

# BNP PARIBAS ASSET MANAGEMENT INDIA PRIVATE LIMITED VALUATION POLICY





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### A. INTRODUCTION:

The Securities and Exchange Board of India (SEBI) has outlined investment valuation norms and accounting policies under SEBI (Mutual Funds) Regulations, 1996 (the Regulations) as amended from time to time. The Investment Valuation Norms are prescribed in the Eighth Schedule of the Regulations (regulation 47) and circulars issued by SEBI from time to time. Further, SEBI has amended Regulation 47 and the Eight Schedule vide a gazette notification dated February 21, 2012 and has introduced overriding guiding principles in the form of "Principles of Fair Valuation".

The amended regulation requires that Mutual Funds shall follow principles of fair valuation to minimize the difference in valuation of mutual fund assets relative to market values and also to enable fair treatment across all classes of investors i.e. existing investors as well as investors seeking to subscribe or redeem units.

It further prescribes that the valuation of investments shall be based on the principles of fair valuation i.e. the valuation shall be reflective of the realizable value of securities / assets. The valuation shall be done in good faith and in a true and fair manner through appropriate valuation policies and procedures as approved by the Board of the asset management company. The valuation policies and procedures approved by the Board of asset management company should seek to address conflict of interest.

The amendment also states that in case of any conflict between the principles of fair valuation and valuation guidelines as per Eighth Schedule and circulars issued by SEBI, the Principles of Fair Valuation shall prevail.

This Policy reflects the guiding principles to ensure fair valuation of all securities under the Schemes to comply with the amended Regulation 47 and the Eight Schedule relating to valuation of investments on February 21, 2012 and February 28, 2012.

#### B. SCOPE:

The following are covered within the scope of this policy:

- (a) Defining valuation procedures / methodologies for various types of securities;
- (b) Valuation of securities / assets in the event of an inter scheme transfer;
- (c) Review of valuation policies and procedures and reporting to the various stakeholders;
- (d) Recording of deviations from established policies and procedures and rationale for same;
- (e) Dealing with Conflict of Interests (including potential conflict of interest) which has / may have a bearing on valuation of securities;
- (f) Valuation of securities / assets during exceptional events.

## C. PERIODIC REVIEW

The Valuation Committee shall review the valuation methodologies at least annually in terms of its appropriateness and accuracy in determining the fair value of each and every security.

The Valuation Committee shall update the Board of Directors of AMC and Trustee Company, at least annually, in terms of the effectiveness of the methodologies and deviations or incorrect valuations.

Further, the Valuation Policy shall also be reviewed by Independent Auditors at least once a Financial Year to ensure the appropriateness of the Valuation Methodologies and to suggest alternative methods, if any.

## D. EXCEPTIONAL EVENTS

Following types of events could be classified as Exceptional events where current market information may not be available / sufficient for valuation of securities. Given the exceptional nature of the following events and the lack of clarity on how it would impact the markets, it is not possible to define a standard methodology to be adopted for fair valuation of securities for such events.

a) Major policy announcements by the Central Bank, the Government or the Regulator;



- b) Natural disasters or public disturbances that force the markets to close unexpectedly or functions abnormally;
- c) Absence of trading in a specific security or similar securities;
- d) Significant volatility in the capital markets;
- e) Closure of the stock market of a particular security;
- f) Events which lead to lack of availability of accurate or sufficient information to value the securities.
- g) Significant illiquidity in fixed income markets.
- h) Events like Sovereign bankruptcy, corporate bankruptcy, disruptive political scenario that may impact the markets.
- i) Valuation Agency do not provide valuation for particular security

The above list is illustrative and not exhaustive.

## **E. ESCALATION PROCESS:**

- Valuation Committee shall be responsible for monitoring Exceptional events and recommending appropriate valuation methods. Necessary guidance may be sought from the Boards of AMC.
- Any deviation from the valuation price given by the valuation agencies, the detailed rationale for each instance
  of deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at
  which the security was valued vis-a-vis the price as per the valuation agencies and the impact of such deviation
  on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.
- The rationale for deviation along-with details as mentioned above shall be disclosed immediately and prominently, under a separate head on the website of AMC

#### F. REVIEW - PREVENTION & DETECTION OF INCORRECT VALUATION:

The AMC has put in place policies and procedures to prevent and detect incorrect valuation like ensuring adherence to the policy along with basic checks and balances in normal course and conducting a periodic review (including Independent Audit) at least annually in terms of its appropriateness and accuracy in determining the fair value of each and every security.

