ITI MUTUAL FUND

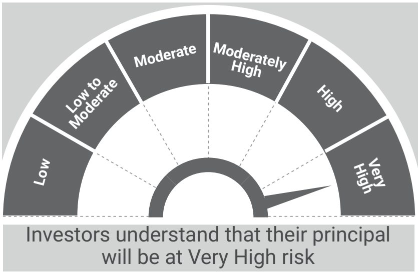
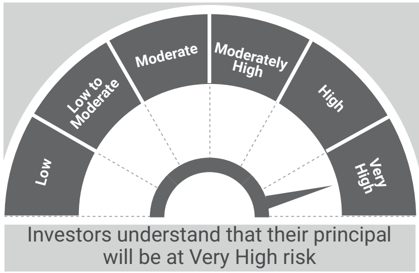
*Long-term wealth creators*

# SCHEME INFORMATION DOCUMENT

## SECTION I

# ITI LARGE & MID CAP FUND

(An open ended equity scheme investing in both large cap and mid cap stocks)

| **This product is suitable for investors who are seeking*:** | **Scheme Riskometer** | **Benchmark Riskometer [As per AMFI, Tier I Benchmark is NIFTY LARGE - MIDCAP 250 Index (TRI)]** |
|---|---|---|
| • Capital appreciation over long term<br>• Investments in equity and equity related instruments of large cap and mid cap companies<br>**Investors should consult their financial advisers if in doubt about whether the product is suitable for them.* |  |  |

The above product labelling assigned during the New Fund Offer (NFO) is based on internal assessment of the scheme characteristics or model portfolio and the same may vary post NFO when the actual investments are made.

**Offer for Units of Rs. 10 Per Unit during the New fund Offer Period and at NAV based prices upon re-opening.**

| New Fund Offer opens on | New Fund Offer Closes on | Scheme opens for continuous sale and repurchase not later than |
|---|---|---|
| **August 21, 2024** | **September 04, 2024** | **On or before September 18, 2024** |

| | |
|---|---|
| **Name of Mutual Fund** | ITI Mutual Fund |
| **Name of Asset Management Company** | ITI Asset Management Limited |
| **Name of Trustee Company** | ITI Mutual Fund Trustee Private Limited |
| **Registered Office of the entities** | 36, ITI House, Dr. R K Shirodkar Marg, Parel, Mumbai 400 012. |
| **Website** | www.itiamc.com |

**The particulars of the Scheme have been prepared in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations 1996, (herein after referred to as SEBI (MF) Regulations) as amended till date and circulars issued thereunder filed with SEBI, along with a Due Diligence Certificate from the AMC. The units being offered for public subscription have not been approved or recommended by SEBI nor has SEBI certified the accuracy or adequacy of the Scheme Information Document.**

The Scheme Information Document sets forth concisely the information about the scheme that a prospective investor ought to know before investing. Before investing, investors should also ascertain about any further changes to this Scheme Information Document after the date of this Document from the Mutual Fund / Investor Service Centres / Website / Distributors or Brokers.

**The investors are advised to refer to the Statement of Additional Information (SAI) for details of ITI Mutual Fund, Standard Risk Factors, Special Considerations, Tax and Legal issues and general information on www.itiamc.com.**

**SAI is incorporated by reference (is legally a part of the Scheme Information Document). For a free copy of the current SAI, please contact your nearest Investor Service Centre or log on to our website. i.e. www.itiamc.com.**

**The Scheme Information Document (Section I and II) should be read in conjunction with the SAI and not in isolation.**

This Scheme Information Document is dated July 23, 2024.

## INDEX

The Scheme Information Document has two sections- Section I and Section II.

While Section I contains scheme specific information that is dynamic, Section II contains elaborated provisions (including references to applicable Regulations/circulars/guidelines) with reference to information/disclosures provided in Section I.

## SECTION I

### Part I. HIGHLIGHTS/SUMMARY OF THE SCHEME

| Sr. No. | Title | Description |
|---|---|---|
| I. | **Name of the scheme** | ITI Large & Mid Cap Fund |
| II. | **Category of the Scheme** | Large & Mid Cap Fund |
| III. | **Scheme type** | An open ended equity scheme investing in large cap & Mid cap stocks |
| IV. | **Scheme code** | ITIM/O/E/LMF/24/06/0019 |
| V. | **Investment objective** | The investment objective of the Scheme is to seek to generate long term capital appreciation by investing in equity and equity related securities of large cap & mid cap stocks. However, there can be no assurance that the investment objective of the scheme would be achieved. |
| VI. | **Liquidity/listing details** | Units of the Scheme will be available for Subscription and/or Redemption at NAV related prices on every Business Day commencing not later than 5 Business Days from the date of allotment of Units post the NFO Period.<br><br>The Scheme being offered is open - ended scheme and will offer units for sale / switch - in and redemption / switch - out, on every business day at NAV based prices subject to applicable loads. As per the Regulations, the Mutual Fund shall dispatch redemption proceeds within 3 working days from the date of redemption request subject to exceptional situations and additional timelines for redemption payments provided by AMFI vide its letter no. AMFI/ 35P/ MEM - COR/ 74 / 2022 - 23 dated January 16, 2023. A penal interest of 15% p.a. or such other rate as may be prescribed by SEBI from time to time, will be paid in case the payment of redemption proceeds is not made within 3 working days from the date of redemption. Further, in certain circumstances [as outlined in SAI – refer section on 'Restrictions on Redemptions'], restrictions on redemptions may be imposed. |
| VII. | **Benchmark (Total Return Index)** | The scheme's benchmark is NIFTY LARGE - MIDCAP 250 Index (TRI)<br>The benchmark is based on AMFI Tier-1 benchmark.<br>NIFTY LARGE - MIDCAP 250 Index (TRI) is a diversified 250 stock index representing major sectors of the economy. This index is intended to measure the performance of large & mid cap market capitalisation companies. Hence, it is an appropriate benchmark for the Scheme. |
| VIII. | **NAV disclosure** | The AMC will calculate and disclose the first NAV of the Scheme within 5 business days from the date of allotment. Subsequently, the AMC will calculate and disclose the NAVs on all the Business Days. The AMC shall update the NAVs on its website (www.itiamc.com) and of the Association of Mutual Funds in India - AMFI (www.amfiindia.com) before 11.00 p.m. on every Business Day. In case of any delay, the reasons for such delay would be explained to AMFI in writing. If the NAVs are not available before the commencement of Business Hours on the following day due to any reason, the Mutual Fund shall issue a press release giving reasons and explaining when the Mutual Fund would be able to publish the NAV.<br><br>The NAV of the Scheme will be calculated and declared by the Fund on every Working Day. The information on NAV may be obtained by |

| | | |
|---|---|---|
| | | the Unitholders, on any business day from the office of the AMC / the office of the Registrar in Hyderabad or any of the other Designated Investor Service Centres. For further details, kindly refer Section II (B) of the SID. |
| IX. | **Applicable timelines** | **Timeline for Dispatch of redemption proceeds**<br><br>The redemption or repurchase proceeds shall be dispatched to the unitholders within 3 business days from the date of redemption or repurchase, except for the circumstances as specified by AMFI.<br><br>**Dispatch of IDCW (if applicable) etc.**<br><br>The Income Distribution Cum Capital Withdrawal (IDCW) proceeds will be dispatched within 7 working days from the Record Date.<br><br>**Delay in payment of redemption / repurchase / IDCW proceeds.**<br><br>In case delay in payment of redemption proceeds, the AMC shall be liable to pay interest to the unitholders at such rate as may be specified by SEBI for the period of such delay (presently @ 15% per annum) if the delay is beyond the SEBI stipulated time which is 3 Business Days.<br><br>In case the AMC delays in dispatching the IDCW proceeds beyond 7 working days from the Record Date, it shall pay interest to the unitholders at such rate as may be specified by SEBI for the period of such delay (presently @ 15% per annum). |
| X. | **Plans and Options**<br>Plans/Options and sub-options under the Scheme | **1) Plans: Regular Plan and Direct Plan**<br>o The Plans will have a common portfolio and separate NAVs.<br><br>o Direct Plan is only for investors who purchase /subscribe Units in the scheme directly with the Fund and is not available for investors who route their investments through a Distributor.<br><br>**2) Options under each Plan:**<br>i) Growth<br>ii) Income Distribution cum Withdrawal (IDCW),<br><br>3) **Sub-options under IDCW:**<br>- IDCW Payout<br>- IDCW Reinvestment<br><br>Amounts under IDCW option can be distributed out of investors capital (equalization reserve), which is part of sale price that represents realized gains. However, investors are requested to note that amount of distribution under IDCW option is not guaranteed and subject to availability of distributable surplus.<br><br>**Additional Plans**<br><br>The Trustees may permit introduction of one or more plans that may be envisaged at a later date under the scheme in terms of Para-no 2.3 of SEBI Master Circular depending upon the market conditions prevailing at the time of launch of the plan(s) and taking into consideration the interests of the unitholders and subject to the SEBI regulations. Investors will be suitably informed by publishing a notice in a newspaper/addendum or through any other means as the Trustee may be considered appropriate.<br><br>**Default option/sub-option:** If the investor does not clearly specify |

the choice of option (Growth / IDCW) at the time of investing, it will be treated as a Growth option. If the investor does not clearly specify at the time of investing, the choice of sub-option under IDCW, it will be treated as a IDCW Reinvestment option.

In case, the IDCW amount is less than Rs. 500/-, then it will be compulsorily reinvested in the existing plan of the scheme, invested by the investor.

**Default Plan**

Investors subscribing under Direct Plan of the Scheme will have to indicate “Direct Plan” against the Scheme name in the application form. However, if distributor code is mentioned in application form, but “Direct Plan” is mentioned against the Scheme name, the distributor code will be ignored and the application will be processed under “Direct Plan”. Further, where application is received for Regular Plan without Distributor code or “Direct” mentioned in the ARN Column, the application will be processed under Direct Plan.

The below table summarizes the procedures which would be adopted by the AMC for applicability of Direct Plan / Regular Plan, while processing application form /transaction request under different scenarios:

| Sr. no | AMFI Registration Number (ARN) Code mentioned in the application Form / transaction request | Plan as selected in the application form / transaction request | Transaction shall be processed and Units shall be allotted under |
|---|---|---|---|
| 1 | Not mentioned | Not mentioned | Direct Plan |
| 2 | Not mentioned | Direct | Direct Plan |
| 3 | Not mentioned | Regular | Direct Plan |
| 4 | Mentioned | Direct | Direct Plan |
| 5 | Direct | Not Mentioned | Direct Plan |
| 6 | Direct | Regular | Direct Plan |
| 7 | Mentioned | Regular | Regular Plan |
| 8 | Mentioned | Not Mentioned | Regular Plan |

In cases of wrong/ incomplete ARN codes mentioned on the application form, the application shall be processed under Regular Plan. The AMC shall endeavour to contact the investor/distributor and obtain the correct ARN code within 30 calendar days of the receipt of the application form from the investor/ distributor. In case, the correct code is not received within 30 calendar days, the AMC shall reprocess the transaction under Direct Plan from the date of application without any exit load. Further, in line with AMFI Best Practices Guidelines Circular no. 111/ 2023/ 2024 dated February 02, 2024, in case of invalid ARN code mentioned on the application form, the application will be processed under Direct Plan.

Invalid ARN has been defined to include ARN validity period expired, ARN cancelled /terminated, ARN suspended, ARN Holder deceased, Nomenclature change (as required pursuant to SEBI (Investment Advisers) Regulations, 2013) and not complied by the Mutual Fund Distributor (‘MFD’), MFD is debarred by SEBI, ARN not present in AMFI ARN database, ARN not empanelled with AMC.

| | | |
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| | | **Default Option – Growth**<br>**Default facility under IDCW Option – Reinvestment**<br><br>For detailed disclosure of default plans and options, kindly refer SAI. |
| **XI.** | **Load Structure** | **Entry Load:** Not Applicable<br><br>Pursuant to SEBI Master circular dated May 19, 2023 no entry load will be charged by the Scheme to the investor. The upfront commission on investment made by the investor, if any, shall be paid to the ARN Holder (AMFI registered Distributor) directly by the investor, based on the investor's assessment of various factors including service rendered by the ARN Holder<br><br>**Exit Load*:**<br><br>• 0.50% if redeemed or switched out on or before completion of 3 months from the date of allotment of units<br>• Nil, if redeemed or switched out after completion of 3 months from the date of allotment of units.<br>No Entry / Exit Load shall be levied on units allotted on Reinvestment of Income Distribution cum Capital Withdrawal Option.<br><br>In respect of Systematic Transactions such as SIP, STP, SWP, Exit Load, if any, prevailing on the date of registration / enrolment for SIP/STP/SWP shall be levied for all the opted Installments<br>.<br>Redemption of units would be done on First in First out Basis (FIFO).<br>*The entire Exit Load, net of Goods & service tax, shall be credited to the Scheme |
| **XII.** | **Minimum Application Amount/switch in** | During NFO & on continuous basis:<br><br>Rs. 5,000/- and in multiples of Rs. 1/- thereafter.<br><br>There is no minimum balance required to be maintained in the scheme<br><br>**Note:** Allotment of units will be done after deduction of applicable stamp duty and transaction charges, if any. |
| **XIII.** | **Minimum Additional Purchase Amount** | Rs. 1,000/- and in multiples of Rs. 1/- thereafter |
| **XIV.** | **Minimum Redemption / switch outamount** | Rs. 1,000/- and in multiples of Rs. 1/- thereafter or the account balance, whichever is lower.<br><br>There will be no minimum redemption criterion for Unit based redemption. |
| **XV.** | **New Fund Offer Period** This is the period during which a new scheme sells its units to the investors. | NFO opens on: August 21, 2024<br>NFO closes on: September 4, 2024<br><br>Minimum duration to be 3 working days and will not be kept open for more than 15 days.<br>Any changes in dates will be published through notice on AMC website i.e.www.itiamc.com. |
| **XVI** | **New Fund Offer Price:** This is the price per unit that the investors have to pay to invest during the | Rs. 10 price per unit |

