

## Due Diligence Questionnaire

### Firm Information

#### 1. Contact Information:

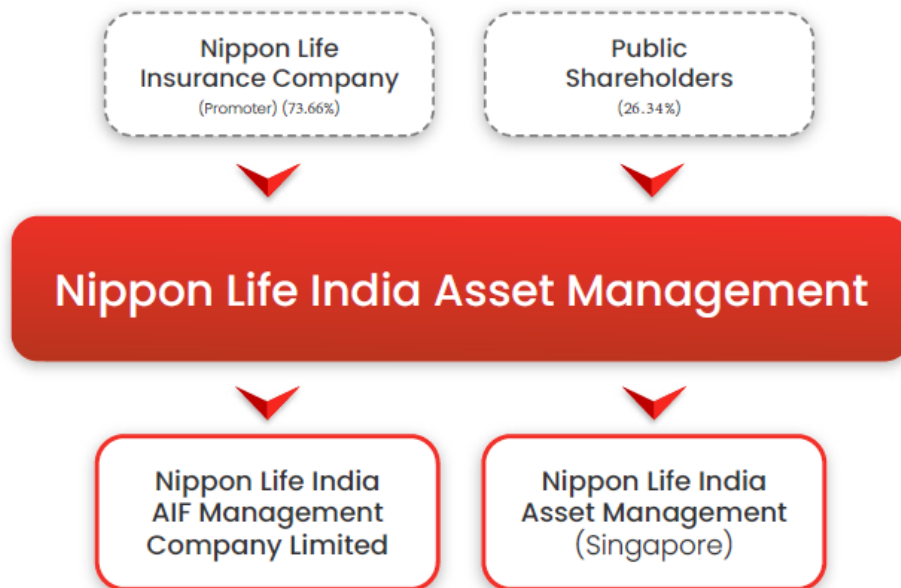
Contact Details					
	Name	Phone	E-Mail	Address	Country
<b>Main Contact</b>	Abhijit Shankar Singh	0065-81893451	abhijit.singh@nipponindiaim.com	9 Raffles Place #18-05 Republic Plaza Singapore 048619	Singapore
<b>Portfolio Manager</b>	Sulabh Jhajharia	0065-81893131	sulabh.jhajharia@nipponindiaim.com		
<b>Trading</b>	Srinivas Guptha	0065-81890548	Srinivas.Guptha@nipponindiaim.com		
<b>Operations</b>	Srinivas Guptha	0065-81890548	Srinivas.Guptha@nipponindiaim.com		
<b>Compliance and Legal Contact</b>	Philippe Cheung	0065-93870916	philippe.cheung@nipponindiaim.com		
<b>Backup Contact</b>	Priyank Agarwal	0091-8976948211	priyank.agarwal@nipponindiaim.com	4th Floor, Tower A, Peninsula Business Park, Ganapatrao Kadam Marg, Lower Parel (W), Mumbai - 400 013	India
<b>Chief Investment Officer Head of Equities</b>	Sailesh Bhan	0091-22-68087053	sailesh.bhan@nipponindiaim.com		
<b>Head of Research</b>	Ashutosh Bhargava	0091-22-68087035	ashutosh.bhargava@nipponindiaim.com		
<b>Head of Trading</b>	Anand Gupta	0091-22-68087326	anand.d.gupta@nipponindiaim.com		
<b>Head of Compliance</b>	Muneesh Sud	0091-22-68087016	muneesh.sud@nipponindiaim.com		
<b>Head of Operation Operational Contact</b>	Milind Nesarikar	0091-22-68088033	milind.s.nesarikar@nipponindiaim.com		
<b>Legal Contact</b>	Anshul Vyas	0091-22-68087229	anshul.vyas@nipponindiaim.com		

## 2. Brief history of organisation and the current ownership:

Nippon Life India Asset Management (Singapore) Pte. Ltd. (NAMS) was incorporated on 22nd August 2005 in Singapore and is a 100% subsidiary of Nippon Life India Asset Management Limited (NAM India). NAMS provides fund management services and is registered with Monetary Authority of Singapore.

