



UTI ASSET MANAGEMENT COMPANY
LIMITED

FIDUCIARY DUTY POLICY
(Updated up to 19th August, 2022)

UTI AMC Limited has a fiduciary duty to maintain high standards of integrity and fairness in our conduct of business and keep the interest of all our investors paramount in all matters.

Our Code of Ethics specifically sets out principles and policies that all employees must uphold in order to satisfy our fiduciary obligations to the investors. Our policy on conflict of interest defines the obligations of employees with regards to conflicts of interest; the Code of ethics mandates all employees to attach highest importance to investor's interest in each scheme, overriding all other interest under all circumstances.

In addition to these policies, all employees are expected to act with integrity, competence, diligence and respect, and must adhere to the highest standards of professional and ethical conduct.

All employees are advised to remain fearlessly professional and honest in all office matters and communications and report any instance of breach or non-compliance to the appropriate authorities.

Relationship Managers/Client Managing Employees are trained to understand the meaning of fiduciary duties and the proper disclosures that must be made.

All employees and third-party service providers are bound to maintain absolute confidentiality regarding information relating to unit holders, investments or other constituents with whom the UTI AMC has dealings.

In addition to the strict guidelines provided by the Code of ethics, UTI AMC Limited has established policies and procedures to regulate securities transactions of employees. Further, we have policies to deal on Anti-Money Laundering, Whistle-blower and Anti-fraud and bribery.

In that respect, UTI AMC aims to exercise the degree of care, diligence and skill that a reasonably prudent investment counsel would exercise in the circumstances.

We have well laid down investment policies and procedures to govern the entire decision making and execution process in the best interest of the unitholders. We have Stewardship Code and Voting Polices to ensure effective post investment monitoring of investments.

In addition to the strict guidelines provided by the Code, UTI AMC has established policies and procedures that apply in all decision-making processes across the firm. The highest standard is always applied and UTI remains up to date on new regulatory changes relating to its fiduciary obligations.