| | | |
|---|---|---|
| | NFO. | |
| **XVII.** | **Segregated portfolio/side pocketing disclosure** | In order to ensure fair treatment to all investors in case of a credit event at issuer level and to deal with liquidity risk, the AMC may create a segregated portfolio of debt and money market instruments. Creation of Segregated portfolio is optional and is at the discretion of the AMC. Further, Creation of Segregated Portfolio shall be subject to Para-no. 4.4 of SEBI Master Circular dated May 19, 2023 as amended from time to time.<br><br>For Details, kindly refer SAI. |
| **XVIII** | **Swing pricing disclosure** | This is not applicable to equity schemes. |
| **XIX.** | **Stock lending/short selling** | The Scheme may engage in short selling of securities in accordance with framework relating to short selling and securities lending and borrowing specified by SEBI. For details on this provision, kindly refer SAI. |
| **XX.** | **How to Apply and other details** | For Summary of process please refer to the SAI and application form for the instructions and Details in section II. |
| **XXI.** | **Investor services** | **Contact details for general service requests:**<br><br>Toll Free No. – 1800-266- 9603, write to mfassist@itiorg.com or send communications to registered office address<br><br>**Contact details for complaint resolution:**<br><br>Ms. Nimisha Keny, Investor Relations Officer or write to mfassist@itiorg.com |
| **XXII** | **Specific attribute of the scheme (such as lock in, duration in case of targetmaturity scheme/close ended schemes) (as applicable)** | Not Applicable |
| **XXIII** | **Special product/facility available during the NFO and on ongoing basis** | The Special Products / Facilities available under the Scheme, are:<br>i) **Systematic Investment Plan :** This facility enables investors to save and invest periodically over a long period of time. At the time of registration, the SIP allows the investors to invest a fixed equal amount for purchasing units of the scheme on specified periodic intervals which are daily/ weekly/ monthly. The provision for Minimum Application Amount will not be applicable under SIP Investments.<br><br>ii) **Systematic Transfer Plan:** This facility enables the Unit holder to transfer fixed amount periodically from one scheme of the Mutual Fund ("Transferor Scheme") to another ("Transferee Scheme") by redeeming units of the Transferor Scheme at the Applicable NAV, subject to Exit Load, if any and investing the same amount in Transferee Scheme at the Applicable NAV, on a recurrent basis for a specified period at specified frequency as per the investor's STP mandate. It offers daily/ weekly/ monthly quarterly frequency.<br><br>iii) **Systematic Withdrawal Plan:** This facility enables an investor to withdraw a specified amount at predetermined intervals from the investments in the Scheme. Monthly and Quarterly frequencies are available under this facility. All terms and |

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|---|---|---|
| | | conditions for SIP/STP/SWP, including Exit Load, if any, prevailing in the date of SIP/STP/SWP enrolment/registration by the fund shall be levied in the Scheme.<br><br>iv) **Transfer of Income Distribution cum capital withdrawal plan:** Under this facility, the IDCW declared in the Scheme, if any, can be transferred to any other openended scheme of the Fund (in existence at the time of declaration of IDCW, as per the features of the respective scheme) at the Applicable NAV based prices.<br><br>v) **One Time Mandate:** This facility enables the Unitholder(s) to transact with in a simple, convenient and paperless manner by submitting OTM - One Time Mandate registration form to the Fund which authorizes his/her bank to debit their account upto a certain specified limit based per day (subject to the statutory limits per transaction), as and when the transaction is undertaken by the Investor, without the need of submitting cheque or fund transfer letter with every transaction thereafter. It enables investment either through Systematic Investment Plan (SIP) or Lumpsum investments in the schemes of the Fund by sending instructions indicating OTM usage for transaction through online or any other mode as enabled by ITIAML from time to time.<br><br>vi) **Auto Switch Facility**: Under this facility, the specified units from the Transferor Scheme will be automatically switched out at the closing applicable NAV as on the last date of the New Fund Offer (NFO) period and that the units in NFO Scheme will be allotted at the NFO Price on the allotment date.<br><br>vii) **Facility to purchase/ redeem units of the Scheme through Stock Exchange Mechanism (as and when provided):** The investors can subscribe to / switch / redeem the Units of the Scheme under “Growth” option through Mutual Fund Service System (“MFSS / NFM II”) platform of National Stock Exchange and “BSEStAR MF” platform of Bombay Stock Exchange.<br><br>**For further details of above special products / facilities, kindly refer SAI** |
| **XXV.** | **Weblink** | Refer the below weblinks :<br>TER for last 6 months - Not Applicable<br>Daily TER – Not Applicable<br>Factsheet of the Fund - https://www.itiamc.com/downloads |

**DUE DILIGENCE BY THE ASSET MANAGEMENT COMPANY**

It is confirmed that:

1. The draft Scheme Information Document of ITI Large & Mid Cap Fund, forwarded to SEBI, is in accordance with the SEBI (Mutual Funds) Regulations, 1996 and the guidelines and directives issued by SEBI from time to time.

2. All legal requirements connected with the launching of the Scheme as also the guidelines, instructions etc., issued by the Government and any other competent authority in this behalf, have been duly complied with.

3. The disclosures made in the Scheme Information Document are true, fair and adequate to enable the investors to make a well-informed decision regarding investment in the proposed Scheme.

4. All the intermediaries named in the Scheme Information Document and Statement of Additional Information are registered with SEBI and their registrations are valid, as on date.

5. The contents of the Scheme Information Document including figures, data, yields, etc. have been checked and are factually correct.

6. The AMC has complied with the compliance checklist applicable for Scheme Information Documents and other than cited deviations/ that there are no deviations from the regulations.

7. Notwithstanding anything contained in this Scheme Information Document, the provisions of the SEBI (Mutual Funds) Regulations, 1996 and the guidelines there under shall be applicable.

8. The Trustee have ensured that the ITI Large & Mid cap Fund approved by them is a new product offered by ITI Mutual Fund and is not a minor modification of any existing Scheme/fund/Product.

**Sd/-**
**Vikas Pandya**
**Head -Compliance, Legal & Secretarial**

Date: July 23, 2024

Place: Mumbai

## Part II. INFORMATION ABOUT THE SCHEME

### A. HOW WILL THE SCHEME ALLOCATE ITS ASSETS?

Under normal circumstances, the asset allocation pattern will be as follows:

| Instruments | Indicative allocations (% of net assets) | | Risk Profile |
|---|---|---|---|
| | **Minimum** | **Maximum** | |
| Equity and Equity related instruments of large and mid cap companies of which: | 70 | 100 | Very High |
| Large Cap^ companies | 35 | 65 | Very High |
| Mid Cap^ Companies | 35 | 65 | Very High |
| Small Cap^ Companies | 0 | 30 | Very High |
| Debt and Money Market Instruments | 0 | 30 | Low to Medium |
| Units issued by REITs and InvITs | 0 | 10 | Very High |

^Investment universe of “Large Cap”, “Mid Cap” and “Small Cap”:
The investment universe of “Large Cap”, “Mid Cap” and “Small Cap” shall comprise companies as defined by SEBI from time to time.

In terms of clause 2.7.1 of Master Circular-
 the universe of “Large Cap” shall consist of 1st to 100th company in terms of full market capitalization;
 the universe of “Mid Cap” shall consist of 101st to 250th company in terms of full market capitalization;
 the universe of “Small Cap” shall consist of 251st company onwards in terms of full market capitalization;
and that the Scheme will be required to adhere the following:

- The list of stocks of “Large Cap”, “Mid Cap” and “Small Cap” companies prepared by AMFI in this regard will be adopted.
- The said list would be uploaded on the AMFI website and would be updated every six months based on the data as on the end of June and December of each year or periodically as specified by SEBI.
- Subsequent to any updation in the said list as uploaded by AMFI, the portfolio of the Scheme will be rebalanced within a period of one month.

The exposure across these stocks will be in line with limits/classification defined by AMFI/SEBI from time to time.

**Indicative Table** (Actual instrument/percentages may vary subject to applicable SEBI circulars)

| Sl. No | Type of Instrument | Percentage of exposure | Circular references |
|---|---|---|---|
| 1. | Securities Lending | Upto 20% of net assets in securities lending and not more than 5% of net assets will be deployed with single intermediary. | SEBI Master circular dated May 19, 2023 – Clause 12.11-Stock Lending scheme |
| 2. | Derivatives for non-hedging purposes | Upto 50% of net assets, including fixed income derivatives * | SEBI Master circular dated May 19, 2023 – Clause 12.25- Norms for investment and disclosure by Mutual Funds in derivatives |
| 3. | Securitized Debt | Upto 35% of the of debt portfolio of the Scheme. | SEBI Master circular dated May 19, 2023 – Clause 12.15-Investment restrictions for securitized debt |

| Sl. No | Type of Instrument | Percentage of exposure | Circular references |
|---|---|---|---|
| 4. | Overseas Securities | The scheme will not invest in these securities | SEBI Master circular dated May 19, 2023 – Clause 12.19-Overseas investment |
| 5. | REITs and InvITs | Upto 10% of the net assets | SEBI Master circular dated May 19, 2023 – Clause 12.21-Investments in units of REITs / InvITs |
| 6. | Debt instruments with special features (AT1 and AT2 Bonds), structured obligations, credit enhancements | The scheme will not invest in these securities | SEBI Master circular dated May 19, 2023 – Clause 12.2-Investment in instruments having special features |
| 7. | Repo / reverse repo in Corporate debt securities | Upto 10% of the net assets and only in AA and above rated corporate debt securities | SEBI Master circular dated May 19, 2023 – Clause 12.18-Participation of mutual funds in repo in corporate debt securities |
| 8. | Credit Default Swap | The scheme will not invest in these securities | SEBI Master circular dated May 19, 2023 – Clause 12.28-CDS-mutual funds as users (protection buyers) |
| 9, | Short term deposits with scheduled commercial banks | Upto 15% of net assets, which can be extended to 20% with Trustees approval | SEBI Master circular dated May 19, 2023 – Clause 12.16-Investment in short term deposits of scheduled commercial banks |
| 10. | Debt Instruments with SO / CE | The scheme will not invest in these securities | SEBI Master circular dated May 19, 2023 – Clause 12.3- Restrictions on Investment in debt instruments having Structured Obligations / Credit Enhancements. |

*The Scheme may use derivatives for purposes as may be permitted from time to time and in accordance with Para 12.25 of SEBI Master Circular dated May 19, 2023. The maximum equity derivative exposure will be restricted to 50% of the equity portfolio and maximum debt derivative exposure will be restricted to 50% of the debt portfolio of the Scheme.

The cumulative gross exposure through equity, debt, derivative positions (including fixed income derivatives), repo transactions in corporate debt securities, REITs/INvTs, other permitted securities/assets and such other securities/assets as may be permitted by the Board from time to time should not exceed 100% of the net assets of the Scheme. Further, the gross exposure limit will not include cash and cash equivalents having residual maturity of less than 91 days (government securities, repo on government securities and treasury bills).

The Scheme may invest in other schemes managed by the AMC or in the schemes of any other mutual funds, provided it is in conformity with the investment objectives of the Scheme and in terms of the prevailing SEBI (MF) Regulations. As per he SEBI (MF) Regulations, no investment management fees will be charged for such investments and the aggregate inter scheme investment made by all the schemes of ITI Mutual Fund or in the schemes of other mutual funds shall not exceed 5% of the net asset value of ITI Mutual Fund.

As per the regulatory requirement, the Scheme may deploy NFO proceeds in Tri Party repo before the closure of NFO period. However, the AMC shall not charge any investment management and advisory fees on funds deployed in Tri Party repo during the NFO period.

**Change in Investment Pattern & Portfolio rebalancing**

**Rebalancing due to Short Term Defensive Consideration:** Due to market conditions, the AMC may invest beyond the range set out in the asset allocation. Such deviations shall normally be for a short term and defensive considerations as per para 1.14.1.2 of SEBI Master Circular on Mutual Funds dated May 19,2023, and the fund manager will rebalance the portfolio within 30 calendar days from the date of deviation.

**Rebalancing due to Passive Breaches:** Further, as per para 2.9 of SEBI Master Circular on Mutual Funds dated May 19,2023, as may be amended from time to time, in the event of deviation from mandated asset allocation due to passive breaches (occurrence of instances not arising out of omission and commission of the AMC), the fund manager shall rebalance the portfolio of the Scheme within 30 Business Days. In case the portfolio of the Scheme is not rebalanced within the period of 30 Business Days, justification in writing, including details of efforts taken to rebalance the portfolio shall be placed before the Investment Committee of the AMC. The Investment Committee, if it so desires, can extend the timeline for rebalancing up to sixty (60) Business Days from the date of completion of mandated rebalancing period. In case the portfolio of scheme is not rebalanced within the aforementioned mandated plus extended timelines, AMCs shall:

I. not be permitted to launch any new scheme till the time the portfolio is rebalanced.
II. not to levy exit load, if any, on the investors exiting such scheme(s).

**B. WHERE WILL THE SCHEME INVEST?**

In order to achieve investment objectives, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities:

1) Equity and equity-related Securities including but not limited to derivatives (stock futures/ index futures and other such permitted derivative instruments including options), equity warrants and convertible instruments.
2) Preference shares and convertible preference shares.
3) Debt instruments (both public and private sector) issued by banks / development financial institutions.
4) Money Market instruments permitted by SEBI including alternative investments for the call money market as may be provided by RBI to meet the liquidity requirements.
5) Securities created and issued by the Central and State Governments as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). State Government Securities (popularly known as State Development Loans or SDLs) are issued by the respective State Government in co-ordination with the RBI.
6) Debt instruments issued by Domestic Government Agencies and statutory bodies, which may or may not carry a Central / State Government guarantee.
7) Corporate Bonds of public sector or private sector undertakings.
8) Corporate debt and securities (of both public and private sector undertakings) including Bonds, Debentures, Notes, Strips, etc.
9) Tri-party Repo in Government Securities
10) Securitized Debt (SD)/Pass Through Certificate (PTC)
11) Debt derivative instruments like Interest Rate Futures (IRFs), Interest Rate Options (including Call and Put options) and Interest Rate Swaps
12) Reverse Repo
13) Repo in Corporate Debt Securities
14) Treasury Bill (T-Bill)
15) Non convertible debentures and bonds
16) Floating rate debt instruments
17) Investments in units of mutual fund schemes
18) Units issued by REITs and InvITs
19) Any other like instruments as may be permitted by RBI/SEBI/ such other regulatory authority from time to time.

