for schemes as notified by AMFI. Accordingly, the benchmark is selected from the benchmarks notified by AMFI for the category of scheme. The performance will be benchmarked to the Total Returns Variant of the Index.

The AMC/ Trustee reserves the right to change the benchmark for evaluation of performance of the Scheme from time to time in conformity with the investment objectives and appropriateness of the benchmark subject to SEBI (MF) Regulations, and other prevailing guidelines, if any.

E. WHO MANAGES THE SCHEME?

The Fund Manager of the Scheme is Mr. Paras Matalia & Mr. Shashi Kumar, his particulars are given below:

Fund Manager	Tenure of managing the Scheme
Mr. Paras Matalia	Since inception of the Scheme
Mr. Shashi Kumar	Since inception of the Scheme

Name of the Fund Manager	Age	Education Qualification	Experience	Other Schemes managed by the Fund Manager
Mr. Paras Matalia (Fund Manager-Equity)	30 years	CA, CFA (US) and B. Com	Mr. Paras Matalia has about 7 years of experience in the capital markets. He started out as an equity research Analyst with Samco Securities Limited. Just prior to joining Groww Mutual Fund, he was working with Samco Mutual Fund as Fund Manager and Head of Equities.	• Groww ELSS Tax Saver Fund • Groww Multi Asset Allocation Fund • Groww Multi Asset Omni FOF • Groww Arbitrage Fund The above mentioned details include name of this Scheme
Mr. Shashi Kumar	45 years	PGDBM & BBA	Mr. Shashi Kumar has an overall 17 years of experience in the Insurance Sector. Prior to joining Groww Asset Management Ltd., he was associated with Bharti Axa Life Co. Ltd. & Canara HSBC Life Insurance Co. Ltd.	• Groww BSE Power ETF • Groww BSE Power ETF FOF • Groww Nifty 200 ETF • Groww Nifty 200 ETF FOF • Groww Nifty 50 Index Fund • Groww Nifty 50 ETF • Groww Nifty 500 Low Volatility 50 ETF • Groww Nifty 500 Momentum 50 ETF • Groww Nifty 500 Momentum 50 ETF FOF • Groww Nifty EV & New Age Automotive ETF • Groww Nifty EV & New Age Automotive ETF FOF • Groww Nifty India Defence ETF • Groww Nifty India Defence ETF FOF • Groww Nifty India Internet ETF • Groww Nifty India Internet ETF FOF • Groww Nifty India Railways PSU ETF

				• Groww Nifty India Railways PSU Index Fund • Groww Nifty Next 50 ETF • Groww Nifty Next 50 Index Fund • Groww Nifty Non-Cyclical Consumer Index Fund • Groww Nifty Realty ETF • Groww Nifty Smallcap 250 ETF • Groww Nifty Smallcap 250 Index Fund • Groww Nifty Total Market Index Fund • Groww Multi Asset Omni FOF • Groww Arbitrage Fund The above mentioned details include name of this Scheme
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F. HOW IS THE SCHEME DIFFERENT FROM EXISTING SCHEMES OF THE MUTUAL FUND?

As per Para 2.6 of SEBI Master Circular of Mutual Fund, Groww Arbitrage Fund is a unique Product. It falls under 'Hybrid Scheme – Arbitrage Fund Category'.

Equity Schemes	Scheme Category	Product Positioning
Groww Aggressive Hybrid Fund	Aggressive Hybrid Fund	An open ended hybrid scheme investing predominantly in equity and equity related instruments
Groww Multi Asset Allocation Fund	Multi Asset Allocation	An open ended scheme investing in Equity, Debt, Commodities and in units of REITs & InvITs

For detailed comparative table of the aforesaid schemes, please click here <https://www.growwmf.in/downloads/sid>

G. HOW HAS THE SCHEME PERFORMED (if applicable)

This scheme is a new scheme and does not have any performance track record.

H. ADDITIONAL SCHEME RELATED DISCLOSURES

- Scheme's portfolio holdings - <https://www.growwmf.in/downloads/fact-sheet>
- Disclosure of name and exposure to Top 7 issuers, stocks, groups and sectors as a percentage of NAV of the scheme in case of debt and equity ETFs/index funds through a functional website link that contains detailed description - Not Applicable
- Functional website link for Portfolio Disclosure - Fortnightly / Monthly/ Half Yearly. <https://www.growwmf.in/statutory-disclosure/portfolio> and <https://www.growwmf.in/financials/half-yearly-unaudited>
- Portfolio Turnover Rate particularly for equity oriented schemes shall also be disclosed. - Not Applicable

as this is a new scheme

v. Aggregate investment in the Scheme by: Not Applicable as this is a new scheme

vi.

Sr. No.	Category of Persons	Net Value		Market Value (In Rs.)
	Concerned scheme's Fund Manager(s)	Units	NAV per unit	
1.	Mr. Paras Matalia	Not Applicable		Not Applicable
2.	Mr. Shashi Kumar	Not Applicable		Not Applicable

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

- **Investments of AMC in the Scheme** – Groww Asset Management Private Limited (GAML), the asset management company may invest in the Scheme. However, as per SEBI (MF) Regulations, GAML will not charge any Investment Management Fee for its investment in the Scheme. In addition, the funds managed by the sponsors, Group may invest in the Scheme. The details are provided on <https://www.growwmf.in/statutory-disclosure/alignment-of-interest>

- **Risk-o-meter** shall be evaluated on a monthly basis and the Risk-o-meter shall be disclosed along with portfolio disclosure on GMF website and on AMFI website within 10 days from the close of each month.

Scheme Summary Document (SSD) shall be updated on a Monthly basis or on changes in any specified fields, whichever is earlier. The same shall be uploaded on websites of GMF, AMFI and stock exchanges.

Consolidated
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Obs.38

Part III- OTHER DETAILS

A. COMPUTATION OF NAV

The NAV of the Units of the Scheme will be computed by dividing the net assets of the Scheme by the number of Units outstanding on the valuation date. The Fund shall value its investments according to the valuation norms, as specified in Schedule VIII of the Regulations, or such norms as may be prescribed by SEBI from time to time.

All expenses and incomes accrued up to the valuation date shall be considered for computation of NAV. For this purpose, major expenses like management fees and other periodic expenses would be accrued on a day to day basis. The minor expenses and income will be accrued on a periodic basis, provided the nondaily accrual does not affect the NAV calculations by more than 1%.

Any changes in securities and in the number of units be recorded in the books not later than the first valuation date following the date of transaction. If this is not possible given the frequency of the Net Asset Value disclosure, the recording may be delayed upto a period of seven days following the date of the transaction, provided that as a result of the non-recording, the Net Asset Value calculations shall not be affected by more than 1%.

In case the Net Asset Value of a scheme differs by more than 1%, due to non - recording of the transactions, the investors or scheme/s as the case may be, shall be paid the difference in amount as follows:-

- (i) If the investors are allotted units at a price higher than Net Asset Value or are given a price lower than Net Asset Value at the time of sale of their units, they shall be paid the difference in amount by the scheme.
- (ii) If the investors are charged lower Net Asset Value at the time of purchase of their units or are given higher Net Asset Value at the time of sale of their units, asset management company shall pay the difference in amount to the scheme. The asset management company may recover the difference from the investors.

NAV of units under the Scheme shall be calculated as shown below:

NAV (Rs.) =	Market or Fair Value of Scheme's investments	+	Current Assets including Accrued Income	-	Current Liabilities and Provisions including accrued expenses
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No. of Units outstanding under Scheme

The NAV of the Scheme will be calculated upto four decimal places and will be declared on each business day. The valuation of the Scheme's assets and calculation of the Scheme's NAV shall be subject to audit on an annual basis and shall be subject to such regulations as may be prescribed by SEBI from time to time.

Illustration:

Assume that the Market or Fair Value of Scheme's investments is Rs. 1,00,00,000; Current asset of the scheme is Rs. 25,00,000; Current Liabilities and Provisions is Rs. 15,00,000 and the No. of Units outstanding under the scheme are 5,00,000. Thus, the NAV will be calculated as:

$$\text{NAV} = \frac{10000000 + 2500000 - 1500000}{500000} = 22.0000$$

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Std Obs.42

Therefore, the NAV of the scheme is Rs. 22.0000

While determining the price of the units, the mutual fund shall ensure that the repurchase price of an open ended scheme is not lower than 97 per cent of the Net Asset Value.

Valuation of the scheme's assets, calculation of the scheme's NAV and the accounting policies & standards will be subject to such norms and guidelines that SEBI may prescribe from time to time. For the detailed

Valuation Policy and the accounting policy of the AMC, please refer the Statement of Additional Information.

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. The New Fund Offer expenses of the scheme will be borne by the AMC.

C. ANNUAL SCHEME RECURRING EXPENSES

As per SEBI (MF) Regulations, 1996, recurring expenses will not exceed 2.25% of the Scheme's daily net assets:

The total fees and expenses for operating the scheme as listed hereunder would be 2.25% of the daily net assets which includes expenses towards management fees, commission, marketing expense and other expense relating to operating the scheme.

Estimated Recurring Expenses:

Expense Head	% of daily Net Assets
Investment Management and Advisory Fees	Upto 2.25%
Trustee fee	
Audit fees	
Custodian fees	
RTA Fees	
Marketing & Selling expense incl. agent commission	
Cost related to investor communications	
Cost of fund transfer from location to location	
Cost of providing account statements and Income Distribution cum Capital Withdrawal redemption cheques and warrants	
Costs of statutory Advertisements	
Cost towards investor education & awareness (at least 2 bps) (as per paragraph 10.1.16 of SEBI Master Circular of Mutual Fund)	
Brokerage & transaction cost over and above 12 bps and 5 bps for cash and derivative market trades resp.	

Goods & Services Tax/ goods and services tax on expenses other than investment and advisory fees	
Goods & Services Tax/ goods and services tax on brokerage and transaction cost	
Other Expenses	
Maximum total expense ratio (TER) permissible under Regulation 52 (6) (c)	Upto 2.25%
Additional expenses under regulation 52 (6A) (c)**	0.05%

In terms of paragraph 10.1.16 of SEBI Master Circular of Mutual Fund, the AMC / Mutual Fund shall annually set apart at least 2 basis points (i.e., 0.02%) on daily net assets of the scheme within the maximum limit of Total Expense Ratio as per Regulation 52 of the SEBI (MF) Regulations for investor education and awareness initiatives.

**Additional Expenses upto 0.05% of daily net assets as permissible under Regulation 52 (6A) (c) may be charged by AMC under different heads of expenses mentioned under Regulation 52 (2) and (4) and more specifically stated in table above.

@ Brokerage and transaction costs incurred for the execution of trades and included in the cost of investment, not exceeding 0.12 per cent of the value of trades of cash market transactions and 0.05 per cent of the value of trades of derivative market transactions. Thus, in terms of paragraph 10.1.14 of SEBI Master Circular of Mutual Fund, it is hereby clarified that the brokerage and transaction costs incurred for the execution of trades may be capitalized to the extent of 0.12 per cent of the value of trades of cash market transactions and 0.05 per cent of the value of trades of derivative market transactions. Any payment towards brokerage and transaction costs (including Goods & Services Tax, if any) incurred for the execution of trades, over and above the said 0.12 per cent for cash market transactions and 0.05 per cent of the value of trades of derivative market transactions may be charged to the scheme within the maximum limit of Total Expense Ratio (TER) as prescribed under Regulation 52 of the SEBI (MF) Regulations.

Direct Plan shall have a lower expense ratio excluding distribution expenses, commission, etc and no commission for distribution of Units will be paid / charged under Direct Plan. All fees and expenses charged in a direct plan (in percentage terms) under various heads including the investment and advisory fee shall not exceed the fees and expenses charged under such heads in a regular plan.

The purpose of the above table is to assist the investor in understanding various costs and expenses that an investor in the Scheme will bear directly or indirectly. These estimates have been made in good faith as per the information available with AMC based on past experience and are subject to change inter-se.

The total recurring expenses that can be charged to the Scheme will be subject to limits prescribed from time to time under the SEBI (MF) Regulations.

Annual recurring expenses of the Scheme, (including the investment and advisory fees without any sub limit) as a % of daily net assets will be subject to following limit:

The AMC shall adhere provisions of SEBI Circular dated October 22, 2018 and various guidelines specified by SEBI as amended from time to time, with reference to charging of fees and expenses.

Annual recurring expenses of the Scheme, (including the investment and advisory fees without any sublimit) as a % of daily net assets will be subject to following limit:

First Rs. 500 Crores	Next Rs. 250 Crores	Next Rs. 1,250 Crores	Next Rs. 3,000 Crores	Next Rs. 5,000 Crores	Next Rs. 40,000 Crores	Balance
2.25%	2.00%	1.75%	1.60%	1.50%	TER reduction of 0.05% for every increase of Rs. 5,000 crores or part thereof	1.05%

In addition to TER within the limits specified under regulation 52 (6) of the Regulations, towards investment & advisory fees as specified under regulation 52(2) of the Regulations and/or towards recurring expenses as specified under 52(4) of the Regulations. **However, such additional expenses will not be charged if exit load is not levied / not applicable to the Scheme.**

In terms of Regulation 52(4A) of SEBI (Mutual Funds) Regulations, 1996 the mutual fund distributors shall be eligible for additional commission as specified under SEBI Circular ref no. **HO/(83)-2025-IMD-POD-1/I/152/2025** dated November 27, 2025 (w.e.f. February 01,2026).

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Std Obs.46
and SO 16

- All scheme related expenses including commission paid to distributors, shall be paid from the Scheme only within the regulatory limits and not from the books of the AMC, its associates, sponsor, trustee or any other entity through any route. Provided that, such expenses that are not specifically covered in terms of Regulation 52 (4) can be paid out of AMC books at actual or not exceeding 2 bps of the Scheme AUM, whichever is lower.
- The Fund / the AMC shall adopt full trail model of commission in the Scheme, without payment of any upfront commission or upfronting of any trail commission, directly or indirectly, in cash or kind, through sponsorships, or any other route.
- All fees and expenses charged in a Direct Plan (in percentage terms) under various heads including the investment and advisory fee shall not exceed the fees and expenses charged under such heads in Regular Plan.
- No pass back, either directly or indirectly, shall be given by the Fund / the AMC / Distributors to the investors.

Illustration in returns between Regular and Direct Plan

Particulars	Regular Plan	Direct Plan
Amount invested at the beginning of the year (Rs.)	10,000	10,000
Returns before Expenses (Rs.)	1,500	1,500
Expenses other than Distribution Expenses (Rs.)	150	150
Distribution Expenses (Rs.)	50	-
Returns after Expenses at the end of the year (Rs.)	1,300	1,350
Returns (%)	13.00%	13.50%

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Std Obs.44

TER for the Segregated Portfolio

- The AMC will not charge investment and advisory fees on Segregated Portfolio. However, TER (excluding the investment and advisory fees) may be charged, on a pro-rata basis only upon recovery of the investments in Segregated Portfolio.
- The TER 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) of the scheme(s) during the period for which 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

Disclosure on Goods & Services Tax:

Goods & Services Tax on investment management and advisory fees shall be in addition to the above expense. Further, with respect to Goods & Services Tax on other than management and advisory fees:

- Goods & Services Tax on other than investment and advisory fees, if any, shall be borne by the scheme within the maximum limit of TER as per regulation 52 of the Regulations.
- Goods & Services Tax on exit load, if any, shall be paid out of the exit load proceeds and exit load net of Goods & Services Tax, if any, shall be credited to the scheme.
- Goods & Services Tax on brokerage and transaction cost paid for asset purchases, if any, shall be within the limit prescribed under regulation 52 of the Regulations.

For the actual current expenses being charged to the Scheme, the investor should refer to the website of the mutual fund <https://www.growwmf.in/downloads/expense-ratio>. Any change proposed to the current expense ratio will be updated on the website at least three working days prior to the change.

As per the Regulations, the total recurring expenses that can be charged to the Scheme in this Scheme information document shall be subject to the applicable guidelines. The total recurring expenses of the Scheme, will, however, be limited to the ceilings as prescribed under Regulation 52(6) of the Regulations.

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Std Obs.47

D. LOAD STRUCTURE

Exit Load is an amount which is paid by the investor to redeem the units from the scheme. Load amounts are variable and are subject to change from time to time. For the current applicable structure, please refer to the website of the AMC (<https://www.growwmf.in/downloads/fact-sheet>) or may call at 8050180222) or your distributor or write to us at support@growwmf.in.

Type of Load	Load chargeable (as %age of NAV)
Exit Load	Nil

All switches will be treated as redemption in the source scheme and subscription in the destination scheme, with the entry and exit load as may be applicable.

In accordance with the requirements specified by the paragraph 10.4.1(a) of SEBI Master Circular of Mutual Fund, no

entry load will be charged for purchase/additional purchase/switches accepted by the Mutual Fund. Similarly, no entry load will be charged with respect to applications for registrations under the Systematic Investment Plan (SIP)/Systematic Transfer Plan (STP) accepted by the Mutual Fund.

