



Annual status of compliance with Stewardship Principles as per the common stewardship code issued by the Authority dated 4th May, 2018 or as may be amended from time to time

Name of the Pension Fund: Tata Pension Management Private Limited

Period of report: FY 2022-23

S. No.	Particulars of principles of Stewardship code	Status of compliance (complied/ not complied)	Relevant details like steps taken for formulation of a policy, date of formulating the policy , date of updation, etc.	Remarks/ reasons for deviations/ non-compliance, 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 a comprehensive policy on the discharge of their stewardship responsibilities. The Policy was approved in the Board Meeting held on 28 th June, 2022 and will be reviewed annually in the ensuing Board Meeting to be held in July, 2023. The Policy has been uploaded on the Website of the Company.	-
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	The Company has a clear policy on managing conflict on interest.	-

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			Forms MBP-1 are taken at the start of the financial year and as and when there is any change in the disclosures already made. No instances of actual/ potential conflict of interests during the quarter.	
3	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.	Complied	The Company has a clear 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.	-
4	Principle - 4 = Pension Fund has a clear policy on intervention in the investee companies.	Complied	The Company has a clear policy on intervention in the investee companies.	-
5	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.	Complied	The Company has a clear policy on collaboration with other institutional investors, where required. No instances of intervention or collaboration with other investors during the quarter.	-
6	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	Complied	The Company has a clear policy on Voting. The Quarterly voting report, Annual Summary of Proxy Voting undertaken by the Pension Fund, Auditors certification on voting activities, will be uploaded on the website before 30 th April, 2023.	-



	dt 20.04.2017 on the matter for compliance.			
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 policy may be disclosed as and when done.</p>	Complied	The Annual report on implementation of every principle will be uploaded on the website before 30 th April, 2023.	-
8	<p>Principle - 6 = The Pension Fund has sent annual intimation to its clients/ beneficiaries on implementation of every principle of common stewardship code.</p>	Complied	The annual intimation to its clients/ beneficiaries on implementation of every principle of common stewardship code will be sent before 30 th April, 2023.	-


Ravikant Rathore
 Chief Investment Officer




Tejas Mehta
 Compliance Officer