

DISCLOSURES PURSUANT TO STEWARDSHIP CODE

Disclosures on implementation of the principles enlisted under Stewardship Code for the FY 2023-2024

In accordance with paragraph 6.16.5 of SEBI Master Circular for Mutual Funds dated 19th May 2023, the Mutual Funds have been advised to mandatorily follow the stewardship principles/code prescribed therein to be adopted in respect of investments in listed Equities of the Investee Companies. Further, a report on implementation of every principle is required to be sent to the clients/ beneficiaries of Mutual Fund as a part of Annual Intimation.

Accordingly, the status of Compliance with Stewardship Code is stated below:

Principle 1: Institutional investors should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically.

LIC Mutual Fund Asset Management Limited has a Board approved Stewardship Code which was approved by the Board of LIC Mutual Fund Asset Management Limited and LIC Mutual Fund Trustee Private Limited.

The same is hosted on our website www.licmf.com

Principle 2: Institutional investor should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.

Complied with.

Investment in Promoter Group Company was made in routine course of Business and on arm's length basis. The same was also reported to Board of Directors of LIC Mutual Fund Trustee Private Limited.

Further, the AMC has put in place a Policy for identifying and managing conflicts of interest and the same has been disclosed on the website of LIC Mutual Fund i.e. www.licmf.com.

Principle 3: Institutional investors should monitor their investee companies

Complied with

The Investment Team during the Financial Year 2023-2024 interacted with the Management of most of the investee companies on a regular basis.

Principle 4: Institutional investors should have a clear policy on intervention in their investee companies. Institutional investors should also have a clear policy for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors, which should be disclosed.

LIC Mutual Fund Asset Management Limited has clearly laid down the process to be followed in case where intervention is required in order to protect the interest of unitholders and the same forms a part of the Stewardship Code. This involves engagement, re-engagement, escalation and need based collaboration with other Institutional Investors. The Investment Committee reviews the need for intervention in Investee Companies, wherever required.

Principle 5: Institutional investors should have a clear policy on voting and disclosure of voting activity.

Complied with.

LIC Mutual Fund Asset Management Limited has a separate policy providing guidelines for exercising voting rights on behalf of LIC Mutual Fund. The policy is disclosed on website of LIC Mutual Fund Asset Management Limited.

As per the regulatory disclosure requirements, the quarterly / Annual voting disclosures providing details of the proxy voting disclosures for the FY 2023-2024 has been disclosed on website of LIC Mutual Fund Asset Management Limited.

Further, the disclosure on the votes cast by Mutual Funds along with Scrutiniser's Certificate shall be included in the Annual Report of the Schemes of LIC Mutual Fund for the FY 2023-2024 in the manner and format prescribed in the Regulations.

Principle 6: Institutional investors should report periodically on their stewardship activities.

The Report on implementation of the Principles of Stewardship Code for the financial year 2023-2024 is being disclosed on the website of LIC Mutual Fund Asset Management Limited.

The same will also be sent to the unitholders as part of Annual Report for the Schemes of LIC Mutual Fund for the Financial year 2023-2024.

Further, the Updated Stewardship Code is disclosed on the website of LIC Mutual Fund Asset Management Limited as and when there are changes to the Policy.