The upfront commission on investment made by the investor, if any, shall be paid to the ARN Holder (AMFI registered distributor) directly by the investor, based on the investor's assessment of various factors including service rendered by the ARN Holder.

Exit load (if any) charged to the unit holders by the Mutual Fund on redemption (including switch-out) of units shall be credited to the respective scheme net of Goods & Services Tax. Goods & Services Tax on exit load, if any, shall be paid out of the exit load proceeds.

Switches of following kind within the Scheme will also not attract any exit load - (i) switch from Direct Plan to Regular Plan; (ii) switch from Regular Plan to Direct Plan where the investment in Regular Plan is without a Distributor (ARN) code; (iii) within different Options (Income Distribution cum Capital Withdrawal /growth) of the same Plan (Direct/Regular) of the Scheme.

Load on bonus/ re-investment of Income Distribution cum Capital Withdrawal units: In terms of paragraph 10.6 of SEBI Master Circular of Mutual Fund, no entry and exit load shall be charged on bonus units or units allotted on reinvestment of Income Distribution cum Capital Withdrawal.

The Trustee / AMC reserves the right to introduce a Load and change the Load structure any time in future if they so deem fit on a prospective basis. The investor is requested to check the prevailing load structure of the scheme before investing.

SO 16

In case of changes/modifications of load, the AMC will endeavor to do the following:

1. An addendum will be attached to the Scheme Information Documents and Key Information Memorandum. The same may be circulated to brokers/distributors so that the same can be attached to all SIDs and abridged SID in stock. Further the addendum will be sent along with a newsletter to unitholders immediately after the changes.
2. Arrangement will be made to display the changes/modifications in the SID in the form of a notice in all the official point of acceptance of transactions and distributor's/broker's office.
3. The introduction of the exit load along with the details may be stamped in the acknowledgement slip issued to the investors on submission of the application form and may also be disclosed in the statement of accounts issued after the introduction of such load.
4. A public notice shall be given in respect of such changes 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.

SECTION II

I. Introduction

A. Definitions/interpretation

For detailed description please click the link: <https://www.growwmf.in/downloads/sid>

B. Risk factors

C. Risk associated with Equity and Equity Related Instruments:

Equity and Equity Related Instruments by nature are volatile and prone to price fluctuations on a daily basis due to macro and micro economic factors. The value of Equity and Equity Related Instruments may fluctuate due to factors affecting the securities markets such as volume and volatility in the capital 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. Further, the Equity and Equity Related Instruments are risk capital and are subordinate in the right of payment to other securities, including debt securities. Equity and Equity Related Instruments listed on the stock exchange carry lower liquidity risk; however, the Scheme's ability to sell these investments is limited by the overall trading volume on the stock exchanges. In certain cases, settlement periods may be extended significantly by unforeseen circumstances. The inability of the Scheme to make intended securities purchases due to settlement problems could cause the Scheme to miss certain investment opportunities. Similarly, the inability to sell securities held in the Scheme's portfolio may result, at times, in potential losses to the Scheme, should there be a subsequent decline in the value of securities held in the Scheme's portfolio. Further, the volatility of medium / small - capitalization stocks may be higher in comparison to liquid large capitalization stocks.

2. Risk associated with Fixed Income and Money Market Instruments:

Interest - Rate Risk

Fixed Income and Money Market Instruments run interest-rate risk. Generally, when interest rates rise, prices of existing fixed income securities fall and when interest rate falls, the prices increase. The extent of rise or fall in the price is a function of existing coupon, days to maturity, 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

Credit risk or default risk refers to the risk that the issuer of a fixed income security 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 be affected because of change in the credit rating of the issuer/instrument and the price of a security goes down if the credit rating agency downgrades the rating of the issuer. In case of Government Securities, there is minimal credit risk to that extent. Lower rated or unrated securities are more likely to react to developments affecting the market and credit risk than the highly rated securities which react primarily to movements in the general level of

interest rates. Lower rated or unrated securities also tend to be more sensitive to economic conditions than higher rated securities.

Liquidity or Marketability Risk

The ability of the Scheme to execute sale/purchase order is dependent on the liquidity or marketability. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. The securities that are listed on the stock exchange carry lower liquidity risk, but the ability to sell these securities is limited by the overall trading volumes. Further, different segments of Indian financial markets have different settlement cycles and may be extended significantly by unforeseen circumstances. Securities which are not quoted on the stock exchange(s) may be illiquid and can carry higher liquidity risk in comparison with securities which are listed on the stock exchange(s) and offer exit option to the investor including put option. The Scheme would invest in the securities which are not listed but offer attractive yields. This may however increase the risk of the portfolio.

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.

3. Risk Factor associated with investing in Securities Segment and Tri-party Repo trade settlement Clearing Corporation of India Ltd. ('CCIL') is providing clearing and settlement services, for Triparty Repo trades in Government Securities, under its Securities Segment. CCIL would act as a Central Counterparty to all the borrow and lend Triparty Repo trades received by it for settlement. CCIL would also be performing the role responsibilities of Triparty Repo Agent, in terms of Repurchase transactions (Repo) (Reserve Bank) Directions, 2018 as amended from time to time. CCIL would settle the Triparty Repo trades, in terms of its Securities Segment Regulations. The funds settlement of members is achieved by multilateral netting of the funds position in Triparty Repo with the funds position in Outright and Market Repo and settling in the books of RBI for members who maintain an RBI Current Account. In respect of other members, funds settlement is achieved in the books of Settlement Bank. Securities settlement for Triparty Repo trades shall be achieved in the Gilt Account of the Member maintained with CCIL. Securities obligation for outright and market repo trades shall be settled in the SGL / CSGIL account of the Member with RBI. Groww Mutual Fund is a member of securities segment and Tri-party Repo trade settlement of the CCIL. Since all transactions of the Fund in government securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL, it reduces the settlement and counterparty risks considerably for transactions in the said segments. To mitigate the potential losses arising in case any member defaults in settling the transactions routed through CCIL, CCIL maintains a Default Fund. CCIL shall maintain two separate Default Funds in respect of its securities segment, one to meet the losses arising out of any default by its members from outright and repo trades and other for meeting losses arising out of any default by its members from Triparty Repo trades. In case any clearing member fails to honor his settlement obligations, the Default Fund is utilized to complete the settlement applying the Default Waterfall Sequence. As per the said waterfall mechanism, after the defaulter's margins and defaulter's contribution to default fund have been appropriated, CCIL's contribution is used to meet the losses. Post utilization of CCIL's contribution, if there is still a loss to be met, then contribution of non-defaulting members to Default Fund is utilized to meet the said loss. The Scheme is subject to the risk of losing initial margin and contribution to Default Fund in the event of failure of any settlement obligation. Further the Scheme's contribution is allowed to be used to meet the residual loss in case of default by the other clearing member (the defaulting member). Further, CCIL periodically prescribes a list of securities eligible for contribution as collaterals by members. Presently, all Central Government Securities and Treasury Bills are accepted as collaterals by CCIL. The above risk factor may undergo a change in case the CCIL notifies securities other than Government of India Securities as eligible for contributions as collateral.

4. Risks associated with investing in Securitized Debt

The Scheme may invest in securitized debt such as asset backed securities (ABS) or mortgage backed securities (MBS). ABS are backed by other assets such as credit card, automobile or consumer loan receivables, retail loan installment or participations in pools of leases. Credit support for these securities may be based on the underlying assets and/or provided through credit enhancements by a third party. The values of these securities are sensitive to changes in the credit quality of the underlying collateral, the credit strength of the credit enhancement, changes in interest rates and at times the financial condition of the issuer. MBS is an asset backed security whose cash flows are backed by the principal and interest payments of a set of mortgage loans. In the case of mortgage-backed securities, these loans are usually first mortgages on residential properties. With asset backed securities, the loans might be credit card receivables, auto loans and leases or home equity loans. As the underlying loans are paid off by the borrowers, the investors in MBS/ABS receive payments of interest and principal over time. MBS, particularly home loan transactions, are subject to interest-rate risk and prepayment risk. A change in interest rates can affect the pace of payments on the underlying loans, which in turn, affects total return on the securities. ABS also carries credit or default risks. If many borrowers on the underlying loans default, losses could exceed the credit enhancement level and result in losses to investors in an ABS transaction. ABS has structure risk due to a unique characteristic known as early amortization or early payout risk.

MBS carry interest rate risk. Maturity is a moving target with these securities. Depending on what happens to interest rates after issuing the MBS, the maturity of the bond could shorten or lengthen dramatically. This is because homeowners are allowed to refinance their mortgages, as decline in interest rates encourages many homeowners to refinance their mortgages. Whereas rise in interest rates causes homeowners to hold on to their mortgages longer. This will extend the originally estimated maturity dates of MBS. ABS and MBS are also subject to prepayment risk. When purchasing an MBS, investors usually calculate some degree of prepayment into their pricing. However, if prepayment happens unexpectedly or faster than predicted, it may result in reduced actual duration as compared to the expected duration of the paper at the time of purchase, which may adversely impact the portfolio yield.

The yield-to-maturity of such securities cannot be known for certain at the time of purchase since the cash flows are not known. When principal is returned early, future interest payments will not be paid on that part of the principal. If the bond was purchased at a premium, the bond's yield will be less than what was estimated at the time of purchase. The credit enhancement stipulated represents a limited loss cover to the investors. These certificates represent an undivided beneficial interest in the underlying receivables and do not represent an obligation of either the issuer or the seller or the originator, or the parent or any affiliate of the seller, issuer and originator. No financial recourse is available to the certificate holders against the investors' representative. Delinquencies and credit losses may cause depletion of the amount available under the credit enhancement and thereby the investor payouts to the certificate holders may get affected if the amount available in the credit enhancement facility is not enough to cover the shortfall. On persistent default of an obligor to repay his obligation, the servicer may repossess and sell the asset. However, many factors may affect, delay or prevent the repossession of such asset or the length of time required to realise the sale proceeds on such sales.

In addition, the price at which such asset may be sold may be lower than the amount due from that obligor. These securities also carry risk associated with the collection agent. With respect to the certificates, the servicer will deposit all payments received from the obligors into the collection account. However, there could be a time gap between collection by a servicer and depositing the same into the collection account especially considering that some of the collections may be in the form of cash. In this interim period, collections from the loan agreements may not be segregated from other funds of originator. If originator in its capacity as servicer fails to remit such funds due to investors, the investors may be exposed to a potential loss.

5. Risks associated with investing in Derivatives

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. The use of a derivative requires an understanding not only of the underlying instrument but also 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. Other risks include risk of mispricing or improper valuation and the inability of the derivative to correlate perfectly with underlying assets, rates and indices, illiquidity risk whereby the Scheme may not be able to sell or purchase derivative quickly enough at a fair price.

SO 06

6. Risks associated with Securities Lending

For Equity Instruments:

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.

For Debt Instruments:

As with other modes of extensions of credit, there are risks inherent to securities lending, including the risk of failure of the other party, in this case the approved intermediary, to comply with the terms of the agreement entered into between the lender of securities i.e. the Scheme and the approved intermediary. Such failure can result in the possible loss of rights to the collateral put up by the borrower of the securities, the inability of the approved intermediary to return the securities deposited by the lender and the possible loss of any corporate benefits accruing to the lender from the securities deposited with the approved intermediary. The Scheme may not be able to sell such lent securities and this can lead to temporary illiquidity.

7. Risks associated with Short Selling

The Scheme may enter into short selling transactions, subject to SEBI and RBI Regulations. Short positions carry the risk of losing money and these losses may grow unlimited theoretically if the price of the stock increases without any limit. This may result in major loss to the Scheme. At times, the participants may not be able to cover their short positions, if the price increases substantially. If numbers of short sellers try to cover their position simultaneously, it may lead to disorderly trading in the stock and thereby can briskly escalate the price even further making it difficult or impossible to liquidate short position quickly at reasonable prices. In additions, short selling also carries the risk of inability to borrow the security by the participants thereby requiring the participants to purchase the securities sold short to cover the position even at unreasonable prices.

8. Risks associated with investing in REITs and InvITs

REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. Investors may note that AMC/Fund Manager's investment decisions may not always be profitable, as actual market movements may be at variance with the anticipated trends. The NAV of the scheme is vulnerable to movements in the prices of securities invested by the scheme, due to various market related factors like changes in the general market conditions, factors and forces affecting capital market, level of interest rates, trading volumes, settlement periods and transfer procedures. The scheme will undertake active portfolio management as per the investment objective to reduce the market risk.

- i) **Liquidity Risk:** This refers to the ease with which securities/instruments of REITs/InvITs can be sold. There is no assurance that an active secondary market will develop or be maintained. Hence, there could be times when trading in the units is infrequent. The subsequent valuation of illiquid units may reflect a discount from the market price of comparable securities/instruments for which a liquid market exists. As these products are new to the market they are likely to be exposed to liquidity risk.
- ii) **Reinvestment Risk:** Investments in securities/instruments of REITs and InvITs may carry reinvestment risk as there could be repatriation of funds by the Trusts in form of buyback of units or Payout of Income Distribution cum Capital Withdrawal, etc. Consequently, the proceeds may get invested in assets providing lower returns.
- iii) **Price Risk:** Securities/Instruments of REITs and InvITs are volatile and prone to price fluctuations on a daily basis owing to market movements. The extent of fall or rise in the prices depends upon factors such as general market conditions, factors and forces affecting capital market, real estate and infrastructure sectors, level of interest rates, trading volumes, settlement periods and transfer procedures.
- iv) **Interest Rate Risk:** Securities/Instruments of REITs and InvITs run interest rate risk. Generally, when interest rates rise, prices of units fall and when interest rates drop, such prices increase.
- v) **Credit Risk:** Credit risk means that the issuer of a REIT/InvIT security / instrument may default on interest payment or even on paying back the principal amount on maturity. Securities / Instruments of REITs and InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be prescheduled.
- vi) **Regulatory/Legal Risk:** REITs and InvITs being new asset classes, rights of unit holders

9. Risk Factors with respect to Imperfect Hedging Using Interest Rate

An Interest Rate Futures is an agreement to buy or sell a debt instrument at a specified future date at a price that is fixed today. Interest Rate Futures are Exchange traded. These future contracts are cash settled.

- Perfect Hedging means hedging the underlying using IRF contract of same underlying.
- Imperfect hedging means the underlying being hedged and the IRF contract has correlation of closing prices of more than 90%.

In case of imperfect hedging, the portfolio can be a mix of:

- Corporate Bonds and Government securities or
- Only Corporate debt securities or
- Only government securities with different maturities

Risk associated with imperfect hedging includes:

Basis Risk: The risk arises when the price movements in derivative instrument used to hedge the underlying assets does not match the price movements of the underlying assets being hedged. Such difference may potentially amplify the gains or losses, thus adding risk to the position.

Price Risk: The risk of mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates, and indices.

Risk of mismatch between the instruments: The risk arises if there is a mismatch between the prices movements in derivative instrument used to hedge, compared to the price movement of the underlying assets being hedged. For example, when IRF which has government security as underlying is used, to hedge a portfolio that contains corporate debt securities.

Correlation weakening and consequent risk of regulatory breach: SEBI (MF) Regulations mandates minimum correlation criterion of 0.9 (calculated on a 90-day basis) between the portfolio being hedged and the derivative instrument used for hedging. In cases where the correlation falls below 0.9, a rebalancing period of 5 working days has been permitted. Inability to satisfy this requirement to restore the correlation level to the stipulated level, within the stipulated period, due to difficulties in rebalancing would lead to a lapse of the exemption in gross exposure

computation. The entire derivative exposure would then need to be included in gross exposure, which may result in gross exposure in excess of 100% of net asset value.

Purchasing a security entails the risk of the security price going down. Short selling of securities (i.e. sale of securities without owning them) entails the risk of the security price going up there by decreasing the profitability of the short position. Short selling is subject to risks related to fluctuations in market price, and settlement/liquidity risks. If required by the Regulations, short selling may entail margin money to be deposited with the clearing house and daily mark to market of the prices and margins. This may impact fund pricing and may induce liquidity risks if the fund is not able to provide adequate margins to the clearing house. Failure to meet margin requirements may result in penalties being imposed by the exchanges and clearing house.

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10.Risks associated with overseas investment

To the extent the assets of the scheme are invested in overseas financial assets, there may be risks associated with currency movements, restrictions on repatriation and transaction procedures in overseas market. Further, the repatriation of capital to India may also be hampered by changes in regulations or political circumstances as well as the application to it of other restrictions on investment. In addition, country risks would include events such as introduction of extraordinary exchange controls, economic deterioration, bi-lateral conflict leading to immobilisation of the overseas financial assets and the prevalent tax laws of the respective jurisdiction for execution of trades or otherwise.

Currency Risk: The fund may invest in overseas mutual fund / foreign securities as permitted by the concerned regulatory authorities in India. Since the assets 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/fluctuations in the value of the foreign currencies relative to the Indian Rupee.

Country Risk: The Country risk arises from the inability of a country, to meet its financial obligations. It is the risk encompassing economic, social and political conditions in a foreign country, which might adversely affect foreign investors' financial interests.

