

Capital Markets

India

Sector View: Cautious NIFTY-50: 25,819 December 18, 2025

TER regulations: Balanced outcome with hope of a stable regime

The SEBI's final rules on the total expense ratio (TER) for mutual funds are more balanced than the initial proposals. The removal of the 5-bps exit-load allowance was widely expected and should largely be passed on. Importantly, the TER reduction has been moderated to 10 bps (versus the 15 bps proposed earlier), which should keep the earnings impact negligible. The cut in brokerage caps is also less aggressive than initially outlined (6 bps versus 2 bps earlier). With greater clarity on regulations and their financial implications, we expect a positive sentiment for AMC and wealth-management stocks.

Revised TER structure

The new expense ratio structure framework is primarily aimed at enhancing transparency and consistency in expense ratio calculations and disclosures. As a principle, expense ratio limits, now called Base Expense Ratio (BER), shall exclude all statutory levies. The key changes include: (1) the removal of additional expense allowance. The additional 5 bps currently permitted to be charged to schemes has now been removed; (2) revised base expense ratio limits. The base expense ratio limits (see Exhibit 1) are revised so as to exclude all the statutory levies; and (3) the rationalization of brokerage limits. Cash market brokerage cap has been reduced to 6 bps (from 8.59 bps of the like-for-like number) and derivatives brokerage cap has been reduced to 2 bps (from 3.89 bps of the like-for-like number).

Final guidelines are relatively more balanced

We see the final guidelines as more balanced compared to initial proposals. The removal of the 5-bps allowance for exit load was expected to be part of the final guidelines. On the other hand, the reduction in TER slabs by 10 bps (compared to the 15 bps proposed in the consultation paper) is a positive and would provide some flexibility, in addition to offsetting the impact of GST on distribution commissions.

A 5-bps cut on the equity regular TER of 1.8% implies a 3% hit to the value chain. We expect AMCs to pass on 60-70% of the 5-bps impact (in line with TER sharing) to distributors and possibly some with RTAs. The residual impact (Exhibit 2), along with the possible benefit of the TER cut (10 bps) being lower than GST on distribution commissions (Exhibit 3), is likely to be zero-to-mid single digits.

AMCs and wealth players in focus

We believe that markets will view the final guidelines favorably, as they bring clarity and conclude the current regulatory cycle. Larger AMCs with strong performance (such as HDFC and Nippon) stand to benefit. Diversified wealth managers (360 One, Nuvama) will also gain from milder brokerage cuts and their lower reliance on MF distribution income. RTAs, however, may face pricing pressure if AMCs try to mitigate yield compression.

Expect a more stable regulatory regime going forward

We continue to maintain the view that India's MF regulations compare quite well against other large countries on metrics such as (1) ban on entry/exit loads (one of the few countries), (2) expense ratio caps (probably the only large country), (3) concentration of top-10 players, (4) scale of non-bank promoted AMCs, along with non-captive distribution, and (5) easy availability of cheaper direct share class. The experience of the past decade also shows decent elasticity of market share with fund performance.

Impact of TER cuts on AMC earnings

	Impact (% of core PBT)			
	1 bps	3 bps	5 bps	
HDFC AMC	1.8	5.5	9.2	
ABSL AMC	1.8	5.3	8.9	
NAM	2.0	5.9	9.8	
UTI AMC	2.5	7.5	12.5	

Source: Bloomberg, Company data, Kotak Institutional Equities estimates

Prices in this report are based on the market close of December 17, 2025

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Final TER rules imply ~10 bps cut to reflect the carve out of GST on distribution commissions