## G. RECORD KEEPING

All the documents which forms the basis of valuation shall be preserved in accordance with the norms prescribed by the SEBI regulations and guidelines.

#### H. DISCLOSURE OF THE POLICY

The Valuation Policy approved by the AMC Board shall be disclosed in Statement of Additional Information (SAI), website of the AMC and other documents as prescribed by the Regulations and guidelines.

## I. VALUATION METHODOLOGIES

- The valuation of investment shall be based on the guiding principles of fair valuation.
- The methodologies for valuing different type of securities are mentioned in Annexure I
- Where it is observed that Valuation methodology mentioned in Annexure I, does not lead to fair valuation of securities, Valuation Committee may on a prospective basis deviate from the defined methodology and adopt such alternate procedures / methods in conformance with the guiding principles of fair valuation in good faith to arrive at the true and fair estimation of the realizable value of the security. The rationale for any such deviations would be recorded in writing and placed before the Board of Directors of the AMC and the Trustee.
- Investment in any new type of security shall be made only after establishment of the valuation methodology for such security with the approval of the Board of Directors of BNP Paribas Asset Management India Private Limited (AMC).
- Valuation price of the Security; arrived as per the policy; shall be applied consistently across the portfolios. In
  other words; any particular security shall be valued at same price across all the portfolios and it cannot have
  different prices for valuation on a particular day.
- In case there are multiple / dual credit ratings for the same company, the lowest among the same shall be considered for valuation purpose; provided the structures of the instruments under consideration are similar.



## **ANNEXURE - 1**

# **VALUATION METHODOLOGIES**

Asset Class	Traded / Not Traded / Unlisted	/ Listed	Valuation Methodology
Debt & Money Market instruments (including Bills Rediscounting	maturity <= 30 Days:	residual	The valuation shall be done on the basis of Straight Line Amortization as long as their valuation remains within $\pm$ 0.025% band of the price derived from the reference price. (Reference price is average of the security level price provided by the agency (CRISIL/ICRA)).
Deposit Scheme) other than Treasury Bills,			In case of amortized value falling outside the above band, the price of the asset will have to be adjusted in order to bring the price within $\pm 0.025\%$ band of the reference price.
Government Securities TREPS, Reverse Repo, Fixed Deposits			New securities (residual maturity of up to 30 days) purchased for which valuation price is not provided by both the external agencies on the date of purchase, the same shall be valued on amortized basis on the date of allotment / purchase.
i ineu Deposits		No.	W.e.f 1st July 2020, Based on SEBI Circular SEBI/HO/IMD/DF4/CIR/P/2019/102 dated 24th Sep 2019, the valuation shall be basis average of security level prices received from external agencies (CRISIL and ICRA)
			Note: Valuation of securities with Put/Call Options: In line with the SEBI circular, the option embedded securities would be valued as follows:
7			Securities with call option: The securities with call option shall be valued at the lower of the value as obtained by valuing the security to final maturity and valuing the security to call option.
			In case there are multiple call options, the lowest value obtained by valuing to the various call dates and valuing to the maturity date is to be taken as the value of the instrument.
			Securities with Put option: The securities with put option shall be valued at the higher of the value as obtained by valuing the security to final maturity and valuing the security to put option
			In case there are multiple put options, the highest value obtained by valuing to the various put dates and valuing to the maturity date is to be taken as the value of the instruments.
			Securities with both Put and Call option on the same day: The securities with both Put and Call option on the same day would be deemed to mature on the Put/Call day and would be valued accordingly.
			The securities having Put and Call Options on the same day but at different prices would not be treated as maturity date of the instrument and would be valued at Put and Call dates. Lower of the best of Put and worst of Call would be taken as the price for valuation.
			In case no Put Trigger Date or Call Trigger Date ('Trigger Date") is available, then valuation would be done to maturity price. In case one Trigger Date is available, then valuation would be done as to the said Trigger Date. In case both Trigger Dates are available, then valuation would be done to the earliest date
			The price derived above shall then be used for valuation on Straight Line