The “Shareholding Pattern” is available on the exchange website as mentioned below:

<https://www.bseindia.com/stock-share-price/nippon-life-india-asset-management-ltd/nam-india/540767/shareholding-pattern/>



NAM India was incorporated on February 24, 1995, under the Indian Companies Act 1956. NAM India is constituted as an asset management company in India and is registered with the Securities and Exchange Board of India (“SEBI”) to act as an asset manager to Nippon India Mutual Fund (NIMF), a trust registered with the SEBI as a Mutual Fund. NAM India is also a portfolio manager registered with SEBI and provides portfolio management services and investment advisory services to its clients.

NAM India has been established as a trust based on the Indian Trusts Act, 1882. Nippon Life Insurance Company (NLI) is the Sponsor and Nippon Life India Trustee Ltd (NLITL) is the trustee. It has been registered with the Securities & Exchange Board of India (SEBI) with registration number MF/022/95/1 dated June 30, 1995. NAM India was formed to launch various schemes under which units are issued to the public with a view to contribute to the capital market and to provide investors the opportunities to make investments in diversified securities.

NAM India is among the fastest growing asset managers in India. It offers a well-rounded portfolio of products that meet varying requirements and constantly endeavors to launch innovative products and customer service initiatives to enhance value for its investors. In addition to this, NAM India also renders advisory services to its offshore clients and has been approved to manage and / or advise pooled assets including offshore funds, insurance funds and provident funds.

NAM India has more than 26 years of wealth creation experience and a robust distribution network spread over ~83,800 distributors and international reach through its various subsidiaries. Clientele include retail investors, financial institutions, banks, trusts, corporate and government entities.

NAM India is sponsored by Nippon Life Insurance Company (“NLI”). NLI is a 133-year-old Global Fortune 500 (Ranked 111 in 2020) company and Japan’s largest private life insurer & one of the largest in the world. NLI offers a wide range of financial products, including individual and group life and annuity policies through

various distribution channels, mainly using face-to-face sales channels for its traditional insurance products. It primarily operates in Japan, North America, Europe, Asia and Oceania.

### 3. Specify licenses to carry out its investment business the company holds:

NAM Singapore holds the capital markets license by MAS Singapore.

NAM India holds the license to carry out AMC business and primarily provides investment management services.

### 4. Total firm-wide assets by asset class, divided by equity/fixed income and mutual fund/segregated accounts, in USD:

USD Bn	Hedge Funds	Mutual Funds	Segregated Account (institutional)	Segregated Account (private)	Other	Total
Equity	-	15.34	0.80	-	-	16.14
Fixed Income	-	11.16	-	-	-	11.16
Mixed/Balanced	-	2.61	-	-	-	2.61
PE/Venture	-	-	-	-	-	-
Other	-	10.77	-	-	-	10.77

### 5. Equity portfolio managers in the firm, detailing strategies managed and total assets under management:

Portfolio Manager	Location (city)	Strategies managed	Num portf/mandates	Total AUM (USD Bn)
<b>Sulabh Jhajharia</b>	Singapore	India Multi Cap Strategies (Mandates and UCITS Fund)	2	1.1
<b>Sailesh Bhan</b>	Mumbai	Diversified Large Cap Fund, Diversified Multi Cap Fund & Sector Fund	3	4.53
<b>Ashutosh Bhargava</b>	Mumbai	Dynamic Asset Allocation, Thematic Fund, ELSS, Multi Asset Allocation, Fund of Funds, Diversified Large Cap Fund & Diversified Multi Cap Fund	9	6.46
<b>Samir Rachh</b>	Mumbai	Diversified Small Cap Fund	1	3.89
<b>Rupesh Patel</b>	Mumbai	Diversified Mid Cap Fund & ELSS Fund	2	3.48
<b>Vinay Sharma</b>	Mumbai	Sector Fund & Focused Fund	2	1.33
<b>Meenakshi Dawar</b>	Mumbai	Flexi Cap Fund, Value Fund & Aggressive Hybrid Fund	3	1.55