11.Risk factors associated with processing of transaction through Stock Exchange Mechanism

The trading mechanism introduced by the stock exchange(s) is configured to accept and process transactions for mutual fund units in both Physical and Demat Form. The allotment and/or redemption of Units through NSE and/or BSE or any other recognised stock exchange(s), on any Business Day will depend upon the modalities of processing viz. collection of application form, order processing/settlement, etc. upon which the AMC has no control. Moreover, transactions conducted through the stock exchange mechanism shall be governed by the operating guidelines and directives issued by respective recognized stock exchange(s).

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Risk Mitigation/Control Strategies:

Equity:

- **Liquidity Risk:** The fund will try to maintain a proper asset-liability match to ensure redemption payments are made on time and not affected by illiquidity of the underlying stocks.
- **Concentration Risk:** The scheme will endeavour to have a well-diversified equity portfolio comprising stocks across various sectors of the economy. This would aid in managing concentration risk and sector-specific risks. Generally, diversification across market cap segments also aids in managing volatility and ensuring adequate liquidity at all times.
- **Derivatives Risk:** The fund will endeavour to maintain adequate controls to monitor the derivatives transactions entered into.

Debt

- Interest Rate Risk: The Fund seeks to mitigate this risk by keeping the maturity of the scheme in line with the interest rate expectations.
- Credit risk or default risk: Management analysis will be used for identifying company specific risks. Management's past track record will also be studied. In order to assess financial risk a detailed assessment of the issuer's financial statements will be undertaken.
- Reinvestment Risk: Reinvestment risks will be limited to the extent of coupons received on debt instruments, which will be a very small portion of the portfolio value.
- The Scheme may invest in derivative for the purpose of hedging, portfolio balancing and other purposes as may be permitted under the Regulations. Interest Rate Swaps will be done with approved counter parties under pre-approved ISDA agreements. Interest rate swaps and other derivative instruments will be used as per local (RBI and SEBI) regulatory guidelines.
- Liquidity or Marketability Risk: Liquidity risk may be high on select securities due to duration and/or issue structure and/ or issuer-specific risk.

Liquidity Risk can be partly mitigated by diversification, staggering of maturities as well as internal risk controls that lean towards purchase of liquid securities.

II. INFORMATION ABOUT THE SCHEME:

A. Where will the scheme invest –

Subject to the Regulations and the disclosures as made under the section “How the Scheme will allocate its Assets”, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities:

▪ Equity and Equity Related Instruments:

- **Equity share** – Equity Share is a security that represents ownership interest in a company.
- **Equity Related Instruments** – are securities which give the holder of the security right to receive Equity Shares on pre agreed terms. It includes convertible debentures, convertible preference shares, warrants carrying the right to obtain equity shares, equity derivatives, Units of Real Estate Investment Trust and such other instrument as may be specified by the SEBI from time to time.
- **Equity Derivatives** – are financial instruments, generally traded on an exchange, the price of which is directly dependent upon (i.e., “derived from”) the value of equity shares or equity indices. Derivatives involve the trading of rights or obligations based on the underlying, but do not directly transfer property. The equity derivatives may take the following forms :-

-Futures: Futures are exchange-traded contracts to sell or buy financial instruments for future delivery at a date and at an agreed price. SEBI has permitted futures contracts on indices and individual stocks with maturity of 1 month, 2 months and 3 months on a rolling basis. The futures contracts are settled on last Thursday (or immediately preceding trading day if Thursday is a trading holiday) of each month. The final settlement price is the closing price of the underlying stock(s)/index.

-Options: Option is a contract which provides the buyer of the option the right, without the obligation, to buy or sell a specified asset at the agreed price on or up to a particular date. Option contracts are of two types viz: (a) Call Option - The option that gives the buyer the right but not the obligation to buy specified quantity of the underlying asset at the strike price is a call option. (b) Put Option – The option that gives the buyer the right but not the obligation to sell is called put option.

- ADRs / GDRs issued by Indian company’s subject to necessary regulatory requirements
- Foreign Equity and Equity Related Instrument

▪ Debt & Money Market Instruments:

- **Certificate of Deposits (CD)** - CD is a negotiable money market instrument issued by scheduled commercial banks and select all-India Financial Institutions that have been permitted by the RBI to raise short term resources. The maturity period of CDs issued by the Banks is between 7 days to one year, whereas, in case of FIs, maturity is between one year to 3 years from the date of issue. CDs may be issued at a discount to face value.
- **Commercial Papers (CP)** - CP is an unsecured negotiable money market instrument issued in the form of a promissory note, generally issued by the corporates, primary dealers and all India Financial Institutions as an alternative source of short term borrowings. They are issued at a discount to the face value as may be determined by the issuer. CP is traded in secondary market and can be freely bought and sold before maturity.

- **Treasury Bills (T-Bills)** are issued by the Government of India to meet their short term borrowing requirements. T-Bills are issued for maturities of 91 days, 182 days and 364 days. T-bills are issued at a discount to their face value and redeemed at par.
- **Commercial Usance Bills** - Bill (bills of exchange/promissory notes of public sector and private sector corporate entities) Rediscounting, usance bills and commercial bills.
- **Repos/reverse repos in Government Securities** as may be permitted by RBI (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). Repo (Repurchase Agreement) or Reverse Repo is a transaction in which two parties agree to sell and purchase the same security with an agreement to purchase or sell the same security at a mutually decided future date and price.
- **Triparty Repo (TREPS)** – "Triparty repo" means a repo contract where a third entity (apart from the borrower and lender), called a Tri- Party Agent, acts as an intermediary between the two parties to the repo to facilitate services like collateral selection, payment and settlement, custody and management during the life of the transaction. TREPS facilitates, borrowing and lending of funds, in Triparty Repo arrangement.
- **Securities created and issued by the Central and State Governments** as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). State Government securities (popularly known as State Development Loans or SDLs) are issued by the respective State Government in co-ordination with the RBI.
- **Non-Convertible Debentures and Bonds** **Non-convertible debentures** as well as bonds are securities issued by companies / institutions promoted / owned by the Central or State Governments and statutory bodies which may or may not carry a Central/State Government guarantee, Public and private sector banks, all India Financial Institutions and Private Sector Companies. These instruments may be secured or unsecured against the assets of the Company and generally issued to meet the short term and long term fund requirements. These instruments may have fixed or floating rate coupon.
- **Securitized Assets** - Securitization is a structured finance process which involves pooling and repackaging of cashflow producing financial assets into securities that are then sold to investors. All assets can be securitized so long as they are associated with cash flows. A Pass Through Certificate (PTC) represents beneficial interest in an underlying pool of cash flows. These cash flows represent dues against single or multiple loans originated by the sellers of these loans. These loans are given by banks or financial institutions to corporates. PTCs may be backed, but not exclusively, by receivables of personal loans, car loans, two wheeler loans and other assets subject to applicable regulations.

A typical process of asset securitization involves sale of specific receivables to a Special Purpose Vehicle (SPV) set up in the form of a trust or a company. The SPV in turn issues financial instruments (promissory notes, participation certificates or other debt instruments) also referred to as Securitized Debt to the investors evidencing the beneficial ownership of the investors in the receivables. The financial instruments are rated by an independent credit rating agency.

The Scheme may invest in various type of securitisation issuances. The Scheme does not propose to limit its exposure to only one asset class or to have asset class based sub-limits as it will primarily look towards the credit rating of the offering.

Disclosures regarding investments in Securitised Debt:

1. How the risk profile of securitized debt fits into the risk appetite of the scheme?

An evaluation procedure similar to that applied in analyzing plain vanilla debt (commercial paper, non convertible debentures and bonds) will be employed for analyzing securitized debt and assessing their suitability in line with investment objective of the scheme.

Normally, the risk of investing in securitized debts is similar to investing in debt securities. However as securitized debt involves staggered cash flows from underlying loans, there is always a risk of pre-payment of loan instalments by the ultimate borrower which may reduce the returns of the Scheme if the re-investment rates are lower than initially envisaged. The efforts will be made to identify and make investments in those assets which have maximum or bullet repayment on maturity.

The securitized debts have a relatively lower liquidity compared to other plain vanilla debt securities. Since we propose to restrict the investments in securitized debt to the extent specified above under respective schemes, we don't envisage any significant liquidity risk.

Securitized debts, typically offer higher yield than debt securities of similar rating and maturity due to the aforementioned additional risks. If the fund manager is of the view that the additional risks are suitably compensated by higher returns, then investments will be made in securitized debts subject to applicable limits.

The Scheme will predominantly invest only in those securitization issuances which have at least an investment grade credit rating indicating high level of safety from the credit risk point of view at the time of making an investment.

2. Policy relating to originators based on nature of originator, track record, NPAs, losses in earlier securitized debt, etc

The Originator is the entity who has initially given the loan and transferred the receivables to a SPV, The Scheme shall invest in those securitized debts, whose Originator is a Corporate Entity, being a Bank or an NBFC. Before entering into any securitization transaction, the risk is assessed based on the information generated from the following sources:

A.

(a) Track record – This is a key parameter that we consider at the time of analyzing the transaction. Originators with long track record of operation lend a greater degree of comfort, as they have a longer operating credit history which can be assessed. The track-record would vary depending on the obligor/ originator. Further the track-record of having undertaken such transactions are also evaluated. Most of the entities which undertake such transactions in the Indian market have both a long track-record of operations and a history of having undertaken securitization transactions.

(b) Willingness to pay, through credit enhancement facilities etc. – In this case the stand alone credit assessment of the obligor is carried out to indicate the overall financial health. In the case of retail pool securitization transactions, credit enhancement levels offered at the start and the overall utilization levels during the tenor of the transaction is analyzed to reflect the credit comfort and cushion available.

(c) Ability to pay- this is the outcome of the stand-alone credit assessment of the issuer which is arrived after analyzing the income statement and balance sheet of the obligor. This aspect is the key in the case of single loan sell down transactions, since the final repayment is to be made by the obligor and is directly dependent on its overall financial health. This aspect is also usually reflected in the stand-alone credit rating of the company which primarily captures the credit risk i.e the ability to honour financial obligations to lenders in a timely fashion.

(d) Business risk assessment, wherein following factors are considered:

- Outlook for the economy (domestic and global) – this forms part of the usual credit assessment and the macro analysis. This will have impact on the business risk of the obligor.
- Outlook for the industry – external risks are analyzed here and their impact on the business risk is analyzed. Opportunities and threats as part of the swot analysis are analyzed.
- Company specific factors – the strengths and weaknesses of the company are critically analyzed here

In addition a **detailed review and assessment of rating rationale** is done including interactions with the company as well as agency - The latest rating assessment report is studied to understand the key strengths and risks faced by the issuer/obligor. It has been our practice to discuss the rating report with the rating agency in order to understand the finer credit aspects and the impact it could have on the financial health and rating. As part of the due diligence, we also hold discussions with the obligors / originators which help in getting a better insight into their background.

Critical Evaluation Parameters (for pool loan and single loan securitization transactions) regarding the originator / underlying issuer is as follows:

Default track record/ frequent alteration of redemption conditions / covenants – all transaction conditions and covenants are analyzed to examine any flexibility available to the obligor/originator to alter the terms and conditions which can impact the investor position. If any of these conditions are un-favourable, then these are negotiated / altered at the start of the transaction.

High leverage ratios of the ultimate borrower (for single-sell downs) – both on a standalone basis as well on a consolidated level/ group level – financial analysis of balance sheet and income sheet ratios forms critical part of credit analysis, since factors such as gearing will determine both the credit rating as well as debt servicing and final repayment. High gearing also may limit the ability of the obligor to seek additional funding from the market on a timely basis to meet any maturing obligations. Hence this aspect is very crucial in the analysis.

Higher proportion of rescheduling of underlying assets of the pool or loan, as the case may be –we analyze the pool at start to ensure that there are no major rescheduled assets within the pool, since any deterioration of such assets could weaken the pool's overall asset quality and could lead to higher credit enhancement utilization.

Higher proportion of overdue assets of the pool or the underlying loan, as the case may be – quality of the retail pool at start is important as it could have a significant impact on the pool's performance during its tenor.

Poor reputation in market - originators /obligors with poor reputation and/or financial health are usually discarded during our credit evaluation, since asset quality could quickly deteriorate in some cases which could impair debt servicing and repayment. Further, such obligors would also find it difficult to tap the market to raise funds if needed to meet any maturing financial obligations.

Insufficient track record of servicing of the pool or the loan, as the case may be – since we critically assess track-record of operations of the obligor/originator, any shortfall in this parameter would be captured in our analysis. We usually prefer obligors / originators with reasonable operating history since it offers adequate credit history for purpose of credit analysis.

3. Risk mitigation strategies for investments with each kind of originator

(a) Size and reach of the originator – different originators have varying levels of reach and access. Besides, different originators operate in different geographies and consumer segments. Also the asset classes that they originate could be different depending on their target profitability, risk tolerance levels and support infrastructure

for disbursing loans and making recoveries and collections. We usually look for originators possessing fair degree of diversification in their operation (metros/ semi urban and rural markets), asset classes (collateralized assets are preferred such as cars, commercial vehicles, construction equipment etc.) and with a fairly robust collection infrastructure. Most of the regular names that we invest comply with these requirements.

(b) Collection process, infrastructure and follow-up mechanism – we usually prefer originators who possess in-house capabilities and infrastructure as regards disbursements, collections and recoveries since it has been historically proven that such entities usually exhibit better asset quality in the long run. Most of the originators in our universe fall in this category.

(c) Quality of MIS – data quality and timely availability is critical in the asset financing business. We stress on this aspect and look for entities which have robust MIS and have networked branches so that MIS generation is faster, efficient and senior management is in a position to take timely decisions.

(d) Credit enhancement for different type of originator – this varies between originators and is usually determined and specified by the originator. The rating agency usually established the base case losses for the originator and for the specific asset category and then applies a stress factor depending on their own assessment of the originators financial health, and other strengths and weaknesses as also the prevailing macroeconomic factors which can impact overall asset quality.

4. The level of diversification with respect to the underlying assets, and risk mitigation measures for less diversified investments

Following framework will be applied while evaluating investment decision relating to a pool securitization transaction:

Characteristics/ Type of Pool	Mortgage Loan#	CV & CE	Cars	2 Wheelers	Micro Finance Pools @	Personal Loans	Single Sell Downs
Approximate Average maturity (in Months)*	36-72	12-30	12-30	12-18	3-15	12-24	12-24
Collateral margin (including cash guarantees, excess interest spread, subordinate tranche)	Min : 10	5-25	5-25	Min : 15	Min : 10	Min : 15	-
Average Loan to Value Ratio (%)	70-90	65-85	65-85	50-75	60-85	NA	-
Average seasoning of the Pool (months)	6-12	3-6	3-6	3-6	1-3	3-6	-
Maximum single exposure range%	5-15	5-15	5-15	5-10	5-15	5-10	5-15
Average single exposure range %	10	10	10	7.5	10	7.5	10

1. Kindly note that these are indicative ranges and final figures could vary depending upon the overall characteristics of the transaction and market conditions.

2. Also since most of the transactions are composite in nature i.e. they have more than one asset class the actual cash level would be finalized based on the final mix.

3. Mortgage loans are usually not clubbed with other asset classes since the average tenors are different for these asset classes. Hence mortgage loan pools are usually issued separately. Hence we have indicated 15 % under this

asset class.

4. Micro finance pools are also issued separately and not clubbed with other asset classes. Hence we have indicated 15% under Micro Finance pools under maximum exposure.
5. The percentages indicated in the table above is with reference to investments in securitized debt instruments, subject to investment restrictions as per the regulations.
6. The scheme shall invest in securitized debt instruments maturing on or before the maturity of the scheme.

CV: Commercial Vehicles

CE: Construction Equipment

- **Pass through Certificate (PTC)** – Pay through or other Participation Certificates represents beneficial interest in an underlying pool of cash flows. These cash flows represent dues against single or multiple loans originated by the sellers of these loans. These loans are given by banks or financial institutions to corporates. PTCs may be backed, but not exclusively, by receivables of personal loans, car loans, two wheeler loans and other assets subject to applicable regulations

Debt derivative instrument

-Interest Rate Swap - An Interest Rate Swap (IRS) is a financial contract between two parties exchanging or swapping a stream of interest payments for a “notional principal” amount on multiple occasions during a specified period. Such contracts generally involve exchange of a “fixed to floating” or “floating to fixed rate” of interest. Accordingly, on each payment date that occurs during the swap period, cash payments based on fixed/ floating and floating rates are made by the parties to one another.

-Forward Rate Agreement- A Forward Rate Agreement (FRA) is a financial contract between two parties to exchange interest payments for a ‘notional principal’ amount on settlement date, for a specified period from start date to maturity date. Accordingly, on the settlement date, cash payments based on contract (fixed) and the settlement rate, are made by the parties to one another. The settlement rate is the agreed bench-mark/ reference rate prevailing on the settlement date.