Money market instruments permitted by SEBI/RBI, in Tri Party repo market or in alternative investment for the Tri Party repo market as may be provided by the RBI to meet the short-term liquidity requirements. Securities in which investment is made for the purpose of ensuring liquidity (debt and money market instruments) are those that fall within the definition of liquid assets as given by SEBI/RBI.

The securities mentioned above and such other securities, the Scheme is permitted to invest, could be listed, unlisted,IPO's, secondary market operations, privately placed, rights offers or negotiated deals, secured, unsecured, rated or unrated and of any maturity.

For applicable regulatory investment limits, please refer the section on "Investment Restrictions", under Section II

The Fund Manager reserves the right to invest in such other securities as may be permitted from time to time and which are in line with the investment objectives of the Scheme.

Subject to the above, any change in the asset allocation affecting the investment profile of the Scheme shall be effected only in accordance with the provisions of sub regulation (15A) of Regulation 18 of the SEBI Regulations, as detailed later in this document.

### *C. WHAT ARE THE INVESTMENT STRATEGIES?*

The Scheme will invest in Equity and Equity Related Instruments of Large Cap & Mid Cap companies with strong growth and sustainable business models, whilst managing risk. Large cap companies are companies which have a market capitalization of upto the top 100th listed company in terms of full market capitalization & the universe of "Mid Cap" shall consist of 101st to 250th listed company in terms of full market capitalization as prescribed under SEBI Master circular dated May 19, 2023,Chapter 2.7 – 'Definition of Large Cap, Mid Cap and Small Cap' as amended from time to time.

The Scheme may also seek participation in other equity and equity related securities to achieve optimal portfolio construction.

The Scheme will have an actively managed investment strategy. The portfolio will be built utilising a bottom-up stock selection process, focusing on appreciation potential of individual stocks from a fundamental perspective. The Scheme may also invest a certain portion of its corpus in debt and money market securities. Investment in debt securities will be guided by credit quality, liquidity, interest rates and their outlook.

**Trading in Derivatives:**

The scheme intends to use derivatives actively in-addition to the purpose of hedging and portfolio balancing or such other purpose as may be permitted under the Regulations from time to time. The same shall be within the permissible limit prescribed by SEBI (Mutual Funds) Regulations, 1996 from time to time.

Derivative transactions that can be undertaken by the Scheme include a wide range of instruments, including, but not limited to Futures, Options, swaps, any other instrument, as may be regulatory permitted.

**A) Futures** - Futures (Index & Stocks) are forward contracts traded on the exchanges & have been introduced both by BSE and NSE. Generally futures of 1 month (near month), 2 months (next month) and 3 months (far month) are presently traded on these exchanges. These futures expire on the last working Thursday of the respective months. Some strategies are mentioned below:

(i) *Arbitrage* – The Scheme may use the strategy of i) selling spot and buying future or ii) Buying spot and selling future.

(ii) *Buying/Selling stock futures* - When the Scheme wants to initiate a long position in a stock whose spot price is at say, Rs.100 and futures is at 98, then the Scheme may just buy the futures contract instead of the spot thereby benefiting from a lower cost.

(iii) *Hedging* - The Scheme may use exchange-traded derivatives to hedge the equity portfolio. Both index and stock futures and options may be used to hedge the stocks in the portfolio.

(iv) *Alpha Strategy* -The Scheme will seek to generate alpha by superior stock selection and removing market risks by selling appropriate index. For example, one can seek to generate positive alpha by buying a bank stock and selling Bank Nifty future.

***B)*** **Option Contracts (Stock and Index) -** An Option gives the buyer the right, but not the obligation, to buy (call) or sell (put) a stock at an agreed-upon price during a certain period of time or on a specific date.

(i) *Index options/Stock options* - Index options / Stock options are termed to be an efficient way of buying / selling an index/stock compared to buying / selling a portfolio of physical shares representing an index for ease of execution and settlement. The participation can be done by buying / selling either Index futures or by buying a call/put option.

**(ii)** *Covered Call Strategy* - The covered call strategy is a strategy where a fund manager writes call options against an equivalent long position in an underlying stock thereby giving up a part of the upside from the long position.

**C) Fixed Income Derivative instruments -** The Scheme may use Derivative instruments like interest rate swaps like overnight indexed swaps (OIS), forward rate agreements, interest rate futures or such other Derivative instruments as may be permitted under the applicable regulations.

Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies. The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments. Investors may refer the SAI for details on the Derivative strategies along with illustrations for better understanding.

**Portfolio Turnover:**

The Scheme being an open ended equity scheme, it is expected that there would be a number of subscriptions and redemptions on a daily basis. Consequently, it is difficult to estimate with any reasonable measure of accuracy, the likely turnover in the portfolio.

There may be an increase in transaction cost such as brokerage paid, if trading is done frequently. However, the cost would be negligible as compared to the total expenses of the Scheme. Frequent trading may increase the profits which will offset the increase in costs. The fund manager will endeavor to optimize portfolio turnover to maximize gains and minimize risks keeping in mind the cost associated with it. However, it is difficult to estimate with reasonable accuracy, the likely turnover in the portfolio of the Scheme. The Scheme has no specific target relating to portfolio turnover.

## *D. HOW WILL THE SCHEME BENCHMARK ITS PERFORMANCE?*

The performance of the Scheme will be benchmarked with NIFTY Large Midcap 250 Total Return Index.

The composition of the aforesaid benchmark is such that it is most suited for comparing performance of the scheme.

Also, as required under Para 1.9 of SEBI Master circular No. SEBI/HO/IMD/IMD-PoD1/P/CIR/2023/74 dated May 19, 2023, the benchmark has been selected from amongst those notified by AMFI as the first-tier benchmark to be adopted by mutual funds and which are reflective of the category of the scheme.

Further, pursuant to SEBI circular on benchmark, Association of Mutual Funds in India (AMFI), in consultation with AMFI valuation committee, has published the list of benchmark as 1st tier benchmarks for mutual fund schemes and the same is also made available on its website https://www.amfiindia.com/research-information/other-data and https://www.amfiindia.com/importantupdates.

## *E. WHO MANAGES THE SCHEME?*

All funds will be managed in a co-fund manager model. Co-managed by Mr. Vishal Jajoo and Mr. Rohan Korde.

| Name of the Fund Manager | Age / Qualification | Experience of the Fund Manager in the last 10 years | Other Schemes managed by the Fund Manager |
|---|---|---|---|
| Mr. Vishal Jajoo | **Age**: 42 years<br>**Qualification:** Chartered Accountant, PGDM (Finance), MBA (Investments | Mr. Jajoo joined ITI Asset Management Limited in January 2023 and has over 15 years of work experience in Investment Management.<br><br>**Past experience-** December 2014 – January 2023 with Tata Investments Corporation limited as Senior Investment Manager; February 2011 – December 2014 with Nirmal Bang Securities Pvt. Ltd. as research analyst. | Fund Manager of ITI ELSS tax saver fund. Co-fund manager of ITI Balance advantage fund and ITI Large Cap Fund |

| Name of the Fund Manager | Age / Qualification | Experience of the Fund Manager in the last 10 years | Other Schemes managed by the Fund Manager |
|---|---|---|---|
| Mr. Rohan Korde | Age: 43 Qualification: Masters in Management Studies (Finance), Bachelor of Commerce | Mr. Korde joined ITI AMC in June 2019 and has over 17 years of work experience in capital markets. His focus has been on fundamental research on investment ideas across various sectors and industries. **Past Experience**: September 2017 – May 2019 with BOB Capital Markets as Vice President Research; February 2015 – August 2017 with Prabhudas Lilladher as Vice President Research; February 2009 – February 2015 with Anand Rathi Share & Stock Brokers as Vice President Research. | Co-Fund Manager of ITI Small Cap Fund, ITI Multi Cap Fund, ITI Value Fund, ITI Pharma and Healthcare Fund, ITI Banking and Financial Services Fund, ITI Flexi Cap Fund, ITI Mid Cap Fund, ITI Focused Equity Fund and ITI Large Cap Fund |

### *F. HOW IS THE SCHEME DIFFERENT FROM EXISTING SCHEMES OF THE MUTUAL FUND?*

The existing open-ended equity and hybrid schemes of ITI Mutual Fund is as below :

| Sr.No. | Name of scheme | Type of scheme |
|---|---|---|
| 1 | ITI ELSS Tax Saver Fund | An open ended equity linked saving scheme with a statutory lock in of 3 years and tax benefit |
| 2 | ITI Multi Cap Fund | An open-ended equity scheme investing across large cap, mid cap, small cap stocks |
| 3 | ITI Large Cap Fund | An open ended equity scheme predominantly investing in large cap stocks |
| 4 | ITI Mid Cap Fund | An open ended equity scheme predominantly investing in Mid Cap stocks |
| 5 | ITI Small Cap Fund | An open ended equity scheme predominantly investing in small cap stocks) |
| 6 | ITI Value Fund | An open-ended equity scheme following a value investment strategy |
| 7 | ITI Pharma and Healhcare Fund | An open ended Equity scheme investing in Pharma andHealthcare |
| 8 | ITI Banking and Financial Services Fund | An open ended equity scheme investing in Banking and Financial Services |
| 9 | ITI Flexi Cap Fund | An open ended dynamic equity scheme investing across large cap, mid cap, small cap stocks |
| 10 | ITI Focused Equity Fund | An open ended equity scheme investing in maximum 30 stocks across market capitalization |
| 11 | ITI Balanced Advantage Fund | An open ended dynamic asset allocation fund |
| 12 | ITI Arbitrage Fund | An open ended scheme investing in arbitrage opportunities |
| 13 | ITI Multi Cap Fund | An open-ended equity scheme investing across large cap, mid cap, small cap stocks |

For a detailed comparison table of aspects viz., scheme type, investment objective, differentiation, Assets Under Management and No. of folios of each of the above schemes, kindly refer the below link https://www.itiamc.com/statuory-disclosure

### *G. HOW HAS THE SCHEME PERFORMED*

This Scheme is a new scheme and does not have any performance track record.

### H. ADDITIONAL SCHEME RELATED DISCLOSURES

a) **Scheme's portfolio holdings:** Not applicable as the scheme is a new Scheme
**b) Disclosure of name and exposure to Top 7 issuers, stocks, groups and sectors as a percentage of NAV of the scheme in case of debt and equity ETFs/index funds through a functional website link that contains detailed description:** Not applicable as the scheme is a new Scheme
**c) Functional website link for Portfolio Disclosure - Fortnightly / Monthly/ Half Yearly:** Not applicable as the scheme is a new Scheme
**d) Portfolio Turnover Rate:** Not applicable as the scheme is a new Scheme
**e) Aggregate investment in the Scheme by concerned Scheme's Fund Manager (s) :** Not applicable as the scheme is a new Scheme

### Investment by the AMC, Trustee, Sponsor, or their associates in the scheme

The AMC, Trustee, Sponsor, or their affiliates may invest in the scheme in the NFO Period or thereafter at any time during the continuous offer period subject to the SEBI Regulations & circulars issued by SEBI and to the extent permitted by its Board of Directors from time to time. As per the existing SEBI Regulations, the AMC will not charge investment management and advisory fee on the investment made by it in the Scheme.

Further, the AMC shall based on the risk value assigned to the scheme in terms of Para 17.4.1of SEBI Master Circular on Mutual Funds dated May 19, 2023, invest minimum amount as a percentage of assets under management of the scheme as specified under Para 6.9 of SEBI Master Circular on Mutual Funds dated May 19, 2023 as amended from time to time.

During the NFO period, AMC's investment shall be made during the allotment of units and shall be calculated as a
percentage of the final allotment value excluding AMC's investment.

Please refer to the link https://www.itiamc.com/statuory-disclosure for AMC investments in ITI Mutual Fund Schemes.

**Part III- OTHER DETAILS**

## A. COMPUTATION OF NAV

The Net Asset Value (NAV) per unit of the Scheme for each option will be computed by dividing the net assets of the Scheme by the number of units outstanding on the valuation day. The AMC will value its investments according to the valuation norms, as specified in Schedule VIII of the SEBI (MF) Regulations, or such norms as may be specified by SEBI from time to time.

The NAV of the Units under the Scheme will be calculated on a daily basis as shown below:

$$\textbf{NAV per unit (Rs.)} = \frac{\textbf{(Market / Fair Value of Scheme's Investments + Current Assets including Accrued Income - Current Liabilities and Provisions)}}{\textbf{No. of units outstanding under the Scheme / Option on the valuation day}}$$

The NAV shall be calculated up to four decimal places. However, the AMC reserves the right to declare the NAVs up to additional decimal places as it deems appropriate. Separate NAV will be calculated and disclosed for each Plan/Option. The NAVs of the Growth Option and the IDCW Option will be different after the declaration of the first IDCW. The AMC will calculate and disclose the NAVs for all the business days.

Units of the Scheme can be redeemed/ switched out at the Applicable NAV subject to prevailing exit load. The Repurchase Price however, will not be lower than 95% of the NAV subject to SEBI Regulations as amended from time to time.

**Methodology of calculation of repurchase price:** For calculating the repurchase price, the exit load applicable at the time of investment shall be deducted from the applicable NAV of the Scheme.

Example: If the applicable NAV is Rs. 10.00, and the exit /repurchase load is 2 percent then the sales price will be Rs. 10.20 and the repurchase price will be Rs. 9.80

For other details such as policy on rounding off, procedure in case of delay in disclosure of NAV etc., kindly refer to SAI.