	Traded / Not Traded / Listed / Unlisted	Valuation Methodology
		Amortization and reference price comparison as stipulated above.
		If a put option is not exercised by a Mutual Fund, then such cases the justification for not exercising the put option noted in the Valuation Committee.
	For Securities with residual maturity > 30 Days :	Valued basis average of security level prices received from external agencies (CRISIL and ICRA).
	Traded / Non Traded	New securities (residual maturity of more than 30 days) purchased for which valuation price is not provided by both the external agencies on the date of purchase, the same shall be valued at purchase yield on the date of allotment / purchase.
		Securities with call option: The securities with call option shall be valued at the lower of the value as obtained by valuing the security to final maturity and valuing the security to call option.
		In case there are multiple call options, the lowest value obtained by valuing to the various call dates and valuing to the maturity date is to be taken as the value of the instrument.
		Securities with Put option: The securities with put option shall be valued at the higher of the value as obtained by valuing the security to final maturity and valuing the security to put option In case there are multiple put options, the highest value obtained by valuing to the various put dates and valuing to the maturity date is to be taken as the value of the instruments.
		Securities with both Put and Call option on the same day: The securities with both Put and Call option on the same day would be deemed to mature on the Put/Call day and would be valued accordingly.
		The securities having Put and Call Options on the same day but at different prices would not be treated as maturity date of the instrument and would be valued at Put and Call dates. Lower of the best of Put and worst of Call would be taken as the price for valuation
		In case no Put Trigger Date or Call Trigger Date ('Trigger Date") is available, then valuation would be done to maturity price. In case one Trigger Date is available, then valuation would be done as to the said Trigger Date. In case both Trigger Dates are available, then valuation would be done to the earliest date
		If a put option is not exercised by a Mutual Fund, then such cases the justification for not exercising the put option noted in the Valuation Committee.
Government Securities, State Development Loans, Cash	Traded / Non Traded (irrespective of maturity)	Valued basis average of security level prices received from external agencies (CRISIL and ICRA).
Management Bills		
Bank Fixed Deposits, TREPS/ Reverse Repo,	-	Valued at cost plus accruals



Asset Class	Traded / Not Traded / Listed / Unlisted	Valuation Methodology
Equity. Normal Preference shares and Cumulative Convertible Preference Share	Traded	Traded Securities are to be valued at the last quoted closing price on the primary Stock Exchange (NSE). If a security is not traded on NSE on a particular valuation day, the close price at which it is traded on BSE shall be considered.
	Not Traded / Thinly Traded	<ol> <li>Thinly Traded: Any security which does not have trading volume of 50,000 scrip's and trading amount of Rs 5,00,000/- during a period of thirty days shall be categorized as thinly traded scrip</li> </ol>
		<ol> <li>Non Traded: If the equity securities are not traded on NSE and BSE for a period of thirty days prior to the valuation date, the scrip must be treated as `non-traded' scrip.</li> </ol>
		<ol> <li>If the security is not traded either on NSE and BSE, the earliest previous day's close price shall be used, provided such day is not more than thirty days prior to the valuation date.</li> </ol>
		4. Other Cases:
		A. Equity Shares: Based on the latest available Balance Sheet, net worth shall be calculated as follows:
		a) Net Worth per share = [Share Capital+ Reserves (excluding Revaluation Reserves) – Misc. expenditure and Debit Balance in P&L A/c] Divided by No. of Paid up Shares.
		<ul> <li>b) Average capitalization rate (P/E ratio) for the industry based upon either BSE or NSE data (which should be followed consistently and changes, if any noted with proper justification thereof) shall be taken and discounted by 75% i.e. only 25% of the Industry average P/E shall be taken as capitalization rate (P/E ratio). Earnings per share (EPS) of the latest audited annual accounts will be considered for this purpose.</li> <li>c) Note: Management to evaluate impact on valuation of thinly traded/non</li> </ul>
		traded equity investments if there are qualification in the auditor's report  d) The value as per the net worth value per share and the capital earning value calculated as above shall be averaged and further discounted by 10% for ill-liquidity so as to arrive at the fair value per share.
		<ul> <li>e) In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalized earning.</li> <li>f) In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year</li> </ul>
		is changed, the shares of such companies shall be valued at zero.  g) In case an individual security accounts for more than 5% of the total assets of the scheme, an independent valuer shall be appointed for the valuation of the said security. To determine if a security accounts for more than 5% of the total assets of the scheme, it should be valued by the procedure above and the proportion which it bears to the total net assets of the scheme to which it belongs would be compared on the date of valuation.
	1.000	B. Preference share: Non traded preference shares should be valued in good faith depending upon the type of the preference Share and after considering illiquidity discount, if any.
Equity	Unlisted	These guidelines are similar to the guidelines issued by SEBI for non traded / thinly traded securities mentioned above except the following:
		a. Computation of Net worth per share as lower of (i) and (ii):  (i) Net worth of the company = Paid up share capital + Reserves other than Revaluation reserve - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses / Number of Paid up Shares  (ii) Net worth of the company = Paid up capital + Consideration on exercise of Option/Warrants received/receivable by the company + free reserves other than Revaluation reserve - Miscellaneous expenditure not written