- **Interest Rate Futures** - A futures contract is a standardized, legally binding agreement to buy or sell a commodity or a financial instrument in a designated future month at a market determined price (the futures price) by the buyer and seller. The contracts are traded on a futures exchange. An Interest Rate Future is a futures contract with an interest bearing instrument as the underlying asset.

- Government securities having an unexpired maturity upto one year

- Index derivatives

- **Foreign Securities** -The Scheme may also invest in suitable investment avenues in overseas financial markets for the purpose of diversification, yield enhancement and to benefit from potential foreign currency appreciation, commensurate with the Scheme objectives and subject to the provisions of Para 12.19.2 of SEBI Master Circular on Mutual Funds dated June 27, 2024 as may be amended from time to time and any other requirements as may be stipulated by SEBI/RBI from time to time. Towards this end, the Mutual Fund may also appoint overseas investment advisors and other service providers, as and when permissible under the regulations: The Scheme may, in terms of its investment objectives with the approval of SEBI/RBI invest in following Foreign Securities:

- i. ADRs/ GDRs issued by Indian or foreign companies;
- ii. Equity of overseas companies listed on recognized stock exchanges overseas ;
- iii. Initial and follow on public offerings for listing at recognized stock exchanges overseas ;
- iv. Foreign debt securities in the countries with fully convertible currencies, short term as well as long term debt instruments with rating not below investment grade by accredited/registered credit rating agencies;
- v. Money market instruments rated not below investment grade ;
- vi. Repos in the form of investment, where the counterparty is rated not below investment grade; repos should not however, involve any borrowing of funds by mutual funds;
- vii. Government securities where the countries are rated not below investment grade;
- viii. Derivatives traded on recognized stock exchanges overseas only for hedging and portfolio balancing with underlying as securities ;
- ix. Short term deposits with banks overseas where the issuer is rated not below investment grade and
- x. Units/securities issued by overseas mutual funds or unit trusts registered with overseas regulators and investing in
 - (a) aforesaid securities,
 - (b) Real Estate Investment Trusts (REITs) listed in recognized stock exchanges overseas or
 - (c) permitted unlisted overseas securities (not exceeding 10% of their net assets).

1. As per Para 12.19 of SEBI Master Circular on Mutual Funds

1.1. Mutual Funds can make overseas investments subject to a maximum of US \$ 1 billion per Mutual Fund, within the overall industry limit of US \$ 7 billion.

1.2. Mutual Funds can make investments in overseas Exchange Traded Fund (ETF(s)) subject to a maximum of US \$ 300 million per Mutual Fund, within the overall industry limit of US \$ 1 billion.

The allocation methodology of the aforementioned limits shall be as follows:

2.1. In case of overseas investments specified at Para 1.1 above, US \$ 50 million would be reserved for each Mutual Fund individually, within the overall industry limit of US \$ 7 billion. Subject to the limit specified in 1.1 and 1.2, the Scheme may invest an amount of US \$ 50 million in foreign securities and US \$ 20 million in overseas ETFs each as permitted by RBI/SEBI from time to time within a period of 6 months from the NFO closure date. Further investments shall follow the norms for ongoing schemes as specified from time to time, which currently are, 20% of the average AUM in Overseas securities / Overseas ETFs of the previous three calendar months would be available to the Mutual Fund for that month to invest in Overseas securities / Overseas ETFs subject to maximum limits specified at Para 1 above.

Provided that the limit for investment in overseas securities including ETFs shall be as permitted by RBI/SEBI from time to time. The overseas limits mentioned in Para 12.19 of SEBI Master Circular on Mutual Funds are soft limits. Subject to the approval of RBI / SEBI and conditions as may be prescribed by them, the Mutual Fund may open one or more foreign currency accounts abroad either directly, or through the custodian/sub custodian, to facilitate investments and to enter into/deal in forward currency contracts, currency futures, interest rate futures / swaps, currency options for the purpose of hedging the risks of assets of a portfolio or for its efficient management. Any other like instruments as may be permitted by RBI/SEBI/ such other Regulatory Authority from time to time.

- **Investments in units of mutual fund schemes** – The Scheme may invest in other schemes managed by the AMC or in the schemes of any other mutual funds in conformity with the investment objective of the Scheme and in terms of the prevailing SEBI (MF) Regulations.
- **Investment in Units issued by InvITs**
- Short selling and securities lending as permitted by SEBI from time to time REITs and InvITs.

Any other instruments, as may be permitted by RBI / SEBI / such other Regulatory Authority, from time to time, subject to Regulatory approvals. The securities mentioned above could be listed or permitted unlisted, privately placed, secured or unsecured, rated or un-rated and of any maturity, as enabled under SEBI (MF) Regulations / circulars/ RBI. The securities may be acquired from primary market/ Initial Public Offer (IPO), secondary market operations, private placement or negotiated deals.

For applicable regulatory investment limits please refer paragraph "Investment Restrictions". The Fund Manager reserves the right to invest in such securities as maybe permitted from time to time and which are in line with the investment objectives of the Scheme.

B. What are the investment restrictions?

SO 11

The following investment limitations and other restrictions, inter alia, as contained in the Trust Deed and the SEBI(MF)Regulations apply to the Scheme:

1. Investment in unrated debt and money market instruments, other than government securities, treasury bills, derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. shall be subject to the following:
 - a. Investments shall only be made in such instruments, including bills rediscounting, usance bills, etc., that are generally not rated and for which separate investment norms or limits are not provided in SEBI (MF) Regulations and various circulars issued thereunder.
 - b. Exposure in such instruments, shall not exceed 5% of the net assets of the scheme.
 - c. All such investments shall be made with the prior approval of the Board of AMC and the Board of trustees.
2. The Mutual Fund under all its Scheme(s) shall not own more than 10% of any company's paid up capital carrying voting rights or 10% of units of REITs issued by a single issuer, as the case may be. Provided, investment in the asset management company or the trustee company of a mutual fund shall be governed by clause (a), of sub-regulation (1), of regulation 7B of the SEBI (MF) Regulations
3. No mutual fund scheme shall invest more than 10 per cent of its NAV in the equity shares or equity related instruments of any entity. Provided that, the limit of 10 per cent shall not be applicable for investments in case of index fund or exchange traded fund or sector or industry specific scheme.
4. The Scheme shall adhere to following limits for investments in Debt and Money Market Instruments issued by a single issuer:

Credit Rating	Maximum Limit (% of net assets)
AAA	10
AA (including AA+ and AA-)	8
A (including A+) & below	6

The above limits may be extended by up to 2% of the NAV of the Scheme with prior approval of the Board of Trustees and AMC, subject to compliance with the overall 12% limit.

Provided that such limits shall not be applicable for investments in Government Securities, treasury bills, and Triparty Repo on G-Secs & T-Bills.

5. The Scheme may invest in another scheme under the same asset management company or any other mutual fund without charging any fees, provided that aggregate inter-scheme investment made by all schemes under the management or in schemes under the management of any other asset management company shall not exceed 5% of the NAV of the mutual fund.

6. Pending deployment of funds of a scheme in securities in terms of investment objectives of the scheme a mutual fund can invest the funds of the scheme in short term deposits of scheduled commercial banks. The investment in these deposits shall be in accordance with Clause 12.16.1.8 of SEBI Master Circular of Mutual Fund.
7. The mutual fund shall not borrow except to meet temporary liquidity needs of the mutual funds for the purpose of repurchase, redemption of units or payment of interest or dividend to the unitholders. Provided that the mutual fund shall not borrow more than 20 per cent of the net asset of the scheme and the duration of such a borrowing shall not exceed a period of six months.
8. The Scheme shall not invest in unlisted debt instruments including commercial papers (CPs), other than (a) government securities, (b) other money market instruments and (c) derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. However, the scheme may invest in unlisted Non-Convertible debentures (NCDs) not exceeding 10% of the debt portfolio of the scheme subject to the condition that such unlisted NCDs have a simple structure (i.e. with fixed and uniform coupon, fixed maturity period, without any options, fully paid up upfront, without any credit enhancements or structured obligations) and are rated and secured with coupon payment frequency on monthly basis.
9. Inter scheme transfers of investments from one scheme to another scheme in the same Mutual Fund shall be allowed only if 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. The securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.

Pursuant to Clause 12.30 of SEBI Master Circular of Mutual Fund, ISTs may be allowed in the following scenarios:

- i. for meeting liquidity requirement in a scheme in case of unanticipated redemption pressure
- ii. for Duration/ Issuer/ Sector/ Group rebalancing

No IST of a security shall be done, if there is negative news or rumours in the mainstream media or an alert is generated about the security, based on internal credit risk assessment. The Scheme shall comply with the guidelines for inter-scheme transfers as specified under clause 12.30 of SEBI Master Circular of Mutual Fund.

10. The Mutual Fund shall buy and sell securities on the basis of deliveries and shall in all cases of purchases, take delivery of relevant securities and in all cases of sale, deliver the securities. The Scheme may engage in Securities lending and the borrowing which shall be within the framework specified by the SEBI.
11. The Scheme shall get the securities purchased or transferred in the name of the mutual fund on account of the concerned scheme, wherever investments are intended to be of long-term nature.
12. The Scheme shall not make any investment in:
 - a) Any unlisted security of an associate or group company of the Sponsor; or
 - b) Any security issued by way of private placement by an associate or group company of the sponsor; or
 - c) The listed securities of group companies of the Sponsor which is in excess of 25% of the net assets.
13. The Scheme based on widely tracked and non bespoke indices, can make investments in accordance with the weightage of the constituents of the underlying index. However, such investments shall be subject to an overall cap of 35% of net asset value of the scheme, in the group companies of the sponsor.
 - The scheme shall not make any investment in any fund of funds scheme.
 - All investments by a mutual fund scheme in equity shares and equity related instruments shall only be made provided such securities are listed or to be listed.

- The Mutual Fund having an aggregate of securities which are worth Rs.10 crores or more, as on the latest balance sheet date, shall subject to such instructions as may be issued from time to time by SEBI, settle their transactions entered on or after January 15, 1998 only through dematerialized securities. Further, all transactions in government securities shall be in dematerialized form.

14. Pursuant to Clause 12.16 of SEBI Master Circular of Mutual Fund:-

- Total investment of the Scheme in Short term deposit(s) of all the Scheduled Commercial Banks put together shall not exceed 15% of the net assets. However, this limit can be raised upto 20% of the net assets with prior approval of the trustees. Further, investments in Short Term Deposits of associate and sponsor scheduled commercial banks together shall not exceed 20% of total deployment by the Mutual Fund in short term deposits.
- “Short Term” for parking of funds by Mutual Funds shall be treated as a period not exceeding 91 days
- The Scheme shall not invest more than 10% of the net assets in short term deposit(s), of any one scheduled commercial bank including its subsidiaries.
- The Scheme shall not invest in short term deposit of a bank which has invested in that Scheme. AMC shall also ensure that the bank in which a scheme has Short term deposit do not invest in the said scheme until the scheme has Short term deposit with such bank.
- Asset Management Company (AMC) shall not be permitted to charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks. The Half Yearly portfolio statements shall disclose all funds parked in short term deposit(s) under a separate heading. Details shall also include name of the bank, amount of funds parked, percentage of NAV. Trustees shall, in the Half Yearly Trustee Reports certify that provisions of the SEBI (MF) Regulations pertaining to parking of funds in short term deposits pending deployment are complied with at all points of time. The AMC(s) shall also certify the same in its CTR(s).
- The investments in short term deposits of scheduled commercial banks will be reported to the Trustees along with the reasons for the investment which, inter-alia, would include comparison with the interest rates offered by other scheduled commercial banks. Further, AMC shall ensure that the reasons for such investments are recorded in the manner prescribed.

The Scheme will comply with SEBI (MF) Regulations and any other regulations applicable to the investments of Funds from time to time. The Trustee may alter the above restrictions from time to time to the extent that changes in the SEBI (MF) Regulations may allow. All investment restrictions shall be applicable at the time of making investment.

- In accordance with clause 12.16.1.9 SEBI Master Circular of Mutual Fund, the aforesaid limits shall not be applicable to term deposits placed as margins for trading in cash and derivatives market.

15. Investments Limitations and Restrictions in Derivatives

In accordance with Clause 12.25 of SEBI Master Circular of Mutual Fund, the following investment restrictions shall apply with respect to investment in Derivatives:

- 1 The cumulative gross exposure through equity, debt and derivative positions will not exceed 100% of the net assets of the scheme. However, cash or cash equivalents with residual maturity of less than 91 days shall be treated as not creating any exposure.
- 2 The Scheme shall not write options or purchase instruments with embedded written options.
- 3 The total exposure related to option premium paid shall not exceed 20% of the net assets of the scheme.
- 4 Exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
 - a. Hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains.
 - b. Hedging positions shall not be taken for existing derivative positions. Exposure due to such positions shall be added and treated under gross cumulative exposure limits mentioned under Point 1.
 - c. Any derivative instrument used to hedge shall have the same underlying security as the existing position being hedged.

d. The quantity of underlying associated with the derivative position taken for hedging purposes shall not exceed the quantity of the existing position against which hedge has been taken.

5 The scheme may enter into plain vanilla Interest Rate Swaps (IRS) for hedging purposes. The value of the notional principal in such cases shall not exceed the value of respective existing assets being hedged by the scheme.

In case of participation in IRS is through over the counter transactions, the counter party shall be an entity recognized as a market maker by RBI and exposure to a single counterparty in such transactions shall not exceed 10% of the net assets of the scheme. However, if mutual funds are transacting in IRS through an electronic trading platform offered by the Clearing Corporation of India Ltd. (CCIL) and CCIL is the central counterparty for such transactions guaranteeing settlement, the single counterparty limit of 10% shall not be applicable.

Exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated under gross cumulative exposure limits mentioned under Point 1. Apart from the investment restrictions prescribed under SEBI (MF) Regulations, the Fund does not follow any internal norms vis-a-vis limiting exposure to a particular scrip or sector etc.

C. Fundamental Attributes

Following are the Fundamental Attributes of the scheme, in terms of Clause 1.14 of SEBI Master Circular of Mutual Fund:

- Type of a scheme - An open ended equity scheme investing in arbitrage opportunities
- Investment Objective
 - o Main Objective – Please refer to Part I. V ie “Investment Objective” mentioned under **“Highlights/Summary of the Scheme”**
 - o Investment pattern – Please refer to **Part II.A “HOW WILL THE SCHEME ALLOCATE ITS ASSETS?”**
 - Terms of Issue –
 - o **Liquidity provisions such as listing, repurchase, redemption** - Please refer to the Part I
 - o **Aggregate fees and expenses charged to the scheme:** Please refer to the section Part II Other details
 - o **Any safety net or guarantee provided:** None

In accordance with Regulation 18(15A) of the SEBI (MF) Regulations and Clause 1.14 of the SEBI Master Circular, the Trustees shall ensure that no change in the fundamental attributes of the Scheme and the Plan(s)/Option(s) thereunder or the trust or the fees and expenses payable or any other change which would modify the Scheme and the Plan(s)/Option(s) thereunder and affect the interest of the unit holders is carried out by the AMC, unless it complies with sub-Regulation (26) of Regulation 25 of SEBI (MF) Regulations. Pursuant to Regulation 25(26) of the SEBI (MF) Regulations and Clause 1.14.1.4 of SEBI Master Circular, the AMC shall ensure that no change in the fundamental attributes of the Scheme and the Plan(s)/Option(s) thereunder or the trust or the fees and expenses payable or any other change which would modify the Scheme and the Plan(s)/Option(s) thereunder and affect the interest of unit holders, shall be carried out unless-

- SEBI has reviewed and provided its comments on the proposal
- A 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 the region where the Head Office of the Mutual Fund is situated; and

- The Unit holders are given an option for a period of 30 calendar days to exit at the prevailing Net Asset Value without any Exit Load.

