

Deutsche Asset Management India Private Ltd

Investment Valuation Policy and Procedures

effective 1st July 2012

Background

The valuation norm, methodology and principles for valuation of investments by Mutual Funds are defined in the Eighth Schedule to the Securities and Exchange Board of India (Mutual Funds) Regulations 1996, along with circulars issued by Sebi from time to time.

Securities and Exchange Board of India (SEBI) vide circular No. Cir/IMD/DF/6/2012 dated February 28, 2012 and Gazette Notification No. LAD-NRO/GN/2012-12/38/4290 dated Feb 21, 2012 amended SEBI (mutual Funds) Regulations, 1996. One of the amendments pertains to the Valuation of investments encompassing the Principles of Fair Valuation. The essence of these amendments is the departure from the earlier prescriptive approach to principles of fair valuation to ensure that valuation methodology provides fair treatment to all investors – existing, new and those exiting.

Prior to this amendment, Schedule Eighth of SEBI MF Regulation and various circulars issued from time to time provided detailed guidelines on valuation of traded securities, non-traded securities, thinly traded securities, etc.

The amendment also states that in case of any conflict between the principles of fair valuation and guidelines as per Eighth Schedule and circulars issued by Sebi, the Principles of Fair Valuation shall prevail.

Principles of Fair Valuation

As per the amended regulation, the overarching principles that shall be followed by the Asset Management Companies for valuation of its investments are:

- The valuation of investments shall be based on the principles of fair valuation i.e. valuation shall be reflective of the realizable value of the securities/assets.
- The valuation shall be done in good faith and in true and fair manner through appropriate valuation policies and procedures
- The policies and procedures approved by the Board of the asset management company shall identify the methodologies that will be used for valuing each type of securities/assets held by the mutual fund schemes.
- Investment in new type of securities/assets by the mutual fund scheme shall be made only after establishment of the valuation methodologies for such securities with the approval of the Board of the asset management company.
- The assets held by the mutual funds shall be consistently valued according to the policies and procedures.
- The policies and procedures shall describe the process to deal with exceptional events where market quotations are no longer reliable for a particular security.

- The asset management company shall provide for the periodic review of the valuation policies and procedures to ensure the appropriateness and accuracy of the methodologies used and its effective implementation in valuing the securities/assets.
- The valuation policies and procedures shall be regularly reviewed (at least once in a Financial Year) by an independent auditor to seek to ensure their continued appropriateness.
- The valuation policies and procedures approved by the Board of Asset Management Company should seek to address conflict of interest.
- Disclosure of the valuation policy and procedures approved by the Board of the asset management company shall be made in Statement of Additional Information (SAI), AMC / MF website and at any other place as may be specified by Sebi.
- The responsibility of true and fairness of valuation and correct NAV shall be of the asset management company, irrespective of disclosure of the approved valuation policies and procedures.
- Any deviation from the disclosed valuation policy and procedures may be allowed with appropriate reporting to Board of Trustees and the Board of the asset Management Company and appropriate disclosures to investors.
- In case of any conflict between the Principles of Fair Valuation as detailed above and Valuation Guidelines issued by the Board hereunder or elsewhere, the Principles of Fair Valuation detailed above shall prevail.

AMFI had issued best practice guidelines circular No. 29/2012-13 dated May 15, 2012 on Valuation Principles for valuing Debt and Money Market Instruments. The same have been considered while framing this Valuation policy.

Deutsche Asset Management – Investment Policy Coverage

This Valuation Policy of Deutsche Asset Management India Pvt Ltd covers the following:

1. Valuation methodologies for all types of securities.
2. Inter-scheme transfers
3. Role of the Valuation Committee
4. Handling conflict of interest
5. Exceptional events
6. Record Keeping

1. Valuation methodologies

The methodology that will be followed for valuing different types of securities held by the schemes of Deutsche Mutual Fund is given in ‘Annexure A’

In case of any new security not covered by the present universe in Annexure, A, the valuation methodology for the same will be laid down with the approval of the board of the Deutsche Asset management India Pvt Ltd (DeAM)

2. Inter-scheme transfers

All the Inter-scheme transfers shall be done as per current policy viz. at prevailing market price.

Annexure A describes the methodology that is followed in arriving at the fair valuation of securities which are intended to be transferred from one scheme to another.

3. Role of Valuation Committee

DeAM Valuation committee currently comprises the following personnel:

- ❖ CEO
- ❖ COO
- ❖ CIO
- ❖ Head of Fixed Income
- ❖ Head of Compliance and Company Secretary
- ❖ Head of Operation
- ❖ Representative from Finance function

The CEO can reconstitute or nominate additional members of the valuation committee.

