

NPS TRUST A/C - MAX LIFE PENSION FUND MANAGEMENT LIMITED

SCHEME G TIER I

Schedule 7

Significant accounting policies & notes to accounts for the Half Year ended March 31, 2023

1.1 Background

Max Life Pension Fund Management Ltd., (MLPFML) a Company incorporated under the Companies Act, 2013, and a subsidiary of Max Life Insurance Limited was appointed as a Pension Fund Manager (PFM) by the Pension Fund Regulatory and Development Authority (PFRDA) for the management of Pension Fund and for this purpose it has entered into Investment Management Agreements (IMA). As per unbundled architecture of the NPS Trust, the main responsibility of the PFM is to manage funds in accordance with the laid down guidelines and declare NAV. The PFM manage funds of subscribers till attaining the age of superannuation / death / voluntary withdrawal, whichever is earlier.

As per the architecture, Protean eGovernance Infrastructure Ltd., KFin Technologies Private Limited, and Computer Age Management Services Limited being the Central Recordkeeping Agencies (CRAs) provides consolidated data to PFM for allotment/redemption of units and Axis Bank Ltd., being the Trustee Bank, provides/receive funds on consolidated basis in respect of such allotment/redemption.

Central Record Keeping Agency (CRA): Protean eGovernance Infrastructure Ltd., KFin Technologies Private Limited, Computer Age Management Services Ltd and PFRDA have set up Central Recordkeeping Agency (CRA) for the NPS.

Some of the key responsibilities of the CRA include the following:

- Record keeping, Administration and Customer service function for NPS subscriber,
- Providing Unique Permanent Retirement Account Number (PRAN) to each subscriber,
- Maintaining database of all PRANs issued and recording transactions relating to each subscriber's PRAN,
- PRAN Transaction Statement,
- An operational interface between PFRDA and other NPS intermediaries such as Pension Funds, Annuity Service Providers, Trust Bank etc.

CRA is responsible to resolve all queries pertaining to investors. CRA informs about the fund flow to Pension Fund Managers (PFM) and also instruct Axis Bank to credit PFM's pool account maintained with them.

The Trustee bank i.e. Axis Bank provides subscription funds on a consolidated basis for all the schemes managed by PFM and credits the same to a control account maintained by the PFM, wherefrom the funds are transferred by the PFM to the respective schemes. The PFM record receipt of funds in the respective schemes only.

NPS trust has designated Deutsche Bank AG (DB) as the custodian, who is responsible for safe custody of securities and settlements of trades and informs/updates about the corporate actions.

The fees payable to CRA, in terms of IMA, is charged to the investor by redeeming the equivalent number of units on receipt of intimation from CRA. As stated above, the amount of funds received from the subscribers is intimated by the Trustee Bank on consolidated basis on T +2 basis. PFM records the same on receipt basis. Accordingly, funds with Trustee Bank at the yearend do not get reflected in the financial statements.

CRISIL has been designated as centralised valuation service provider appointed by NPS Trust, who is responsible for providing rates for valuation, which is used by PFM for valuation of investments.

1.2 Schemes Particulars

The Company manages eight separate schemes under the two tiered structure (Tier I and II) prescribed under the NPS. The schemes are classified as Scheme E, G, C, A and Tax Saver based on the asset class prescribed under the NPS as follows:

Scheme E - Equity market instruments

Scheme G - Government securities

Scheme C - Credit risk bearing fixed income instruments

Scheme A -Alternate Investment funds

Scheme Tax Saver- Hybrid Investments

Tier-I: This is the non-withdrawable permanent retirement account into which the regular contributions made by the subscriber are credited and invested as per the portfolio/fund manager chosen of the subscriber.

Tier-II: This is a voluntary withdrawable account which is allowed only when there is an active Tier I account in the name of the subscriber. The withdrawals are permitted from this account as per the needs of the subscriber as and when required.

The objective of the schemes is to maximize the risk adjusted return by investing in specified securities as per investing pattern as prescribed by PFRDA.