Portfolio Manager	Location (city)	Strategies managed	Num portf/mandates	Total AUM (USD Bn)
<b>Dhrumil Shah</b>	Mumbai	Flexi Cap Fund, Value Fund, Diversified Mid Cap Fund, Conservative Hybrid Fund & Equity Savings Fund	5	3.30
<b>Sanjay Doshi</b>	Mumbai	Sector Fund, Retirement Funds & Diversified Mid Cap Fund	4	2.59
<b>Amar Kalkundrikar</b>	Mumbai	Dynamic Asset Allocation, Diversified Large and Mid Cap Fund & Thematic Fund	3	1.30
<b>Kinjal Desai</b>	Mumbai	International Equity Funds	5	0.36
<b>Akshay Sharma</b>	Mumbai	International Equity Funds	5	0.36
<b>Tejas Sheth</b>	Mumbai	Diversified Mid Cap Fund, Diversified Small Cap Fund & Multi Asset Allocation	3	6.04
<b>Anand Gupta</b>	Mumbai	Arbitrage Fund & Equity Savings Fund	2	1.15
<b>Sulabh Jhajharia</b>	Singapore	Multi Cap, Offshore Funds and Segregated Mandate	2	1.05
<b>Aishwarya Agarwal</b>	Mumbai	Diversified Large and Mid Cap Fund	1	0.41
<b>Bhavik Dave</b>	Mumbai	Sector Fund	1	0.54
<b>Prateek Poddar</b>	Mumbai	Focused Fund	1	0.79
<b>Nikhil Rungta</b>	Mumbai	Flexi Cap Fund	1	0.54

## 6. People who will have the direct responsibility for the UCITS Equity Portfolio are:

- Sulabh Jhajharia (Fund Manager)
- Sailesh Bhan (CIO Equities)

## **Strategy Information**

### **7. A brief description of the product's investment universe, underlying investment philosophy, competitive edge and organisation of research efforts:**

#### **Investment Universe**

Investment Universe selected through intensive research using qualitative and quantitative factors:

From 5000 + stocks to ~ 450 to 500 :

- Management Quality
- Structural Industry Strength
- Business Scalability
- Business Profitability
- Strong Balance Sheet

#### **Investment Philosophy:**

The strategy follows Growth at a Reasonable Price (GARP), Multicap. Investing into High quality management teams with a time frame: 2-3 years.

Fund invests into

- Companies with good earnings growth trajectory, high ROE's, good quality management and high operating leverage.
- Companies benefiting from the strong GDP growth in India and elsewhere, managed by passionate and dynamic management.

#### **Competitive Edge:**

NAM India is the 4th largest asset manager in India with over ~USD 45 Bn assets under management with the highest investor base of 19.6 mn investor accounts and a well-established track record of equity fund management spanning over 27 years.

Strong emphasis on 'Responsible Alpha' or risk optimized Wealth creation with a 'process driven' culture. Incorporating a 3-stage approach to ensure consistently better performance across market cycles.

- 1) Enhanced Research Capabilities through a large team of 28 investment professionals across research & fund management.
- 2) Input risk controls through stringent fund casing framework involving various parameters like Risk Rating of entire universe under coverage, fund level - defined deviation ranges, targeted active share.
- 3) Output risk optimization through factor style analysis construct with targeted Tracking Error ranges to optimal risk/return possibilities.

