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ALUMNI CORNER

Demystifying Investment Opportunities for Retirement Fund

Varsha V. Pawar



Varsha V. Pawar is an alumna of IIM Calcutta Executive Education (2016-17, EPAF – Batch XI) and a Chartered Accountant. She has various Finance certifications to her credit over the years. She started her career with Tata Group after completing her CA. She is associated with the Group for approx. 18 years now. She has vast experience in the Treasury and Finance field, varying from Fund management

and Fund placement- cash and liquidity, fixed income investments, Fund raising through IPO/ Rights issuances/ private placements/ Borrowings etc. and writing covered calls. She was a core team member for Tata Consultancy Services Limited, IPO in 2004.

As per Indian culture every individual is inculcated with the habit of saving money from early childhood. When the person takes up employment in an organization a part of his salary gets deducted as his/her contribution towards Provident Fund (PF). At the time of retirement, the amount accrued in the his/her PF is handed over to the employee as his/her social security. This article gives an insight on investment avenues that are used to generate a return on our savings and multiply the retirement fund of every employee over the years. The contribution of provident fund and interest thereon forms the retirement corpus of the individual. Further, this article throws light on how fund management activity can be carried out by a PF Trust.

Efficiencies in fund management of a PF can be evaluated with the surplus generated by the PF, whether the PF Trust can credit the employee PF account by the pay-out rate declared by Employees' Provident Fund Organisation (EPFO). The EPFO is one of the world's largest social security organizations and a retirement body that provides social security in India to the salaried class. It is similar to a 401 (k) plan which provides social security to employees in the US. The features of provident fund in India and 401(k) plan may vary. The guiding principle of the PF can be summed as safety, returns, and liquidity. Safety by investing in safe assets as permitted, returns which can be measured by being able to match EPFO pay-out rate and liquidity being assessed fund management skills of the investment officer managing the PF.

As per the Provident Fund Act, 1952 (the Act) an employer with 20 or more employees is under an obligation to register under the said Act and start a provident fund scheme for its employees. As per the Act, once an individual joins an organization, the employee contributes 12 % of the basic salary (plus dear allowances if any) towards provident fund. Similarly, the employer should be able to contribute an equivalent percentage i.e. 12% as the employer's contribution. Of this, 3.67% is the employer's contribution towards provident fund and balance 8.33% is the contribution to Employees Pension Scheme.

The employer may transfer the monthly provident fund contribution to the Employees' Provident Fund Organisation (EPFO) or manage the investment of the provident fund contribution in-house. In case, an employer decides to manage the provident fund in-house, the employer will have to set up a Trust entrusted with the responsibility of the management of the retirement benefits of its employees. This is done through the Board of Trustees who manage the day-to-day affairs of the Trust.

The investment of the surplus funds has to be as per the Investment Pattern prescribed by the Ministry of Labour and Employment. On 29th May 2015, the Ministry of Labour and Employment notified the prescribed investment pattern for investing the retirement funds of the employees. Irrespective of whether the employer manages the retirement corpus through its Trust or gives the fund management to EPFO, both are obligated to follow the Government prescribed Investment pattern.

The Employees Provident Fund money is sovereign-backed, and the interest earned is tax-free. Provident Fund enjoys the EEE (exempt-exempt) status. The employee's contribution is tax-deductible under Section 80C of the Income Tax Act, 1961. Hence, the money invested, the interest earned, and the money the employee eventually withdraws after the mandatory specified period (5 years) are exempt from income tax.

There have been major changes in the Investment pattern which was introduced in May 2015. The applicable Investment Pattern went through severe criticism from trade unions (Economic Times article Jun 2014 and others also) due to the introduction of investment in equity and equity-related instruments. However, the investment pattern was approved and is now is the applicable Investment Pattern for provident fund contributions.

Summarised investment pattern is as below:

Category of		Minimum	Maximum
Investment	Description	investible (%)	investible (%)
I	Govt Securities and related instruments	45	65 ^
II	Debt Instruments and related investments	20^	45
III	Short-term Debt Instruments and Related	0	5
	Investments		
V	Equities and Related Investments	5	15
VI	Asset-Backed, Trust Structured and	0	5
	Miscellaneous Investments		

[^] as amended from time to time

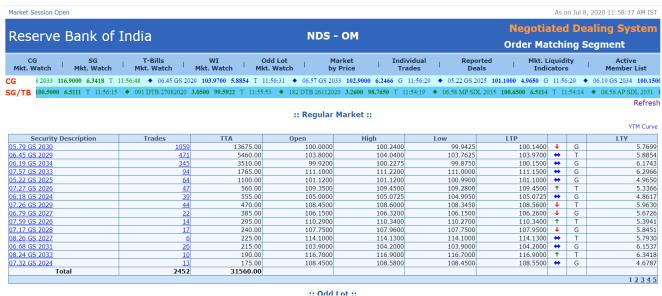
This pattern applies to the investible surplus for the year. How is investible surplus determined? The investible surplus is the provident fund contributions plus the interest inflows on the investment of the Trust so far plus the maturity proceeds of the existing portfolio less the outflows (i.e. pay-out obligations). Outflows are pay-outs towards retirement (settlements) or if the employee leaves the current organization, he would transfer the accumulated PF funds to his new organization. This is referred to as transfer out. The Act permits withdrawal for specific purposes only, such as education, marriage, housing loan, and medical reasons; this is referred to as non-refundable withdrawals. Primarily these are the only outflows – settlements, transfer outs, and non-refundable withdrawals. A PF Trust does not bear any expenses, the expenses are borne by the employer. These are reimbursed by the employer and typically would include audit fees/ bank charges.