D. INDEX METHODOLOGY (FOR INDEX FUNDS, ETFS AND FOFS HAVING ONE UNDERLYING DOMESTIC ETF): Not Applicable

E. PRINCIPLES OF INCENTIVE STRUCTURE FOR MARKET MAKERS (FOR ETFS): Not Applicable

F. 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 of Mutual Fund– Not Applicable

G. Other Scheme Specific Disclosures:

Listing and transfer of units	The Scheme being an open-ended Scheme under which the Units are available for Subscription and Redemption on an ongoing basis on all the Business Days, the Units of the Scheme are not proposed to be listed on any stock exchange. However, the AMC/ Trustee reserves the right to list the Units of the Scheme as and when the AMC/ Trustee considers it necessary in the interest of Unit holders of the Scheme. There are no restrictions on transfer of Units of the Scheme whether held in Statement of Account (physical) mode or dematerialised mode. Further, the Units held in dematerialized form can be transferred and transmitted in accordance with the provisions of SEBI (Depositories and Participants) Regulations, as may be amended from time to time. Further, additions / deletions of names of Unit holders will not be allowed under any folio of the Scheme. However, the said provisions will not be applicable in case a person (i.e. a transferee) becomes a holder of the Units by operation of law or upon enforcement of pledge, then the AMC shall, subject to production of such satisfactory evidence and submission of such documents, proceed to effect the transfer, if the intended transferee is otherwise eligible to hold the Units of the Scheme. The said provisions in respect of deletion of names will not be applicable in case of death of a Unit holder (in respect of joint holdings) as this is treated as transmission of Units and not transfer
Dematerialization of units	The Scheme offers option to hold units in electronic (demat) mode. Accordingly, the Units of the Scheme will be available in dematerialized (electronic) form. The option to hold units in electronic (demat) mode is not available for plans/options where the IDCW frequency is less than one month. The applicant intending to hold Units in dematerialized form will be required to have a beneficiary account with a Depository Participant (DP) of NSDL/CDSL and will be required to mention in the application form DP Name, DP ID and Beneficiary Account Number with the DP at the time of subscribing Units of the Schemes. In case Unit holders do not provide their demat account details or the demat details provided in the application form are incomplete / incorrect or do not match with the details with the Depository records, the Units will be allotted in account statement mode provided the application is otherwise complete in all respect. Further, if the Units cannot be allotted in demat mode due to reason that KYC details including IPV is not updated with DP, the Units will be

Consolidated
Std Obs.57

	allotted in non-demat mode subject to compliance with necessary KYC provisions and the application is otherwise complete in all respect.
Minimum Target amount (This is the minimum amount required to operate the scheme and if this is not collected during the NFO period, then all the investors would be refunded the amount invested without any return.)	The Fund seeks to collect a minimum subscription amount of Rs. 10,00,00,000/- (Rupees ten crores only) under the scheme.
Maximum Amount to be raised (if any)	There is no upper limit on the total amount that may be collected.
Dividend/ Income Distribution cum Capital Withdrawal Policy (IDCW)	The Trustee will endeavor to declare IDCW under the IDCW Option, subject to availability of distributable surplus calculated in accordance with the Regulations. IDCW distribution procedure: In accordance with Chapter 11 of SEBI Master Circular of Mutual Fund, the procedure for IDCW distribution will be as follows: 1. Quantum of IDCW and record date shall be fixed by the Board of Trustees. IDCW so decided shall be paid, subject to availability of distributable surplus as on the date of declaration of IDCW. 2. Within 1 calendar day of the decision by the Board of Trustees, the AMC shall issue notice to the public communicating the decision about the IDCW including the record date, in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where Head Office of the Mutual Fund is situated. 3. Record date shall be the date, which will be considered for the purpose of determining the eligibility of investors whose name appear on the register of unit holders for receiving IDCWs. The Record Date will be 2 working days from the date of issue of notice. 4. The NAV will be adjusted to the extent of IDCW distribution and statutory levy, if any at the close of business hours on record date. 5. Before the issue of such notice, no communication indicating the probable date of IDCW declaration in any manner whatsoever will be issued by the Mutual Fund. 6. The payment of dividend to the unitholders shall be made within seven working days from the record date. Even though the asset portfolio will be common, the NAVs of the growth option and IDCW option in the Scheme will be distinctly different after declaration of the first IDCW to the extent of distributed income, applicable tax and statutory levy, if any, and expenses relating to the distribution of the IDCWs.
Allotment (Detailed procedure)	Subject to the receipt of the specified Minimum Subscription Amount for the Scheme, full allotment will be made to all valid applications received during the New Fund Offer. The AMC/ Trustee reserves the right to reject any application inter alia in the absence of fulfilment of any regulatory requirements, fulfilment of any requirements as per the SID, incomplete/incorrect documentation and furnishing necessary information to the satisfaction of the Mutual Fund/AMC. Allotment will be completed within 5 business days after the closure of the

	New Fund Offer. Allotment of units and dispatch of allotment advice to FPI will be subject to RBI approval if required. Investors who have applied in non-depository mode will be entitled to receive the account statement of units within 5 Business Days of the closure of the NFO Period. For applicants applying through the ASBA mode, on intimation of allotment by KFIN to the banker the investors account shall be debited to the extent of the amount due thereon. On allotment, units will be credited to the Investor's demat account as specified in the ASBA application form. The Asset Management Company shall, on production of instrument of transfer together with relevant documents, register the transfer within 30 days from the date of such production. The Units of the Scheme held in the dematerialised form will be fully and freely transferable (subject to lock-in period, if any and subject to lien, if any marked on the units) in accordance with the provisions of SEBI (Depositories and Participants) Regulations, 2018 as may be amended from time to time and as stated in paragraph 14.4.4 of SEBI Master Circular of Mutual Fund. Further, for the procedure of release of lien, the investors shall contact their respective DP. Also, when a person becomes a holder of the units by operation of law or upon enforcement of pledge, then the AMC shall, subject to production/submission of such satisfactory evidence, which in its opinion is sufficient, effect the transfer, if the intended transferee is otherwise eligible to hold the units.
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 scheme is suitable to their risk profile.	The following persons are eligible to apply for subscription to the units of the Scheme (subject to, wherever relevant, subscription to units of the Scheme being permitted under the respective constitutions and relevant statutory regulations): 1. Indian resident adult individuals either singly or jointly (not exceeding three) or on an Anyone or Survivor basis; 2. Hindu Undivided Family (HUF) through Karta of the HUF; 3. Minor through parent / legal guardian; 4. Partnership Firms and Limited Liability Partnerships (LLPs); 5. Proprietorship in the name of the sole proprietor; 6. Companies, Bodies Corporate, Public Sector Undertakings (PSUs), Association of Persons (AOP) or Bodies of Individuals (BOI) and societies registered under the Societies Registration Act, 1860; 7. Banks (including Co-operative Banks and Regional Rural Banks) and Financial Institutions; 8. Mutual Funds registered with SEBI; 9. Religious and Charitable Trusts, Wakfs or endowments of private trusts (subject to receipt of necessary approvals as required) and private trusts authorised to invest in mutual fund schemes under their trust deeds; 10. Non-Resident Indians (NRIs) / Persons of Indian origin (PIOs) residing abroad on repatriation basis or on non-repatriation basis; 11. Foreign Portfolio Investors (FPIs) and their subaccounts registered with SEBI on repatriation basis; 12. Army, Air Force, Navy and other para-military units and bodies created by such institutions; 13. Scientific and Industrial Research Organizations;

	14. Multilateral Funding Agencies / Bodies Corporate incorporated outside India with the permission of Government of India / RBI; 15. Provident Funds, Pension Funds, Gratuity Funds and Superannuation Funds to the extent they are permitted; 16. Other schemes of Groww Mutual Fund subject to the conditions and limits prescribed by SEBI (MF) Regulations; 17. Trustee, AMC or Sponsor or their associates may subscribe to units under the Scheme; 18. Such other individuals /institutions/ body corporates etc., as may be decided by the AMC from time to time, so long as, wherever applicable, subject to their respective constitutions and relevant statutory regulations. The list given above is indicative and the applicable laws, if any, as amended from time to time shall supersede the list. Note: 1. Non Resident Indians (NRIs) and Persons of Indian Origin (PIOs) residing abroad / Foreign Institutional Investors (FIIs) have been granted a general permission by Reserve Bank of India under Schedule 5 of the Foreign Exchange Management (Transfer or Issue of Security by a Person Resident Outside India) Regulations, 2000 for investing in / redeeming units of the mutual funds subject to conditions set out in the aforesaid regulations. 2. It is expressly understood that at the time of investment, the investor/unitholder has the express authority to invest in units of the Scheme and the AMC / Trustee / Mutual Fund will not be responsible if such investment is ultra vires the relevant constitution. Subject to the Regulations, the Trustee may reject any application received in case the application is found invalid/ incomplete or for any other reason in the Trustee's sole discretion. 3. Dishonored cheques are liable not to be presented again for collection, and the accompanying application forms are liable to be rejected. 4. The Trustee, reserves the right to recover from an investor any loss caused to the Scheme on account of dishonor of cheques issued by the investor for purchase of Units of this Scheme. 5. For subscription in the Scheme, it is mandatory for investors to make certain disclosures like bank details etc. and provide certain documents like PAN copy etc. (for details please refer SAI) without which the application is liable to be rejected. 6. Subject to the SEBI (MF) Regulations, any application for units of this Scheme may be accepted or rejected in the sole and absolute discretion of the Trustee/AMC. The Trustee/AMC may inter-alia reject any application for the purchase of units if the application is invalid or incomplete or if the Trustee for any other reason does not believe that it would be in the best interest of the Scheme or its unitholders to accept such an application.
Who cannot invest	The following persons are not eligible to invest in the Scheme: - Any individual who is a foreign national or any other entity that is not an Indian resident under the Foreign Exchange Management Act, 1999 (FEMA Act) except where registered with SEBI as a FII or sub account of FII or otherwise explicitly permitted under FEMA Act/ by RBI/ by any other applicable authority or where they falls under the category of QFIs/FPIs. - Pursuant to RBI A.P. (DIR Series) Circular No. 14 dated September 16, 2003, Overseas Corporate Bodies (OCBs) cannot invest in Mutual Funds. - NRIs residing in Non-Compliant Countries and Territories (NCCTs) as determined by the Financial Action Task Force (FATF), from time to time.

		• Persons residing in countries which require licensing or registration of Indian Mutual Fund products before selling the same in its jurisdiction. • Such other persons as may be specified by AMC from time to time.
Consolidated Std Obs.35	How to Apply and other details	Investors may obtain Key Information Memorandum (KIM) along with the application forms from the AMC offices or Customer Service Centers of the Registrar or may be downloaded from https://www.growwmf.in/downloads/kim (AMC's website). Please refer to the SAI and Application Form for the instructions. An Application Form accompanied by a payment instrument issued from a bank account other than that of the Applicant / Investor will not be accepted except in certain circumstances. For further details, please refer paragraph —Non — acceptance of Third Party Payment Instruments for subscriptions / investments under the section —How to Apply in SAI. Bank Details: In order to protect the interest of Unit holders from fraudulent encashment of redemption / IDCW cheques, SEBI has made it mandatory for investors to provide their bank details viz. name of bank, branch, address, account type and number, etc. to the Mutual Fund. Applications without complete bank details shall be rejected. The AMC will not be responsible for any loss arising out of fraudulent encashment of cheques / warrants and / or any delay / loss in transit. Also, please refer to point on Registration of Multiple Bank Accounts in respect of an Investor Folio given elsewhere in this document.
Consolidated Std Obs.61 & SO 21		
	The policy regarding reissue of repurchased units, including the maximum extent, the manner of reissue, the entity (the scheme or the AMC) involved in the same.	Not Applicable Units once redeemed will not be reissued.
	Restrictions, if any, on the right to freely retain or dispose of units being offered.	The Mutual Fund will be repurchasing (subject to completion of lock-in period, if any) and issuing units of the Scheme on an ongoing basis and hence the transfer facility is found redundant. Any addition / deletion of name from the folio of the Unit holder is deemed as transfer of Units. In view of the same, additions / deletions of names will not be allowed under any folio of the Scheme. The said provisions in respect of deletion of names will not be applicable in case of death of a Unit holder (in respect of joint holdings) as this is treated as transmission (transfer of units by operation of law) of Units and not transfer. Units of the Scheme held in demat form shall be freely transferable (subject to lock-in period, if any) and will be subject to transmission facility in accordance with the provisions of the SEBI (Depositories and Participants) Regulations, 1996 as amended from time to time. Also, when a person becomes a holder of the units by operation of law or upon enforcement of pledge, then the AMC shall, subject to production/submission of such satisfactory evidence, which in its opinion is sufficient, effect the transfer, if the intended transferee is otherwise eligible to hold the units. RIGHT TO RESTRICT REDEMPTION AND / OR SUSPEND REDEMPTION OF THE UNITS: The Fund at its sole discretion reserves the right to restrict Redemption (including switchout) of the Units (including Plan

	/Option) of the Scheme of the Fund upon occurrence of the below mentioned events for a period not exceeding ten (10) working days in any ninety (90) days period subject to approval of the Board of Directors of the AMC and the Trustee. The restriction on Redemption (including switch-out) shall be applicable where the Redemption (including switch-out) request is for a value above Rs. 2,00,000/- (Rupees Two Lakhs). Further, no restriction shall be applicable to the Redemption / switch-out request upto Rs. 2,00,000/- (Rupees Two Lakhs). It is further clarified that, in case of redemption request beyond Rs. 2,00,000/- (Rupees Two Lakhs), no restriction shall be applicable on first Rs. 2,00,000/- (Rupees Two Lakhs). The Trustee / AMC reserves the right to restrict Redemption or suspend Redemption of the Units in the Scheme of the Fund on account of circumstances leading to a systemic crisis or event(s) that severely constrict market liquidity or the efficient functioning of the markets. A list of such circumstances under which the restriction on Redemption or suspension of Redemption of the Units in the Scheme of the Fund may be imposed are as follows: 1. Liquidity issues- when market at large becomes illiquid affecting almost all securities rather than any issuer specific security; or 2. Market failures / Exchange closures; or 3. Operational issues; or 4. If so directed by SEBI. It is clarified that since the occurrence of the abovementioned eventualities have the ability to impact the overall market and liquidity situation, the same may result in exceptionally large number of Redemption requests being made and in such a situation the indicative timelines (i.e. within 3-4 Business Days) mentioned by the Fund in the scheme offering documents, for processing of requests for Redemption may not be applicable. Please refer to paragraphs on 'Transfer and Transmission of units, Right to limit Redemption, Suspension of Purchase and/ or Redemption of Units and Pledge of Units' in the SAI for further details.
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.	<u>Applicable NAV for Purchases/Switch-ins</u> 1. In respect of valid applications received upto 3.00 p.m. on a business day and entire amount is available in the mutual fund's account for utilization before the cut off time of the same day – closing NAV of the day of receipt of application; 2. In respect of valid applications received after 3.00 p.m. on a business day and the entire amount is available in the mutual fund's account for utilization before cut off time of the next business day – the closing NAV of the next business day; 3. Irrespective of the time of receipt of the application where the entire amount is available in Mutual fund's account for utilization before cut off time on any subsequent business day – the closing NAV of such subsequent business day. The above cut-off timings and applicability of NAV shall be applicable in respect of valid applications received at the Official Point(s) of Acceptance on a Business Day: 1. It is clarified that switches will be considered as redemption in the switch-out scheme and purchase / subscription in the switch-in scheme. 2. Cheques received on a business day may be deposited with the primary bankers of the respective location on the next business day. NAV shall be as per the applicable NAV mentioned above. To enable early sighting of funds by the schemes, investors are

	requested to avail of electronic facilities like RTGS / NEFT in respect of subscriptions and submit the proof of transfer of funds along with their applications. AMC shall not be responsible for any delay on account of banking clearance or circumstances which are beyond the control of AMC. 3. The provisions for applicability of NAV based on realization of funds will be applicable to all types of investment including various systematic investments routes (viz, SIP, STP, DTP etc.) as may be offered by the Scheme from time to time. <u>Applicable NAV for Redemption/ Switch outs</u> a) where the application received upto 3.00 pm – closing NAV of the day of receipt of application; and b) an application received after 3.00 pm – closing NAV of the next business day. Further, where the AMC or the Registrar has provided a facility to the investors to redeem /switch-out of the Scheme through the medium of Internet by logging onto specific web-sites or any other facilities offered by the AMC and where investors have signed up for using these facilities, the Applicable NAVs will be as provided above. Technical issues when transactions are processed through online facilities/ electronic modes: The time of transaction done through various online facilities / electronic modes offered by the AMC, for the purpose of determining the applicability of NAV, would be the time when the request for purchase / SIP/ sale / switch of units is received in the servers of AMC/RTA. In case of transactions through online facilities / electronic modes, there may be a time lag of few seconds or upto 1-7 banking days between the amount of subscription being debited to investor's bank account and the subsequent credit into the respective Scheme's bank account. This lag may impact the applicability of NAV for transactions where NAV is to be applied, based on actual realization of funds by the Scheme. Under no circumstances will Groww Asset Management Limited or its bankers or its service providers be liable for any lag / delay in realization of funds and consequent pricing of units. The AMC has the right to amend cut off timings subject to SEBI (MF) Regulations for the smooth and efficient functioning of the Scheme. Representation of SIP transaction which have failed due to technical reasons will also follow same rule.
Minimum amount for purchase/redemption/switches (mention the provisions for ETFs, as may be applicable, for direct subscription/redemption with AMC	Ongoing: Rs.500 and in multiples of Re. 1 Switch-in amount: Rs.500 and in multiples of Re.1. The minimum subscription limits for new purchases/additional purchases will apply to each Option separately. Minimum Redemption Amount: The minimum redemption amount shall be Rs. 500 and in multiples of Re. 1 In case, if the investor wants to submit redemption in units, the value should be equivalent to the minimum redemption amount specified above as on the applicable NAV date and the units should be in multiples of 0.001. In case the available balance in folio is less than the minimum redemption amount/units, then the investor can submit a request for "All units/Full redemption" of the amount / units available in folio. If the redemption is received in "Units" or "Amount" and reported

	Units/Amount are more than available units/amount in the folio then it will be considered as full unit/amount redemption. Please note this will not be applicable for units under pledge and demat folios. The AMC reserves the right to change the minimum amounts for various purchase / redemption/ switch. Such changes shall only be applicable to transactions on a prospective basis
Accounts Statements Consolidated Std Obs.60 & SO 20	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 mutual funds (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. The monthly CAS will be dispatched to investors that have opted for delivery via electronic mode (e-CAS) within twelve (12) days from the month end and to investors that have opted for delivery via physical mode within fifteen (15) days from the month end. Half-yearly CAS shall be issued at the end of every six months (i.e. September/ March) to all investors providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form across demat accounts, if applicable. The CAS will be dispatched to investors that have opted for e-CAS on or before the eighteenth (18th) day of April and October and to investors that have opted for delivery via physical mode by the twenty first (21st) day of April and October. For further details, refer SAI.
Dividend/ IDCW	The IDCW warrants shall be dispatched to the unit holders within 7 working days of the date of declaration of IDCW. In case of Unit Holder having a bank account with certain banks with which the Mutual Fund would have made arrangements from time to time, the IDCW proceeds shall be directly credited to their account. The IDCW will be paid by warrant and payments will be made in favor of the Unit holder (registered holder of the Units or, if there is more than one registered holder, only to the first registered holder) with bank account number furnished to the Mutual Fund (please note that it is mandatory for the Unit holders to provide the Bank account details as per the directives of SEBI). Further, the IDCW proceeds may be paid by way of ECS/EFT/NEFT/RTGS/any other manner through which the investor's bank account specified in the Registrar & Transfer Agent's records is credited with the IDCW proceeds as per the instructions of the Unit holders. In case the delay is beyond 7 working days, then the AMC shall pay interest @ 15% p.a. from the expiry of 7 working days till the date of dispatch of the warrant.