Exhibit 1: History of expense ratio regulations, proposal and final guidelines

	Old TER Re	egime (pre 2018)	Curren	t TER regime	Consu	Itation paper	Fina	l guideline	
Fund AUM	TER	Effective TER	TER	Effective TER	TER	Effective TER	TER	Effective TER	Final vs current
5	2.50	2.50	2.25	2.25	2.10	2.10	2.10	2.10	(0.15)
7.5	2.25	2.42	2.00	2.17	1.90	2.03	1.90	2.03	(0.13)
20	2.00	2.16	1.75	1.91	1.60	1.76	1.60	1.76	(0.14)
50	2.00	2.06	1.60	1.72	1.45	1.58	1.50	1.61	(0.12)
100	1.75	1.91	1.50	1.61	1.35	1.46	1.40	1.50	(0.11)
150	1.75	1.85	1.45	1.56	1.30	1.41	1.35	1.45	(0.11)
200	1.75	1.83	1.40	1.52	1.25	1.37	1.30	1.41	(0.10)
250	1.75	1.81	1.35	1.48	1.20	1.33	1.25	1.38	(0.10)
300	1.75	1.80	1.30	1.45	1.15	1.30	1.20	1.35	(0.10)
350	1.75	1.79	1.25	1.42	1.10	1.27	1.15	1.32	(0.10)
400	1.75	1.79	1.20	1.40	1.05	1.25	1.10	1.29	(0.10)
450	1.75	1.78	1.15	1.37	1.00	1.22	1.05	1.27	(0.10)
500	1.75	1.78	1.10	1.34	0.95	1.19	1.00	1.24	(0.10)
550	1.75	1.78	1.05	1.32	0.90	1.17	0.95	1.21	(0.10)

Source: AMFI, Kotak Institutional Equities

Around 9-12% impact on core PBT due to 5 bps exit load removal, if fully absorbed by AMCs

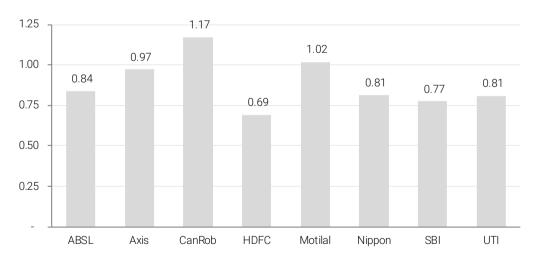
Exhibit 2: Impact on core earnings due to removal of exit load

	Revenue	Core PBT	Equity AAUM	Impact (% of core PBT)		
	(Rs mn)	(Rs mn)	(Rs bn)	1 bps	3 bps	5 bps
HDFC AMC	10.3	7.8	5,720	1.8	5.5	9.2
ABSL AMC	4.6	2.7	1,924	1.8	5.3	8.9
NAM	6.6	4.2	3,276	2.0	5.9	9.8
UTI AMC	3.9	1.3	1,332	2.5	7.5	12.5

Source: Company, Kotak Institutional Equities

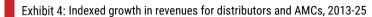
Revised TER slabs comfortable absorb GST on distribution commissions

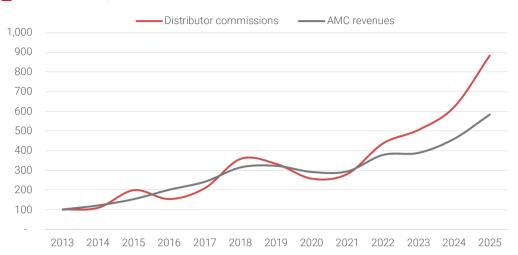
Exhibit 3: Weighted average distribution commission (regular-direct TER) for equity/hybrid schemes (%)



Source: Company, Kotak Institutional Equities

Distributors have seen stronger revenue growth compared to AMCs in recent years

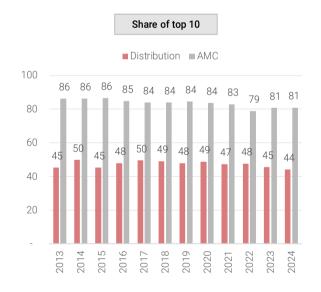


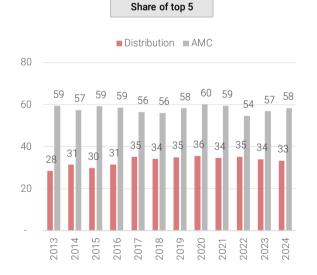


Source: AMFI, Kotak Institutional Equities

AMCs are more consolidated than distributors

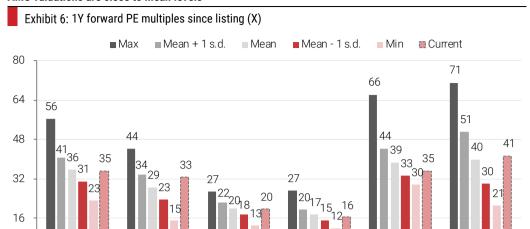
Exhibit 5: Share of top 10 and top 5 players in revenues, March fiscal year-ends, 2013-25 (%)