Under Category I of Investment: Government Securities and related instruments:

The permissible investment papers are securities issued by the Government of India (GOI) and State Government. GOI issues securities to raise funds, and these securities can be subscribed by Provident Fund Trust. Similarly, State Governments also raises funds to meet their respective state finances, and this is done by issue of State Deployment Loans (SDL). Yields on a GOI paper is lower than that of SDL – GOI papers carry zero risks. The borrowings of the state, education, infrastructure, etc. would determine the quality of the State which would in turn determine the yield of SDL.¹³

Extracts from Negotiated Dealing System – Order Matching (NDS – OM), gives a perspective of yields for GOI /SDL (across states)

¹³ Further reading of quality of state is available at www.rbi.org.in/Scripts/Annualpublications.



:: Unit

¥ NDS OM-ccil.com

In the above extract, one may observe the following:

- All the papers under this Tab are Government papers.
- 5.79 GS 2030 the 10YR GOI Security, LTY 5.7699% semi-annualised (5.85% annualised)
- Maximum trades and most liquid from the entire lot.
- LTY (represents the last traded yield).
- Yield in the above table is all semi annualized yield.

The other papers that can be invested under Category I are the SDL. Extract of the same is in the next table, which shows:

- All the papers under this Tab are SDL.
- MH represents papers issued by Maharashtra state, GJ represents papers issued by Gujarat state, and so
 on.
- Interest rate differential is due to the quality of state, and the tenor for which the paper is issued.
- Bid-ask spread indicates the liquidity of the paper.for 5.79 GS 2030 the 10YR Gsec, LTY 5.7699% semi- annualised (5.85% annualised).
- Yield in the above table is all semi annualized yield.



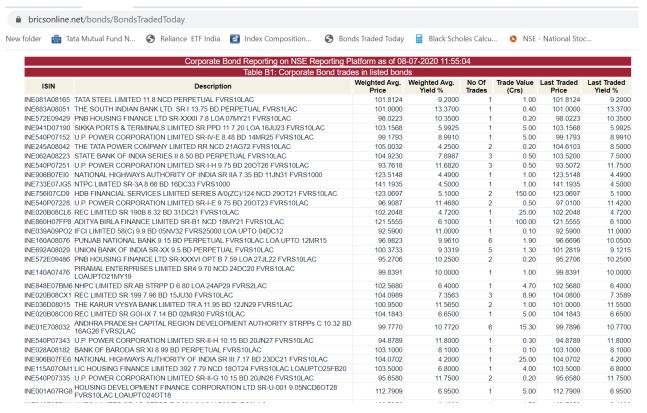
¥ NDS OM-ccil.com

Under Category II of Investment: Debt Instruments and related investments

The following are the key features that the debt security should have to qualify for investment by a PF Trust:

- Listed paper or proposed to be listed
- Residual maturity of not less than 3 years
- Dual rated
- Fixed deposits placed with bank qualify under this category, however, the following criteria are required to be met before placing deposits with banks
 - Should have declared profits in the preceding 3 years
 - Should have maintained Capital to Risk-weighted assets ratio of 9% or as prescribed by RBI from time to time
 - Non-performing assets should be less than 4%
 - The minimum net worth of not less than 200 crores.

The below extract gives bond yields which are traded;



¥bricsonline

The above extract gives a fair idea of the risk-return on a corporate bond. It is simple thumb rule, "higher the risk higher the return".

Under Category III of Investment: Short-term Debt Instruments and Related Investments

This is an optional category, as the minimum prescribed investment under this category is 0%. The instruments qualifying under this category are liquid mutual funds, commercial papers, certificates of deposits, and bank deposits of a tenor less than 1 year.

