

## UNIFI ASSET MANAGEMENT PRIVATE LIMITED

### DETAILS OF PENALTIES, PENDING LITIGATION OR PROCEEDINGS, FINDINGS OF INSPECTIONS OR INVESTIGATIONS FOR WHICH ACTION MAY HAVE BEEN TAKEN OR IS IN THE PROCESS OF BEING TAKEN BY ANY REGULATORY AUTHORITY

[During the last five financial year wherever the amount of penalty is more than Rupees 5 lakh]

- 1) All disclosures regarding penalties and action(s) taken against foreign Sponsor(s) may be limited to the jurisdiction of the country where the principal activities (in terms of income/revenue) of the Sponsor(s) are carried out or where the headquarters of the Sponsor(s) is situated.

**NIL**

- 2) In case of Indian Sponsor(s), details of all monetary penalties imposed and/ or action taken during the last five financial years or pending with any financial regulatory body or governmental authority, against Sponsor(s) and/ or the AMC and/ or the Board of Trustees/Trustee Company; for irregularities or for violations in the financial services sector, or for defaults with respect to shareholders or debenture holders and depositors, or for economic offences, or for violation of securities law. Details of settlement, if any, arrived at with the aforesaid authorities during the last five financial years shall also be disclosed.

- i. Penalties imposed by a financial regulatory body or government authority against the Sponsor and / or the AMC and / or the Board of the Trustees, for irregularities / violations in the financial services sector, or for defaults with respect to shareholders or debenture holders and depositors, or for economic offences, or for violation of securities law, during the last five financial years:

#### **Sponsor:**

Unifi Capital Private Limited ("Unifi") additionally acts as an investment manager of Unifi AIF ("Fund/Trust"), a Category III Alternative Investment Fund ) registered with SEBI under the SEBI (AIFs) Regulations, 2012 ("AIF Regulations"). Following an inspection of the Trust, conducted by SEBI for the period 2020-2021, an Administrative Warning Letter dated May 11, 2022 ("AWL") was issued in relation to certain non-compliances of the AIF Regulations, followed by a Show Cause Notice dated October 19, 2022 ("SCN") issued against Unifi, Unifi's directors and the trustees of the Trust. Appropriate responses to the AWL and SCN were filed along with settlement applications for all the respondents thereunder. On August 01, 2023, vide Settlement Order No SO/BS/DP/2023-24/7057-7064, SEBI accepted the settlement application filed on a consolidated basis for all respondents. The matter remains closed.

#### **Unifi AMC: NIL**

- ii. For irregularities or for violations in the financial services sector, or for defaults with respect to shareholders or debenture holders and depositors, or for economic offences, or for violation of securities law: **NIL**

- 3) Details of all enforcement actions taken by SEBI in the last five financial years and / or pending with SEBI for the violation of SEBI Act, 1992 and Rules and Regulations framed there under including debarment and / or suspension and / or cancellation and / or imposition of monetary penalty / adjudication / enquiry proceedings, if any, to which the Sponsor(s) and / or the AMC and / or the Board of Trustees / Trustee Company and / or any of the directors and / or key personnel (especially the fund managers) of the AMC and Trustee Company were / are a party. The details of the violation shall also be disclosed.

**NIL**

- 4) Any pending material civil or criminal litigation incidental to the business of the Mutual Fund to which the Sponsor(s) and / or the AMC and / or the Board of Trustees / Trustee Company and / or any of the directors and / or key personnel are a party should also be disclosed separately.

**NIL**

- 5) Any deficiency in the systems and operations of the Sponsor(s) and / or the AMC and / or the Board of Trustees / Trustee Company which SEBI has specifically advised to be disclosed in the SID, or which has been notified by any other regulatory agency, shall be disclosed.

**Sponsor:**

Following an inspection of the books of accounts and other records relating to the PMS operations conducted by SEBI for the period April 01, 2019 to June 30, 2022, vide letter dated February 28, 2023, SEBI had observed two instances of deficiencies pertaining to non-compliance with PMS and other related SEBI regulations. SEBI has warned and advised the Company to be cautious and ensure strict compliance of the provisions of the SEBI Act, Regulations, and the directives/circulars issued from time to time while carrying out PMS activity. As a corrective action, the Company has put additional processes/systems in place to ensure such instances are not repeated. The matter remains closed.

SEBI issued a deficiency letter based on the offsite inspection data submitted for the period from April 2023 to September 2023, identifying two procedural deficiencies related to PMS operations within the submitted data. We have provided an action taken report clarifying the rectifications of the observed deficiencies as response. SEBI has not taken further action, and the matter is now considered closed.

**Unifi AMC: NIL**

Date: February 21, 2025