



एस बी आई पेंशन फंड्स प्रा. लि.
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SBI Pension Funds Pvt. Ltd.

1904, 19वा मजला, बी विंग, परीनी क्रेसेन्डो, जी ब्लॉक,
बांद्रा कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुम्बई - 400 051.

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Bandra Kurla Complex, Bandra (East), Mumbai - 400 051.
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CIN : U66020MH2007GOI176787

Tel. : (022) 4214 7121

Date :

Ref. No. :

Annual Report on implementation of every Principle of the Stewardship Policy of the Company for the financial year 2022-2023

Name of the Pension Fund: SBI Pension Funds Private Limited

| Sr. No. | Principles of Stewardship Code | Whether Complied or Not | Remarks, if any |
|---------|--|-------------------------|---|
| 1 | Principle - 1: Pension Fund has formulated a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it on its website, review and update it periodically. | Complied | The Company has formulated the comprehensive Stewardship Policy on 01 st November, 2018. The same has been disclosed on the Company's website and was last reviewed on 29 th March, 2023. |
| 2 | Principle - 2: Pension Fund has a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities as guided in the circular and publicly disclose it. | Complied | Managing conflict of interest forms an integral part of the Stewardship Policy. Necessary actions proposed to be taken with respect to the conflict of interest has been detailed in the Policy. |



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| 3 | <p>Principle - 3: Pension Fund has formulated a policy on monitoring of the investee companies by ensuring different levels of monitoring in different investee companies and is engaged in monitoring of the investee companies on ongoing basis as guided in the circular.</p> | Complied | Monitoring the investee companies on an ongoing basis forms an integral part of the Stewardship Policy. The Company is monitoring the investee companies on an ongoing basis. |
| 4 | <p>Principle - 4: Pension Fund has a clear policy on intervention in their investee companies.</p> | Complied | The Company has clear policy on intervention in Investee Companies. As and when a need arises, the company has adequate mechanism in place to intervene in the management of the Investee Companies. |
| 5 | <p>Principle - 4: Pension Fund has a clear policy on collaboration with other institutional investors, where required, to preserve the interests of the ultimate investors, which should be disclosed.</p> | Complied | The Company has clear policy on collaboration with other institutional investors. As and when a need arises, the company has adequate mechanism in place to collaborate with other institutional investors. |
| 6 | <p>Principle - 5: Pension Fund has a clear policy on voting and disclosure of voting activity by taking their own voting decisions in the investee company after in depth analysis rather than blindly supporting the management decisions. PFRDA has already issued a circular dt 20.04.2017 on the matter of compliance.</p> | Complied | The Company has formulated Voting Policy on Assets held by NPS Trust. The Voting Policy on Assets held by NPS Trust was last reviewed in the Board Meeting held on March 29, 2023. Quarterly/ Annual Voting Report has been uploaded on the website of the Company and sent to NPS Trust. |
| 7 | <p>Principle - 6: Pension Fund has placed a report on implementation of every principle of common stewardship code on its website as per the periodicity decided by the Board of the Pension Fund.</p> <p>Different principles may be disclosed with different periodicities like voting may be disclosed on quarterly basis while implementation of conflict of interest may be disclosed annually and any updation of the policy may be disclosed as an when done.</p> | Complied | As mentioned in Point No 6, Voting details are uploaded on the website on the quarterly basis. Further, a report on implementation of every principle of common stewardship code is being uploaded on the website of the Company on a yearly basis. |



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| 8 | <p>Principle – 6: Pension Fund has sent annual intimation to its clients/ beneficiaries on implementation of every principle of common stewardship code.</p> | Complied | <p>The Company on a yearly basis provides scheme wise annual report and Stewardship compliance to the central recordkeeping agency for onward transmission to subscribers. Further, a report on the implementation of every principle of common stewardship code is being uploaded on the website of the Company & also being sent to PFRDA on a yearly basis.</p> |
| 9 | <p>Principle – 7: Pension Funds shall ensure that adequate training with respect to compliances under the Stewardship Policy is imparted to its personnel and employees who are part of the Investment Team.</p> | Complied | <p>The training related to Stewardship Principles for FY 2022-2023 was conducted on 10th February, 2023 by Stakeholders Empowerment Services (SES)</p> |
| 10 | <p>Principle 8: Disclosure of Change in Interest from Directors, members of Investment Committee and Key Managerial Personnel</p> | Complied | <p>The Company ensures to collect from Directors, members of Investment Committee and Key Managerial personnel details of any change in interest or concern in the Company, body corporate, firms or other association of individuals to the Pension fund in form MBP-1 on quarterly basis.</p> |



Chief Investment Officer

