

Reporting of Stewardship Activities (FY 2020-21)

Aventus Wealth Management Private Limited (AWMPL) is an Investment Manager to SEBI Registered Category III Alternative Investment Fund - Aventus Equity Opportunities Fund registered with SEBI - Reg No. IN/AIF1/17-18/0360. Aventus Phoenix Fund is currently the only scheme managed by AWMPL under Aventus Equity Opportunities Fund.

SEBI vide its circular ref. no. CIR/CFD/CMD1/ 168 /2019 dated December 24, 2019 has notified a detailed Stewardship Code for all categories of Alternative Investment Funds. The said circular requires AWMPL to report confirming implementation of stewardship principles on a periodic basis.

Pursuant to the above, a detailed report on the stewardship activities undertaken by AWMPL in FY 2020-21 is provided hereunder:

- **Principle 1: Policy on Stewardship Responsibilities**

A detailed policy on the stewardship responsibilities is formulated by AWMPL. The Board of Directors of AWMPL vide its resolution dated June 30, 2020 approved and adopted the Stewardship Policy.

The policy document shall be reviewed periodically but not less than on annual frequency.

The Stewardship Policy is available on the website of AWMPL www.avendus.com

Training programme was conducted for all the relevant personnel of the Fund during the said period.

- **Principle 2: Conflict of Interest**

There have been no instances identified pertaining to Conflict of Interest as defined in the Stewardship Code. Accordingly, we confirm compliance with the said principle.

- **Principle 3: Monitoring of investee companies**

AWMPL has acted responsibly in assessment and monitoring of the investee companies in line with the Stewardship Policy for the period under review.

- **Principle 4: Intervention in investee companies**

Fund manager has monitored and evaluated quarterly/annual results of the investee companies and important corporate actions. Fund manager in its review during the period did not find anything which warranted an intervention. Further, votes were cast on shareholder resolutions on certain occasions.

Records of such decisions have been adequately maintained.

The fund does not hold more than 2% of the paid up capital of any of the investee company.

- **Principle 5: Voting Policy**

AWMPL has strived to ensure that it exercises voting in the best interest of unitholders. It has followed the voting process as laid down in the Stewardship Policy.

AWMPL has recorded and disclosed specific rationale supporting its voting decision with respect to each voting proposal received.

A report on the voting exercised has been hosted on the website of the Company for the half year ended September 2020 and March 2021.

Further, an annual consolidated report is also available to the investors on the website of the company.