

**HELIOS INDIA ALTERNATE FUND (SEBI REGN IN/AIF3/19-20/0773)**

**Stewardship Code for Helios India Alternate Fund (Alternative Investment Fund) managed by Helios Capital Asset Management (india) Private Limited for the Financial Year 2024-2025**

Principles of Stewardship Code	Status of Compliance	Comments
<p><b>Principle 1:</b> Institutional Investors should formulate a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it, review and update it periodically.</p>	<p>Complied with</p>	<p>The Investment Manager has formulated Stewardship Code ('Code') in accordance with the provision of the SEBI Circulars. The Investment reviews the said code once every two years or earlier, if required, in light of change in applicable law and/or for business reasons. The Code has been disclosed on the Investment Manager's website <a href="http://www.helioscapital.in">www.helioscapital.in</a>. Please <a href="#">click here</a> to view the code.</p>
<p><b>Principle 2:</b> Institutional investors should have a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities and publicly disclose it.</p>	<p>Complied with</p>	<p>The Code also covers conflict of interests in fulfilling stewardship responsibilities as well as the manner in which such conflicts would be managed without diluting the spirit of discharging stewardship responsibilities.</p>
<p><b>Principle 3:</b> Institutional investors should monitor their investee companies.</p>	<p>Complied with</p>	<p>The Code clearly defines the process for monitoring the investee companies and the same were monitored through various activities like publicly available information, management interaction through meetings/ con-call, broker research and inputs, industry information, System Alerts, etc.</p>
<p><b>Principle 4:</b> Institutional investors should have a clear policy on intervention in their investee companies. Institutional investors should also have a clear policy for collaboration with other institutional investors where required, to preserve the interests of the ultimate investors, which should be disclosed.</p>	<p>Complied with</p>	<p>In order to protect to protect value of investments and discharging stewardship responsibility, the Code provides for intervention of investee company on a case-by-case basis. Decision for intervention will be decided by the Investment Team with the approval of the Chief Executive Officer.</p> <p>The circumstances for intervention may, inter alia, include poor financial performance of the company, corporate governance related practices, ESG risks, leadership issues, litigation, Inequitable treatment of shareholders, Poor business strategy, Non-compliance with regulations etc.</p>

Principles of Stewardship Code	Status of Compliance	Comments
<p><b>Principle 5:</b> Institutional investors should have a clear policy on voting and disclosure of voting activity.</p>	<p>Complied with</p>	<p>The AMC has formulated the Voting policy approved by the Board of directors of the Investment Manager. The Policy lays down the rules related to voting on the issues related to the investee companies.</p> <p>Please <a href="#">click here</a> to view the policy.</p> <p>The Investment Manager has also disclosed its voting activities on the website on quarterly basis as per the guidelines issued by SEBI.</p>
<p><b>Principle 6:</b> Institutional investors should report periodically on their stewardship activities.</p>	<p>Complied with</p>	<p>In terms of the requirements laid down under the Principle 6, this report has been prepared for the purpose of disclosure on the website of the Investment Manager and reporting to the investors of the schemes managed by Helios India Alternate Fund on how the Investment Manager has fulfilled its stewardship responsibilities for the FY 2024-25.</p> <p>Further, this report shall also be sent to the investors along with / as part of the annual/ quarterly report of the scheme(s) of Helios India Alternate Fund for the FY 2024-25.</p> <p>The proxy voting details are hosted on the website of the Investment Manager <a href="https://helioscapital.in/disclosure-of-voting-details-quarterly/">https://helioscapital.in/disclosure-of-voting-details-quarterly/</a></p>