## B. NEW FUND OFFER (NFO) EXPENSES

These expenses are incurred for the purpose of various activities related to the NFO like sales and distribution fees paid, marketing and advertising, Registrar & Transfer Agents expenses, printing and stationary, bank charges etc. s per Para 10.1.12 of SEBI Master Circular on Mutual Funds dated May 19, 2023, the NFO expenses shall be borne by the AMC/ Sponsors as applicable and the same shall not be charged to the Scheme.

## C. ANNUAL SCHEME RECURRING EXPENSES

These are the fees and expenses for operating the Scheme. These expenses include Investment Management and Advisory Fee charged by the AMC, Registrar & Transfer Agent's fee, marketing and selling costs etc. as given in the table specified below:

The AMC has estimated that upto 2.25% of the daily net assets of the Scheme, will be charged to the Scheme as expenses. For the actual current expenses being charged, the Investor should refer to the website of the AMC https://www.itiamc.com/statuory-disclosure.

| Sr. No | Expenses Head | (% p.a. of Daily Net Assets* (Estimated p.a.) |
|---|---|---|
| i. | Investment Management & Advisory Fees | Upto 2.25% |
| ii. | Trustee Fees | |
| iii. | Audit Fees | |
| iv. | Custodian Fees | |
| v. | Registrar & Transfer Agent Fees including cost of providing account statements / IDCW / redemption cheques/ warrants | |
| vi. | Marketing & Selling expenses incl. agent commission and statutory advertisement | |
| vii | Costs related to investor communications | |
| viii. | Cost of fund transfer from location to location | |
| xi. | Cost towards investor education & awareness (at least 0.02 percent) | |
| xii. | Brokerage & transaction cost pertaining to distribution of units | |
| xiii. | Goods and Services tax on expenses other than investment and advisory fees | |
| xiv. | Goods and Services tax on brokerage and transaction cost | |
| xv. | Other Expenses# (to be specified as per Reg 52 of SEBI MF Regulations) | |
| **A.** | **Maximum total expense ratio (TER) permissible under Regulation 52 (6) (c)** | **Upto 2.25%** |
| B. | Additional expenses under regulation 52 (6A) (c) | **Upto 0.05%** |
| C. | Additional expenses for gross new inflows from specified cities under Regulation 52(6A)(b) | **Upto 0.30%** |

# Any other expenses which are directly attributable to the Schemes, may be charged within the overall limits as specified in the Regulations, except those expenses which are specifically prohibited as per Regulations.

These estimates have been made in good faith as per the information available to the Investment Manager and are subject to change inter-se or in total subject to prevailing Regulations. The AMC may incur actual expenses which may be more or less than those estimated above under any head and/or in total. Type of expenses charged shall be as per the SEBI Regulations.

The total expenses of the Scheme including the investment management and advisory fee shall not exceed the limit stated in Regulation 52 of the SEBI (MF) Regulations.

Direct Plan shall have a lower expense ratio excluding distribution expenses, commission, etc. and no commission for distribution of Units will be paid/ charged under Direct Plan.

***Impact of TER on Scheme returns (for both Direct and Regular plans)**

| **Particulars** | | **Regular Plan** | **Direct Plan** |
|---|---|---|---|
| Opening AUM | a | Rs. 10,000,000 | Rs. 10,000,000 |
| Opening NAV | b | 10.0000 | 10.0000 |
| O/s Units | C=a/b | 1,000,000 | 1,000,000 |
| Market Value of Investment (Assumed) | d | Rs. 10,002,650 | Rs. 10,002,650 |
| NAV before charging Expense Ratio | e=d/c | 10.0027 | 10.0027 |
| Total Expense Ratio in % | f | 2.00% | 1.50% |
| Total Expense Ratio in value | g=e*f | 0.0005 | 0.0004 |
| Closing NAV | h=e-g | 10.0022 | 10.0023 |
| Returns without expense Ratio | i | 9.67% | 9.67% |
| Returns with expense Ratio | j | 7.67% | 8.17% |

The above illustration is purely given to explain the impact of the expense ratio on a scheme's return and should not be construed as an indicative return of the scheme.

**Notes:**

1. The above computation assumes no investment/ redemption made during the year. The investment

is made in the Growth option of the scheme.
2. The above computation is simply to illustrate the impact of expenses of the schemes. The actual expenses charged to the schemes will not be more than the amount that can be charged to the scheme as mentioned in this SID.
3. It is assumed that expenses charged are evenly distributed throughout the year. Tax impact on customers has not been considered due to the individual nature of this impact.
4. Calculations are based on one day NAV and actual returns may differ from those considered above.

The current expense ratios will be updated on the AMC website and on the AMFI website at least three working days prior to the effective date of the change. The exact web link for TER is http://www.itiamc.com/statutory-disclosure/total-expense-ratio.

Goods and Services tax on expenses other than the investment management and advisory fees, if any, shall be charged to the Scheme within the maximum limit of total expense ratio as prescribed under regulation 52 of the SEBI (MF) Regulations. Goods and Services tax on brokerage and transaction cost paid for execution of trade, if any, shall be within the limit prescribed under regulation 52 of the SEBI (MF) Regulations.

' In terms of SEBI Master circular dated May 19, 2023,Chapter 10 – 'Loads, fees, charges and expenses', , the AMC shall annually set apart at least 0.02% on daily net assets within the maximum limit of recurring expenses as per Regulation 52 for investor education and awareness initiatives.

The total expenses of the Scheme including the investment management and advisory fee shall not exceed the limits stated in Regulation 52(6) which are as follows:

(i) On the first Rs. 500 crores of the daily net assets – 2.25%;
(ii) On the next Rs. 250 crores of the daily net assets – 2.00%;
(iii) On the next Rs. 1,250 crores of the daily net assets – 1.75%;
(iv) On the next Rs. 3,000 crores of the daily net assets – 1.60%;
(v) On the next Rs. 5,000 crores of the daily net assets – 1.50%
(vi) On the next Rs. 40,000 crores of the daily net assets – Total expense ratio reduction of 0.05% for every increase of Rs. 5,000 crores of daily net assets or part thereof.
(vii) On the balance of the assets – 1.05%;

In addition to the limits specified in Regulation 52 (6) of SEBI Regulations, the following costs or expenses may be charged to the Scheme:

(a) Brokerage and transaction cost incurred for the purpose of execution shall be charged to the schemes as provided under Regulation 52 (6A) (a) upto 12 bps and 5 bps for cash market transactions and derivatives transactions respectively. Any payment towards brokerage & transaction costs, over and above the said 12 bps and 5 bps for cash market transactions and derivatives transactions respectively may be charged to the Scheme within the maximum limit of Total Expense Ratio (TER) as prescribed under Regulation 52 of the SEBI (Mutual Finds) Regulations, 1996.

(b) Expenses not exceeding of 0.30 per cent of daily net assets, if the new inflows from such cities as specified by SEBI/AMFI from time to time are at least –

(i) 30 per cent of gross new inflows in the Scheme, or;
(ii) 15 per cent of the average assets under management (year to date) of the Scheme, whichever is higher:

Provided that if inflows from such cities is less than the higher of sub-clause (i) or sub- clause (ii), such expenses on daily net assets of the Scheme shall be charged on proportionate basis: Provided further that expenses charged under this clause shall be utilised for distribution expenses incurred for bringing inflows from such cities.

Provided further that amount incurred as expense on account of inflows from such cities shall be credited back to the scheme in case the said inflows are redeemed within a period of one year from the date of investment. Provided further that, additional TER can be charged based on inflows only from retail investors from B30 cities in terms of Master circular dated May 19, 2023,Chapter 10 – 'Loads, fees, charges and expenses'. For this purpose inflows of amount upto Rs. 2,00,000/- per transaction, by individual investors shall be considered as inflows from "retail investor". *Investors may* *kindly note that SEBI vide its letter no. SEBI/HO/IMD-SEC 3/P/OW/2023/5823/1 dated February 24, 2023 and AMFI vide letter no. 35P/MEM-COR/85-a/2022-23 dated March 02, 2023 has directed AMCs to keep B-30 incentive structure in abeyance with effect from March 01, 2023 until further notice.*

(c) Goods and Services tax on investment management and advisory fees shall be charged to the Scheme, in addition to the above expenses, as prescribed under the SEBI (MF) Regulations. All Scheme related expenses including commission paid to distributors, by whatever name it may be called and in whatever manner it may be paid, shall necessarily be paid from the Scheme only within the regulatory limits and not from the books of the AMC, its Associate, Sponsor, Trustee or any other entity through any route. However, expenses that are very small in value but high in volume may be paid out of AMC's books at actuals or not exceeding 2 bps of respective Scheme AUM, whichever is lower. A list of such miscellaneous expenses will be as provided by AMFI in consultation with SEBI.

Any circular/clarification issued by SEBI in regard to expenses chargeable to the Scheme/Plan(s) will automatically become applicable and will be incorporated in the SID/SAI/KIM accordingly.

## D. LOAD STRUCTURE

Load is an amount which is paid by the investor to redeem the units from the Scheme. Load amounts are variable and are subject to change from time to time. For the current applicable structure, please refer to the website of the AMC www.itiamc.com or may call at 1800-266-9603 (toll free no.) or your distributor.

| Type of Load | Load Chargeable (as % of NAV)# |
|---|---|
| Entry | Not Applicable<br>Pursuant to SEBI Master circular dated May 19, 2023 no entry load will be charged by the Scheme to the investor. The upfront commission on investment made by the investor, if any, shall be paid to the ARN Holder (AMFI registered Distributor) directly by the investor, based on the investor's assessment of various factors including service rendered by the ARN Holder. |
| Exit | • 0.50% if redeemed or switched out on or before completion of 3 months from the date of allotment of units<br>• Nil, if redeemed or switched out after completion of 3 months from the date of allotment of units.<br>Redemption of units would be done on First in First out Basis (FIFO).<br>*The entire Exit Load, net of Goods & service tax, shall be credited to the Scheme. |

# Applicable for normal subscriptions/redemptions including transactions under special products such as SIP, SWP, etc. offered by the AMC.

There shall be no exit load for switches between the options under the same Plan. Switch of investments from Regular Plan to Direct Plan under the Scheme shall be subject to applicable exit load, unless the investments were made directly i.e. without any distributor code. However, any subsequent switch-out or redemption of such investments from Direct Plan will not be subject to any exit load.

No exit load shall be levied for switch-out from Direct Plan to Regular Plan under the Scheme. However, any subsequent switch-out or redemption of such investment from Regular Plan shall be subject to exit load based on the original date of investment in the Direct Plan. There shall be no load on issue of units allotted on reinvestment of IDCW for existing as well as prospective investors.

At the time of changing the Load Structure:

1.An Addendum detailing the changes will be attached to Scheme Information Document (s) and Key Information Memorandum. The addendum may be circulated to all the distributors / brokers so that the same can be attached to all Scheme Information Documents and Key Information Memoranda already in stock.

2.The addendum will be displayed on the website of the AMC and arrangements will be made to display the addendum in the form of a notice in all the Investor Service Centres and distributors / brokers office.

3.The introduction of the Exit Load along with the details may be stamped in the acknowledgement slip issued to the investors on submission of the application form and may also be disclosed in the statement of accounts issued after the introduction of such Load.

4.A public notice shall be given in respect of such changes in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of region where the Head

Office of the Mutual Fund is situated.
5.Any other measure which the Mutual Fund may consider necessary
The investors / unitholders are requested to check the prevailing load structure of the Scheme before investing.

**E. REQUIREMENT OF MINIMUM INVESTORS IN THE SCHEME**

The Scheme shall have a minimum of 20 investors and no single investor shall account for more than 25% of the corpus of the Scheme. The two conditions mentioned above shall also be complied within each subsequent calendar quarter thereafter, on an average basis, as specified by SEBI. If there is a breach of the 25% limit by any investor over the quarter, a rebalancing period of one month would be allowed and thereafter the investor who is in breach of the rule shall be given 15 days notice to redeem his exposure over the 25 % limit. Failure on the part of the said investor to redeem his exposure over the 25% limit within the aforesaid 15 days would lead to automatic redemption by the Mutual Fund on the Applicable Net Asset Value on the 15th day of the notice period. The Fund shall adhere to the requirements prescribed by SEBI from time to time in this regard.

## Section II

**B. Introduction**

**A. Definitions/interpretation –** Kindly refer the Functional website link that contains detailed description https://www.itiamc.com/statuory-disclosure

***B. Risk factors***

- **Standard Risk Factors:**

**1)** Investment in Mutual Fund Units involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal.
**2)** As the price / value / interest rate of the securities in which the Scheme invests fluctuates, the value of your investment in the Scheme may go up or down, depending on the various factors and forces affecting the capital markets.
**3)** Past performance of the Sponsors/AMC/Mutual Fund does not guarantee future performance of the Scheme.
**4)** The name of the Scheme does not in any manner indicate either the quality of the Scheme or its future prospects and returns.
**5)** The Sponsors are not responsible or liable for any loss resulting from the operation of the Scheme beyond the initial contribution of an amount of Rs. 1 lakh made by it towards setting up the Fund.
**6)** ITI Large & Mid Cap Fund is not a guaranteed or assured return Scheme.
**7)** Although it is intended to generate capital appreciation and maximize the returns by actively investing in debt and money market instruments, investors may note that AMC/Fund Manager's investment decisions may not be always profitable.

**Scheme specific risk factors**

Different types of securities in which the Scheme would invest as given in the Scheme Information Document carry different levels and types of risk. Accordingly, the Scheme's risk may increase or decrease depending upon its investment pattern.

**1. Risks associated with investing in Equities and Equity related Securities:**

• The value of the Scheme's investments may be affected by factors affecting the securities markets such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in law / policies of the government, taxation laws and political, economic or other developments which may have an adverse bearing on individual Securities, a specific sector or all sectors. Consequently, the NAV of the Units of the Scheme may be affected.

• Equity Securities and equity-related Securities are volatile and prone to price fluctuations on a daily basis. The liquidity of investments made by the Scheme may be restricted by trading volumes settlement periods and transfer procedures. This may impact the ability of the Unit Holders to redeem their Units. In view of this, the Trustee has the right, in its sole discretion to limit Redemptions (including suspending Redemption) in certain circumstances [as outlined in SAI - 'Restrictions on Redemptions'].