The broad role of the Committee is to:

- Define valuation procedure and methodology for different types of securities
- Review, approve and recommend the valuation policy/ procedures to the AMC board and Trustee Board for their approval and noting
- Review the policy and procedures on a periodic basis, at least once annually.
- Review and approve valuation methodologies at least annually or more frequently based on market condition
- Act as escalation body for pricing/ valuation issues, addressing areas of potential conflicts of interest
- Review and approve Asset Specific issue such as liquidity, stale price, valuation changes and the Non-performing Assets.
- Review and approve the spread adjustment in the value of asset based on liquidity and issuer risk consideration.
- Review MIS to provide oversight on exceptions such as missing prices, stale prices, big movers, tolerance check and trade V/s price comparison.
- Recommend valuation method during exceptional events
- Recommend valuation methodology for a new type of security to the AMC Board
- Reporting any deviation to valuation to the AMC Board / Trustees and disclosure to the investors

4. Handling conflict of Interest

The valuation committee shall be responsible for ongoing review of areas of conflict and should recommend to the DeAM board the procedures to mitigate it.

5. Exceptional Events

Following are the some of the events that can broadly be classified as exceptional events:

- a. Major policy announcements by the Central Bank, the Government or the Regulator.
- b. Natural disasters or public disturbances that force the markets to close unexpectedly.
- c. Absence of trading in a specific security or similar securities
- d. Significant volatility in the capital markets
- e. Severe liquidity issue in the market
- e. Any other events where realizable value may be substantially different from benchmark based prices obtained.

The Valuation Committee shall be responsible for monitoring exceptional events and recommending appropriate valuation methods under the circumstances.

Further, the Valuation Committee shall seek the guidance of the AMC board in deciding the appropriate methodology for valuation of affected securities.

Deviations from the valuation policy and principles, if any, will be communicated to the unit holders' wide suitable disclosures on the fund website.

6. Record keeping

This policy document will be updated in SID / SAI, AMC website and other documents as prescribed by the SEBI regulations and guidelines.

All the documents which form the basis of valuation including inter-scheme transfers (the approval notes & supporting documents) shall be maintained in electronic form or physical papers.

Above records shall be preserved in accordance with the norms prescribed by the SEBI regulations and guidelines.

Annexure A

Following are the broad valuation methodology for each type of securities.

1. Equity and related securities

Equity Shares, Preference Share, Equity Warrants	
Traded	At the last quoted closing price on the Bombay Stock Exchange (BSE)/ National Stock Exchange (NSE) or other stock exchange, where such security is listed. If not traded on the primary stock exchange, the closing price on the other stock exchange will be considered. BSE will be the primary stock exchange.
Non Traded	<ol style="list-style-type: none"> 1. When a security is not traded on any stock exchange, on the date of valuation, then the previous closing price on BSE / any other Stock Exchange will be used, provided such closing price is not earlier than a period of 30 calendar days. 2. In all other cases, the valuation methodology will be as under: <ol style="list-style-type: none"> a. Equity Shares non traded and not listed: Valuation will be computed in accordance with the method prescribed under SEBI (MF) Regulations. (i.e. on the basis of average of book value and the price computed on the basis of the PE ratio (after appropriate discount to Industry PE), further discounted for illiquidity) b. Preference Shares: Intrinsic value will be considered c. Equity Warrants / Rights entitlement / partly paid up rights shares: Valuation price will be arrived at, after applying appropriate discount after reducing the exercise price / issuance price from the closing price of the underlying cash equity security. d. Demerger: Where at least one resultant company is not immediately listed, valuation price will be arrived at by using cum-price, before demerger reduced for quoted price of the listed resultant company(s). In case of a demerger pending listing, the resultant company/ies shall be valued at the intrinsic value arrived at on the date of corporate action e. Merger/ Amalgamation or any other corporate action The specific security valuation will arrived at, after considering the nature of corporate action. <p>In all the cases above, and also for other equity related instruments and corporate actions, valuation of the security will be pre-approved by Valuation Committee.</p>

Thinly Traded	<p>Valuation will be computed in accordance with the method prescribed under SEBI (MF) Regulations. i.e. on the basis of average of book value and the price computed on the basis of the PE ratio (after appropriate discount to Industry PE), further discounted for illiquidity.)</p> <p>Definition of thinly traded equity/ equity related security: When trading in an equity/equity related security in a calendar month is both less than INR 5 lacs and the total volume is less than 50,000 shares, it shall be considered as a thinly traded security</p> <p>In case of above, valuation of the security will be approved by Valuation Committee.</p>
Futures and Options	
Traded	On the valuation day, at the settlement price provided by the respective stock exchanges.
Non Traded	When a security is not traded on the respective stock exchange on the date of valuation, then the settlement price / any other derived price provided by the respective stock exchange.

2. Fixed Income and related securities

- **Traded Instruments**

All the securities will be valued at traded yield / price if the same security is traded by AMC or were traded on any public platform.

The traded yield / price will be used only if the following criteria are met.

Residual Maturity	For Trades reported on Public Platform	For trades done by the AMC
For Instruments maturing above 1 year	At least two trades, aggregating to Rs. 25 crores or more.	The aggregate value of trades should be Rs. 5 crore or more.
For Instruments maturing greater than 91 days (60 days from 30 Sep 2012) and up to 1 year	At least three trades, aggregating to Rs. 100 crores or more.	The aggregate value of trades should be Rs. 5 crore or more.
For Instruments maturing up to 91 days (60 days from 30 Sep 2012)	At least three trades, aggregating to Rs. 100 crores or more.	The aggregate value of trades should be Rs. 5 crore or more.