#### **Awards and Recognition:**

- Morning Star 5 Star Rating - RAMS India Equities Portfolio Fund II - USD Institutional Class
- City Wire Middle East Best Fund Manager 2023 : Sulabh Jhajharia (Equity – India category)
- Refinitiv Lipper Fund Awards 2023 – For the USD Share Class A

## 8. The investment decisions for the product, UCITS Equity Fund is taken by:

Mr. Sulabh Jhajharia in consultation with CIO Equity Investments makes the investment decisions. These are made on the basis of the convictions of the extensive onshore research team.

## 9. Investment committee, who are the members and the role of the committee:

We have a formal Investment committee (IC) which is formed under the supervision of the Board and authorized to formulate the overall investment policies within a broad framework of local regulations and prudent principles, which are then again approved by the Board and Trustees. The IC also tracks for deviations from asset allocation and directs fund managers to take corrective action where required. All decisions of the investment committee get placed at the board meeting for ratification. The Investment Committee is authorized by the Board of Directors to supervise investments. This committee comprises of:

- CEO: Sundeep Sikka
- Head – Equities: Sailesh Bhan
- Head – Fixed Income: Amit Tripathi
- Head – Operations: Milind Nesarikar
- Head – Compliance: Muneesh Sud
- Head – Risk Management: Rishi Garg
- Fund Managers (as decided by the Head Equities and/ or Head Fixed Income)

## 10. Requirement for investment professionals to invest in the strategy:

Yes, the portfolio managers do invest in their own product. As per the Indian regulator SEBI, all the investment professionals residing in India are required to mandatorily invest 20% of their take home salary in units of the funds that are under their direct purview or management. These units are locked in for a period of three years and subject to claw-back in case of violation of the model code of conduct prescribed by AMCs and AMFI (Association of mutual funds in India). Hence, as per the regulatory requirement the mentioned guidelines are followed.

## 11. UCITS Equity portfolio construction methodology:

1. We look at minimum USD 150Mn market cap for any stock to enter our universe. There is no specific number on trading volume as lot of mid and small caps trade in blocks.
2. Currently around 30% Mid & Small Cap which can go up to 50%
3. Typically have 50% or more Active Share.
4. **Certain other characteristics of our portfolio are:**
  - a) Liquidity : 70% of AUM in 3 days and 100% of AUM in 7 days
  - b) Maximum Sector Exposure : 35% in each sector
  - c) Maximum Sector Deviation : 10% vs Benchmark
  - d) Maximum Mid Cap Single Stock : 3.5% of AUM at time of investment
  - e) Maximum Small Cap Single Stock : 2% of AUM at time of investment
  - f) Maximum Cash : 10%
  - g) Portfolio beta ~1
  - h) UCITS Regulations:
    - A) Max 10% per stock
    - B) 5:40 Rule

## 12. Total AUM (in USD) for the UCITS Equity portfolio and portfolios managed according to the same strategy:

Nippon India UCITS Multi Cap strategy has an AUM of USD 1.1 Bn as on 31<sup>st</sup> July 2023. This includes the AUM in the UCITS fund (RAMS India Equities Portfolio Fund II) and the AUM in the managed account for a Sovereign Wealth Fund.

The benchmark used for the portfolio is MSCI India - USD.

**13. Total AUM managed by the relevant portfolio manager(s), split by strategy:**

Portfolio Manager	Strategy	Number portfolios mandates	Name of largest Portfolio	Total AUM (USD Bn)
<b>Sulabh Jhajharia</b>	RAMS India Equities Portfolio Fund II and Segregated Mandate	2	Segregated Mandate	1.1
<b>Sailesh Bhan</b>	Nippon India Multi Cap Fund Nippon India Large Cap Fund Nippon India Pharma Fund	3	Nippon India Multi Cap Fund	4.53

## **Team Information**

### **14. An overview of all our investment professionals involved in the mandate applied for, including portfolio managers, analysts and traders:**

Please see the Equity Investment Team Details in the annex

### **15. Fund Manager(s) and his/her team remuneration, criteria are any bonus payments and the share of the bonus in total compensation:**

As a long-term attrition control measure and ensuring smooth business operations, we have a strategic and focussed approach on the key aspects of employee experience at NAM India, namely, organization's agility, engaging leadership, talent focus, enriching work assignments, career development, learning, culture and well-being. We are always committed to build an ecosystem with a fine balance between focus on business excellence and people & culture!