• Settlement periods may be extended significantly by unforeseen circumstances. The inability of the Scheme to make intended Securities purchases, due to settlement problems, could cause the Scheme to miss certain investment opportunities. Similarly, the inability to sell Securities held in the Scheme's portfolio could result, at times, in potential losses to the Scheme, should there be a subsequent decline in the value of Securities held in the Scheme's portfolio.

• Investments in equity and equity related Securities involve a degree of risk and investors should not invest in the Scheme unless they can afford to take the risk of losing their investment.

• The liquidity and valuation of the Scheme's investments due to its holdings of Securities proposed to be listed may be affected if they have to be sold prior to the target date for disinvestment.

• Securities which are not quoted on the stock exchanges are inherently illiquid in nature and carry a larger liquidity risk in comparison with Securities that are listed on the exchanges or offer other exit options to the investors, including put options. The AMC may choose to invest in Securities proposed to be listed within the regulatory limit. This may however increase the risk of the portfolio.

2. **Risks associated with investing in debt and / or Money Market Securities/ Units of Liquid / Money Market /Debt Mutual Fund Schemes:**

The NAV of the scheme is likely to be affected by changes in the prevailing rates of interest. The AMC may, considering the overall level of risk of the portfolio, invest in lower rated/ unrated securities offering higher yields. This may increase the risk of the portfolio.

The following are the risks associated with investment in debt and Money Market securities:

**Interest Rate Risk**: As with all debt securities, changes in interest rates may affect the Scheme's Net Asset Value as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of long-term securities generally fluctuate more in response to interest rate changes than do short-term securities. Indian debt markets can be volatile leading to the possibility of price movements up or down in fixed income securities and thereby to possible movements in the NAV.

**Re-investment Risk:** Investments in fixed income securities may carry re-investment risk as interest rates prevailing on the interest or maturity due dates may differ from the original coupon of the bond. Consequently, the proceeds may get invested at a lower rate.

**Spread Risk:** Yield Spreads between fixed income securities might change. Example: Corporate Bonds are exposed to the risk of widening of the spread between corporate bonds and gilts. Prices of corporate bonds tend to fall if this spread widens which might adversely affect the NAV of the scheme. Similarly, in case of floating rate securities, where the coupon is expressed in terms of a spread or mark up over the benchmark rate, widening of the spread results in a fall in the value of such securities.

**Liquidity Risk:** This risk pertains to how saleable a security is in the market or the ease at which a security can be sold at or close to its true value. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of some of the investments. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. The liquidity of debt securities may change, depending on market conditions. At the time of selling the security, the security can become less liquid (wider spread) or illiquid, leading to loss in value of the portfolio. Securities that are proposed to be listed generally carry a higher liquidity risk compared to listed securities.

Money market securities, while fairly liquid, lack a well-developed secondary market, which may restrict the selling ability of the Scheme and may lead to the Scheme incurring mark to market losses and losses when the security is finally sold.

Liquidity risk is greater for thinly traded securities, lower-rated bonds, bonds that were part of a smaller issue, bonds that have recently had their credit rating downgraded or bonds sold by an infrequent issuer may be relatively illiquid. Bonds are generally the most liquid during the period right after issuance when the bond typically has the highest trading volume.

**Credit Risk/ Default Risk:** Credit risk is the risk that the issuer of a debenture/ bond or a money market instrument may default on interest and /or principal payment obligations and/or on violation of covenant(s) and/or delay in scheduled payment(s). Even when there is no default, the price of a security may change with expected changes in the credit rating of the issuer.

Government Security is a sovereign security and the default risk is considered to be the least. Corporate bonds carry a higher credit risk than Government Securities and among corporate bonds there are different levels of safety. Credit risks of most issuers of debt securities are rated by independent and professionally run rating agencies. Ratings of Credit issued by these agencies typically range from “AAA” ( “Triple A” denoting “Highest Safety”) to “D” (denoting “Default”). A bond rated higher by a particular rating agency is safer than a bond rated lower by the same rating agency.

Basis Risk (interest – rate movement) : During the life of a floating rate seurity or a swap, the underlying benchmark index may become less active and may not capture the actual movement in interest rates or at times the benchmark may cease to exist. These types of event may result in loss of value in the portfolio.

**Counterparty Risk:** This is the risk of failure of counterparty to the transaction to deliver securities against consideration received or to pay consideration against securities delivered, in full or in part or as per the agreed specification. There could be losses to the Scheme in case of counterparty default.

**Settlement Risk:** Different segments of the Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances. The inability of the Scheme to make purchases in intended securities due to settlement problems could cause the Scheme to miss certain investment opportunities. Fixed income securities run the risk of settlement which can adversely affect the ability of the fund house to swiftly execute trading strategies which can lead to adverse movements in NAV.

**Duration Risk:** The modified duration of a bond is a measure of its price sensitivity to interest rates movements, based on the average time to maturity of its interest and principal cash flows.

Bond portfolio managers increase average duration when they expect rates to decline, to get the most benefit, and decrease average duration when they expect rates to rise, to minimize the negative impact. If rates move in a direction contrary to their expectations, they lose.

**Inflation Risk:** Inflation causes tomorrow's currency to be worth less than today's; in other words, it reduces the purchasing power of a bond investor's future interest payments and principal, collectively known as "cash flows." Inflation also leads to higher interest rates, which in turn leads to lower bond prices. Inflation- indexed securities such as Treasury Inflation Protection Securities (TIPS) are structured to remove inflation risk.

**Performance Risk:** Performance of the Scheme may be impacted with changes in factors which affect the capital market and in particular the debt market.

**Selection Risk:** This is the risk that a security chosen will underperform the market for reasons that cannot be anticipated.

**Timing Risk:** It is the risk of transacting at a price based on erroneous future price predictions resulting to losses. Timing risk explains the potential for missing out on beneficial movements in price due to an error in timing. This could lead to purchasing too high or selling too low.

**Call Risk:** Some corporate, municipal and agency bonds have a "call provision" entitling their issuers to redeem them at a specified price on a date prior to maturity. Declining interest rates may accelerate the redemption of a callable bond, causing an investor's principal to be returned sooner than expected. In that scenario, investors have to reinvest the principal at the lower interest rates. (See also Reinvestment risk.)

**Concentration Risk:** This is the risk arising from over exposure to few securities/issuers/sectors. The Scheme intends to invest substantially in Tri – Party Repo. For risks relating to investments in Tri – Party Repo, please refer to the section on 'Risks associated with investing in Securities Segment and Tri-party Repo trade settlement' herein below in this document.

**Legislative Risk:** This is the risk that a change in the tax code could affect the value of taxable or tax-exempt interest income.

**3. Risks associated with investing in Derivatives**

• The Scheme may invest in derivative products in accordance with and to the extent permitted under the Regulations. The use of derivatives requires an understanding of the underlying instruments and the derivatives themselves. The risk of investments in derivatives includes mispricing or improper valuation and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.

• Trading in derivatives carries a high degree of risk although they are traded at a relatively small amount of margin which provides the possibility of great profit or loss in comparison with the principal investment amount.

• The Scheme may find it difficult or impossible to execute derivative transactions in certain circumstances. For example, when there are insufficient bids or suspension of trading due to price limits or circuit breakers, the Scheme may face a liquidity issue.

• The option buyer's risk is limited to the premium paid, while the risk of an option writer is unlimited. However, the gains of an option writer are limited to the premiums earned. Since in case of the Scheme all option positions will have underlying assets, all losses due to price-movement beyond the strike price will actually be an opportunity loss.

• The relevant stock exchange may impose restrictions on exercise of options and may also restrict the exercise of options at certain times in specified circumstances. The writer of a put option bears the risk of loss if the value of the underlying asset declines below the exercise price. The writer of a call option bears a risk of loss if the value of the underlying asset increases above the exercise price.

• Investments in index futures face the same risk as investments in a portfolio of shares representing an index. The extent of loss is the same as in the underlying stocks.

• The Scheme bears a risk that it may not be able to correctly forecast future market trends or the value of assets, indexes or other financial or economic factors in establishing derivative positions for the Scheme.

• The risk of loss in trading futures contracts can be substantial, because of the low margin deposits required, the extremely high degree of leverage involved in futures pricing and the potential high volatility of the futures markets.

• Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends on the ability of the fund manager to identify such opportunities. Identification and execution of the strategies to be pursued by the fund manager involves uncertainty and the decision of fund manager may not always be profitable. No assurance can be given that the fund manager will be able to identify or execute such strategies.

• The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments.

• As and when the Scheme trades in derivative products, there are risk factors and issues concerning the use of derivatives that investors should understand. Derivatives require the maintenance of adequate controls to monitor such transactions and the embedded market risks that a derivative adds to the portfolio.

Besides the price of the underlying asset, the volatility, tenor and interest rates affect the pricing of derivatives. Other risks in using derivatives include but are not limited to:

a) **Market Liquidity Risk**: This is where the derivatives cannot be sold at prices that reflect the underlying assets, rates and indices.

b) **Model Risk**: This is the risk of mis-pricing or improper valuation of derivatives.

c) **Basis Risk**: This is when the instrument used as a hedge does not match the movement in the instrument / underlying asset being hedged. The risks may be inter–related also; for e.g. interest rate movements can affect equity prices, which could influence specific issuer / industry assets.

d) Mark to Market Risk: There could be a mark to market loss in derivatives leg of arbitrage and additional margin may need to be provided for the same.

**4. Risks associated with Covered Call Strategy**

• Writing call options are highly specialized activities and entail higher than ordinary investment risks. In such investment strategy, the profits from call option writing is capped at the option premium, however the downside depends upon the increase in value of the underlying equity shares. This downside risk is reduced by writing covered call options.

• The Scheme may write covered call option only in case it has adequate number of underlying equity shares as per regulatory requirement. This would lead to setting aside a portion of investment in underlying equity shares. If covered call options are sold to the maximum extent allowed by regulatory authority, the Scheme may not be able to sell the underlying equity shares immediately if the view changes to sell and exit the stock. The covered call options need to be unwound before the stock positions can be liquidated. This may lead to a loss of opportunity, or can cause exit issues if the strike price at which the call option contracts have been written become illiquid. Hence, the Scheme may not be able to sell the underlying equity shares, which can lead to temporary illiquidity of the underlying equity shares and result in loss of opportunity.

• The writing of covered call option would lead to loss of opportunity due to appreciation in value of the underlying equity shares. Hence, when the appreciation in equity share price is more than the option premium received the Scheme would be at a loss.

**5. Risk associated with investing in Securitized Debt:**

A securitization transaction involves true sale of cash generating assets & receivables such as asset backed securities (ABS) or mortgage backed securities (MBS) by the originator (a bank, non-banking finance company (NBFC), housing finance company (HFC), or a manufacturing/service company) to a Special Purpose Vehicle (SPV), typically set up in the form of a trust. Investors are issued rated Pass Through Certificates (PTCs), the proceeds of which are paid as consideration to the originator. In this manner, the originator, by transferring his cash generating asset(s) to an SPV, receives consideration from investors upfront. Investors get paid from the periodic distribution of cash generated by the underlying asset(s). Typically, the transaction is provided with some sort of credit enhancement (as stipulated by the rating agency for a target rating). If the delinquencies and credit losses in the underlying pool exceed the credit enhancement provided, ABS/MBS holders will suffer credit losses. ABS/ MBS are also normally exposed to a higher level of reinvestment risk as compared to the normal corporate or sovereign debt. This mechanism attempts to protect investors against potential delay in cash flows from assets as well as potential defaults by trancing risks by structuring cash flows in different forms.

Generally available asset classes for securitization in India are:

- Commercial vehicles
- Auto and two wheeler pools
- Mortgage pools (residential housing loans)
- Personal loans, credit card and other retail loans
- Corporate loans/receivables

In terms of specific risks attached to securitisation, each asset class would have different underlying risks, however, residential mortgages typically have lower default rates as an asset class. On the other hand, repossession and subsequent recovery of commercial vehicles and other auto assets is normally easier and better compared to mortgages.

Some of the asset classes such as personal loans, credit card receivables etc., being unsecured credits in nature, may witness higher default rates. As regards corporate loans/ receivables, depending upon the nature of the underlying security for the loan or the nature of the receivable the risks would correspondingly fluctuate. However, the credit enhancement stipulated by rating agencies for such asset class pools is typically much higher and hence their overall risks are comparable to other AAA or equivalent rated asset classes. Some of the factors, which are typically analyzed for any pool, are as follows:

**Size of the loan**: this generally indicates the kind of assets financed with loans. Also indicates whether there is excessive reliance on very small ticket size, which may result in difficult and costly recoveries. To illustrate, the ticket size of housing loans is generally higher than that of personal loans. Hence in the construction of a housing loan asset pool for say Rs. 1,00,00,000/- it may be easier to construct a pool with just 10 housing loans of Rs.10,00,000/- each rather than to construct a pool of personal loans as the ticket size of personal loans may rarely exceed Rs. 5,00,000/- per individual.

**Average original maturity of the pool**: this indicates the original repayment period and whether the loan tenors are in line with industry averages and borrower's repayment capacity. To illustrate, in a car pool consisting of 60 month contracts, the original maturity and the residual maturity of the pool viz. number of remaining installments to be paid gives a better idea of the risk of default of the pool itself. If in a pool of 100 car loans having original maturity of 60 months, more than 70% of the contracts have paid more than 50% of the monthly installments and if no default has been observed in such contracts, this pool should have a lower probability of default than a similar car loan pool where 80% of the contracts have not yet paid 5 installments.