1.3 Basis of preparation

The financial statements have been prepared to comply with the Pension Fund Regulatory and Development Authority Act, 2013, PFRDA (Preparation of financial statements and

Auditor's report of Schemes under National Pension System) Guidelines- 2012, Accounting Standards notified under the Companies Act, 2013 to the extent made applicable by PFRDA (Preparation of financial statements and Auditor's report of Schemes under National Pension System) Guidelines- 2012 and generally accepted accounting principles. These financial statements have been prepared on an accrual basis under the historical cost convention, except valuation of investments, which are 'mark-to-market'.

1.4 Accounting of Unit Capital

Units are created and redeemed based on the intimation provided by Central Record Keeping Agency (CRA) and the same are reflected as Unit Capital and the net premium or discount to the face value is transferred to the Unit Premium Reserve.

1.5 Investments

Transactions for purchase and sale of securities are accounted on trade date at cost and sale price respectively.

The holding cost of investments is determined by the weighted average cost method and the cost includes applicable taxes, stamp charges and brokerage but exclude other transactional charges. Investments are reconciled with the custodian records on daily basis.

Valuation of Investments

The scheme marks all investments to market and carries investments in the Balance Sheet at the market value as on Balance Sheet date / date of determination / date of valuation.

The change in unrealised appreciation/depreciation in the value of investments is determined separately for each assets category at the year-end and is recognised in the Revenue Account. The change in net unrealised appreciation, if any, is transferred to /from "Unrealised Appreciation Reserve" shown as part of Reserves and Surplus.

As per directive received from NPS Trust, the valuation of investments is carried out by CRISIL Limited w.e.f. April 01, 2022. The Investment valuation methodology adopted by CRISIL Limited is as follows:

The following valuation norms are as prescribed by PFRDA (Preparation of Financial Statements and Auditor's Report of schemes under National Pension System) Guidelines - 2012.

Central Government, State Government securities and Treasury bills are valued based on CRISIL Limited 's internal valuation methodology as follows:

1. For traded securities, Last Traded Yield shall be considered with minimum quantum criteria as A. Gsec- 5 cr and above, B. State Government Securities- 5 cr and above, C. Treasury bill- 25 cr and above. Outlier trade if any(+/- Bps from the model yield) is not considered for the valuation.

2. For non- traded securities, bid-ask level shall be considered for valuation. If bid-ask yields are not available, the previous day's spread over benchmark is carried forward and considered for valuation.
3. Polling for outliers to be adopted for each level.

Valuation of Money Market Instrument and Mutual Fund

Money market instruments like, commercial paper, and certificate of deposit are valued at last quoted price / applicable Matrix based valuation for investment grade securities. Mutual fund units are valued based on the net asset value of the preceding day of the valuation date.

1.6 Income Recognition

Interest income on all interest bearing investment is recognised on daily accrual basis; when investments are purchased, interest paid for the period from the last interest due date upto the date of purchase is debited to Interest Recoverable Account and not included in cost of purchase. Similarly interest received at the time of sale for the period from the last interest due date upto the date of sale credited to Interest Recoverable Account and not included in sale value.

Accretion of discount relating to Treasury bills is recognised over the holding / maturity period on a straight-line basis.

Profit or loss on sale of Government securities is the difference between the sale consideration net of expenses and the weighted average amortised cost as on the date of sale.

Profit or loss on sale of mutual fund units is the difference between the sale consideration net of expenses and the weighted average book cost.

1.7 Computation of NAV

The NAV of the units is determined by dividing the net assets, including investments recognised and valued as per the accounting policies, by the number of outstanding units on the valuation date.

1.8 Income Taxes

No Provision for Income tax has been made since the income of the Scheme is exempt under Section 10(44) of the Income tax Act, 1961.

1.9 Net unrealized gain or loss in value of investments

The net unrealized gain or loss in the value of investments is determined separately for each category of investment. The net change in unrealized gain or loss between two

balance sheet dates is recognized in the revenue account. Later, the change in unrealized gain (net) in the value of investment is transferred from/to unrealized appreciation reserve through appropriation account.

1.10 Unit Premium Reserve

Difference between the issue/redemption price and face value of units is credited / debited to Unit Premium Reserve.

