

As per SEBI Master Circular No. CIR/ISD/AML/3/2010 dated December 31, 2010 regarding Client Due Diligence policy, related circulars on anti-money laundering and SEBI circular No.CIR/MIRSD/2/2013 dated January 24, 2013, non-individuals and trusts are required to provide details of ultimate beneficial owner [UBO] and submit appropriate proof of identity of such UBOs. The beneficial owner has been defined in the circular as the natural person or persons, who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted, and includes a person who exercises ultimate effective control over a legal person or arrangement.

1. Ultimate Beneficial Owner [UBO]:

A. For Investors other than individuals or trusts:

- (i) The identity of the natural person, who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest. Controlling ownership interest means ownership of/ entitlement to:
 - more than 25% of shares or capital or profits of the juridical person, where the juridical person is a company;
 - more than 15% of the capital or profits of the juridical person, where the juridical person is a partnership;
 - more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.
- (ii) In cases where there exists doubt under clause (i) above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity of the natural person exercising control over the juridical person through other means like through voting rights, agreement, arrangements or in any other manner.
- (iii) Where no natural person is identified under clauses (i) or (ii) above, the identity of the relevant natural person who holds the position of senior managing official.

B. For Investors which is a trust:

The identity of the settler of the trust, the trustee, the protector, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.

C. Exemption in case of listed companies

If the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

D. Foreign investors

In accordance SEBI circular CIR/MIRSD/11/2012 dated September 5, 2012, list of Beneficial Owners with shareholding or beneficial interest in FPIs (including FII and Sub- Accounts, FVCIs where applicable but excluding individual where he is the first applicant/holder) equal to or above 25% has to be provided. If Global Custodian /Local Custodian provides an undertaking to submit these details,

then such undertaking may be obtained. AMC / Mutual Fund reserves right to obtain any further information / documents from the client based on its assessment of their risk profile.

2. UBO Codes:

UBO Code Description

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| UBO-1 | Controlling ownership interest of more than 25% of shares or capital or profits of the juridical person [Investor], where the juridical person is a company |
| UBO-2 | Controlling ownership interest of more than 15% of the capital or profits of the juridical person [Investor], where the juridical person is a partnership |
| UBO-3 | Controlling ownership interest of more than 15% of the property or capital or profits of the juridical person [Investor], where the juridical person is an unincorporated association or body of individuals |
| UBO-4 | Natural person exercising control over the juridical person through other means exercised through voting rights, agreement, arrangements or in any other manner [In cases where there exists doubt under UBO-1 to UBO - 3 above as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests] |
| UBO-5 | Natural person who holds the position of senior managing official [In case no natural person cannot be identified as above] |
| UBO-6 | The settlor(s) of the trust |
| UBO-7 | Trustee(s) of the Trust |
| UBO-8 | The Protector(s) of the Trust [if applicable]. |
| UBO-9 | The beneficiaries with 15% or more interest in the trust if they are natural person(s) |
| UBO-10 | Natural person(s) exercising ultimate effective control over the Trust through a chain of control or ownership. |

3. Position/Designation:

Refers to the Position/Designation of the Beneficial Owner during the time of ownership.

4. Applicable period

Refers to the period of Beneficial Ownership to be indicated, if applicable

5. KYC requirements

Beneficial Owner(s) is/are required to comply with the prescribed KYC process as stipulated by SEBI from time to time with any one of the KRA & submit the same to AMC. KYC acknowledgement proof is to be submitted for all the listed Beneficial Owner(s). AMC / Mutual Fund reserves right to obtain any further information / documents from the client based on its assessment of their risk profile.

6. Foreign Country Information

If you are a Person with Tax Residency in a Country other than India, please provide your Country of birth, Nationality, Country of Tax residency and Foreign Tax Reference Number. If you have any questions about your tax residency, please contact your tax advisor.

For any queries / clarifications, Please contact the nearest Investor Service Centres (ISCs) of the AMC at toll free number 1800 103 7237 or e-mail us: customerservices@sundarammutual.com