**Loan to value ratio ("LTV"):** this indicates how much of the value of the asset is financed by borrower's own equity. The lower the LTV, the better it is. This ratio stems from the principle that where the borrower's own contribution of the asset cost is high, the chances of default are lower. To illustrate: for a truck costing Rs. 20 lakhs, if the borrower has himself contributed Rs. 10 lakhs and has taken Rs. 10 lakhs as a loan, he is going to have lesser propensity to default as he would lose an asset worth Rs. 20 lakhs if he defaults in repaying an installment. This is as against a borrower who may meet only Rs. 2 lakhs out of his own equity for a truck costing Rs. 20 lakhs. Between the two scenarios given above, as the borrower's own equity is lower in the latter case, it would typically have a higher risk of default than the former. Average seasoning of the pool: this indicates whether borrowers have already displayed repayment discipline. To illustrate, in the case of a pool of personal loans, if a pool of assets consist of borrowers who have already repaid 80% of the installments without default, the probability of default is lower than for a pool where only 10% of installments have been repaid. In the Indian scenario, also, more than 95% of issuances have been AAA or equivalent rated issuances indicating the strength of the underlying assets as well as adequacy of credit enhancement.

**6. Risk Associated with Short Selling and Securities Lending**

The risks in lending portfolio Securities, as with other extensions of credit, consist of the failure of another party, in this case the approved intermediary, to comply with the terms of the agreement entered into between the lender of Securities, i.e. the Scheme, and the approved intermediary. Such failure to comply can result in a possible loss of rights in the collateral put up by the borrower of the Securities, the ability of the approved intermediary to return the Securities deposited by the lender and the possible loss of any corporate benefits accruing to the lender from the Securities deposited with the approved intermediary. The Mutual Fund may not be able to sell such Securities and this can lead to temporary illiquidity.

**7. Risks associated with investing in repo transactions in corporate bonds**

The market for the aforesaid product is illiquid. Hence, repo obligations cannot be easily sold to other parties. If a counterparty fails, the scheme would have to take recourse to the collateral provided. If a counterparty fails to repay and the value of the collateral falls beyond the haircut, then the Scheme would be exposed to a loss of interest or principal.

Corporate bond repo will be settled between two counterparties in the OTC segment unlike in the case of TREPS transactions where CCIL stands as central counterparty on all transactions (no settlement risk).

Further, if the Scheme needs to take recourse to the debt securities provided as collateral, and the issuer of the debt securities makes a default, the scheme may lose the whole, or substantial portion of the amount. This risk is somewhat mitigated by the fact that only bonds which have credit rating of AA+ and above can be accepted as collateral for repo transactions.

**8. Risks associated with investing in Securities Segment and Tri-party Repo trade settlement**

The mutual fund is a member of securities segment and Tri-party Repo trade settlement of the Clearing Corporation of India (CCIL). All transactions of the mutual fund in government securities and in Tri-party Repo trades are settled centrally through the infrastructure and settlement systems provided by CCIL; thus reducing the settlement and counterparty risks considerably for transactions in the said segments. The members are required to contribute an amount as communicated by CCIL from time to time to the default fund maintained by CCIL as a part of the default waterfall (a loss mitigating measure of CCIL in case of default by any member in settling transactions routed through CCIL). CCIL shall maintain two separate Default Funds in respect of its Securities Segment, one with a view to meet losses arising out of any default by its members from outright and repo trades and the other for meeting losses arising out of any default by its members from Triparty Repo trades. The mutual fund is exposed to the extent of its contribution to the default fund of CCIL at any given point in time i.e. in the event that the default waterfall is triggered and the contribution of the mutual fund is called upon to absorb settlement/default losses of another member by CCIL, the scheme may lose an amount equivalent to its contribution to the default fund.

**9.Risks associated with Investments in REITs and InvITs:**

•**Price-Risk or Interest-Rate Risk**: REITs & InvITs run price-risk or interest-rate risk. Generally, when interest rates rise, prices of existing securities fall and when interest rates drop, such prices increase. The extent of fall or rise in the prices is a function of the existing coupon, days to maturity and the increase or decrease in the level of interest rates.

•**Credit Risk**: In simple terms this risk means that the issuer of a debenture/ bond or a money market instrument may default on interest payment or even in paying back the principal amount on maturity. REITs & InvITs are likely to have volatile cash flows as the repayment dates would not necessarily be prescheduled.

•**Liquidity or Marketability Risk**: This refers to the ease with which a security can be sold at or near to its valuation yield-to-maturity (YTM). The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. As these products are new to the market they are likely to be exposed to liquidity risk.

•**Reinvestment Risk**: Investments in REITs & InvITs may carry reinvestment risk as interest rates prevailing on the interest or maturity due dates may differ from the original coupon of the bond. Consequently, the proceeds may get invested at a lower rate.

•**Risk of lower than expected distributions**: The distributions by the REIT or InvIT will be based on the net cash flows available for distribution. The amount of cash available for distribution principally depends upon the amount of cash that the REIT/INVIT receives as IDCWs or the interest and principal payments from portfolio assets.

The above are some of the common risks associated with investments in REITs & InvITs. There can be no assurance that investment objectives will be achieved, or that there will be no loss of capital. Investment results may vary substantially on a monthly, quarterly or annual basis.

**10. Risks associated with transaction in Units through stock exchange(s):**

In respect of transaction in Units of the Scheme through BSE and / or NSE (applicable to the facility to transact in the Units of the Scheme through the Stock Exchange mechanism provided by the AMC), allotment and redemption of Units on any Business Day will depend upon the order processing / settlement by BSE and / or NSE and their respective clearing corporations on which the Fund has no control.

**11. Risks associated with Restrictions on Redemption:**

As outlined in Section I – 'Restrictions on Redemptions' the Trustee and the AMC may impose restrictions on redemptions when there are circumstances leading to a systemic crisis or event that severely constricts market liquidity or the efficient functioning of markets. Accordingly, such restriction may affect the liquidity of the Scheme and there may be a delay in investors receiving part of their redemption proceeds.

**12. Risks associated with Segregated portfolio:**

The AMC / Trustee shall decide on creation of segregated portfolio of the Scheme in case of a credit event at issuer level i.e. downgrade in credit rating by a Credit Rating Agencies (CRA) or actual default (in case of unrated debt or money market instruments). Accordingly, Investor holding units of segregated portfolio may not able to liquidate their holding till the time recovery of money from the issuer. The Security comprised of segregated portfolio may not realise any value.

Further, Listing of units of segregated portfolio in recognised stock exchange does not necessarily guarantee their liquidity. There may not be active trading of units in the stock market. Further trading price of units on the stock market may be significantly lower than the prevailing NAV.

## *C. Risk mitigation strategies*

Investments in equity, debt and derivative securities carry various risks such as inability to sell securities, trading volumes and settlement periods, market risk, interest rate risk, liquidity risk, default risk, reinvestment risk etc. Whilst such risks cannot be eliminated, they may be mitigated by diversification and hedging.

Further, the AMC has necessary framework in place for risk mitigation at an enterprise level. The Risk Management division is an independent division within the organization. Internal limits are defined and judiciously monitored. Risk indicators on various parameters are computed and are monitored on a regular basis. For risk control, the following may be noted:

| Risk & Description specific to the Scheme | Risk mitigants / management strategy |
|---|---|
| **Market risk**<br>Risk arising due to vulnerability to price fluctuations and volatility, having material impact on the overall returns of the scheme. | Endeavour to have a well diversified portfolio of good companies with the ability to use cash/derivatives for of hedging. The scheme may use derivatives to limit this risk. |

| | |
|---|---|
| **Derivatives risk**<br>Various inherent risks arising as a consequence of investing in derivatives. | The fund will endeavor to continuous monitoring of the derivatives positions and strictly adheres to the regulations and internal norms. The fund has provision for using derivative instruments for portfolio rebalancing and hedging purpose. |
| **Credit risk**<br>Risk associated with repayment of investment<br><br>**Performance risk**<br>Risk arising due to change in factors affecting the market | Investment universe carefully selected to only include issuers with high credit quality Understand the working of the markets and respond effectively to market movements |
| **Concentration risk**<br>Risk arising due to over exposure in few securities | Invest across the spectrum of issuers and keeping flexibility to invest across tenor |
| **Liquidity risk**<br>Risk arising due to inefficient Asset Liability Management, resulting in high impact costs | The Fund seek to control portfolio liquidity at portfolio construction stage by investing in such stocks having strong fundamentals, sound financial strength and good corporate governance and high liquidity. Having optimum mix of cash & cash equivalents along with the debt papers in the portfolio |
| **Interest rate risk**<br>Price volatility due to movement in interest rates | Control the portfolio duration and periodically evaluate the portfolio structure with respect to existing interest rate scenario |
| **Event risk**<br>Price risk due to company or sector specific event | Understand businesses to respond effectively and speedily to events. Usage of derivatives: Hedge portfolios, if required, in case of predictable events with uncertain outcomes |

## II. <u>Information about the scheme:</u>

### A. Where will the scheme invest

In order to achieve the investment objective, the corpus of the Scheme can be invested in any (but not exclusively) of the following securities:

1) Equity and equity-related Securities including but not limited to derivatives (stock futures/ index futures and other such permitted derivative instruments including options), equity warrants and convertible instruments.
2) Preference shares and convertible preference shares.
3) Debt instruments (both public and private sector) issued by banks / development financial institutions.
4) Money Market instruments permitted by SEBI including alternative investments for the call money market as may be provided by RBI to meet the liquidity requirements.
5) Securities created and issued by the Central and State Governments as may be permitted by RBI, securities guaranteed by the Central and State Governments (including but not limited to coupon bearing bonds, zero coupon bonds and treasury bills). State Government Securities (popularly known as State Development Loans or SDLs) are issued by the respective State Government in co-ordination with the RBI.
6) Debt instruments issued by Domestic Government Agencies and statutory bodies, which may or may not carry a Central / State Government guarantee.
7) Corporate Bonds of public sector or private sector undertakings.
8) Corporate debt and securities (of both public and private sector undertakings) including Bonds, Debentures, Notes, Strips, etc.
9) Tri-party Repo in Government Securities
10) Securitized Debt (SD)/Pass Through Certificate (PTC)
11) Debt derivative instruments like Interest Rate Futures (IRFs), Interest Rate Options (including Call and Put options) and Interest Rate Swaps
12) Reverse Repo
13) Repo in Corporate Debt Securities
14) Treasury Bill (T-Bill)
15) Non convertible debentures and bonds

16) Floating rate debt instruments
17) Investments in units of mutual fund schemes
18) Units issued by REITs and InvITs
19) Any other like instruments as may be permitted by RBI/SEBI/ such other regulatory authority from time to time.

The securities mentioned above and such other securities, the Scheme is permitted to invest, could be listed, unlisted, IPO's, secondary market operations, privately placed, rights offers or negotiated deals, secured, unsecured, rated or unrated and of any maturity.

For applicable regulatory investment limits, please refer the below section on "B. Investment Restrictions".

The Fund Manager reserves the right to invest in such other securities as may be permitted from time to time and which are in line with the investment objectives of the Scheme.

Subject to the above, any change in the asset allocation affecting the investment profile of the Scheme shall be effected only in accordance with the provisions of sub regulation (15A) of Regulation 18 of the SEBI Regulations, as detailed later in this document.

**Debt and Money Markets in India**

The Indian debt market is today one of the largest in Asia and includes securities issued by the Government (Central & State Governments), public sector undertakings, other government bodies, financial institutions, banks and corporates. Government and public sector enterprises are the predominant borrowers in the markets. Securities in the debt market typically vary based on their tenure and rating. The major players in the Indian debt markets today are banks, financial institutions, mutual funds, insurance companies, primary dealers, trusts, pension funds and corporates. The Indian debt market is the largest segment of the Indian financial markets. The debt market comprises broadly two segments, viz. Government Securities market or G-Sec market and corporate debt market. The latter is further classified as market for PSU bonds and private sector bonds.

The Government Securities market is the oldest and the largest component of the Indian debt market in terms of market capitalization, outstanding securities and trading volumes. The G-Sec market plays a vital role in the Indian economy as it provides the benchmark for determining the level of interest rates in the country through the yields on the Government Securities which are referred to as the risk-free rate of return in any economy. Over the years, there have been new products introduced by the RBI like zero coupon bonds, floating rate bonds, inflation indexed bonds, etc. The corporate bond market, in the sense of private corporate sector raising debt through public issuance in capital market, is only an insignificant part of the Indian Debt Market. A large part of the issuance in the non- Government debt market is currently on private placement basis.

The money markets in India essentially consist of the call money market (i.e. market for overnight and term money between banks and institutions), reverse repo transactions (temporary buy with an agreement to sell the securities at a future date at a specified price), commercial papers (CPs, short term unsecured promissory notes, generally issued by corporates), certificate of deposits (CDs, issued by banks) and Treasury Bills (issued by RBI) and similar securities. In a predominantly institutional market, the key money market players are banks, financial institutions, insurance companies, mutual funds, primary dealers and corporates. In money market, activity levels of the Government and non government debt vary from time to time.

Apart from these, there are some other options available for short tenure investments that include MIBOR linked debentures with periodic exit options and other such instruments. PSU / DFI / Corporate paper with a residual maturity of less than 1 year are actively traded and offer a viable investment option.

Following table exhibits various debt instruments along with current yields as on July 22, 2024.

| **Instrument** | **Yield Range** |
|---|---|
| | **(% per annum)** |
| Tri – Party Repo | 6.60 – 6.75 |
| Repo | 6.60 - 6.75 |
| 91 days T-Bill | 6.80 - 6.95 |
| 364 days T-Bill | 6.95 - 7.10 |
| 1 month CD/CP | 6.95 - 7.60 |

| | |
|---|---|
| 3-month CD/CP | 7.15 - 7.65 |
| 6-month CD/CP | 7.40 – 7.90 |
| 1 year CD/CP | 7.40 -7.95 |
| 1-year Corporate Bond - AAA Rated | 7.55 - 7.70 |
| 3-year Corporate Bond - AAA Rated | 7.55 -7.70 |
| 5-year Corporate Bond - AAA Rated | 7.50 -7.65 |
| 5-year G-sec | 7.00 - 7.10 |
| 10-year G-sec | 6.99 -7.10 |

*(Source: CCIL, FBIL, RBI, BLOOMBERG, NSE)*

These yields are indicative and do not indicate yields that may be obtained in future as interest rates keep changing consequent to changes in macro-economic conditions and RBI policy. The price and yield on various debt instruments fluctuate from time to time depending upon the macro economic situation, inflation rate, overall liquidity position, foreign exchange scenario etc. Also, the price and yield vary according to maturity profile, credit risk etc.

