

WINVEST AIF

STEWARDSHIP CODE

For Winvest AIF,

(Investment Manager: WeekendInvesting Analytics Private Limited)

DOCUMENT CONTROL

Policy Owner: Winvest AIF - Compliance Team

Approved By: Board of Directors, Winvest AIF

Version No. & Effective Date: Version 1.0 – January 2026

Review Cycle: Annual Review or Earlier as Required

1. INTRODUCTION

This Stewardship Code (“Code”) sets out the framework adopted by Winvest AIF for the discharge of its stewardship responsibilities in relation to investments made in listed equities by Momentum Equity and Gold Allocation Fund, an open-ended scheme of Winvest AIF, a SEBI-registered Category III Alternative Investment Fund.

The Code is framed pursuant to the requirements of the Stewardship Code for AIFs issued by SEBI and aims to enhance the quality of engagement between Winvest AIF, investee companies, and investors with the objective of strengthening governance, transparency, and long-term value creation.

2. PURPOSE OF THE CODE

The purpose of this Code is to:

- Safeguard and enhance long-term investor value
- Promote sound corporate governance practices among investee companies
- Encourage responsible decision-making and engagement
- Ensure transparency in voting, engagement, and monitoring activities

WINVEST

SEBI Registration Number: IN/AIF3/25-26/1911
Trust PAN: AAATW8386K
Scheme: Momentum Equity and Gold Allocation Fund
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The stewardship framework supports Winvest AIF's systematic, momentum-based investment strategy and its fiduciary responsibility toward investors.

3. PRINCIPLE 1: POLICY ON STEWARDSHIP RESPONSIBILITIES

Winvest AIF has formulated this Code to guide its conduct as an institutional investor. These responsibilities are reviewed annually.

3.1 Stewardship Responsibilities

Winvest AIF shall:

- Consider corporate governance and investor-related matters when making investment decisions
- Assess material environmental, social, and governance (ESG) factors
- Engage constructively with investee companies
- Vote on shareholder resolutions in the long-term interest of investors
- Maintain transparency in its stewardship and reporting activities

3.2 Discharge of Duties

Stewardship responsibilities are discharged through:

- Voting on shareholder resolutions
- Monitoring investee companies
- Engaging with management and boards
- Intervening when required
- Escalating issues where necessary

3.3 Oversight

The Board of Directors of Winvest AIF shall oversee stewardship activities. The Investment Team is responsible for execution. Independent proxy advisors may be appointed where required.

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3.4 Disclosure

This Code and any amendments shall be made available on the Winvest AIF website.

3.5 Training

Periodic training will be provided to employees involved in implementing this Code.

4. PRINCIPLE 2: MANAGING CONFLICTS OF INTEREST

Winvest AIF shall ensure that conflicts of interest are identified, managed, and disclosed appropriately.

4.1 Identification of Conflicts

Conflicts may arise where:

- The investee company is a client or has a business relationship with Winvest AIF
- Employees, directors, or related parties have personal interests in an investee company
- Multiple schemes managed by Winvest AIF participate in the same opportunity
- A significant investor's interests diverge from those of the broader investor base

4.2 Management of Conflicts

Winvest AIF shall:

- Prioritise investor interests at all times
- Make appropriate disclosures to investors where required
- Ensure transactions are undertaken at arm's length
- Document conflict-resolution processes
- Abstain from voting or engaging where conflicts materially affect independence of judgement.

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5. PRINCIPLE 3: MONITORING INVESTEE COMPANIES

Winvest AIF shall monitor investee companies consistently and proportionately.

5.1 Monitoring Parameters

Monitoring shall include:

- Operating and financial performance
- Corporate governance standards
- Leadership quality and succession planning
- Capital allocation practices
- Regulatory and compliance adherence
- ESG-linked material risks

5.2 Methods of Monitoring

Monitoring will be conducted through:

- Management meetings and conference calls
- Review of public disclosures and filings
- Analyst reports and market intelligence
- Proxy advisory inputs
- Internal research and quantitative screens

5.3 Regulatory Compliance

All monitoring shall comply with applicable laws including insider-trading regulations.

5.4 Internal Review

The Audit & Risk Committee shall review monitoring effectiveness annually.

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6. PRINCIPLE 4: INTERVENTION IN INVESTEE COMPANIES

Intervention may be undertaken when concerns arise regarding governance, transparency, performance, or compliance.

6.1 Trigger Events for Intervention

Intervention may be considered when:

- Disclosures are inadequate or misleading
- Related-party transactions raise concerns
- Governance practices are compromised
- Significant performance deterioration occurs
- Shareholder interests are adversely affected
- ESG or regulatory risks emerge

6.2 Mechanisms for Intervention

1. Initial Communication
2. Confidential engagement with company management.
3. Enhanced Interaction
4. Follow-up discussions and formal communication.
5. Re-engagement
6. Reiterating unresolved concerns.
7. Escalation
8. Engagement with the Board or raising issues at shareholder meetings.
9. Regulatory Reporting
10. Where necessary, concerns may be escalated to authorities.

6.3 Outcome

Intervention outcomes do not automatically mandate divestment. Buy/sell decisions are determined by the Investment Team based on overall assessment.

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7. COLLABORATIVE ENGAGEMENT

Winvest AIF may collaborate with other institutional investors, professional associations, regulators, or proxy advisors to address matters of collective interest, provided such collaboration does not constitute acting in concert.

8. PRINCIPLE 5: VOTING AND DISCLOSURE OF VOTING ACTIVITY

8.1 Voting Policy

Winvest AIF shall:

- Vote on all resolutions where voting is deemed beneficial for investor interests
- Ensure votes are cast in a fair, unbiased, and informed manner
- Maintain clear voting rationales
- Disclose annual voting activity to investors

8.2 Attendance at Shareholder Meetings

Where appropriate, Winvest AIF may attend general meetings and participate in discussions.

8.3 Methods of Voting

Voting may be conducted through:

- E-voting
- Proxy voting
- Physical attendance
- Custodian-facilitated voting

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