The weighted average yield will be considered as the traded yield. In case of forward settlement dates, traded yield shall to be considered for valuation.

Where both the market and the AMC trades qualify, market trade will be considered for the traded price.

In case of multiple platforms reporting trades on the same day, the order of preference will be FIMMDA, NSE WDM and BSE. The qualifying criteria will be at exchange/platform level.

- **Non Traded Instruments**

All the securities which are not traded or traded but do not qualify as traded (not falling in the above criteria) will be valued as under:

Instruments maturing up to 91 days (60 days from 30 Sep 2012)

Securities will be amortized from purchase price/ last traded price on straight line amortization as long as their valuation remains within $\pm 0.10\%$ band of the price derived from the reference price for each bucket. The reference price shall be obtained from the Bond Valuer. The Valuation Committee or its subcommittee would ensure that the difference between valuation price and reference price is within $\pm 0.10\%$.

Where an instrument is purchased for the first time, the credit spread for the purpose of valuation would be fixed at the time of purchase. Such spread shall be difference between the purchase yield and the benchmark yield with no cap prescribed for illiquidity discount or premium. This credit spread may be changed based on factors like primary market supply, significant trading activity in the secondary market in same or similar assets, change in the credit rating or profile of the issuer or prospect of a significant credit event etc. The detailed justification for such price adjustment shall be documented and the same will be approved by CEO. The Valuation Committee shall also review it in its periodical meetings.

The existing methodology of using amortization will be continued till the availability of reference price from the Bond Valuer.

Instruments maturing above 91 days (60 days from 30 Sep 2012)

Security will be valued at a price arrived by using Crisil Bond Valuer (CBV). The Fund Manager (FM) will review the price determined by CBV. If the price is not reflective of current market yield, then a spread adjustment may be recommended.

Where an instrument is purchased for the first time, the credit spread for the purpose of valuation would be fixed at the time of purchase. Such spread shall be difference between the purchase yield and the benchmark yield with no cap prescribed for illiquidity discount or premium. This credit spread may be changed based on factors like primary market

supply, significant trading activity in the secondary market in same or similar assets, change in the credit rating or profile of the issuer or prospect of a significant credit event etc. The detailed justification for such price adjustment shall be documented and the same will be approved by CEO. The Valuation Committee shall also review it in its periodical meetings.

3. Other types of securities

Following methodology shall be adopted for valuation of other types of securities:

- a. Government Securities and State Government Securities of any tenor would be valued at the average of the prices provided by the agencies nominated by AMFI (currently CRISIL & ICRA) on a daily basis.
- b. Treasury bills
 - With residual maturity > 91 days
It would be valued at the average of the prices provided by the agencies nominated by AMFI (currently CRISIL & ICRA) on a daily basis.
 - With residual maturity < 91 days
In case if they are traded - at weighted average traded yield available on NDS-OM. The criteria for considering traded price will be at least 3 trades of aggregating to Rs. 100 crores or more and in case of AMC's own trade, aggregate value of trades should be 5 crores or more.

In case they are not traded - the same will be valued on a straight line amortisation basis from the last traded price / purchase price whichever is more recent.
- c. Units of Mutual Funds will be valued at the last available NAV
- d. Following assets will be valued at cost plus accruals / amortization
 - Fixed Deposits
 - CBLO/ Reverse Repo
 - Bill Rediscounting
 - Cash Management Bills

Inter Scheme Transfer

The Fund Manager shall check the traded price of the same or similar securities available on public platform before concluding inter scheme transfers. All inter-scheme transfer shall be done at weighted average YTM, which will be calculated as under:

Same Security: All trades in same security irrespective of the amount will be aggregated on the public platform. If there are no trades other than the AMC's own trade, then the AMC's trade shall be considered only if the size is Rs.5 crore and more. If there are no trades in same security, then similar securities will be considered.

Similar Securities: All trades in similar securities on the public platform will be aggregated for similar securities on a public platform. If there are no trades other than AMC's own trade, then the AMC's trade shall be considered only if the size is Rs.5 crore and more.

Criteria for identifying the similar securities:

For the purpose of valuation, similar security shall be identified by the following means:

Step 1

- Same issuer with maturity date within ± 5 days for securities with residual maturity ≤ 91 days and within ± 30 days for securities with residual maturity > 91 days of security shall be considered first. If no such instance is available, then Step 2 shall be followed.

Step 2

- Similar security from a different issuer within the same category (PSU Bank, Private Bank or Financial Institution etc) and similar credit rating (both Short term and long term), with maturity date within ± 5 days for securities with residual maturity ≤ 91 days and within ± 30 days for securities with residual maturity > 91 days, provided the maturity dates are within the same calendar quarter.

If there are no trades (including AMC's own trade) in same or similar security on a public platform at the time of inter-scheme transfer, then the Transfer shall be done at last valued price.

Note:

Outlier trades, if any, shall be ignored after suitable justification by Fund Managers is provided