

PARTNER EDITION · ADVISOR PLAYBOOK

Allocation & Tax Playbook

Allocation frameworks for HNI portfolios — and the SIF tax conversation.

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How a SIF fits the HNI equity sleeve

A SIF allocation belongs inside the equity sleeve of an HNI portfolio. It doesn't replace mutual funds (still the cheapest long-only equity) or PMS (still the right vehicle for personalised stock portfolios at ₹50L+). It displaces some long-only equity with a hedged version — lowering portfolio volatility while preserving most of the expected return.

HOW MUCH? THREE INPUTS.

Behavioural volatility tolerance

Measured by past-drawdown behaviour, not stated preference.

Existing concentrated alpha

Direct equity and PMS already provide uncorrelated alpha.

Trust in the asset class

New entrants warrant smaller initial sizing — conviction builds over a cycle.

SIZING RULES OF THUMB

- Never less than ₹10 lakh — anything below the SEBI minimum doesn't make sense.
- Never more than 25% of the total equity sleeve in the first year.
- Never put emergency liquidity or imminent-need cash into a SIF.
- Diversify across at least two SIFs once the total SIF allocation exceeds ₹50 lakh.

₹1 crore portfolio

Bucket	% of portfolio	Allocation	Vehicle
Liquid + emergency	10%	₹10 L	Liquid MF + bank FD
Debt core	30%	₹30 L	Banking & PSU + short-duration MF
Equity core (long-only)	40%	₹40 L	Flexi-cap MF + large-cap MF
Equity hedged (SIF)	15%	₹15 L	One hybrid long-short SIF
Tactical / opportunistic	5%	₹5 L	Direct equity / thematic MF

RATIONALE

At ₹1 Cr, the SIF allocation is a single fund — typically a hybrid long-short SIF for first-time HNI exposure. The ₹15 L ticket clears the ₹10 L SEBI minimum and delivers meaningful drawdown protection on the equity sleeve. Two-fund SIF diversification doesn't earn its keep at this ticket — the second fund's incremental value is smaller than the operational friction it adds. If the client is unusually risk-tolerant and wants more equity participation, consider replacing 5% of the long-only equity with an equity LS SIF (taking total SIF exposure to 20%).

₹3 crore portfolio

Bucket	% of portfolio	Allocation	Vehicle
Liquid + emergency	5%	₹15 L	Liquid MF + sweep FD
Debt core	25%	₹75 L	Gilt + banking & PSU + corp bond MF
Equity core (long-only)	35%	₹105 L	Flexi-cap + large-mid + small-cap
Equity hedged (SIF)	20%	₹60 L	1 hybrid LS + 1 equity LS
PMS / strategic	10%	₹30 L	One PMS mandate
Tactical / direct equity	5%	₹15 L	Conviction direct positions

RATIONALE

At ₹3 Cr the SIF allocation supports two funds — typically split ~60% hybrid LS / ~40% equity LS. This delivers both volatility protection and equity participation in the same sleeve. The 10% PMS allocation is the gateway to personalised stock selection if the client wants it; otherwise this capacity can re-route into a third SIF — an active asset allocator — for a valuation-driven layer.

₹10 crore portfolio

Bucket	% of portfolio	Allocation	Vehicle
Liquid + emergency	3%	₹30 L	Liquid + sweep + treasury bills
Debt core	22%	₹220 L	Gilt + banking & PSU + tax-free bonds
Equity core (long-only)	30%	₹300 L	Diversified MF + direct equity
Equity hedged (SIF)	20%	₹200 L	2 hybrid LS + 1 equity LS + 1 AAA
PMS / AIF	15%	₹150 L	1-2 PMS + 1 AIF Cat III
Real assets	5%	₹50 L	REITs + InvITs
Tactical / global	5%	₹50 L	GIFT-City feeder / direct global ETF

RATIONALE

At ₹10 Cr the SIF allocation supports four funds across all three categories: two hybrid long-short funds (different managers, different sub-styles), one equity long-short, and one active asset allocator. The PMS / AIF allocation covers strategies SIFs cannot run; real assets at 5% provide an inflation hedge with low correlation.

SIFs follow the underlying, not the wrapper

SEBI's classification rule is based on average equity exposure over the year:

Fund classification	Equity %	STCG	LTCG	LTCG holding period
Equity-oriented SIF	≥ 65%	20%	12.5% above ₹1 L exempt	> 12 months
Debt / hybrid-oriented SIF	< 65%	Slab rate	Slab rate	—
Dividend / IDCW (any SIF)	—	Slab rate	Slab rate	—

THE TRAP TO AVOID

Hybrid long-short SIFs are often classified as debt-oriented even when net equity is 40–60%, because total gross equity (long book + hedge book) often sums to under 65%. Debt-oriented hybrid LS SIFs are taxed at slab on both STCG and LTCG — this catches clients off-guard. Always quote the fund's tax category explicitly at onboarding and document it in the suitability record.

