

REPORTING ON DISCHARGE OF STEWARDSHIP RESPONSIBILITY

Securities and Exchange Board of India (SEBI) vide its circular CIR/CFD/CMD1/168 /2019, dated December 24, 2019, requires reporting of the status of compliance with the stewardship principle as part of its annual intimation to clients / beneficiaries. The stewardship code was applicable with effect from July 1, 2020.

The subsequent paragraphs detail the manner in which the elements of the stewardship code have been discharged by DSP Asset Managers Private Limited (Company).

The Board of the Company and DSP Trustee Private Limited (Trustee Company) at its meeting held on April 01, 2023 had approved the policy on discharge of stewardship responsibilities. The policy on discharge of stewardship responsibilities ("Policy") sets out the framework and guidelines on discharge of the stewardship responsibilities of the Company. The responsibility for the overall implementation and execution of policy rests with the Stewardship Committee of the Company. Accordingly, the Stewardship Committee of the Company, with an endeavor to safeguard the interests by enhancing monitoring and engagement with investee companies, has laid down certain principles. During the year, 4 stewardship meeting(s) were conducted.

The Status of Compliance with the Stewardship Code is stated below:

| Principle | Description | Compliance status | Remarks |
|-------------|---|-------------------|--|
| Principle 1 | Institutional investors should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically | Complied | The Policy on discharge of stewardship responsibilities (Policy) had been approved by the Board of the Company and Trustee Company. The Policy is disclosed on the website of the Company under mandatory disclosure section. https://www.dspim.com/mandatory-disclosures/stewardship/stewardship-policy.pdf |
| Principle 2 | Institutional investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it. | Complied | The conflict of interest policy disclosed on the website under mandatory disclosure section specifies various control measures and prescribes procedures to be followed by the Company for identifying and managing conflicts. There was no instance of conflict of interest noted by the stewardship committee at its meeting held during the period in relation to any investee company. |
| Principle 3 | Institutional investors should monitor their investee companies | Complied | The Investment Team of the Company engages with the investee companies as part of the research process that leads to an investment in an investee company, which include meeting with the management. The stewardship committee at its periodic meetings has reviewed monitoring and engagement activities carried out by the investment team for the said period. |

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| 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. | Complied | The Policy covers when and how to intervene, if any intervention is required in the investee companies. The stewardship committee reviews the intervention in the investee companies. |
| Principle 5 | Institutional investors should have a clear policy on voting and disclosure of voting activity | Complied | DSP Mutual Fund has comprehensive voting policy which includes details of mechanisms of voting, circumstances in which voting should be for/against, disclosure of voting, the voting policy, voting decisions (including rationale for decision), use of proxy voting/voting advisory services, etc. The quarterly voting disclosure are published on website under mandatory disclosure section linked here . |
| Principle 6 | Institutional investors should report periodically on their stewardship activities | Complied | This report on stewardship activities for Financial Year 2023-2024 is uploaded on the AMC website and forms part of the Annual Report which is being sent to the Unitholders. |