

**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**

- 1. All disclosures regarding penalties and action(s) taken against foreign Sponsor(s) may be limited to the jurisdiction of the country where the principal activities (in terms of income / revenue) of the Sponsor(s) are carried out or where the headquarters of the Sponsor(s) is situated. Further, only top 10 monetary penalties during the last three years shall be disclosed.**

Not Applicable

- 2. In case of Indian Sponsor(s), details of all monetary penalties imposed and/ or action taken during the last three years or pending with any financial regulatory body or governmental authority, against Sponsor(s) and/ or the AMC and/ or the Board of Trustees /Trustee Company; for irregularities or for violations in the financial services sector, or for defaults with respect to shareholders or debenture holders and depositors, or for economic offences, or for violation of securities law. Details of settlement, if any, arrived at with the aforesaid authorities during the last three years shall also be disclosed.**

Pursuant to inspection conducted by SEBI, for the period April 01, 2015 to August 09, 2016, a show cause notice dated March 23, 2018 was issued along with a supplementary show cause notice dated July 19, 2019 against Samco Securities Limited in respect of certain allegation under Securities and Exchange Board of India (Stockbrokers and Sub-brokers) Regulations, 1992 and circulars and / or guidelines issued thereunder. It was alleged that the above actions liable for penalty under Section 23D of the Securities Contracts (Regulation) Act, 1956 and imposed a monetary penalty of Rs. 2,00,000/- (Rupees Two Lakh only). The same has been paid to SEBI.

Pursuant to inspection conducted by SEBI, for the period April 01, 2020 to November 30, 2022, a show cause notice dated October 20, 2022 was issued against Samco Securities Limited in respect of certain allegation under Securities and Exchange Board of India (Stockbrokers and Sub-brokers) Regulations, 1992 and circulars and / or guidelines issued thereunder. It was alleged that the above actions liable for penalty under Section 15HB of the SEBI Act 1992 and Section 19G of Depositories Act, 1996 and imposed a monetary penalty of Rs. 7,00,000/- (Rupees Seven Lakh only) on August 31, 2023. Currently, the entity filed an appeal before the Tribunal.

Pursuant to inspection conducted by SEBI, for the period April 01, 2022 to May 31, 2023, a show cause notice dated February 20, 2024 was issued against Samco Securities Limited in respect of certain allegation under Securities and Exchange Board of India (Stockbrokers and Sub-brokers) Regulations, 1992 and circulars and / or guidelines issued thereunder. It was alleged that the above actions liable for penalty under Section 15HB and Section 15A(a) of the SEBI Act 1992 imposed a monetary penalty of Rs. 2,50,000/- (Rupees Two Lakh Fifty Thousand only) on May 29, 2024. Currently, the entity is in process of filing an appeal before the Tribunal.

- 3. Details of all enforcement actions taken by SEBI in the last three years and/ or pending with SEBI for the violation of SEBI Act, 1992 and Rules and Regulations framed there under including debarment and/ or suspension and/ or cancellation and/ or imposition of monetary penalty/adjudication/enquiry proceedings, if any, to which the Sponsor(s) and/ or the AMC and/ or the Board of Trustees /Trustee Company and/ or any of the directors and/ or key personnel (especially the fund managers) of the AMC and Trustee Company were/ are a party. The details of the violation shall also be disclosed.**

SEBI conducted an investigation into the trading activities of certain investors in the scrip of Religare Enterprises Ltd. Based on the investigation, SEBI had issued the show cause notice dated July 09, 2021 to Mr. Vipul Modi ex-Director of Samco Trustee Private Limited. The matter essentially pertains to the alleged

insider trading by certain individuals. While the Notice does not mention about any alleged ill-gotten gains against Mr. Vipul Modi. A consent application was filed under SEBI (Settlement Proceedings) Regulation 2018 without admission of guilt nor denying the allegations.

Accordingly, a Committee of SEBI heard the matter and after due process of law, SEBI passed a Settlement Order on June 10, 2022 stating that the proceedings under the Show Cause Notice are settled for the alleged defaults against the Notices on mutually agreed monetary terms. There has not been any other non-monetary terms in the Settlement Order.

- 4. Any pending material civil or criminal litigation incidental to the business of the Mutual Fund to which the Sponsor(s) and/ or the AMC and/ or the Board of Trustees /Trustee Company and/ or any of the directors and/ or key personnel are a party should also be disclosed separately.**

Nil

- 5. Any deficiency in the systems and operations of the Sponsor(s) and/ or the AMC and/ or the Board of Trustees/Trustee Company which SEBI has specifically advised to be disclosed in the SID, or which has been notified by any other regulatory agency, shall be disclosed.**

Nil