1.11 Units reconciliation

The subscribers' units as per Investment management system are reconciled with Central Recordkeeping Agency (CRA) records on daily basis.

1.12 Investment management fee

Investment management fees are recognised on daily accrual basis on closing Asset Under Management (AUM) in accordance with IMA. The Investment management fee excludes custodian charges and applicable taxes, if any.

The Company has charged investment management fee as per the below slab structure basis the aggregate AUM managed by the PFM under all Scheme during the period of operation.

Slab of AUM	Investment Management Fees
Upto 10,000 Cr	0.09%
10,001 - 50,000 Cr	0.06%
50,001 - 1,50,000 Cr	0.05%
Above 1,50,000 Cr	0.03%

1.13 Trustee fees

The Trustee fees is charged to the scheme at 0.005% p.a. on Net Assets Value.

1.14 Other Expenses

Custody charges are recognised on accrual basis in accordance with IMA. Trustee bank charges, if any, are recognised when they are debited by the trustee bank on a quarterly basis.

NAME OF PENSION FUND
SCHEME NAME
PERIOD

MAX LIFE PENSION FUND MANAGEMENT LIMITED
SCHEME G TIER I
31ST MARCH 2023

ISIN No.	Name of the Instrument	Industry	Quantity	Market Value	% of Portfolio	Rating
Debt Instruments						
Central Government Security						
IN0020220102	7.41% GOI 19 DEC 2036	Government	2490000	249,820,455	38.06%	Sovereign (GOI)
IN0020220151	7.26% GOI 6 FEB 2033	Government	200000	19,927,740	3.04%	Sovereign (GOI)
IN0020210244	6.54 GOI 17 JAN 2032	Government	100000	9,492,580	1.45%	Sovereign (GOI)
IN0020220060	7.26 GOI 22 AUGUST 2032	Government	90000	8,966,016	1.37%	Sovereign (GOI)
IN0020170174	7.17 GOI 08 JAN 2028	Government	87000	8,690,430	1.32%	Sovereign (GOI)
IN0020220037	7.38 GOI 20 JUNE 2027	Government	63100	6,353,962	0.97%	Sovereign (GOI)
IN0020200401	6.76% GOI 22 FEB 2061	Government	66800	6,130,530	0.93%	Sovereign (GOI)
IN0020220029	7.54 GOI 23 MAY 2036	Government	50000	5,065,170	0.77%	Sovereign (GOI)
IN0020220011	7.10 GOI 18 APRIL 2029	Government	50000	4,968,945	0.76%	Sovereign (GOI)
	Subtotal			319,415,828	48.66%	