	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 para 14.1.3 of SEBI Master Circular of Mutual Fund
	Bank Mandate	It is mandatory for every applicant to provide the name of the bank, branch, address, account type and number as per SEBI requirements and any Application Form without these details will be treated as incomplete. Such incomplete applications will be rejected. 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.
	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 of Mutual Fund by SEBI for the period of such delay
Consolidated Std Obs.52	Unclaimed Redemption and Income Distribution cum Capital Withdrawal Amount	As per the Clause 14.1.3 of SEBI Master Circular of Mutual Fund, the unclaimed Redemption and dividend amounts shall be deployed by the Fund in call money market or money market instruments and in a separate plan of Liquid scheme / Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts. The investment management fee charged by the AMC for managing such unclaimed amounts shall not exceed 50 basis points. The AMCs shall not be permitted to charge any exit load in this plan. Provided that such schemes where the unclaimed redemption and IDCW amounts are deployed shall be only those Overnight scheme/ Liquid scheme / Money Market Mutual Fund schemes which are placed in A-1 cell (Relatively Low Interest Rate Risk and Relatively Low Credit Risk) of Potential Risk Class matrix. The investors who claim these amounts during a period of three years from the due date shall be paid at the prevailing NAV. After a period of three years, this amount can be transferred to a pool account and the investors can claim the said amounts at the NAV prevailing at the end of the third year. In terms of the circular, the onus is on the AMC to make a continuous effort to remind investors through letters to take their unclaimed amounts. The website of Groww Mutual Fund also provides information on the process of claiming the unclaimed amount and the necessary forms / documents required for the same. The details of such unclaimed amounts are also disclosed in the annual report sent to the Unit Holders. Important Note: All applicants must provide a bank name, bank account number, branch address, and account type in the Application Form.
Consolidated Std Obs.37	Disclosure w.r.t investment by minors	As per paragraph 17.6 of SEBI Master Circular of Mutual Fund, the following Process for Investments in the name of a Minor through a Guardian will be applicable: a. Payment for investment by any 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. For existing folios, the AMCs shall insist upon a Change of Pay-out Bank mandate before redemption is processed. b. Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor, i.e.

	the account the minor may hold with the parent/ legal guardian after completing all KYC formalities. c. 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. d. AMCs shall build a system control 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. Please refer SAI for detailed process on investments made in the name of a Minor through a Guardian and Transmission of Units.
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III. Other Details

- A. In case of Fund of Funds Scheme, Details of Benchmark, Investment Objective, Investment Strategy, TER, AUM, Year wise performance, Top 10 Holding/ link to Top 10 holding of the underlying fund should be provided – Not Applicable**
- B. Periodic Disclosures such as Half yearly disclosures, half yearly results, annual report**

Monthly / Half - Yearly Portfolio Disclosures This is a list of securities where the corpus of the Scheme is currently invested. The market value of these investments is also stated in portfolio disclosures.	The Mutual Fund shall disclose the scheme portfolios as on the last day of the month/ as on the last day of every half year ended March and September within 10 days from the close of each month / half-year respectively. Further, the Mutual Fund shall also disclose portfolio of the scheme on a fortnightly basis within 5 days from the end of the fortnight. The disclosure shall be on https://growwmf.in/statutory-disclosure/portfolio (Fortnightly/Monthly), https://growwmf.in/financials/half-yearly-unaudited-financials-&-portfolio (Half Yearly) and www.amfiindia.com. The AMC shall send via email the fortnightly statement of scheme portfolio within 5 days from the close of each fortnight and the monthly and half-yearly statement of scheme portfolio within 10 days from the close of each month / half-year respectively. Mutual Fund shall publish an advertisement every half-year disclosing the hosting of the half-yearly statement of its schemes portfolio on its website and on the website of AMFI. Such advertisement shall be published in the all India edition of at least two daily newspapers, one each in English and Hindi. Mutual Fund shall provide a physical copy of the statement of its scheme portfolio, without charging any cost, on specific request received from a unitholder.
Half -Yearly Financial Results	The Mutual Fund and AMC shall within one month from the close of each half year i.e. 31st March and on 30th September, host a soft copy of its unaudited financial results on their website. The Mutual Fund and AMC shall publish an advertisement disclosing the hosting of such financial results on their website, in atleast one national English daily newspaper and in a regional newspaper published in the language of the region where the Head Office of the Mutual Fund is situated. It will also be displayed on the website of the AMC (https://www.growwmf.in/financials/half-yearly-unaudited-financials-&-portfolio) and AMFI www.amfiindia.com
Annual Report	The Scheme wise annual report or an abridged summary thereof shall be mailed (emailed, where e-mail id is provided unless otherwise required) to all Unit holders not later than four months (or such other period as may be specified by SEBI from time to time) from the date of closure of the relevant accounting year (i.e. 31st March each year) and full annual report shall be available for inspection at the Head Office of the Mutual Fund and a copy shall be made available to the Unit holders on request on payment of

	nominal fees, if any. Scheme wise annual report shall also be displayed on the website of the AMC https://www.growwmf.in/financials/scheme-financials and Association of Mutual Funds in India www.amfiindia.com
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C. Transparency/NAV Disclosure (Details with reference to information given in Section I)

Consolidated
Std Obs. 41

The AMC will calculate and disclose the first NAV under the Scheme not later than 5 Business Days from the date of allotment of units under the NFO Period. Subsequently, the NAV will be calculated and disclosed at the close of every Business Day. As required by SEBI, the NAVs shall be disclosed in the following manner:

- ii) Displayed on the website of the Mutual Fund <https://www.growwmf.in/nav>
- iii) Displayed on the website of Association of Mutual Funds in India (AMFI) (www.amfiindia.com). Any other manner as may be specified by SEBI from time to time. The same shall also be communicated to the Stock exchange(s), where the units will be listed. Mutual Fund / AMC will provide facility of sending latest available NAVs to unitholders through SMS, upon receiving a specific request in this regard. The AMC shall update the NAVs on the website of the Mutual Fund <https://www.growwmf.in/nav> and on the website of Association of Mutual Funds in India - AMFI (www.amfiindia.com) by 11.00 p.m. on every Business Day. In case of any delay, the reasons for such delay would be explained to AMFI in writing. If the NAVs are not available before 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 NAVs.

D. Transaction charges and stamp duty

Applicability of Stamp Duty : 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 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 shall be levied on applicable mutual fund transactions. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions to the unitholders would be reduced to that extent. The stamp duty will be deducted from the net investment amount i.e. gross investment amount less any other deduction like transaction charge. Units will be created only for the balance amount i.e. Net Investment Amount as reduced by the stamp duty. The stamp duty will be computed at the rate of 0.005% on an inclusive method basis.

For instance: If the transaction amount is Rs. 100100/- and the transaction charge is Rs. 100, the stamp duty will be calculated as follows: $((\text{Transaction Amount} - \text{Transaction Charge}) * 0.005\%) = \text{Rs.5}$. If the applicable Net Asset Value (NAV) is Rs. 10 per unit, then units allotted will be calculated as follows: $(\text{Transaction Amount} - \text{Transaction Charge} - \text{Stamp Duty}) / \text{Applicable NAV} = 9,999.50$ units.

For details please refer SAI.

E. Associate Transactions- Please refer to Statement of Additional Information (SAI)

F. Taxation- For details on taxation please refer to the clause on Taxation in the SAI apart from the following:

This information is provided for general information only and is based on the prevailing tax laws, as applicable in case of this Scheme. However, in view of the individual nature of the implications,

each investor is advised to consult his or her own tax advisors/ authorised dealers with respect to the specific amount of tax and other implications arising out of his or her participation in the schemes.

Groww Mutual Fund is registered as a Mutual Fund with Securities and Exchange Board of India ('SEBI') under SEBI (MF) Regulations. Any income earned by such mutual fund registered with SEBI is exempt from taxation as per section 10(23D) of the Income Tax Act, 1961 ('Act')

Type of Capital Gain	Condition	Income Tax Rates		TDS Rates	
		Resident/ PIO/ NRI/	FII	Resident	NRI/OCBs/ FII & others
		Other non FII non-residents			
Tax on Dividend	The Finance Act, 2020, abolished dividend distribution tax (DDT) and tax exemption on income received from mutual fund in the hands of investor. as provision of section 10 (35) is rescinded. Further, Income is taxable in the hands of investor as per the applicable tax rates.				
Short Term Capital Gain (redemption before completing one year of holding)	STT has been paid on redemption	20%	20%	Nil	20%
	Other cases	Normal rate of tax applicable to the assessee	30%	Nil	30% for Non-resident other than corporates 35% for non-residents corporates, FII & Others
Long Term Capital Gain (redemption after completing one year of holding)	STT has been paid on redemption	12.5%	12.5%	Nil	12.5%

PIO: Person of Indian origin

NRI: Non-resident Indian

FII: Foreign Institutional investor

OCB: Overseas Corporate Body

Under section 112A of the Act, where long term capital gain exceeds Rs. 1,25,000/- tax is payable @ 12.50% plus applicable surcharge and cess (without indexation benefit).

Taxability in the hands of Investor

If the units are held as stock-in-trade of a business, the said income will be taxed at the rates at which the normal income of that investor is taxed.

If the units are held as investments, the said income will be taxed as capital gains. In such case, the tax rates applicable will depend on whether the gain on sale of units is classified as a short-term capital gain or a long-term capital gain.

Tax on Income Distributed by a Mutual Fund

Finance Act, 2020 has amended the provision of section 115R of the Act (Dividend Distribution Tax) to provide that the income distributed on or before 31st March 2020 shall only be covered under the provision of this section.

With effect from 1st April, 2020, dividend or income distribution by mutual fund on units is taxable in the hands of unit holders at the applicable rates

* 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 Rs. 10,000, no withholding is required to be carried out. However, the scheme shall be withholding tax when the aggregate amount in financial year at Permanent Account Number (PAN) level exceeds Rs. 9,000.

Tax rates mentioned above are further increased by surcharge and health and education cess as may be applicable for respective investor.

Surcharge and cess shall not be applied on basic tax while deducting TDS, if any, on income of resident investors.

Surcharge Rates Total income	Individual /HUF ~	Partnership Firms & Co-operative Societies	Domestic Companies*	Foreign Companies
Less than or equal to 50 lakhs	NIL	NIL	NIL	NIL
>50 lakhs <= 1 crore	10%	NIL	NIL	NIL
>1 crore <= 2 crores	15%	12%	7%	2%
>2 crores <= 5 crores	25%	12%	7%	2%
>5 crores <= 10 crores	37%	12%	7%	2%
>10 crores	37%	12%	12%	5%

~~Surcharge rate shall not exceed 25% in case of individual and HUF opting for new tax regime under section 115BAC of the Act. In case total income includes income by way of dividend on shares, short-term capital gains on units of equity oriented mutual fund schemes and long-term capital gains on mutual fund schemes, the rate of surcharge on the said type of income not to exceed 15% [refer clause on Taxation in the SAI for further details] .

* 10% basic surcharge (irrespective of taxable income) for domestic companies availing benefit under section 115BAA and section 115BAB of the Act.

Tax plus surcharge shall be further increased by a health and education cess of 4 percent.

DTAA Benefits

Taxability in the hands of non-resident investor shall be subject to Double Taxation Avoidance Agreement (“DTAA” or “tax treaty”) benefits which can be claimed in the return of income to be filed by such investors, as applicable. Further, such DTAA benefit may also be claimed at the time of withholding of taxes (subject to requisite documents for claiming DTAA benefit made available by investor to the Mutual Fund). The investors should obtain specific advice from their tax advisors regarding the availability of the tax treaty benefits.

AADHAR Linking

As per section 139AA of the Act read with rule 114AAA of the Income-tax Rules, 1962, in the case of a resident person, whose PAN has become inoperative due to non-linking of PAN with Aadhaar, it shall be deemed that he has not furnished the PAN and tax could be withheld at a higher rate of 20% as per section 206AA of the Act.

Securities Transaction Tax (STT)

STT is payable on sale (redemption) of units of an Equity Oriented funds mutual fund.

DISCLAIMER: The information given here is neither a complete disclosure of every material fact of Income-tax Act 1961 nor does it constitute tax or legal advice. Investors are requested to review the prospectus carefully and obtain expert professional advice with regard to specific legal, tax and financial implications of the investment/participation in the scheme

G. Rights of Unitholders- Please refer to SAI for details.

H. List of official points of acceptance: Please refer to <https://www.growwmf.in/downloads/sid> for a complete list of Official points of acceptance.

I. 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

The said information has been disclosed in good faith as per the information available to the AMC at <https://www.growwmf.in/downloads/penalties-&-pending-litigation>

The Scheme Information Document containing details of the Scheme of Groww Mutual Fund, had been approved by the Board of Groww Trustee Limited on December 16, 2025. The Board of Directors of Groww Trustee Limited have ensured that the scheme approved by them is a new product offered by the Mutual Fund and is not a minor modification of the existing scheme/fund/ product.

Notwithstanding anything contained in the Scheme Information Document the provisions of the SEBI (MF) Regulations and the Guidelines thereunder shall be applicable.

**For and on behalf of the Board of Directors of
Groww Asset Management Ltd.**

Sd/-

Varun Gupta

CEO

Date: December 30, 2025

Place: Mumbai

Consolidated
Std
Obs.48
& 49 &
SO 22

Consolidated
Std Obs.63 &
SO 24

Name of Registrar: KFin Technologies Ltd. Selenium, Tower B, Plot number 31 & 32, Financial District, Nanakramguda, Serilingampally Mandal, Hyderabad- 500 032

Contact Number - 1800-309-4034 Email Id - investorsupport.mfs@kfintech.com, Website Address - www.kfintech.com

LIST OF COLLECTION CENTRES

AMC Investor Service Centres:

Lower Parel: 505 – 5th Floor, Tower 2B, One World Centre, Near Prabhadevi Railway Station, Lower Parel, Mumbai – 400013, Maharashtra, Tele-+91 22 69744435

Ghatkopar: Office no. 601, Sixth Floor, Wing A, Integrated Arcade, Corner of Dharamshi Lane and R.B. Mehta Marg, Ghatkopar (East), Mumbai – 400077, Maharashtra

Customer Support Email Id – support@growwmf.in

Customer Support Number – 80501 80222

Time stamping branch

MFCentral:

With effect from September 24, 2021 MF Central has been designated as Official point of acceptance of Groww Mutual Fund for non-financial transactions. The same can be accessed using <https://mfcentral.com/> 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 Centres or collection centres of KFIN or CAMS.