Source: Kotak Institutional Equities

AMC valuations are close to mean levels



ABSL

UTI

CAMS

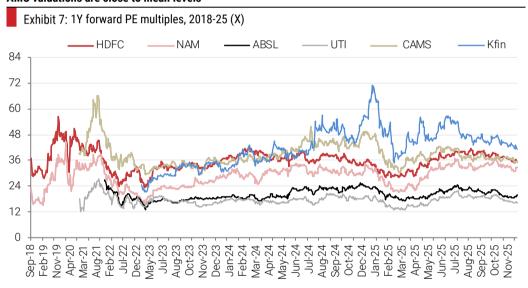
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Source: Bloomberg, Kotak Institutional Equities

HDFC

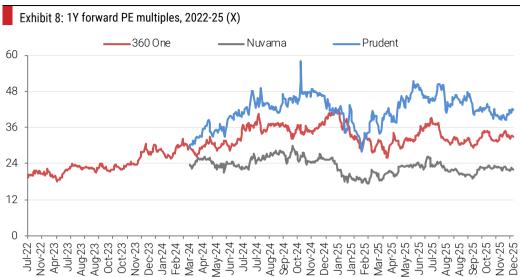
AMC valuations are close to mean levels

NAM



Source: Bloomberg, Kotak Institutional Equities

AMC valuations are close to mean levels



Source: Bloomberg, Kotak Institutional Equities

Exhibit 9: Regulatory proposals impacting AMCs in SEBI act, 2025

New proposal	Impact	Categories affected
BER thresholds cut; TER = BER +	Tightens fee headroom and	Active equity, FoFs; smaller AUM slabs
brokerage + statutory/regulatory levies	compresses margins across schemes;	per scheme
(levies excluded from BER)	effect varies by AUM slab and product	
	mix.	
Removal of additional 5 bps allowance	Eliminates a direct revenue cushion	Active equity schemes with exit loads
for exit-load schemes	where it was being used.	
Brokerage caps reduced (cash: 6 bps;	Lowers scheme trading costs,	Passive and high-turnover strategies
derivatives: 2 bps, both exclusive of	improving investor outcomes and TER	
levies)	competitiveness.	
Operational easing (fewer trustee	Recurring compliance and	All AMCs
meetings; no duplicate half-yearly	communication opex relief; faster	
portfolio disclosures; digital-first	processes.	
ads/disclosures)		
Borrowing enabled for equity index	Better cash management with	Index funds/ETFs
funds/ETFs; intra-day borrowing	potential tracking-error reduction.	
clarified for redemption timing		
Higher AUM slabs revised upward vs	Moderates BER impact for scale	Large AMCs and large schemes
consult draft (equity ≥ Rs20 bn per	schemes, tempering margin hit.	
scheme)		

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This report has been updated since it was released in the India Daily of December 18, 2025.

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ADD. We expect this stock to deliver 5-15% returns over the next 12 months.

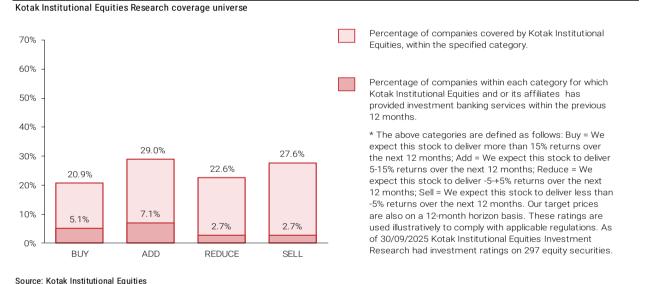
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