Asset Class	Traded / Not Traded / Listed / Unlisted	Valuation Methodology
		off or deferred revenue expenditure, intangible assets and accumulated losses / {Number of paid-up shares + number of shares that would be obtained on conversion/exercise of outstanding warrants and options}.
		If the net worth of the company is negative, the share should be marked down to Zero.
		a) Average capitalisation rate (P/E ratio) for the industry based upon either BSE or NSE data (which should be followed consistently and changes, if any, noted with proper justification thereof) shall be taken and discounted by 75% i.e. only 25% of the Industry average P/E shall be taken as capitalisation rate (P/E ratio). Earnings per share of the latest audited annual accounts will be considered for this purpose.
		b) The value as per the Net Worth value per share and the capital earning value calculated as above shall be averaged and further discounted by 15 per cent for illiquidity so as to arrive at the fair value per share.
		c) Computation of fair value per share to be considered for valuation at 15 % discount for illiquidity. [(Net worth per share + Capitalized value of EPS) / 2] * 0.85
		The above valuation methodology shall be subject to the following conditions:
		<ul> <li>a. All calculations shall be based on audited accounts. Management to evaluate impact on valuation of thinly traded/non traded equity investments if there are qualification in the auditor's report</li> <li>b. If the latest Balance Sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero.</li> </ul>
7		<ul> <li>c. If the Net Worth of the company is negative, the share would be marked down to zero.</li> <li>d. In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalised earning.</li> <li>e. In case an individual security accounts for more than 5 per cent of the total</li> </ul>
/		assets of the scheme, an independent valuer shall be appointed for the valuation of the said security. To determine if a security accounts for more than 5 per cent of the total assets of the scheme, it shall be valued in accordance with the procedure as mentioned above on the date of valuation.
Application		Application money should be valued at cost up to allotment.
Money for Primary Market Issue		Equity securities allotted and proposed to be listed, but not listed, are to be valued at cost till listing.
Qualified Institutional Placement (QIP) / Follow on Public Offer		Valued at Bid price or Market price, whichever is lesser.
Rights Entitlements	Traded	If the rights are traded, then the traded price will be considered for valuation.
	Non Traded/Unlisted/Thinly Traded	<b>Thinly Traded:</b> Any security which does not have trading volume of 50,000 scrip's and trading amount of Rs 5,00,000/- during a period of thirty days shall be categorized as thinly traded scrip
		<b>Non Traded:</b> If the equity securities are not traded on NSE and BSE for a period of thirty days prior to the valuation date, the scrip must be treated as 'non-traded' scrip.
		Valuations of non-traded/thinly traded/Unlisted rights entitlement, SEBI Regulations have explained this with the help of following formula:
		V <sub>r</sub> = n/m * (P <sub>ex</sub> – P <sub>of</sub> ) Where V <sub>r</sub> = Value of Rights n = Number of rights offered m = Number of original shares held