Under Category IV of Investments: Equity and related instruments

The permitted instruments under this category are as below:

- Equity shares listed on either National Stock Exchange (NSE) or Bombay Stock Exchange (BSE) with a market capitalisation of not less than Rs 5000 crs
- Derivatives with the shares as underlying traded in either of the exchanges, NSE/BSE
- Units of equity mutual fund, where the exposure to equity is not less than 65%
- Exchange traded fund that replicates either the BSE or the NSE Index

Under Category V: Asset-Backed, Trust Structured and Miscellaneous Investments

This again is an optional category where the PF Trust may opt for 0% of the investment of its investible surplus

Following securities qualify under this category of investment:

- Commercial mortgage-based Securities or Residential mortgage-based securities.
- Units of securities issued by the Real Estate Investment Trusts regulated by SEBI
- Asset-Backed Securities regulated by SEBI
- Units of Infrastructure Investment Trusts regulated by SEBI

Not many corporates have raised funds issuing securities which qualify under Category V. ILFS had raised some funds in the past which qualified the investment under this category

Investment Strategy

Now that the regulatory provisions are explained, I would touch upon, the investment strategy that an Investment officer/Fund manager managing the investments of PF Trust could follow. The strategy normally reflects the Fund manager's views on the market, his philosophy (aggressive/ passive/ safe bet). Each investment decision of the Fund manager/ Investment Officer will have to be approved by the Trustees who ideally should have safety as their guiding principle. They are entrusted with the responsibility of safekeeping the employees' retirement fund. Loss of revenue to PF Trust on account of incorrect investment decision/fraud etc is to be borne by the employer.

A PF Trust under Investment Category I may prefer investing in GOI securities, though the yield maybe a little lower than a State Development Loan paper (SDL). Here the guiding philosophy is the safety of the investment. Normally the yield difference is 50-75 bps (One basis point is equivalent to 0.01%) for a like tenor. The Trust may also invest in SDLs issued by states with good credit quality. This may help in enhancing the overall portfolio yield. Category I has the highest percentage allocation of the investible surplus.

Under the Investment Category II, which permits investment in corporate securities, the investment manager must do a thorough analysis of the promoters/ Balance sheet analysis/ track news items, etc. The investment ,manager may invest for the bare minimum mandated by the pattern i.e. not less than three years. Higher tenor in corporate

bonds could be avoided unless exceptionally good credit. Preferably stay away from perpetual, sub-debt,

unsecured papers, etc.

Under the Category III, the PF Trust may invest in liquid mutual funds. The investment manager must do a

thorough analysis of the liquid fund portfolio also. Preferably stay away from commercial papers or use the same

checks and balances viz. promoters, balance sheet analysis, etc.

Under Category IV, Equity and related instruments, it may be safer to invest in Exchange Traded Fund (ETF),

corporate officers managing the investments may not have the skill sets to do a thorough analysis for equity

investment. So the Trust may adopt a NIFTY or a Sensex ETF. It is easier as these ETFs replicate the NIFTY 50

index or the Sensex. The Nifty 50 comprise of the Top 50 companies, so automatically the ETF replicates the

investment in the Top 50 companies by buying an ETF unit.

Under Category V, still not fully developed in India so I may not express my views. Not analyzed a lot of papers

under this category.

The investment strategy is largely dependent upon the expected pay-out rate by EPFO, as any PF Trust will have

to match the rate declared by EPFO even though they may decide to manage investments in- house. They may

opt to pay higher than the mandated. Since the Investment pattern permits the sale of securities the Investment

officer may book profits during the year depending on his view on interest rate/equity markets. Adequate care has

to be taken as every sale faces reinvestment risk. The sale of securities is a good way to build a surplus for the

PF.

Over the years, EPFO has declared PF pay-out rate depending upon the interest outlook over the years. Based on

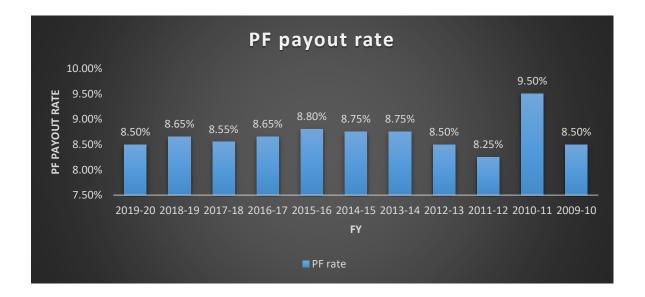
the pay- out rate, I have prepared the pay-out graph to analyse the interest credited to employees' provident fund

account each year. ¹⁴ EPFO pay-out rates for last 10 year are as follows (PF pay-out rate for FY 20-21 is not yet

declared):

¹⁴ The provident fund pay-out rate data is taken from

https://www.epfindia.gov.in/site_docs/PDFs/MiscPDFs/InterestRate_OnPFAccumulationsSince1952.pdf



I now assess how the performance of an investment officer managing the PF may be evaluated. Primarily his performance would be assessed on surplus generated by the PF fund, portfolio yield, whether the PF Trust is able to match EPFO pay-out rate or the Trust can pay higher interest credit than mandated by EPFO.

Having explained the Investment Pattern that is required to follow by either EPFO or a PF Trust (which has decided to manage the funds in house) and also explained the investment strategy that may be adopted by the PF Trust, it is entirely the decision of the PF Trust (provided it gets approvals from EPFO) to manage PF funds inhouse. This decision will be crucial as it is necessary that the investment officer has the necessary skill sets and expertise to safeguard the retirement fund of its employees.

- ^ References to Economic Times article
- ^ PF Act and related guidelines
- ^ NDS OM- ccil.com
- ^ bricsonline
