



Annual status of compliance with Stewardship Principles as per the common stewardship code issued by the Authority dated 4th May, 2018 or as may be amended from time to time

Name of the Pension Fund: Tata Pension Fund Management Private Limited

Period of report: FY 2024-25

S. No.	Particulars of principles of Stewardship code	Status of compliance (complied/ not complied)	Relevant details like steps taken for formulation of a policy, date of formulating the policy, date of updation, etc.	Remarks/ reasons for deviations/ non-compliance, if any
1	Principle - 1 = Pension Fund has formulated a comprehensive policy on the discharge of their stewardship responsibilities, publicly disclose it on its website, review and update it periodically.	Complied	The Company has formulated a comprehensive policy on the discharge of their stewardship responsibilities. During the year under review, the Policy was reviewed by the Board in its Meeting held on October 25, 2024 and January 22, 2025. The Policy has been uploaded on the Website of the Company.	-
2	Principle - 2 = Pension Fund has a clear policy on how they manage conflicts of interest in fulfilling their stewardship responsibilities as guided in the circular and publicly disclose it.	Complied	The Company has a clear policy on managing conflict on interest. Forms MBP-1 are taken at the start of the financial year and as and when there is any change in the disclosures already made. The Company had abstained on voting on the Group Companies where there could be actual/	-

TATA PENSION FUND MANAGEMENT PRIVATE LIMITED

(Formerly known as Tata Pension Management Private Limited)

1903 B Wing 19th Floor Parinee Crescenzo G-Block Bandra Kurla Complex Bandra East Mumbai 400 051

Tel 91 22 6969 8006 E-mail service@tatapfm.com Website www.tatapensionfund.com

CIN U74140MH2006PTC164217



			potential conflict of interests. The details relating to Voting are uploaded on the website of the Company. Apart from the above, there have been no instances of actual/ potential conflict of interests during the year.	
3	Principle - 3 = Pension Fund has formulated a policy on monitoring of the investee companies by ensuring different levels of monitoring in different investee companies and is engaged in monitoring of the investee companies on ongoing basis as guided in the circular.	Complied	The Company has a clear policy on monitoring of the investee companies by ensuring different levels of monitoring in different investee companies and is engaged in monitoring of the investee companies on ongoing basis as guided in the circular.	-
4	Principle - 4 = Pension Fund has a clear policy on intervention in the investee companies.	Complied	The Company has a clear policy on intervention in the investee companies. No instances of intervention with other investors during the year.	-
5	Principle - 4 = Pension Fund has a clear policy on collaboration with other institutional investors, where required, to preserve the interests of the ultimate investors, which should be disclosed.	Complied	The Company has a clear policy on collaboration with other institutional investors, where required. No instances of collaboration with other investors during the year.	-
6	Principle - 5 = Pension Fund has a clear policy on voting and disclosure of voting activity by taking their own voting decisions in the investee company after in-depth analysis rather than blindly supporting the management	Complied	The Company has a clear policy on Voting which is uploaded on the website of the Company. The Quarterly Voting Reports, Annual Summary of Proxy Voting undertaken by the Pension Fund and	-



	decisions. PFRDA has already issued a circular dt 20.04.2017 on the matter for compliance.		Auditors Certification on Voting Activities for the FY 2024-25 is uploaded on the website of the Company.	
7	<p>Principle - 6 = Pension Fund has placed a report on implementation of every principle of common stewardship code on its website as per the periodicity decided by the Board of the Pension Fund.</p> <p>Different principles may be disclosed with different periodicities like voting may be disclosed on quarterly basis while implementation of conflict of interest may be disclosed annually and any updation of policy may be disclosed as and when done.</p>	Complied	The Annual Report on implementation of every principle is uploaded on the website of the Company.	-
8	<p>Principle - 6 = The Pension Fund has sent annual intimation to its clients/ beneficiaries on implementation of every principle of common stewardship code.</p>	Complied	The annual intimation to its clients/ beneficiaries on implementation of every principle of common stewardship code was sent to the subscribers before 30 th April, 2025.	-


Ravikant Rathore
 Chief Investment Officer




Tejas Mehta
 Compliance Officer