Asset Class	Traded / Not Traded / Listed / Unlisted	d Valuation Methodology
		P <sub>ex</sub> = Ex-right price P <sub>of</sub> = Rights offer price
		The following issues while valuing the rights entitlements have to be addressed:
		<ul> <li>i) In case original shares on which the right entitlement accrues are not traded on the Stock Exchange, right entitlement should be valued at zero</li> <li>ii) When rights are not treated pari passu with the existing shares such as, restrictions with regard to dividend etc., suitable adjustment should be made by way of a discount to the value of rights at the last dividend announced rate.</li> <li>iii) Where right entitlements are not subscribed to but are to be renounced, and where renouncements are being traded, the right entitlements have to</li> </ul>
		be valued at traded renunciation value.  iv) Where right entitlements are not traded and it is decided not to subscribe the rights, the right entitlements have to be valued at zero.  v) In case the Rights Offer Price is greater than the ex-rights price, the value
Cuppended		of the rights share is to be taken as zero.
Suspended Security	-	In case trading in an equity security is suspended for trading on the stock exchange up to 30 days, then the last traded price would be considered for valuation of that security.
		If an equity security is suspended for trading on the stock exchange for more than 30 days, then it would be considered as non traded and valued accordingly.
Partly Paid-up Equity Shares:	Traded	If the partly paid-up equity shares are traded in market separately then the same shall be valued at traded price (like any other equity instrument).
	Non - traded	Non traded partly paid-up equity shares shall be valued at Underlying Equity price as reduced by the balance call money payable or zero, whichever is higher.
Shares tendered for Buyback		On tendering the shares for buyback: Valued normally at the NSE/BSE closing price.
Baybask		<b>Acceptance of offer:</b> On receipt of the information from the custodian / company, the quantity accepted would be removed from the holding at the buyback price.
Valuation of Shares on		Merger: On merger following possibilities arise which influence valuation, these are:
Merger, De- merger and Other Corporate	1, 19	<ul> <li>Shares held of a continued entity, which is traded:</li> <li>At traded prices of continued entity.</li> </ul>
Action Events:		Shares held of discontinued entity:  Price of continued entity based on the conversion ratio.
		Shares of a new entity:     Valuation of merged entity will be arrived at by considering the closing price of the pre-merged entities adjusted for conversion ratio.
		• Shares of merged entity is not traded:  Valuation of merged entity will be arrived at by summation of previous day's value of the respective companies prior to merger, divided by the entitled quantity of the merged entity up to a period of 30 days in cases where the identity of the entities getting merged is lost. In case shares of merged entity are not traded for more than 30 days, then AMC shall provide the fair valuation of the same.
		<u>De-merger:</u> On de-merger following possibilities arise which influence valuation, these are:
	J.	Both the shares are traded immediately on de-merger:  In this case both the shares are valued at respective traded prices.
		Shares of only one company continued to be traded on de-merger:  In such a scenario, the shares of Non Traded/Unlisted would be fairly valued in good faith by valuation committee on case to case basis. Traded



Asset Class	Traded / Not Traded / Liste / Unlisted	d Valuation Methodology
		share shall be valued at traded price.
		Both the shares are not traded on de-merger:  Shares of de-merged companies are to be valued equal to the pre demerger value up to a period of 30 days from the date of de-merger. The market price of the shares of the de-merged company one day prior to exdate can be bifurcated over the de-merged shares. The market value of the shares can be bifurcated in the proportion of net worth of demerged companies or on any other basis as considered appropriate by Valuation Committee.
		In case shares of both the companies are not traded for more than 30 days, then the AMC shall provide the fair valuation for the same.
		Other corporate action event: In case of any other type of capital corporate action event, the same shall be valued at fair price on case to case basis as may be determined by the Valuation Committee.
Valuation o Warrants	f Traded	If the warrants are traded, the traded price will be considered for valuation.
	Non Traded	In respect of warrants to subscribe for shares attached to instruments, the warrants can be valued at the value of the share which would be obtained on exercise of the warrant as reduced by the amount which would be payable on exercise of the warrant.; If the amount payable on exercise of the warrants is higher than the value of the share, the value of the warrants should be taken as zero.
	154	Value of Warrant =Max [(Price of Underlying Security - Exercise Price), 0]
Stock and Index	( -	An illiquidity discount, as appropriate shall be taken into account for valuation.  • Equity / Index Options Derivatives
Derivatives		(i) Market values of traded open option contracts shall be determined with respect to the exchange on which contracted originally, i.e., traded option contracted on the National Stock Exchange (NSE) would be valued at the settlement price on the NSE. The price of the same option series on the Bombay Stock Exchange (BSE) cannot be considered for the purpose of valuation, unless the option itself has been contracted on the BSE. Thus; traded option shall be valued at the settlement price provided by the respective Stock Exchanges.
		(ii) When a security is not traded on the respective stock exchange on the date of valuation, then the settlement price / any other derived price provided by the respective stock exchange shall be considered for valuation.
		Equity / Index Futures Derivatives
		(i) Market values of traded futures contracts shall be determined with respect to the exchange on which contracted originally, i.e., traded futures position contracted on the National Stock Exchange (NSE) would be valued at the settlement price on the NSE. The price of the same futures contract on the Bombay Stock Exchange (BSE) cannot be considered for the purpose of valuation, unless the futures contract itself has been contracted on the BSE. Thus; traded futures contracts shall be valued at the settlement price provided by the respective Stock Exchanges.
		(ii) When a security is not traded on the respective stock exchange on the date of valuation, then the settlement price / any other derived price provided by the respective stock exchange shall be considered for valuation.
All OTO Derivatives Including Interest Rate	1	Irrespective of the residual maturity, securities shall be valued at average of security level prices obtained from valuation agencies.
Swaps (IRS)	/	