Added with the above areas of employee experience and also ensuring fair, competitive and performance driven total rewards philosophy, we make sure that all our key and critical talent is taken care of with an all-round and holistic employee experience while they are associated with NAM India.

The measure of performance is metric driven, and we take into account both short-term and long-term metrics. The short-term metrics range within a year and long-term metrics range within a time horizon of 1-3 years typically. Their Compensation is reviewed yearly depending upon the Department & Company performance. Likewise, **Bonus** is paid basis the **Individual & department performance**. Bonus is paid on a yearly basis. we provide Long term Incentive Plan to our key talent. This includes ESOPs and Phantom Stocks. Fund Managers are covered under the ESOP Plan and have been granted **NAM India ESOPs**. The bonus pay-out is a performance linked incentive scheme and hence the rate/percentage of the same is decided, objectively, per the performance ratings for the PMs. The performance measurement, in itself, is a scientific process and objective and KPI based which takes into account the key performance outputs and in line with organization's objective and aspirations from the role.

### **16. A brief biography of the investment professionals with direct involvement for this product:**

#### **Portfolio Manager – Sulabh Jhajharia**

Has over 18 years' experience with 16 years' experience in Indian equities, is currently managing the UCITS and one Managed Account portfolios for NAM Singapore.

Has been with the organization since its inception in Singapore and has been through the whole life cycle of its India India Equity Growth Fund(IEGF), where he played a key role in fund management and research functions Has worked in Citibank Global Consumer Investments group and with Infosys Technologies on various assignments for financial institutions.

Holds an MBA in Finance from NUS Business School, Singapore and has a B Tech in Computer Engineering from IP University, Delhi He is also a CFA charter holder.



**SAILESH RAJ BHAN - CIO - Equities Nippon Life India Asset Management Ltd.**

Qualifications: MBA Finance, Osmania University, Hyderabad

Chartered Financial Analyst (CFA) ICFAI, Hyderabad

BSc. With specialization in Genetics, Osmania University, Hyderabad

Experience:

Sailesh Raj Bhan has over 26 years of Experience in Equity Research and Fund Management in India.

He has been associated with Nippon Life Asset Management Limited managing several funds since 2003.

Fund Management:

He manages the flagship diversified equity schemes like Nippon India Multi Cap Fund (previously Nippon India Equity Opportunities Fund) - a strategy with assets of over `10,000cr (\$1.3bn) since its inception in March 2005 and Nippon India Large Cap Fund (previously Nippon India Top 200 Fund) – with assets of over `11000cr (over \$1.4bn) since its inception 2007.

Sailesh also manages the Largest Pharma Sector Fund in India since its inception 15 years back in May 2004 and advises on international mandates for some strategies for the last 5 year.

Total Work Experience:

2001-2003 Emkay Share and Stock Brokers Pvt. Ltd, Mumbai (NSE and BSE broking house) Head - Research

1996-2001 Shah & Sequeira Investment Advisory Services Pvt. Ltd, Mumbai (Research arm of NSE (Arcadia share and stock brokers) and BSE broking house (Kaushik Shah Shares and Securities) - Research Analyst

1995-1996 ICFAI- Securities Research Center Analyst – Equity Research

ICFAI securities Research Centre - Hyderabad. (A research outfit focused on Securities analysis and industry research) - Research Analyst