### *B. What are the investment restrictions?*

The investment policies of the scheme shall comply with the rules, regulations and guidelines laid out in SEBI (Mutual Funds) Regulations, 1996. As per the Regulations, specifically the Seventh Schedule, the following investment limitations are applicable to scheme of Mutual Funds:

1. The Mutual Fund under all its schemes shall not own more than 10% of any company's paid up capital carrying voting rights. Provided, no sponsor of the mutual fund, its associate or group company including the asset management company of the fund, through the schemes of the mutual fund or otherwise, individually or collectively, directly or indirectly, have

   a.10% or more of the share holding or voting rights in the asset management company or the trustee company of any other mutual fund;
   b. representation on the board of the asset management company or the trustee company of any other mutual fund.

2. The Scheme shall buy and sell Securities on the basis of deliveries and shall in all cases of purchases, take delivery of relevant Securities and in case of sale deliver the securities.

   Provided that a mutual fund may engage in short selling of securities in accordance with the framework relating to short selling and securities lending and borrowing specified by the Board.

   Provided that the Fund may enter into derivatives transactions on a recognised stock exchange subject to such guidelines as may be specified by SEBI. Provided further that sale of government security already contracted for purchase shall be permitted in accordance with the guidelines issued by the Reserve Bank of India in this regard.

3. The Scheme shall not invest more than 10% of its NAV in the equity shares or equity-related instruments of any company. For the purpose of determining the above limit, a combination of positions of the underlying securities and stock derivatives, will be considered.

4. All investments by the scheme in equity shares and equity related instruments shall only be made provided such securities are listed or to be listed.

5. The Scheme shall not invest more than 10% of its NAV in debt instruments comprising money market instruments and non-money market instruments issued by a single issuer which are rated not below investment grade by a credit rating agency authorised to carry out such activity under the SEBI Act, 1992. Such investment limit may be extended to 12% of the NAV of the Scheme with the prior approval of the Board of Trustee and the Board of directors of the AMC.

   Provided that such limit shall not be applicable for investments in Government Securities, treasury bills and TREPS. Provided further that investment within such limit can be made in mortgaged backed securitised debt which are rated not below investment grade by a credit rating agency registered with SEBI.

Further, a mutual fund scheme shall not invest more than:

a. 10% of its NAV in debt and money market securities rated AAA; or

b. 8% of its NAV in debt and money market securities rated AA: or

c. 6% of its NAV in debt and money market securities rated A and below issued by a single issuer.

The above investment limits may be extended by up to 2% of the NAV of the scheme with prior approval of the Board of Trustees and Board of Directors of the AMC, subject to compliance with the overall 12% limit as specified above.

6. The Scheme shall not invest in unlisted debt instruments including commercial papers, except Government Securities, and other money market instruments and derivative products such as Interest Rate Swaps, Interest Rate Futures, etc. which are used by mutual fund for hedging :

   However, mutual fund schemes may invest in unlisted Non-Convertible Debentures (NCDs) not exceeding 10% of the debt portfolio of the scheme subject to the condition that such unlisted NCDs have a simple structure(i.e. with fixed and uniform coupon, fixed maturity period, without any options, fully paid up upfront, without any credit enhancements or structured obligations) and are rated and secured with coupon payment frequency on monthly basis.

   Provided further that the Scheme shall comply with the norms under this clause within the time and in the manner as may be specified by the Board.

7. Investment in unrated debt and money market instruments, other than government securities, treasury bills, derivative products such as Interest Rate Swaps (IRS), Interest Rate Futures (IRF), etc. shall be subject to the following:

   a. Investments should only be made in such instruments, including bills re-discounting, usance bills, etc., that are generally not rated and for which separate investment norms or limits are not provided in SEBI (Mutual Fund) Regulations, 1996 and various circulars issued thereunder.
   b. Exposure of mutual fund schemes in such instruments shall not exceed 5% of the net assets of the schemes.
   c. All such investments shall be made with the prior approval of the Board of AMC and the Board of trustees.

8. The scheme shall not make any investment in:

   i) Any unlisted security of an associate or group company of the sponsors; or
   ii) Any security issued by way of private placement by an associate or group company of the sponsors; or
   iii) The listed securities of group companies of the sponsors which is in excess of 25% of the net assets of the Scheme.

9. Transfers of investments from one scheme to another scheme in the same mutual fund shall be allowed only if, —
   (a) such transfers are done at the prevailing market price for quoted instruments on spot basis. [Explanation. — "Spot basis" shall have same meaning as specified by stock exchange for spot transactions;]
   (b) the securities so transferred shall be in conformity with the investment objective of the scheme to which such transfer has been made.

   Further, the inter scheme transfer of securities would be done either for meeting liquidity requirements in a scheme in case of unanticipated redemption pressure or to facilitate duration, issuer, sector or group rebalancing as referred in SEBI Master circular dated May 19, 2023, Chapter 9.11 & 12.30 -'Inter scheme transfers'.

10. The Scheme may invest in other schemes of the Mutual Fund or any other mutual fund without charging any fees, provided the aggregate inter-scheme investment made by all the schemes under the same management or in schemes under the management of any other asset management company shall not exceed 5% of the Net Asset Value of the Mutual Fund. Provided that this clause shall not apply to any Fund of Funds scheme.

11. The Mutual Fund shall get the securities purchased or transferred in the name of the Fund on account of the concerned Scheme, wherever investments are intended to be of a long-term nature.

12. Save as otherwise expressly provided under the Regulations, the Scheme shall not advance any loans for any purpose.

13. The Fund shall not borrow except to meet temporary liquidity needs of the Fund for the purpose of repurchase/redemption of Units or payment of interest and/or IDCW to the Unit holder.

    The Fund shall not borrow more than 20% of the net assets of the Scheme and the duration of the borrowing shall not exceed a period of 6 months.

14. The Scheme shall not make any investment in any fund of funds scheme.

15. Pending deployment of the funds of the Scheme in securities in terms of the investment objective of the Scheme, the Mutual Fund may park the funds of the Scheme in short term deposits of scheduled commercial banks, subject to the following guidelines issued by SEBI vide its Master circular dated May 19, 2023, Chapter 12.16 – 'Investment in short term deposits', as may be amended from time to time:

    (i) "Short Term" for such parking of funds by the Scheme shall be treated as a period not exceeding 91 days. Such short-term deposits shall be held in the name of the Scheme.
    (ii) The Scheme shall not park more than 15% of the net assets in short term deposit(s) of all the scheduled commercial banks put together. However, such limit may be raised to 20% with prior approval of the Trustee.
    (iii) Parking of funds in short term deposits of associate and sponsors scheduled commercial banks together shall not exceed 20% of total deployment by the Mutual Fund in short term deposits.
    (iv) The Scheme shall not park more than 10% of the net assets in short term deposit(s), with any one scheduled commercial bank including its subsidiaries.
    (v) The Scheme shall not park funds in short term deposit of a bank which has invested in that Scheme. Further, the Trustees/AMC shall also ensure that the bank in which a scheme has short term deposit do not invest in the said scheme, until the scheme has short term deposit with such bank.
    (vi) The above norms do not apply to term deposits placed as margins for trading in cash and derivatives market.
    (vii) The AMC shall not charge any investment management and advisory fees for parking of funds in short term deposits of scheduled commercial banks.

16. The Scheme shall not invest:

    • more than 10% of its net assets in the units of REIT and InvIT; and
    • more than 5% of its net assets in the units of REIT and InvIT issued by a single issuer.

17. The Mutual Fund under all its schemes shall not own more than 10% of the units issued by a single issuer of REIT and InvIT.

18. Pursuant to SEBI Master circular dated May 19, 2023,Chapter 12.3- 'Restrictions on Investment in debt instruments having Structured Obligations / Credit Enhancements' , the Scheme shall not invest in debt instruments having Structured Obligations / credit enhancements.

19. The Scheme shall participate in Repo in corporate debt securities in accordance with SEBI Master circular no. SEBI/HO/IMD/IMD-POD-1/P/CIR/2023/74 dated May 19, 2023and such other directions issued by RBI and SEBI from time to time subject to the following:

    (i) The Gross exposure of the scheme to repo transactions in corporate debt securities shall not be more than 10% of the net asset of the scheme.
    (ii) The cumulative gross exposure through repo transactions in corporate debt securities along with equity, debt, derivative positions and other securities as specified by SEBI shall not exceed 100% of the net assets of the scheme.
    (iii) The Scheme shall participate in repo transactions only in AA and above rated corporate debt securities, Commercial Papers and Certificate of Deposits.
    (iv) In terms of Regulation 44 (2) of the Securities and Exchange Board of India (Mutual Funds) Regulations, 1996, the Scheme shall borrow through repo transactions only if the tenor of the transaction does not exceed a period of six months.
    (v) The Scheme shall ensure compliance with the Seventh Schedule of the Mutual Funds Regulations about restrictions on investments, wherever applicable, with respect to repo transactions in corporate debt securities.

(vi) For the purpose of consideration of credit rating of exposure on repo transactions for various purposes including for Potential Risk Class (PRC) matrix, liquidity ratios, Risk-o-meter etc., the same shall be as that of the underlying securities, i.e., on a look through basis.

(vii) For transactions where settlement is guaranteed by a Clearing Corporation, the exposure shall not be considered for the purpose of determination of investment limits for single issuer, group issuer and sector level limits.

(viii) The scheme shall participate in Repo in corporate debt securities in accordance with directions issued by RBI and SEBI from time to time and in accordance with the Policy framed by the Board of Directors of ITI Asset Management Limited and ITI Mutual Fund Trustee Private Limited in this regard.

**20. Limitations and restrictions for investments in derivative instruments**

SEBI has vide its circular DNPD/Cir-29/2005 dated September 14, 2005 inter alia specified the guidelines pertaining to trading by Mutual Funds in Exchange Traded derivatives. The position limits have subsequently been modified vide circulars inter alia including circular no. DNPD/Cir-30/2006 dated January 20, 2006 and circular no. SEBI/DNPD/Cir-31/2006 dated September 22, 2006, circular no. SEBI/HO/MRD/DP/ CIR/P/2016/143 dated December 27, 2016 and and Para 7.5 of SEBI Master Circular on Mutual Funds dated May 19, 2023

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All derivative positions taken in the portfolio would be guided by the following principles.

**i. Position limit for the Mutual Fund in index options contracts**

a. The Mutual Fund position limit in all index options contracts on a particular underlying index shall be Rs. 500 crore or 15% of the total open interest of the market in index options, whichever is higher, per Stock Exchange.

b. This limit would be applicable on open positions in all options contracts on a particular underlying index.

**ii. Position limit for the Mutual Fund in index futures contracts**

a. The Mutual Fund position limit in all index futures contracts on a particular underlying index shall be Rs. 500 crore or 15% of the total open interest of the market in index futures, whichever is higher, per Stock Exchange.

b. This limit would be applicable on open positions in all futures contracts on a particular underlying index.

**iii. Additional position limit for hedging**

In addition to the position limits at point (i) and (ii) above, the Mutual Fund may take exposure in equity index derivatives subject to the following limits:

a. Short positions in index derivatives (short futures, short calls and long puts) shall not exceed (in notional value) the Mutual Fund's holding of stocks.
b. Long positions in index derivatives (long futures, long calls and short puts) shall not exceed (in notional value) the Mutual Fund's holding of cash, government securities, T-Bills and similar instruments.

**iv. Position limit for Mutual Fund for stock based derivative contracts**

The combined futures and options position limit shall be 20% of the applicable Market Wide Position Limit (MWPL).

**v. Position limit for each scheme of a Mutual Fund for stock based derivative contracts**

The scheme-wise position limit / disclosure requirements shall be –

a. For stock option and stock futures contracts, the gross open position across all derivative contracts on a particular underlying stock of a scheme of a mutual fund shall not exceed the higher of:

   1% of the free float market capitalisation (in terms of number of shares) or 5% of the open interest in the derivative contracts on a particular underlying stock (in terms of number of contracts).

b. This position limits shall be applicable on the combined position in all derivative contracts on an underlying stock at a Stock Exchange.
c. For index based contracts, Mutual Funds shall disclose the total open interest held by its scheme or all schemes put together in a particular underlying index, if such open interest equals to or exceeds 15% of the open interest of all derivative contracts on that underlying index.

**Exposure limits for the Scheme:**
In accordance with SEBI Master circular dated May 19, 2023, Chapter 12,24 – 'Cumulative Gross Exposure limits' and 12.25 – 'Norms for investment and disclosure by Mutual Funds in derivatives', the following exposure limits for investment in derivatives will be applicable to the Scheme:

I. The cumulative gross exposure through equity, debt, derivative positions (including commodity and fixed income derivatives), repo transactions and units issued by REITs & InvITs shall not exceed 100% of the net assets of the Scheme. However, cash or cash equivalents with residual maturity of less than 91 days shall be treated as not creating any exposure.
II. The Scheme shall not write options or purchase instruments with embedded written options except call options under a covered call strategy.
III. The total exposure related to option premium paid shall not exceed 20% of the net assets of the Scheme.
IV. Exposure due to hedging positions may not be included in the above mentioned limits subject to the following:
   a. Hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains.
   b. Hedging positions cannot be taken for existing derivative positions. Exposure due to such positions have to be added and treated under limits mentioned in point 1 above.
   c. Any derivative instrument used to hedge shall have the same underlying security as the existing position being hedged.
   d. The quantity of underlying associated with the derivative position taken for hedging purposes does not exceed the quantity of the existing position against which hedge has been taken.
V. The Scheme may enter into plain vanilla interest rate swaps for hedging purposes. The counter party in such transactions shall have to be an entity recognized as a market maker by RBI. Further, the value of the notional principal in such cases shall not exceed the value of respective existing assets being hedged by the scheme. Exposure to a single counterparty in such transactions shall not exceed 10% of the net assets of the scheme.
VI. Exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated as exposure for the limit mentioned in point 1 above.
VII. Definition of Exposure in case of Derivative Positions:

Each position taken in derivatives shall have an associated exposure as defined under. Exposure is the maximum possible loss that may occur on a position. However, certain derivative positions may theoretically have unlimited possible loss. Exposure in derivative positions shall be computed as follows:

| Position | Exposure |
|---|---|
| Long Future | Futures Price * Lot Size * Number of Contracts |
| Short Future | Futures Price * Lot Size * Number of Contracts |
| Option bought | Option Premium Paid * Lot Size * Number of Contracts |

22. The Scheme may write call options only under a covered call strategy for constituent stocks of NIFTY 50 and BSE SENSEX subject to the following:

(i) The total notional value (taking into account strike price as well as premium value) of call options written by a scheme shall not exceed 15% of the total market value of equity shares held in that scheme.
(ii) The total number of shares underlying the call options written shall not exceed 30% of the unencumbered shares of a particular company held in the scheme. The unencumbered shares in a scheme shall mean shares that are not part of Securities Lending and Borrowing Mechanism (SLBM), margin or any other kind of encumbrances.
(iii) At all points of time the Mutual Fund scheme shall comply with the provisions at paragraph (i)

and (ii) above. In case of any passive breach of the requirement at paragraph (i), the respective scheme shall have 7 trading days to rebalance the portfolio. During the rebalancing period, no additional call options can be written in the said scheme.

