

UTIPFL/PFRDA/O-UR- 078//2025-26

Annual Reporting on compliance status of Common Stewardship Code

Name of the Pension Fund: UTI Pension Fund Limited

Period of Reporting: 1st April, 2024 to 31st March, 2025

S.No	Particulars of Principles of Stewardship Code	Status of Compliance (Complied/Not Complied)	Relevant details like steps taken, formulation of a policy , date of formulating policy, date of updation, etc.	Remarks/reasons for deviation/non-compliance, if any.
1	<u>Principle 1:</u> 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	<p>UTI Pension Fund Limited has formulated the Common Stewardship Code and Corporate Governance Policy on 22nd October, 2019.</p> <p>The Common Stewardship Code is reviewed annually by the Board of the Pension fund and was last reviewed on 22nd January 2025. The updated version of the Common Stewardship Code has been publicly disclosed on the Company's website.</p> <p>The pension fund also ensures that adequate training is provided to personnel involved in implementation of stewardship principles.</p>	Not Applicable
2	<u>Principle 2:</u> 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	<p>Policy on Conflict of Interest has been formulated and publicly disclosed as part of common stewardship code.</p> <p>The Pension fund has also reported to the authorities all changes in interest in timely manner.</p> <p>Further, to abide by the Guidelines issued on Self dealing, Front Running and Insider Trading, the declarations of the Directors, Employees having access to Investment decisions & KP's of the Pension fund, are collected and reviewed on quarterly basis and any instances of actual/potential conflict of interest that may have arisen during the period, are reported to the Board and the Authority.</p> <p>During the year, no such instances of on Self dealing, Front Running and Insider Trading were reported. However, in quarter ended June 2024,</p>	Not Applicable

			<p>there were two instances where the proper procedure for obtaining pre-clearance was inadvertently missed by an employee and by an independent director.</p> <p>PFM believes that the number of shares traded by the aforementioned personnel were not substantial. Additionally, the aforementioned personnel were not privy to the decisions made by the investment team.</p> <p>A report on the matter was also submitted to the Board and the Authority.</p>	
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	<p>Policy on monitoring investee companies has been formulated and publicly disclosed as part of common stewardship code.</p> <p>Investee companies are being continuously reviewed & monitored on an ongoing basis for various developments/corporate actions as well as operating performance.</p>	Not Applicable
4	<p>Principle 4: Pension Fund has a clear policy on intervention in their investee companies.</p>	Complied	<p>Policy on intervention in their investee companies has been formulated and publicly disclosed as part of the common stewardship code.</p> <p>The issues wherein they have intervened and/or collaborated with other investors have been shared with the authority on quarterly basis.</p>	Not Applicable
5	<p>Principle 4 : Pension Fund has a clear policy on collaboration with other institutional investors, where required to preserve the interest of the ultimate investors which should be disclosed.</p>	Complied	<p>Policy on collaboration has been formulated and publicly disclosed as part of common stewardship code.</p>	Not Applicable
6	<p>Principle 5 : Pension Fund should have 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 dated 20.04.2017 on the matter of Compliance.</p>	Complied	<p>UTI Pension Fund Limited has formulated the Voting Policy on Assets held by NPS Trust.</p> <p>The disclosure of voting activity has been done separately and is publicly disclosed on the website and also sent to the NPS Trust on quarterly basis.</p> <p>(Reporting of the Quarterly E Voting</p>	Not Applicable

			count, Quarterly E Voting summary, Annual E Voting count and Annual E Voting summary has been discontinued by NPS w.e.f Q2 of FY 2024- 2025)	
7	<p><u>Principle 6:</u></p> <p>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 Policy may be disclosed as and when done.</p>	Complied	Report on implementation of every principle of the stewardship code is uploaded on the website of the Company on Annual basis.	Not Applicable
8	<p><u>Principle 7:</u></p> <p>The Pension Fund has sent annual intimation to its clients/beneficiaries on implementation of every principle of common stewardship code.</p>	Complied	Report on implementation of the stewardship principles are periodically reported to NPS Trust and PFRDA. The same is also publicly available for clients/beneficiaries on the website of the Company. Report on implementation of every principle of Stewardship activities is also forwarded to subscribers on annual basis through CRA.	Not Applicable

FOR UTI PENSION FUND LIMITED



BALRAM P. BHAGAT
CHIEF EXECUTIVE OFFICER & WHOLE TIME DIRECTOR
DATE: 09/04/2025
PLACE: MUMBAI