

Groww Asset Management Limited

Soft Dollar Arrangement

Version Control Matrix

| Approver | Board of AMC and Trustees |
|------------------|---------------------------|
| Owner | Risk Management Team |
| Date of Approval | July 15, 2024, |
| Status | Approved |
| Version | 1.1/2024-25 |

Note: This document is applicable to Groww Asset Management Limited. Policy must be reviewed /updated once in a year.



Soft Dollar Arrangements (Pursuant to SEBI Circular no. SEBI/HO/IMD/DF2/CIR/P/2016/42 dated March 18, 2016 (the SEBI Circular)) In terms of Clause F of the SEBI Circular, Soft Dollar arrangements refers to an arrangement between Asset Management Companies (AMCs) and brokers in which the AMC executes trades through a particular broker and in turn the broker may provide benefits such as free research, hardware, software or even non-research-related services etc., to the AMC. Such arrangements between the AMCs and brokers should be limited to only benefits (like free research report, etc.) that are in the interest of investors and the same should be suitably disclosed.

In this regard, it may be noted that Groww Asset Management Limited (the AMC) does not have any Soft-Dollar arrangements with any of its brokers. The empanelled brokers may provide research related services like research reports, invitation to attend meetings/calls/conferences with companies, subject experts/leaders, etc, which can facilitate in investment decision process. Such services, provided by the brokers, are free of cost and are in the interest of investors of Groww Mutual Fund. The business given to brokers and brokerage rates charged to the schemes are within the limits specified under SEBI (Mutual Funds) Regulations, 1996.

Policy Review

The policy shall be reviewed by the Board of AMC and Trustees as and when needed or once in a year to align with regulatory changes and updates.