### ANNEX - Equity Investment Team Details

S No.	Name	FUNCTIONAL DESIGNATION	DOJ	Nippon Experience	Total Experience	Sector
1	Sailesh Bhan	CIO - Equity Investments	19/Nov/2003	19	27	Diversified Large & Mid caps
2	Ashutosh Bhargava	Head - Equity Research & Fund Manager	08/Oct/2007	15	18	Strategy, Macro, Quant, Asset Allocation, ESG
3	Samir Rachh	Fund Manager- Equity	15/Oct/2007	15	32	Small Caps
4	Anand Devendra Gupta	Vice President - Dealing (Equity) & Fund Manager	28/Feb/2008	15	30	Dealer
5	Sanjay Doshi	Fund Manager- Equity	01/Feb/2011	12	19	Engineering, capital goods, Defence
6	Rohit Hashmukh Shah	Dealer - Equity	12/Dec/2012	10	12	Dealer
7	Kinjal Desai	Fund Manager- Overseas Investments	15/Dec/2012	10	10	FMCG, Building Materials (Ex cement), Media, Fund Manager - Overseas, Pipes (Plastics)
8	Aishwarya Deepak Agrawal	Senior Research Analyst & Fund Manager	20/Nov/2013	9	23	Oil & Gas, Telecom, Metal, Hotels
9	Bhavik Dave	Co-Fund manager - Equity and Research Analyst	30/Sep/2014	8	11	Financials, Business Services, Real Estate
10	Tejas Sheth	Research Analyst - Equity & Co - Fund Manager	09/Feb/2015	8	18	Agri Inputs, Chemicals, Select Mid Cap and Small Cap
11	Akshay Sharma	Fund Manager - Investment Overseas	23/May/2016	7	7	Quant & Data, Textiles. Packaging, Paper, Fund Manager - Overseas
12	Meenakshi Dawar	Fund Manager- Equity	01/Mar/2017	6	14	Diversified Large & Mid caps

S No.	Name	FUNCTIONAL DESIGNATION	DOJ	Nippon Experience	Total Experience	Sector
13	Vikram Dhawan	Fund Manager-Commodities	16/Oct/2017	5	29	Commodities
14	Dhrumil Gautam Shah	Co - Fund Manager	01/Feb/2018	5	17	Mid Cap
15	Akash Surendra Pipara	Associate Research Analyst	20/Mar/2018	5	5	Agri Inputs, Chemicals, Cement, Cap goods
16	Vinay Sharma	Fund Manager-Equity	02/Apr/2018	5	19	Financials, Diversified Large & Mid caps
17	Prateek Poddar	Research Analyst & Co - Fund manager	10/Sep/2018	5	10	Auto, Non Lending Financials
18	Nikhil Vijay Rungta	Research Analyst - Equity & Co-Fund Manager	25/Mar/2019	4	15	Auto, Auto anc, chemicals, financials
19	Lokesh Maru	Research Associate	17/Feb/2020	3	7	Quant & Data, ESG, Sugar, Luggage, Home furnishing and other agro commodities stocks
20	Ritesh Nathmal Rathod	Research Analyst	16/Mar/2020	3	17	IT, Pharma
21	Amar Kalkundrikar	Senior Fund Manager - Equity	21/Sep/2020	3	21	Retail, Consumer durables
22	Rupesh Patel	Senior Fund Manager - Equity	15/Jun/2021	2	24	Large and Mid caps
23	Herin Visaria	Dealer - Equity	01/Sep/2021	2	15	Dealer
24	Amber Singhania	Research Analyst - Equity	01/Sep/2021	2	19	Engineering, Capital goods, Cons electricals, Cement
25	Rishit Bipin Parikh	Research Analyst - Equity	11/Oct/2021	1	9	Internet / New Age tech, Exchange, Diagnostics, Hospitals, Airlines
26	Advait Pratap Lath	Senior Executive - Investment Research	04/Jul/2022	1	1	ESG research
27	Rahul Modi	Research Analyst - Equity	08/Feb/2023	0	10	Logistics, Power & Utility, Infrastructure, Building construction
28	Sulabh Jhajharia	Portfolio Manager - Offshore Funds	23/Apr/2007	16	18	Multi Cap, Offshore Funds and Segregated Mandate