SAMCO MUTUAL FUND
The Momentum House.

POLICY ON USE OF INTRADAY BORROWING FACILITY

August 2026

Version Control

Version	Date	Reason for change
1.0	25-08-2026	Initial Document

Author	**:**	**Compliance Team**
Issue date	**:**	**August 25, 2026**
Version	**:**	**1.0**
Status	**:**	**Reviewed**

Review and Approval

Date	Name
25-08-2026	Drafted by Ms. Natasha Mahanty, Company Secretary & Compliance Officer and approved by the Board of Directors of Samco Asset Management Private Limited and Samco Trustee Private Limited

1. Objective

The objective of this Policy is to establish the governance framework, eligibility criteria, operational process and internal controls governing the use of Intraday Borrowing Facility by the schemes of Samco Mutual Fund in accordance with Regulation 42 of the SEBI (Mutual Funds) Regulations, 2026 and the SEBI Circular HO/(92)2026-IMD-POD-2/I/16006/2026 dated 10 July 2026 & SEBI gazette notification date 3 July 2026. The facility is intended solely to bridge temporary intraday timing mismatches between payouts and receipt of guaranteed inflows due on the same business day.

2. Regulatory Framework

This Policy is framed pursuant to Regulation 42 of the SEBI (Mutual Funds) Regulations, 2026, the SEBI Circular HO/(92)2026-IMD-POD-2/I/16006/2026 dated 10 July 2026 on Borrowing by Mutual Funds and the SEBI gazette notification date 3 July 2026.

3. Scope

This Policy shall apply to all schemes of Samco Mutual Fund that may require temporary intraday liquidity support to meet redemption obligations or payout obligations permitted under SEBI Regulations. The Policy shall be reviewed annually or earlier if required.

4. Purpose of Intraday Borrowing

Intraday borrowing shall be used only for:

1. All unitholder pay-outs such as redemptions, IDCW pay-outs, interest etc.

2. Pay-in with respect to investments made by the scheme.

3. MTM obligations and foreign exchange settlements.

4. Repayment of existing borrowings

5. Eligible Receivables/quantum of intraday borrowings

1. Guaranteed receivables such as inflows from RBI, Clearing Corporations, subscription inflows received in scheme bank accounts etc.

2. Non-guaranteed receivables sighted during the day such as inflows from maturity Proceeds and/or secondary market settlement from NCDs, CP, CDs, OTC Swaps, etc. and to be received by the scheme by end of the day.

3. Intraday borrowing in addition to clause 1 and 2 may be availed by AMCs solely for the purpose of meeting redemption and other pay-out to the unitholders as specified under Regulation 42(1) of SEBI (Mutual Funds) Regulations, 2026

6. Approval Authority

Borrowings within approved facilities shall require joint approval of the COO & CEO.

7. Operational Process

Operations shall estimate redemption obligations, validate eligible receivables, determine borrowing requirement, obtain approvals, arrange drawdown, and ensure immediate repayment upon receipt of funds.

8. Cost of Borrowing

All costs, charges or losses arising from intraday borrowing on account of any unforeseen event or delay in receiving the funds from receivables shall be in line with para 11.10 of the Master Circular.

9. Disclosure

The approved Policy shall be hosted on the AMC website.