The STCG 20% conversation

THE OBJECTION

“If I rebalance my SIF after six months, I'm paying 20% on the gain. That's worse than the tax on my mutual fund.”

YOUR REPLY

Yes — the STCG rate on equity SIFs is 20%, the same as equity MFs. They're identical. But the typical need to rebalance is lower with a SIF, because the manager is hedging actively inside the fund. With an MF, you trigger STCG every time you reduce equity exposure to manage risk. With a SIF, the manager does that work for you — realised gain stays inside the fund (already netted into the NAV) and is deferred until you actually sell units.

WORKED EXAMPLE

An HNI holds ₹50 L in an equity MF and another ₹50 L in an equity long-short SIF. In a 12% drawdown, the MF holder must rebalance to maintain target equity weight — triggering STCG. The SIF holder doesn't need to rebalance because the manager has already adjusted net exposure inside the fund. Same gain, lower realised tax friction.

March 2026 rebalancing — with vs without a SIF

Setup. ₹1 Cr portfolio, 50% equity MF (₹50 L), 0% SIF — as of 28 Feb 2026. By 31 Mar 2026 equity drew down 11.3%. The MF book is now at ₹44.4 L. Client wants to rebalance back to 50:50.

PATH A · NO SIF

Rebalance the old way

- Sell ~₹6 L of debt MF, deploy into equity MF.
- Buys low (good) — but no hedge for the next leg down (vulnerability).
- Triggers small STCG on the debt MF redemption (slab rate) — minor.
- Portfolio still has zero drawdown protection going forward.

PATH B · WITH SIF (15% HYBRID LS)

Rebalance with hedged equity

- Hybrid LS SIF (₹15 L start) drew down ~2.8% → ₹14.6 L.
- Equity MF (₹35 L start, post-SIF allocation) drew down 11.3% → ₹31.0 L.
- Total equity sleeve drawdown ₹4.4 L vs ₹5.6 L in Path A — saved ~₹1.2 L.
- Less rebalancing needed → less STCG triggered. Hedge stays on.

Year-end tax-loss harvesting calendar

Equity SIF units held under 12 months can offset short-term gains anywhere in the financial year. Treatment matches MFs, with two operational advantages: twice-weekly NAVs give multiple discrete entry points each month (useful for tactical year-end harvesting), and detailed factsheets show realised gains inside the fund — useful for timing the unit-level harvest.

Oct

REVIEW

Review SIF YTD performance.
Identify candidate harvest positions.

Nov

CONFIRM

Confirm STCG vs LTCG holding period lot-by-lot.

Dec

EXECUTE

Execute harvesting transactions. Re-enter in a different scheme (30-day cooling for SEBI's same-scheme rule).

Jan-Feb

MONITOR

Monitor re-entries. Validate replacement schemes match the original mandate.

Mar

HAND OFF

Final cleanup. Confirm the CA has all required data.

What your client's CA will ask for

A clean SIF tax filing depends on a handful of documents — get them in one place before year-end.

✓ **Capital gains statement**

Pulled from the AMC distributor portal — one per SIF, per financial year.

✓ **Redemption log**

Date, units, NAV and realised gain or loss for each redemption transaction.

✓ **STT statement**

From the AMC — required for STT credit computation. Applies only to equity-oriented SIFs.

✓ **Distributor commission disclosure**

Where the client's records require it.

✓ **Fund classification factsheet**

Equity $\geq 65\%$ or $< 65\%$. This determines whether the fund is taxed as equity-oriented or debt-oriented.

✓ **Exit load deductions**

These reduce realised proceeds but are not separate capital expenses — flag them for the CA.

✓ **Dividend / IDCW statement**

Required if the fund pays IDCW. Taxed at slab rate.

Next steps

After this playbook lands with your client, three things help them act:

- 01** Map the playbook to their portfolio
Walk through which model (₹1 Cr / ₹3 Cr / ₹10 Cr) most closely fits their existing balance sheet.
- 02** Confirm the tax classification of each fund
Pull the latest factsheet for every SIF on the shortlist. Document equity $\geq 65\%$ or $< 65\%$ in the suitability record.
- 03** Schedule a CA hand-off call
Bring the CA into the conversation early so the tax treatment is clear from the first investment, not the first redemption.

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