Name of RTA- KFin Technologies Ltd Contact details: 1800-309-4034

Website: www.kfintech.com

Investor Service Centres: KFin Technologies Ltd

Sr	Branch Name	State	Address
1	Bangalore	Karnataka	Kfin Technologies Ltd No 35 Puttanna Road Basavanagudi Bangalore 560004
2	Belgaum	Karnataka	Kfin Technologies Ltd Premises No.101 Cts No.1893 Shree Guru Darshani Tower Anandwadi Hindwadi Belgaum 590011
3	Bellary	Karnataka	Kfin Technologies Ltd Ground Floor 3Rd Office Near Womens College Road Beside Amruth Diagnostic Shanthi Archade Bellary 583103
4	Davangere	Karnataka	Kfin Technologies Ltd D.No 162/6 1St Floor 3Rd Main P J Extension Davangere Taluk Davangere Manda Davangere 577002
5	Gulbarga	Karnataka	Kfin Technologies Ltd H No 2-231 Krishna Complex 2Nd Floor Opp. Opp. Municipal Corporation Office Jagat Station Main Road Kalaburagi Gulbarga 585105
6	Hassan	Karnataka	Kfin Technologies Ltd Sas No: 490 Hemadri Arcade 2Nd Main Road Salgame Road Near Brahmins Boys Hostel Hassan 573201

7	Hubli	Karnataka	Kfin Technologies Ltd R R Mahalaxmi Mansion Above Indusind Bank 2Nd Floor Desai Cross Pinto Road Hubballi 580029
8	Mangalore	Karnataka	Kfin Technologies Ltd Shop No - 305 Marian Paradise Plaza 3Rd Floor Bunts Hostel Road Mangalore - 575003 Dakshina Kannada Karnataka
9	Margoa	Goa	Kfin Technologies Ltd Shop No 21 Osia Mall 1St Floor Near Ktc Bus Stand Sgdpa Market Complex Margao - 403601
10	Mysore	Karnataka	Kfin Technologies Ltd No 2924 2Nd Floor 1St Main 5Th Cross Saraswathi Puram Mysore 570009
11	Panjim	Goa	Kfin Technologies Ltd H. No: T-9 T-10 Affran Plaza 3Rd Floor Near Don Bosco High School Panjim 403001
12	Shimoga	Karnataka	Kfin Technologies Ltd Jayarama Nilaya 2Nd Corss Mission Compound Shimoga 577201
13	Ahmedabad	Gujarat	Kfin Technologies Ltd Office No. 401 On 4Th Floor Abc-I Off. C.G. Road - Ahmedabad 380009
14	Anand	Gujarat	Kfin Technologies Ltd B-42 Vaibhav Commercial Center Nr Tvs Down Town Shrow Room Grid Char Rasta Anand 380001
15	Baroda	Gujarat	Kfin Technologies Ltd 1St Floor 125 Kanha Capital Opp. Express Hotel R C Dutt Road Alkapuri Vadodara 390007
16	Bharuch	Gujarat	Kfin Technologies Ltd 123 Nexus Business Hub Near Gangotri Hotel B/S Rajeshwari Petroleum Makampur Road Bharuch 392001
17	Bhavnagar	Gujarat	Kfin Technologies Ltd 303 Sterling Point Waghawadi Road - Bhavnagar 364001
18	Gandhidham	Gujarat	Kfin Technologies Ltd Shop # 12 Shree Ambica Arcade Plot # 300 Ward 12. Opp. Cg High School Near Hdfe Bank Gandhidham 370201
19	Gandhinagar	Gujarat	Kfin Technologies Ltd 138 - Suyesh solitaire, Nr. Podar International School, Kudasana, Gandhinagar-382421 Gujarat
20	Jamnagar	Gujarat	Kfin Technologies Ltd 131 Madhav Plazza Opp Sbi Bank Nr Lal Bunglow Jamnagar 361008
21	Junagadh	Gujarat	Kfin Technologies Ltd Shop No. 201 2Nd Floor V-Arcade Complex Near Vanzari Chowk M.G. Road Junagadh 362001
22	Mehsana	Gujarat	Kfin Technologies Ltd Ff-21 Someshwar Shopping Mall Modhera Char Rasta - Mehsana 384002
23	Nadiad	Gujarat	Kfin Technologies Ltd 311-3Rd Floor City Center Near Paras Circle - Nadiad 387001
24	Navsari	Gujarat	Kfin Technologies Ltd 103 1St Floore Landmark Mall Near Sayaji Library Navsari Gujarat Navsari 396445
25	Rajkot	Gujarat	Kfin Technologies Ltd 302 Metro Plaza Near Moti Tanki Chowk Rajkot Rajkot Gujarat 360001
26	Surat	Gujarat	Kfin Technologies Ltd Ground Floor Empire State Building Near Udhna Darwaja Ring Road Surat 395002

27	Valsad	Gujarat	Kfin Technologies Ltd 406 Dreamland Arcade Opp Jade Blue Tithal Road Valsad 396001
28	Vapi	Gujarat	Kfin Technologies Ltd A-8 Second Floor Solitaire Business Centre Opp Dcb Bank Gidc Char Rasta Silvassa Road Vapi 396191
29	Chennai	Tamil Nadu	Kfin Technologies Ltd 9Th Floor Capital Towers 180 Kodambakkam High Road Nungambakkam Chennai – 600 034
30	Calicut	Kerala	Kfin Technologies Ltd Second Floor Manimuriyil Centre Bank Road Kasaba Village Calicut 673001
31	Cochin	Kerala	Kfin Technologies Ltd Door No:61/2784 Second floor Sreelakshmi Tower Chittoor Road, Ravipuram Ernakulam-Kerala-682015
32	Kannur	Kerala	Kfin Technologies Ltd 2Nd Floor Global Village Bank Road Kannur 670001
33	Kollam	Kerala	Kfin Technologies Ltd Sree Vigneswara Bhavan Shastri Junction Kollam - 691001
34	Kottayam	Kerala	Kfin Technologies Ltd 1St Floor Csiascension Square Railway Station Road Collectorate P O Kottayam 686002
35	Palghat	Kerala	Kfin Technologies Ltd No: 20 & 21 Metro Complex H.P.O.Road Palakkad H.P.O.Road Palakkad 678001
36	Tiruvalla	Kerala	Kfin Technologies Ltd 2Nd Floorerinjery Complex Ramanchira Opp Axis Bank Thiruvalla 689107
37	Trichur	Kerala	Kfin Technologies Ltd 4Th Floor Crown Tower Shakthan Nagar Opp. Head Post Office Thrissur 680001
38	Trivandrum	Kerala	Kfin Technologies Ltd, 3rdFloor, No- 3B TC-82/3417, CAPITOL CENTER, OPP SECRETARIAT, MG ROAD, TRIVANDRUM- 695001
39	Coimbatore	Tamil Nadu	Kfin Technologies Ltd 3Rd Floor Jaya Enclave 1057 Avinashi Road - Coimbatore 641018
40	Erode	Tamil Nadu	Kfin Technologies Ltd Address No 38/1 Ground Floor Sathy Road (Vctv Main Road) Sorna Krishna Complex Erode 638003
41	Karur	Tamil Nadu	Kfin Technologies Ltd No 88/11 Bb Plaza Nrmp Street K S Mess Back Side Karur 639002
42	Madurai	Tamil Nadu	Kfin Technologies Ltd No. G-16/17 Ar Plaza 1St Floor North Veli Street Madurai 625001
43	Nagercoil	Tamil Nadu	Kfin Technologies Ltd Hno 45 1St Floor East Car Street Nagercoil 629001
44	Pondicherry	Pondicherry	Kfin Technologies Ltd No 122(10B) Muthumariamman Koil Street - Pondicherry 605001
45	Salem	Tamil Nadu	Kfin Technologies Ltd No.6 Ns Complex Omalur Main Road Salem 636009
46	Tirunelveli	Tamil Nadu	Kfin Technologies Ltd 55/18 Jeney Building 2Nd Floor S N Road Near Aravind Eye Hospital Tirunelveli 627001
47	Trichy	Tamil Nadu	Kfin Technologies Ltd No 23C/1 E V R Road Near Vekkaiammam Kalyana Mandapam Putthur - Trichy 620017

48	Tuticorin	Tamil Nadu	Kfin Technologies Ltd 4 - B A34 - A37 Mangalmal Mani Nagar Opp. Rajaji Park Palayamkottai Road Tuticorin 628003
49	Vellore	Tamil Nadu	Kfin Technologies Ltd No 2/19 1St Floor Vellore City Centre Anna Salai Vellore 632001
50	Agartala	Tripura	Kfin Technologies Ltd Ols Rms Chowmuhan Mantri Bari Road 1St Floor Near Jana Sevak Saloon Building Traffic Point Tripura West Agartala 799001
51	Guwahati	Assam	Kfin Technologies Ltd Ganapati Enclave 4Th Floor Opposite Bora Service Ullubari Guwahati Assam 781007
52	Shillong	Meghalaya	Kfin Technologies Ltd Annex Mani Bhawan Lower Thana Road Near R K M Lp School Shillong 793001
53	Silchar	Assam	Kfin Technologies Ltd N.N. Dutta Road Chowchakra Complex Premtala Silchar 788001
54	Ananthapur	Andhra Pradesh	Kfin Technologies Ltd. #13/4 Vishnupriya Complex Beside Sbi Bank Near Tower Clock Ananthapur-515001.
55	Guntur	Andhra Pradesh	Kfin Technologies Ltd 2Nd Shatter 1St Floor Hno. 6-14-48 14/2 Lane Arundal Pet Guntur 522002
56	Hyderabad	Telangana	Kfin Technologies Limited, 2nd floor JBS Station, Lower Concourse 1, Situated in Jubilee Bus Metro Station, Secunderabad 500009
57	Karimnagar	Telangana	Kfin Technologies Ltd 2Nd Shutterhno. 7-2-607 Sri Matha Complex Mankammathota - Karimnagar 505001
58	Kurnool	Andhra Pradesh	Kfin Technologies Ltd Shop No:47 2Nd Floor S Komda Shopping Mall Kurnool 518001
59	Nanded	Maharashtra	Kfin Technologies Ltd Shop No.4 Santakripa Market G G Road Opp.Bank Of India Nanded 431601
60	Rajahmundry	Andhra Pradesh	Kfin Technologies Limited, D.No: 6-7-7, Sri Venkata Satya Nilayam,1st Floor, Vadrevu vari Veedhi, T - Nagar, Rajahmundry AP- 533101
61	Solapur	Maharashtra	Kfin Technologies Ltd Shop No 106. Krishna Complex 477 Dakshin Kasaba Datta Chowk Solapur-413007
62	Srikakulam	Andhra Pradesh	Kfin Technologies Ltd D No 158, Shop No # 3, Kaki Street, Opp Tulasi Das Hospital, CB Road, Srikakulam Andhra Pradesh - 532001
63	Tirupathi	Andhra Pradesh	Kfin Technologies Ltd Shop No:18-1-421/F1 City Center K.T.Road Airtel Backside Office Tirupathi - 517501
64	Vijayawada	Andhra Pradesh	Kfin Technologies Ltd Hno26-23 1St Floor Sundarammastreet Gandhinagar Krishna Vijayawada 520010
65	Visakhapatnam	Andhra Pradesh	Kfin Technologies Ltd Dno : 48-10-40 Ground Floor Surya Ratna Arcade Srinagar Opp Roadto Lalitha Jeweller Showroom Beside Taj Hotel Ladge Visakhapatnam 530016
66	Warangal	Telangana	Kfin Technologies Ltd Shop No22 Ground Floor Warangal City Center 15-1-237 Mulugu Road Junction Warangal 506002

67	Khammam	Telangana	Kfin Technologies Ltd 11-4-3/3 Shop No. S-9 1St Floor Sri Venkata Sairam Arcade Old Cpi Office Near Priyadarshini College near Nagar Khammam 507002
68	Hyderabad(Gachibowli)	Telangana	Kfin Technologies Ltd Selenium Plot No: 31 & 32 Tower B Survey No.115/22 115/24 115/25 Financial District Gachibowli Nanakramguda Serilingampally Mandal Hyderabad 500032
69	Akola	Maharashtra	Kfin Technologies Ltd Shop No 25 Ground Floor Yamuna Tarang Complex Murtizapur Road N.H. No- 6 Opp Radhakrishna Talkies Akola 444001 Maharashtra
70	Amaravathi	Maharashtra	Kfin Technologies Ltd Shop No. 21 2Nd Floor Gulshan Tower Near Panchsheel Talkies Jaistambh Square Amaravathi 444601
71	Aurangabad	Maharashtra	Kfin Technologies Ltd Shop No B 38 Motiwala Trade Center Nirala Bazar Aurangabad 431001
72	Bhopal	Madhya Pradesh	Kfin Technologies Ltd Sf-13 Gurukripa Plaza Plot No. 48A Opposite City Hospital Zone-2 M P Nagar Bhopal 462011
73	Dhule	Maharashtra	Kfin Technologies Ltd Ground Floor Ideal Laundry Lane No 4 Khol Galli Near Muthoot Finance Opp Bhavasar General Store Dhule 424001
74	Indore	Madhya Pradesh	Kfin Technologies Ltd. 101 Diamond Trade Center 3-4 Diamond Colony New Palasia Above Khurana Bakery Indore - 452001
75	Jabalpur	Madhya Pradesh	Kfin Technologies Ltd 2Nd Floor 290/1 (615-New) Near Bhavartal Garden Jabalpur - 482001
76	Jalgaon	Maharashtra	Kfin Technologies Ltd 3Rd Floor 269 Jaee Plaza Baliram Peth Near Kishore Agencies Jalgaon 425001
77	Nagpur	Maharashtra	Kfin Technologies Ltd Plot No. 2 Block No. B / 1 & 2 Shree Apartment Khare Town Mata Mandir Road Dharampeth Nagpur 440010
78	Nasik	Maharashtra	Kfin Technologies Ltd S-9 Second Floor Suyojit Sankul Sharanpur Road Nasik 422002
79	Sagar	Madhya Pradesh	Kfin Technologies Ltd Ii Floor Above Shiva Kanch Mandir. 5 Civil Lines Sagar Sagar 470002
80	Ujjain	Madhya Pradesh	Kfin Technologies Ltd Heritage Shop No. 227 87 Vishvavidyalaya Marg Station Road Near Icici Bank Above Vishal Megha Mart Ujjain 456001
81	Asansol	West Bengal	Kfin Technologies Ltd 112/N G. T. Road Bhanga Pachil G.T Road Asansol Pin: 713 303; Paschim Bardhaman West Bengal Asansol 713303
82	Balasore	Orissa	Kfin Technologies Ltd 1-B. 1St Floor Kalinga Hotel Lane Baleshwar Baleshwar Sadar Balasore 756001
83	Bankura	West Bengal	Kfin Technologies Ltd Plot Nos- 80/1/Anatunchati Mahalla 3Rd Floor Ward No-24 Opposite P.C Chandra Bankura Town Bankura 722101
84	Berhampur (Or)	Orissa	Kfin Technologies Ltd Opp Divya Nandan Kalyan Mandap 3Rd Lane Dharam Nagar Near Lohiya Motor Berhampur (Or) 760001

85	Bhilai	Chatisgarh	Kfin Technologies Ltd Office No.2 1St Floor Plot No. 9/6 Nehru Nagar [East] Bhilai 490020
86	Bhubaneswar	Orissa	Kfin Technologies Ltd A/181 Back Side Of Shivam Honda Show Room Saheed Nagar - Bhubaneswar 751007
87	Bilaspur	Chatisgarh	Kfin Technologies Ltd Shop.No.306 3Rd Floor Anandam Plaza Vyapar Vihar Main Road Bilaspur 495001
88	Bokaro	Jharkhand	Kfin Technologies Ltd City Centre Plot No. He-07 Sector-Iv Bokaro Steel City Bokaro 827004
89	Burdwan	West Bengal	Kfin Technologies Ltd Saluja Complex; 846 Laxmipur G T Road Burdwan; Ps: Burdwan & Dist: Burdwan-East Pin: 713101
90	Chinsura	West Bengal	Kfin Technologies Ltd No : 96 Po: Chinsurah Doctors Lane Chinsurah 712101
91	Cuttack	Orissa	Kfin Technologies Ltd Shop No-45 2Nd Floor Netaji Subas Bose Arcade (Big Bazar Building) Adjusent To Reliance Trends Dargha Bazar Cuttack 753001
92	Dhanbad	Jharkhand	Kfin Technologies Ltd 208 New Market 2Nd Floor Bank More - Dhanbad 826001
93	Durgapur	West Bengal	Kfin Technologies Ltd Mwav-16 Bengal Ambuja 2Nd Floor City Centre Distt. Burdwan Durgapur-16 Durgapur 713216
94	Gaya	Bihar	Kfin Technologies Ltd Property No. 711045129 Ground Floorhotel Skylark Swaraipuri Road - Gaya 823001
95	Jalpaiguri	West Bengal	Kfin Technologies Ltd D B C Road Opp Nirala Hotel Opp Nirala Hotel Opp Nirala Hotel Jalpaiguri 735101
96	Jamshedpur	Jharkhand	Kfin Technologies Ltd Madhukunj 3Rd Floor Q Road Sakchi Bistupur East Singhbhum Jamshedpur 831001
97	Kharagpur	West Bengal	Kfin Technologies Ltd Holding No 254/220 Sbi Building Malancha Road Ward No.16 Po: Kharagpur Ps: Kharagpur Dist: Paschim Medinipur Kharagpur 721304
98	Kolkata	West Bengal	Kfin Technologies Ltd 2/1 Russel Street 4Thfloor Kankaria Centre Kolkata 70001 Wb
99	Malda	West Bengal	Kfin Technologies Ltd Ram Krishna Pally; Ground Floor English Bazar - Malda 732101
100	Patna	Bihar	Kfin Technologies Ltd, Flat No.- 102, 2BHK Maa Bhawani Shardalay, Exhibition Road, Patna-800001
101	Raipur	Chatisgarh	Kfin Technologies Ltd Office No S-13 Second Floor Reheja Tower Fafadih Chowk Jail Road Raipur 492001
102	Ranchi	Jharkhand	Kfin Technologies Ltd Room no 103, 1st Floor, Commerce Tower,Beside Mahabir Tower,Main Road, Ranchi -834001
103	Rourkela	Orissa	Kfin Technologies Ltd 2Nd Floor Main Road Udit Nagar Sundargarh Rourekla 769012
104	Sambalpur	Orissa	Kfin Technologies Ltd First Floor; Shop No. 219 Sahej Plaza Golebazar; Sambalpur Sambalpur 768001
105	Siliguri	West Bengal	Kfin Technologies Ltd Nanak Complex 2Nd Floor Sevoke Road - Siliguri 734001