State Development Loans						
IN4520220422	7.73% TELANGANA SDL 08 MAR 2034	State Government	780000	78,318,786	11.93%	Sovereign (SDL)
IN1520220295	7.72% GUJARAT 15 MARCH 2035	State Government	469600	47,172,400	7.19%	Sovereign (SDL)
IN1620220484	7.77% HARYANA SDL 29 MAR 2033	State Government	308700	31,035,895	4.73%	Sovereign (SDL)
IN4520220356	7.68% TELANGANA 01 FEBRUARY 2042	State Government	200000	20,015,120	3.05%	Sovereign (SDL)
IN2220210024	6.87 MAHARASHTRA 5 MAY 2033	State Government	200000	18,952,480	2.89%	Sovereign (SDL)
IN1920180131	8.17% KARNATAKA SDL 16 JANUARY 2029	State Government	100000	10,279,900	1.57%	Sovereign (SDL)
IN2220200017	7.83% MAHARASHTRA 08 APRIL 2030	State Government	100000	10,133,840	1.54%	Sovereign (SDL)
IN2220220189	07.74 MAHARASHTRA 01 MARCH 2033	State Government	100000	10,084,010	1.54%	Sovereign (SDL)
IN2120220131	7.74% MADHYA PRADESH SDL 23 MAR 2043	State Government	100000	10,080,580	1.54%	Sovereign (SDL)
IN2120200232	6.61 MP 20 JAN 2037	State Government	100000	9,061,730	1.38%	Sovereign (SDL)
IN1920220036	7.74% KARNATAKA SDL 23 NOVEMBER 2037	State Government	80000	8,075,352	1.23%	Sovereign (SDL)
IN2220190010	8.15 MAHARASHTRA 16 APRIL 2030	State Government	62000	6,389,658	0.97%	Sovereign (SDL)
IN4520220307	7.63% TELANGANA SDL 11 JAN 2036	State Government	60000	5,981,826	0.91%	Sovereign (SDL)
IN1620170143	8.45% HARYANA SDL 07 MAR 2028	State Government	50000	5,211,140	0.79%	Sovereign (SDL)
IN2120220065	7.64% MANDHYA PRADESH SDL 08 FEB 2033	State Government	50000	4,989,005	0.76%	Sovereign (SDL)
IN1620220229	7.67% HARYANA 28 SEP 2032	State Government	29550	2,966,749	0.45%	Sovereign (SDL)
IN1520220030	7.82% GUJARAT 29 JUNE 2032	State Government	29000	2,931,323	0.45%	Sovereign (SDL)
IN1620180076	8.58% HARYANA SDL 28 NOV 2038	State Government	20000	2,165,746	0.33%	Sovereign (SDL)
IN1920200657	7.24% KARNATAKA SDL 10 MARCH 2037	State Government	22000	2,126,916	0.32%	Sovereign (SDL)
IN1920180081	8.52% KARNATAKA SDL 28 NOV 2028	State Government	20000	2,093,540	0.32%	Sovereign (SDL)
IN2120220032	7.88% MP 27 OCTOBER 2033	State Government	20000	2,029,866	0.31%	Sovereign (SDL)
IN1920170124	07.69% KARNATAKA SDL 20-12-2027	State Government	20000	2,022,982	0.31%	Sovereign (SDL)
IN2220220130	7.70% MAHARASHTRA 19 OCTOBER 2030	State Government	20000	2,013,472	0.31%	Sovereign (SDL)
IN2220220114	7.64% MAHARASHTRA SDL 28 SEP 2032	State Government	20000	2,003,456	0.31%	Sovereign (SDL)
IN1520220071	7.61% GUJARAT SDL 03 AUG 2032	State Government	10300	1,026,988	0.16%	Sovereign (SDL)
IN1620200114	6.72% HARYANA SDL 28 OCT 2035	State Government	9500	879,222	0.13%	Sovereign (SDL)
IN3120220089	7.64% TAMILNADU SDL 27 JUL 2029	State Government	7700	772,323	0.12%	Sovereign (SDL)
IN1920220127	7.68% KARNATAKA SDL 21 DECEMBER 2034	State Government	5500	548,694	0.08%	Sovereign (SDL)
	Subtotal			299,363,000	45.61%	

Other Approved Securities						
INF020B08AZ0	8.06% REC GOI SERVICE 27/03/2028	State Government	40000	4,087,004	0.62%	Sovereign (GOI / SDL)
	Subtotal			4,087,004	0.62%	

Money Market Instruments						
Liquid Funds						
INF789FB1571	UTI Overnight Fund - Direct Plan - Growth	Management of Mutual Funds	41990.20998	128,827,446	19.63%	
	Subtotal			128,827,446	19.63%	
Debt Instruments				622,865,832	94.89%	
Credit Rating Exposure						
Central Govt. Securities				319,415,828	48.66%	
State Development Loans				299,363,000	45.61%	
Other Approved Securities				4,087,004	0.62%	
Money Market Instruments				128,827,446	19.63%	
Cash / Cash Equivalent Net Current Assets				-95,314,892	-14.52%	
Grand Total				656,378,386	100.00%	

NAV DATE	NAV
at the beginning of the period	10.0000
at the end of the period	10.4381
Total NPAs provided for and its percentage of NAV	Nil
Total value and Percentage of illiquid equity shares	Nil
Total Outstanding exposure in derivative instruments at the end of the period	Nil
Total Infrastructure investments	Nil
Average Maturity of Portfolio (in Yrs.)	12.23
Modified Duration (in Yrs.)	7.60
Yield to Maturity (%)	7.50%