Asset Class	Traded / Not Traded / Listed / Unlisted	Valuation Methodology
Forward Rate Agreements		
(FRA)		
Non Investment Grade/Default		Definition: 1. Money market or Debt security shall be classified as "below investment"
Securities		grade" if the long term rating of the security issued by a SEBI registered Credit Rating Agency (CRA) is below BBB- or if the short term rating of the security is below A3.
		2. Money market or Debt security shall be classified as "Default" if the interest and / or principal amount has not been received, on the day such amount was due or when such security has been downgraded to "Default" grade by a CRA
		Valuation of Principal:
		All money market and debt securities which are rated below investment grade/Default shall be valued at the average of security level prices provided by valuation agencies.
		Till the time valuation agencies compute the valuation, such securities will be valued at the based on the indicative haircuts provided by valuation agencies. The said hair cut should be applied on the date of credit event i.e. migration of the security to sub-investment grade. Further, these haircuts shall be updated and refined, as and when there is availability of material information which impacts the haircuts based on the decision of the Valuation Committee.
		In case of any trade in such securities during the period, lower of the trade price or price post hair cut / Valuation price should be considered for valuation subject to trade size as defined by the valuation agency
		Any deviation from the hair cut or Valuation price for such securities should be approved by the Valuation Committee.
		Valuation of accrued interest/ future interest accrual
		<ul> <li>The indicative haircut that has been applied to the principal should also be applied to accrued interest.</li> <li>In case of securities classified as below investment grade but not default, interest accrual may continue with the same haircut applied to the principal.</li> </ul>
		<ul> <li>In case of securities classified as default, no further interest accrual shall be made.</li> </ul>
		Treatment for future recovery for both principal or interest:
		<ul> <li>Any recovery shall first be adjusted against the outstanding interest recognized in the NAV and any balance then shall be adjusted against the value of principal recognized in the NAV</li> <li>Any recovery in excess of the carried value (i.e. the value recognized in NAV) should then be applied first towards amount of interest written off and then towards amount of principal written off</li> </ul>
Convertible	-	Non-convertible and convertible components are valued separately.
Debentures / Bond		A. The non-convertible component shall be valued on the same basis as would be applicable to a non-convertible debt instrument.
		<ul> <li>B. The convertible component to be valued as follows: <ol> <li>Ascertain</li> <li>The number of shares to be received after conversion.</li> <li>Whether the shares would be pari passu for dividend on conversion.</li> <li>The rate of last declared dividend.</li> <li>Whether the shares are presently traded or non traded/thinly traded.</li> <li>Market rate of shares on the date of valuation</li> </ol> </li></ul>



Asset Class	Traded / Not Traded / Listed / Unlisted	Valuation Methodology
		(ii) In case the shares to be received, on the date of valuation, are thinly traded / non-traded, these shares to be received on conversion are to be valued as thinly traded / non-traded equity shares.
		<ul> <li>(iii) In case the shares to be received on conversion are not non-traded or thinly traded on the date of valuation and would be traded pari passu for dividend on conversion: <ul> <li>a) Number of shares to be received on conversion, per convertible debenture, multiplied by the present market rate</li> <li>b) Determine the discount for non-tradability of the shares on the date of valuation.</li> <li>(This discount should be determined in advance and to be used uniformly for all the convertible securities. Rate of discount should be documented and approved by the Board of AMC)</li> <li>Value = (a)*market rate [1-(b)]</li> </ul> </li></ul>
		<ul> <li>(iv) In case the shares to be received on conversion are not non-traded or thinly traded on the date of valuation but would not be traded pari passu for dividend on conversion:</li> <li>a) Number of shares to be received on conversion, per convertible debenture, multiplied by the present market rate</li> <li>b) Arrive at the market value of the shares on the date of valuation by reducing the amount of last paid dividend.</li> <li>c) Determine the discount for non-tradability of the shares on the date of valuation.</li> </ul>
		(This discount should be determined in advance and to be used uniformly for all the convertible securities. Rate of discount should be documented and approved by the Board of AMC)  Value = (a)*{b- [1- (c)]}
		<ul> <li>(v) In case of optionally convertible debentures, two values must be determined assuming both, exercising the option and not exercising the option.</li> <li>If the option rests with the issuer, the lower of the two values shall be taken as the valuation of the optionally convertible portion, and;</li> <li>If the option rests with the investor, the higher of the two values shall be taken.</li> </ul>
		At the closing traded price as on the valuation date
Unit (MFU) and ETFs	Unlisted & Listed but not Traded	At the NAV on the valuation date.
Inter Scheme Transfer	Equity and related securities	IST in Equity and related securities is restricted.
Transiei	Debt and related Securities	As per SEBI Circular SEBI/HO/IMD/DF4/CIR/P/2019/102 dated 24th Sep 2019 dated 24th September 2019. IST price for all Debt and Money market instrument will be determined based on the average of the prices so received from external Valuation Agency (CRISIL & ICRA), subject to the price received within the TAT defined by AMFI.
		In case, price from only one valuation agency is received within the agreed TAT, that price may be used for IST pricing.
		In case, prices are not received from any of the valuation agencies within the agreed TAT, valuation committee may determine the fair price for the IST.
		Till the time, the AMFI provides guidelines to TAT and arrangement is in place, we shall continue with the existing practice of determining based on the IST price received from independent agency (ICRA).