106	Agra	Uttar Pradesh	Kfin Technologies Ltd House No. 17/2/4 2Nd Floor Deepak Wasan Plaza Behind Hotel Holiday Inn Sanjay Place Agra 282002
107	Aligarh	Uttar Pradesh	Kfin Technologies Ltd 1St Floor Sevti Complex Near Jain Temple Samad Road Aligarh-202001
108	Allahabad	Uttar Pradesh	KFin Technologies Limited Shop No. TF-9, 3rd Floor Vinayak Vrindavan Tower, Built Over H.NO.34/26 Tashkent Marg, Civil Station, Allahabad (now Prayagraj)Uttar Pradesh, Pin Code: 211001
109	Ambala	Haryana	Kfin Technologies Ltd 6349 2Nd Floor Nicholson Road Adjacent Kos Hospitalambala Cant Ambala 133001
110	Azamgarh	Uttar Pradesh	KFin Technologies Ltd Shop no. 18 Gr. Floor, Nagarpalika, Infront of Tresery office, Azamgarh, UP-276001
111	Bareilly	Uttar Pradesh	Kfin Technologies Ltd 1St Floorrear Sidea -Square Building 54-Civil Lines Ayub Khan Chauraha Bareilly 243001
112	Begusarai	Bihar	KFin Technologies Limited, SRI RAM MARKET, KALI ASTHAN CHOWK, MATIHANI ROAD, BEGUSARAI, BIHAR - 851101
113	Bhagalpur	Bihar	Kfin Technologies Ltd 2Nd Floor Chandralok Complexghantaghar Radha Rani Sinha Road Bhagalpur 812001
114	Darbhanga	Bihar	KFin Technologies Limited, H No-185, Ward No-13, National Statistical office Campus, Kathalbari, Bhandar Chowk , Darbhanga, Bihar - 846004
115	Dehradun	Uttaranchal	Kfin Technologies Ltd Shop No-809/799 Street No-2 A Rajendra Nagar Near Sheesha Lounge Kaulagarh Road Dehradun-248001
116	Deoria	Uttar pradesh	Kfin Technologies Ltd K. K. Plaza Above Apurwa Sweets Civil Lines Road Deoria 274001
117	Faridabad	Haryana	Kfin Technologies Ltd A-2B 2Nd Floor Neelam Bata Road Peer Ki Mazar Nehru Groundnit Faridabad 121001
118	Ghaziabad	Uttar Pradesh	Kfin Technologies Ltd Ff - 31 Konark Building Rajnagar - Ghaziabad 201001
119	Ghazipur	Uttar Pradesh	Kfin Technologies Ltd House No. 148/19 Mahua Bagh Raini Katra- Ghazipur 233001
120	Gonda	Uttar Pradesh	Kfin Technologies Ltd H No 782 Shiv Sadan Iti Road Near Raghukul Vidyapeeth Civil Lines Gonda 271001
121	Gorakhpur	Uttar Pradesh	Kfin Technologies Ltd Shop No 8 & 9 4Th Floor Cross Road The Mall Bank Road Gorakhpur - 273001
122	Gurgaon	Haryana	Kfin Technologies Ltd No: 212A 2Nd Floor Vipul Agora M. G. Road - Gurgaon 122001
123	Gwalior	Madhya Pradesh	Kfin Technologies Ltd City Centre Near Axis Bank - Gwalior 474011
124	Haldwani	Uttaranchal	Kfin Technologies Ltd Shoop No 5 Kmvn Shopping Complex - Haldwani 263139
125	Haridwar	Uttaranchal	Kfin Technologies Ltd Shop No. - 17 Bhatia Complex Near Jamuna Palace Haridwar 249410

126	Hissar	Haryana	Kfin Technologies Ltd Shop No. 20 Ground Floor R D City Centre Railway Road Hissar 125001
127	Jhansi	Uttar Pradesh	Kfin Technologies Ltd 1St Floor Puja Tower Near 48 Chambers Elite Crossing Jhansi 284001
128	Kanpur	Uttar Pradesh	Kfin Technologies Ltd 15/46 B Ground Floor Opp : Muir Mills Civil Lines Kanpur 208001
129	Lucknow	Uttar Pradesh	Kfin Technologies Ltd Ist Floor A. A. Complex 5 Park Road Hazratganj Thaper House Lucknow 226001
130	Mandi	Himachal Pradesh	Kfin Technologies Ltd House No. 99/11 3Rd Floor Opposite Gss Boy School School Bazar Mandi 175001
131	Mathura	Uttar Pradesh	Kfin Technologies Ltd Shop No. 9 Ground Floor Vihari Lal Plaza Opposite Brijwasi Centrum Near New Bus Stand Mathura 281001
132	Meerut	Uttar Pradesh	Kfin Technologies Ltd Shop No:- 111 First Floor Shivam Plaza Near Canara Bank Opposite Eves Petrol Pump Meerut-250001 Uttar Pradesh India
133	Mirzapur	Uttar Pradesh	KFin Technologies Limited, Second Floor, Triveni Campus Ratanganj, Mirzapur, Uttar Pradesh, 231001
134	Moradabad	Uttar Pradesh	Kfin Technologies Ltd Chadha Complex G. M. D. Road Near Tadi Khana Chowk Moradabad 244001
135	Morena	Madhya Pradesh	Kfin Technologies Ltd House No. Hig 959 Near Court Front Of Dr. Lal Lab Old Housing Board Colony Morena 476001
136	Muzaffarpur	Bihar	Kfin Technologies Ltd First Floor Saroj Complex Diwam Road Near Kalyani Chowk Muzaffarpur 842001
137	Noida	Uttar Pradesh	Kfin Technologies Ltd F-21 2Nd Floor Near Kalyan Jewelers Sector-18 Noida 201301
138	Panipat	Haryana	KFin Technologies Ltd Shop No. 20 1St Floor Bmk Market Behind Hive Hotel G.T.Road Panipat-132103 Haryana
139	Renukoot	Uttar Pradesh	Kfin Technologies Ltd C/O Mallick Medical Store Bangali Katra Main Road Dist. Sonbhadra (U.P.) Renukoot 231217
140	Rewa	Madhya Pradesh	Kfin Technologies Ltd Shop No. 2 Shree Sai Anmol Complex Ground Floor Opp Teerth Memorial Hospital Rewa 486001
141	Rohtak	Haryana	Kfin Technologies Ltd Office No:- 61 First Floor Ashoka Plaza Delhi Road Rohtak 124001.
142	Roorkee	Uttaranchal	KFin Technologies Ltd Near Shri Dwarkadhish Dharm Shala, Ramnagar, Roorkee-247667
143	Satna	Madhya Pradesh	Kfin Technologies Ltd 1St Floor Gopal Complex Near Bus Stand Rewa Roa Satna 485001
144	Shimla	Himachal Pradesh	Kfin Technologies Ltd 1St Floor Hills View Complex Near Tara Hall Shimla 171001
145	Shivpuri	Madhya Pradesh	Kfin Technologies Ltd A. B. Road In Front Of Sawarkar Park Near Hotel Vanasthali Shivpuri 473551
146	Sitapur	Uttar Pradesh	Kfin Technologies Ltd 12/12 Surya Complex Station Road Uttar Pradesh Sitapur 261001

147	Solan	Himachal Pradesh	Kfin Technologies Ltd Disha Complex 1St Floor Above Axis Bank Rajgarh Road Solan 173212
148	Sonepat	Haryana	Kfin Technologies Ltd Shop No. 205 Pp Tower Opp Income Tax Office Subhash Chowk Sonepat. 131001.
149	Sultanpur	Uttar Pradesh	Kfin Technologies Ltd 1St Floor Ramashanker Market Civil Line - Sultanpur 228001
150	Varanasi	Uttar Pradesh	Kfin Technologies Ltd D.64 / 52, G – 4 Arihant Complex , Second Floor ,Madhopur, Shivpurva Sagra ,Near Petrol Pump Varanasi -221010
151	Yamuna Nagar	Haryana	Kfin Technologies Ltd B-V 185/A 2Nd Floor Jagadri Road Near Dav Girls College (Uco Bank Building) Pyara Chowk - Yamuna Nagar 135001
152	Kolhapur	Maharashtra	Kfin Technologies Ltd 605/1/4 E Ward Shahupuri 2Nd Lane Laxmi Niwas Near Sultane Chambers Kolhapur 416001
153	Mumbai	Maharashtra	Kfin Technologies Ltd 6/8 Ground Floor Crossley House Near Bse (Bombay Stock Exchange)Next Union Bank Fort Mumbai - 400 001
154	Pune	Maharashtra	Kfin Technologies Ltd Office # 207-210 Second Floor Kamla Arcade Jm Road. Opposite Balgandharva Shivaji Nagar Pune 411005
155	Vashi	Maharashtra	Kfin Technologies Limited, Haware Infotech Park 902, 9th Floor, Plot No 39/03, Sector 30A, Opp Inorbit Mall, Vashi Navi Mumbai 400703
156	Andheri	Maharashtra	Kfin Technologies Ltd Office No 103, 1st Floor, MTR Cabin-1, Vertex, Navkar Complex M .V .Road, Andheri East , Opp Andheri Court, Mumbai - 400069
157	Borivali	Maharashtra	Kfin Technologies Ltd Gomati Smutiground Floor Jambli Gully Near Railway Station Borivali Mumbai 400 092
158	Thane	Maharashtra	Kfin Technologies Ltd Room No. 302 3Rd Floorganga Prasad Near Rbl Bank Ltd Ram Maruti Cross Roadnaupada Thane West Mumbai 400602
159	Ajmer	Rajasthan	KFIN Technologies Ltd, Shop no. 2 3rd Floor, Above Raymond Shop, Opp City Power House, Hathi Bhata, Ajmer-305001
160	Alwar	Rajasthan	Kfin Technologies Ltd Office Number 137 First Floor Jai Complex Road No-2 Alwar 301001
161	Amritsar	Punjab	Kfin Technologies Ltd Sco 5 2Nd Floor District Shopping Complex Ranjit Avenue Amritsar 143001
162	Bhatinda	Punjab	Kfin Technologies Ltd Mcb -Z-3-01043 2 Floor Goniana Road Opporite Nippon India Mf Gt Road Near Hanuman Chowk Bhatinda 151001
163	Bhilwara	Rajasthan	Kfin Technologies Ltd Office No. 14 B Prem Bhawan Pur Road Gandhi Nagar Near Canarabank Bhilwara 311001
164	Bikaner	Rajasthan	KFin Technologies Limited H.No. 10, Himtasar House, Museum circle, Civil line, Bikaner, Rajasthan - 334001
165	Chandigarh	Union Territory	Kfin Technologies Ltd First Floor Sco 2469-70 Sec. 22-C - Chandigarh 160022

166	Ferozpur	Punjab	Kfin Technologies Ltd The Mall Road Chawla Building Ist Floor Opp. Centrail Jail Near Hanuman Mandir Ferozepur 152002
167	Hoshiarpur	Punjab	Kfin Technologies Ltd Unit # Sf-6 The Mall Complex 2Nd Floor Opposite Kapila Hospital Sutheri Road Hoshiarpur 146001
168	Jaipur	Rajasthan	Kfin Technologies Ltd Office No 101 1St Floor Okay Plus Tower Next To Kalyan Jewellers Government Hostel Circle Ajmer Road Jaipur 302001
169	Jalandhar	Punjab	Kfin Technologies Ltd Office No 7 3Rd Floor City Square Building E-H197 Civil Line Next To Kalyan Jewellers Jalandhar 144001
170	Jammu	Jammu & Kashmir	Kfin Technologies.Ltd 1D/D Extension 2 Valmiki Chowk Gandhi Nagar Jammu 180004 State - J&K
171	Jodhpur	Rajasthan	Kfin Technologies Ltd Shop No. 6 Gang Tower G Floor Opposite Arora Moter Service Centre Near Bombay Moter Circle Jodhpur 342003
172	Karnal	Haryana	Kfin Technologies Ltd 3 Randhir Colony Near Doctor J.C.Bathla Hospital Karnal (Haryana) 132001
173	Kota	Rajasthan	Kfin Technologies Ltd D-8 Shri Ram Complex Opposite Multi Purpose School Gumanpur Kota 324007
174	Ludhiana	Punjab	Kfin Technologies Ltd Sco 122 Second Floor Above Hdfe Mutual Fun Feroze Gandhi Market Ludhiana 141001
175	Moga	Punjab	Kfin Technologies Ltd 1St Floordutt Road Mandir Wali Gali Civil Lines Barat Ghar Moga 142001
176	New Delhi	New Delhi	Kfin Technologies Ltd 305 New Delhi House 27 Barakhamba Road - New Delhi 110001
177	Pathankot	Punjab	Kfin Technologies Ltd 2Nd Floor Sahni Arcade Complex Adj.Indra Colony Gate Railway Road Pathankot Pathankot 145001
178	Patiala	Punjab	Kfin Technologies Ltd B- 17/423 Lower Mall Patiala Opp Modi College Patiala 147001
179	Sikar	Rajasthan	Kfin Technologies Ltd First Floorsuper Tower Behind Ram Mandir Near Taparya Bagichi - Sikar 332001
180	Sri Ganganagar	Rajasthan	Kfin Technologies Ltd Address Shop No. 5 Opposite Bihani Petrol Pump Nh - 15 Near Baba Ramdev Mandir Sri Ganganagar 335001
181	Udaipur	Rajasthan	Kfin Technologies Ltd Shop No. 202 2Nd Floor Business Centre 1C Madhuvan Opp G P O Chetak Circle Udaipur 313001
182	Eluru	Andhra Pradesh	Kfin Technologies Ltd Dno-23A-7-72/73K K S Plaza Munukutla Vari Street Opp Andhra Hospitals R R Peta Eluru 534002
183	chandrapur	Maharashtra	Kfin Technologies Ltd C/o Global Financial Services,2nd Floor, Raghuwanshi Complex,Near Azad Garden, Chandrapur, Maharashtra-442402
184	Ghatkopar	Maharashtra	Kfin Technologies Ltd 11/Platinum Mall, Jawahar Road, Ghatkopar (East), Mumbai 400077
185	Satara	Maharashtra	Kfin Technologies Ltd G7, 465 A, Govind Park Satar

			Bazaar, Satara - 415001
186	Ahmednagar	Maharashtra	KFin Technologies Limited, Above Shubham mobile & Home Appliances, 1st Floor, Tilak Road, Maliwada Ahmednagar, Maharashtra 414001
187	Nellore	Andhra Pradesh	KFin Technologies Ltd 24-6-326/1, Ibaco Building 4th Floor, Grand Truck road, Beside Hotel Minerva, Saraswathi Nagar, Dargamitta Nellore - 524003
188	Kalyan	Maharashtra	KFin Technologies Limited Seasons Business Centre, 104 / 1st Floor, Shivaji Chowk, Opposite KDMC (Kalyan Dombivali Mahanagar Corporation) Kalyan - 421301
189	Korba	Chhattisgarh	KFin Technologies Limited Office No.202, 2nd floor, ICRC, QUBE, 97, T.P. Nagar, Korba -495677
190	Ratlam	Madhya Pradesh	KFin Technologies Limited 106 Rajaswa Colony, Near Sailana Bus Stand, Ratlam (M.P.) 457001
191	Tinsukia	Assam	KFin Technologies Limited 3rd Floor, Chirwapatty Road, Tinsukia-786125, Assam
192	Saharanpur	Uttar Pradesh	KFin Technologies Limited Ist Floor, Krishna Complex, Opp. Hathi Gate, Court Road, Saharanpur, Uttar Pradesh, Pincode 247001
193	Kalyani	West Bengal	KFin Technologies Limited Ground Floor, H No B-7/27S, Kalyani, Kalyani HO, Nadia, West Bengal – 741235
194	Hosur	Tamil Nadu	KFin Technologies Limited No.2/3-4. Sri Venkateswara Layout, Denkanikottai road, Dinnur Hosur - 635109

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