Asset Class	Traded / Not Traded / Listed	Valuation Methodology
	/ Unlisted	
Foreign Securities (Equities/ADRs/ GDRs)		<ul> <li>Foreign Securities shall be valued based on the last quoted closing price at Overseas Stock Exchange on which respective securities are listed. However, the AMC shall select the appropriate stock exchange at the time of launch of a scheme in case a security is listed on more than one stock exchange and the reason for the selection will be recorded in writing. Any subsequent change in the reference stock exchange used for valuation will be necessarily backed by reason for such change being recorded in writing by the AMC. However, in case of extreme volatility in other markets post the closure of the relevant markets, the AMC shall value the security at suitable fair value.</li> <li>When on a particular Valuation day, a security has not been traded on the selected stock exchange; the value at which it is traded on another stock exchange or last quoted closing price on selected stock exchange shall be used provided such date is not more than thirty days prior to the valuation date.</li> <li>Due to difference in time zones of different markets, in case the closing prices of securities are not available within a given time frame to enable the AMC to upload the NAV for a Valuation Day, the AMC may use the previous day price or the last available traded price as may be warranted / for the purpose of valuation.</li> <li>On valuation date, all assets and liabilities in foreign currency shall be valued in Indian Rupees at the RBI reference rate as at the close of banking hours on the relevant business day in India. For Currencies where RBI reference rate is not available, Bloomberg / Reuters shall be used. If required the AMC may change the source of determining the exchange rate.</li> <li>Non -traded ADR /GDRs shall be valued after considering prices/ issue terms of underlying security. Valuation Committee shall decide the appropriate discount for illiquidity. Non- traded foreign security shall be</li> </ul>
		<ul><li>valued by AMC at fair value after considering relevant factors on case to case basis.</li><li>Corporate Action (Foreign Security): In case of any corporate action event,</li></ul>
		the same shall be valued at fair price on case to case basis as may be determined by the Valuation Committee in consultation with Independent advisors (if required).

## Waterfall approach for valuation of money market and debt securities

The following broad principles shall be adopted by external valuation agencies as part of the waterfall approach, for arriving at the security level prices:

- All trades on stock exchanges and trades reported on trade reporting platforms till end of the trade reporting time (excluding Inter-scheme transfers), should be considered for valuation on that day.
- All traded securities shall be valued on the basis of traded yields, subject to identification of outlier trades by the valuation agencies.
- Volume Weighted Average Yield (VWAY) for trades in the last one hour of trading shall be used as the basis for valuation of Government Securities (including T-bills). Valuation of all other money market and debt securities (including Government securities not traded in last one hour) shall be done on the basis of VWAY of all trades during the day.
- An indicative list of exceptional events shall form part of the documented waterfall approach of the valuation agency. In
  case of any exceptional events on a day, only VWAY of trades post such event may be considered for valuation.
  Further, all exceptional events along-with valuation carried out on such dates shall be documented with adequate
  justification by valuation agency.
- For the purpose of Polling by valuation Agency, AMC shall follow the guidelines provided by AMFI for the polling process.
- · AMC will have a separate Policy for Polling process based on the guidelines provided by AMFI