(iv) In case the Scheme needs to sell securities on which a call option is written under a covered call strategy, it must ensure compliance with paragraphs (i) and (ii) above while selling the securities.

(v) In no case, the scheme shall write a call option without holding the underlying equity shares. A call option can be written only on shares which are not hedged using other derivative contracts.

(vi) The premium received shall be within the requirements prescribed under point III. of heading 'Exposure limits for the scheme' i.e. the total gross exposure related to option premium paid and received must not exceed 20% of the net assets of the Scheme.

The exposure on account of the call option written under the covered call strategy shall not be considered as exposure as per point I. of heading 'Exposure limits for the scheme'

23. The Mutual Fund may hedge the portfolio or part of the portfolio (including one or more securities) on weighted average modified duration basis by using Interest Rate Futures (IRFs). The maximum extent of short position that may be taken in IRFs to hedge interest rate risk of the portfolio or part of the portfolio, is as per the formula given below:

<u>(Portfolio Modified Duration*Market Value of the Portfolio)</u> (Futures Modified Duration*Futures Price/ PAR)

The Scheme shall not carry out imperfect hedging using IRFs.

All investments by the Scheme will be made in accordance with the Investment Objective and Investment Pattern described earlier. The Trustee may alter the above restrictions from time to time to the extent that changes in the Regulations may allow and as deemed fit in the general interest of the Unit Holders.

The Scheme will comply with the other Regulations applicable to the investments of Mutual Funds from time to time. Apart from the Investment Restrictions prescribed under the Regulations, internal risk parameters for limiting exposure to a particular scrip or sector may be prescribed from time to time to respond to the dynamic market conditions and market opportunities.

All the investment restrictions will be applicable at the time of making investments. Changes do not have to be effected merely because of appreciations or depreciations in value of the investments, or by reason of receipt of any rights, bonuses or benefits in the nature of capital or of any schemes of arrangement or of amalgamation, reconstruction or exchange, or at any repayment or redemption or other reason outside the control of the Fund resulting in any of the above limits getting breached. However, the AMC shall take appropriate corrective action as soon as possible taking into account the interests of the Unit holders.

## *C. Fundamental Attributes*

Following are the Fundamental Attributes of the scheme, in terms of Clause 1.14 of SEBI Master Circular for Mutual Funds dated May 19, 2023:

**(i) Type of a Scheme**
An open ended equity scheme investing in large cap and Mid cap stocks.

**(ii) Investment Objective**

- The investment objective of the Scheme is to seek to generate long term capital appreciation by investing in equity and equity related securities of large cap and mid cap stocks. However, there can be no assurance that the investment objective of the scheme would be achieved.

- The investment pattern of the Scheme is as set out in ***Part II, Section A- 'How will the Scheme allocate its assets?***', with the option to alter the asset allocation for a short term period on defensive considerations.

**(iii) Terms of Issue**

- Liquidity provisions such as listing, repurchase, redemption

  Listing - The Units of the Scheme are not proposed to be listed on any stock exchange. However, the Trustee reserves the right to list the Units as and when this Scheme is permitted to be listed under the Regulations and the Trustee considers it necessary in the interest of Unit holders of the Fund.

  Repurchase, Redemption - The Scheme offers Units for subscription and redemption at NAV based prices on all Business Days on an ongoing basis, commencing not later than five business days from the date of allotment. Under normal circumstances, the AMC shall dispatch the Redemption proceeds within 3 Business Days from date of receipt of request from the Unit holder.

- Aggregate fees and expenses charged to the scheme

  The aggregate fees and expenses charged to the Scheme will be in line with the limits defined in the SEBI (MF) Regulations as amended from time to time. The aggregate fee and expenses to be charged to the Scheme is provided in Part III (B) of Section I – Annual scheme recurring expenses.

- Any safety net or guarantee provided

  The Scheme does not provide any safety net or guarantee nor does it provide any assurance regarding the realization of the investment objective of the scheme or in respect of declaration of IDCW.

**Changes in Fundamental Attributes**

In accordance with Regulation 18(15A) of the SEBI (MF) Regulations and Clause 1.14.1.4 of SEBI Master Circular for Mutual Funds dated May 19, 2023 the Trustees shall ensure that no change in the fundamental attributes of the Scheme(s) and the Plan(s) / Option(s) thereunder or the trust or fee and expenses payable or any other change which would modify the Scheme(s)and the Plan(s) / Option(s) thereunder and affect the interests of Unitholders is carried out unless:

- SEBI has reviewed and provided its comments on the proposal;
- A written communication about the proposed change is sent to each Unitholder and an advertisement is given in one English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where the Head Office of the Mutual Fund is situated; and
- The Unitholders are given an option for a period of atleast 30 calendar days to exit at the prevailing Net Asset Value without any exit load.

***D. Other Scheme Specific Disclosures:***

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| Listing and transfer of units | The Scheme is an open ended equity scheme, sale and repurchase will be made on a continuous basis and therefore listing on stock exchanges is not envisaged. However, the Trustee may at their discretion list the units on any Stock Exchange.<br><br>The Units of the Scheme held in the dematerialised form will be fully and freely transferable (subject to lock-in period, if any and subject to lien, if any marked on the units) in accordance with the provisions of SEBI (Depositories and Participants) Regulations as may be amended from time to time.<br><br>For units held in non - demat form / by way of an Account Statement, unit holders intending to transfer units will have to get the units Certified by submitting designated form. On receipt of the said request, RTA will mark the underlying units as Certified Units and will issue a Certified SOA for those units. The AMC / RTA, on production of Designated Transfer Form together with relevant Certified SOA and requisite documents, register the transfer and provide the Certified SOA to the transferee within 10 business days from the date of such production. Investors may note that stamp duty and other statutory levies, if any, as applicable from time to time shall be borne by the transferee.<br><br>If a person becomes a holder of the Units consequent to operation of law, or upon enforcement of a pledge, the Fund will, subject to production of satisfactory evidence, |

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| | effect the transfer, if the transferee is otherwise eligible to hold the Units. Similarly, in cases of transfers taking place consequent to death, insolvency etc., the transferee's name will be recorded by the Fund subject to production of satisfactory evidence. |
| Dematerialization of units | An applicant in a scheme whose application has been accepted shall have the option either to receive the statement of accounts or to hold the units in dematerialised form and the asset management company shall issue to such applicant, a statement of accounts specifying the number of units allotted to the applicant or issue units in the dematerialized form as soon as possible but not later than five working days from the date of closure of the initial subscription list or from the date of receipt of the application. Further, the unitholders who wish to trade in units would be required to have a demat account.<br><br>Further, investors also have an option to convert their physical holdings into the dematerialised mode at a later date. Each Option under each Plan held in the dematerialised form shall be identified on the basis of an International Securities Identification Number (ISIN) allotted by National Securities Depositories Limited (NSDL) and Central Depository Services Limited (CDSL). The ISIN details of the respective option under the respective Plan can be obtained from your Depository Participant (DP) or the investors can access the website link www.nsdl.co.in or www.cdslindia.com.The holding of units in the dematerialised mode would be subject to the guidelines/procedural requirements as laid by the Depositories viz. NSDL/CDSL from time to time. |
| Minimum Target amount (This is the minimum amount required to operate the scheme and if this is not collected during the NFO period, then all the investors would be refunded the amount invested without any return.) | Rs. 10,00,00,000 (Rupees Ten Crore) |
| Maximum Amount to be raised (if any) | There will be no upper limit on the total amount collected under the Scheme during the NFO Period. |
| Dividend Policy (IDCW) | Under the IDCW option, the Trustees will endeavour to declare the IDCW subject to availability of distributable surplus calculated in accordance with SEBI Regulations. IDCW amount can be distributed out of investor's capital (Equalization Reserve), which is part of sale price that represents realized gains. The actual declaration of IDCW and frequency will inter-alia, depend on availability of distributable surplus calculated in accordance with SEBI (MF) Regulations and the decision of Trustees shall be final in this regard. There is no assurance or guarantee to the Unit holders as to the rate of IDCW nor that the IDCW will be paid regularly.<br><br>The AMC/Trustee reserves the right to change the frequency of declaration of IDCW or may provide additional frequency for declaration of IDCW. IDCW Distribution Procedure in accordance with SEBI Master circular no. SEBI/HO/IMD/IMD-POD-1/P/CIR/2023/74 dated May 19, 2023, the procedure for IDCW distribution would be as under:<br><br>1. Quantum of IDCW and the record date will be fixed by the Trustee. IDCW so decided shall be paid, subject to availability of distributable surplus.<br>2. Within one calendar day of the decision by the Trustee, the AMC shall issue notice to the public communicating the decision including the record date. The record date |

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| | shall be 2 working days from the date of publication in at least English daily newspaper having nationwide circulation as well as in a newspaper published in the language of the region where the head office of the Mutual Fund is situated.<br>3. Record date shall be the date, which will be considered for the purpose of determining the eligibility of Unitholders whose names appear on the register of Unitholder for receiving IDCWs. The Record Date will be 2 working days from the date of issue of notice.<br>4. The notice will, in font size 10, bold, categorically state that pursuant to payment of IDCW, the NAV of the Scheme would fall to the extent of payout and statutory levy (if applicable).<br>5. The NAV will be adjusted to the extent of IDCW distribution and statutory levy, if any, at the close of Business Hours on record date.<br>6. Before the issue of such notice, no communication indicating the probable date of IDCW declaration in any manner whatsoever will be issued by Mutual Fund.<br><br>The IDCW (dividend warrants / cheque / demand draft shall be dispatched to the Unit Holders within 7 working days from the record date. In the event of failure to dispatch the IDCW (IDCW) within the stipulated 7 working days period from the record date, the AMC shall be liable to pay interest @ 15 percent per annum calculated from the record date till the date of dispatch of IDCW proceeds, to the Unit holders.<br><br>The IDCW (IDCW) proceeds will be paid by way of ECS / EFT / NEFT / RTGS / Direct credits/ any other electronic manner if sufficient banking details are available with the Mutual Fund for the Unitholder. In case of specific request for IDCW (IDCW) by warrants/cheques/demand drafts or unavailability of sufficient details with the Mutual Fund, the IDCW (IDCW) will be paid by warrant/cheques/demand drafts and payments will be made in favour of the Unit holder (registered holder of the Units or, if there are more than one registered holder, only to the first registered holder) with bank account number furnished to the Mutual Fund. |
| Allotment (Detailed procedure) | • On acceptance of the application for subscription, an allotment confirmation specifying the number of units allotted by way of e-mail and/or SMS within 5 business days from the date of closure of NFO period will be sent to the Unitholders/ investors registered e-mail address and/or mobile number.<br>• An applicant whose application has been accepted shall have the option either to receive the statement of accounts or to hold the units in dematerialised form and the asset management company shall issue to such applicant, a statement of accounts specifying the number of units allotted by way of e-mail and / or sms to the applicant or issue units in the dematerialized form as soon as possible but not later than five working days from the date of closure of the initial subscription list or from the date of receipt of the application. The asset management company shall issue units in dematerialized form to a unit holder in a scheme within two working days of the receipt of request from the unit holder.<br>• Where investors / Unitholders, have provided an email address, an account statement reflecting the units allotted to the Unitholder shall be sent by email on their registered email address.<br>• The Unitholder may request for a physical account statement by writing / calling the AMC /ISC / RTA. The AMC shall dispatch an account statement within 5 Business Days from the date of the receipt of request from the Unit holder.<br><br>**Option to hold units in dematerialised (demat) form**<br><br>Investors shall have an option to subscribe to/ hold the units in electronic (demat) form in accordance with the guidelines/procedural requirements as laid down by the Depositories (NSDL/CDSL) from time to time. The Applicants intending to hold Units in demat form will be required to have a beneficiary account with a Depository Participant (DP) of the NSDL/CDSL and will be required to mention in the application form DP's Name, DP ID No. and Beneficiary Account No. with the DP at the time of purchasing Units.<br><br>In case investors desire to convert their existing physical units (represented by statement of account) into dematerialized form or vice versa, the request for conversion of units held in physical form into Demat (electronic) form or vice versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. In case the |

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| | units are desired to be held by investor in dematerialized form, the KYC performed by Depository Participant shall be considered compliance of the applicable SEBI norms.<br><br>Investors desirous of having the Units of the Scheme in dematerialized form should contact the ISCs of the AMC/Registrar. For details, Investors may contact any of the Investor Service Centres of the AMC. |
| **Refund** | If application is rejected, full amount will be refunded within 5 working days of closure of NFO. If refunded later than 5 working days @ 15% p.a. for delay period will be paid and charged to the AMC. |
| **Who can invest**<br>This is an indicative list and investors shall consult their financial advisor to ascertain whether the scheme is suitable to their risk profile. | Prospective investors are advised to satisfy themselves that they are not prohibited by any law governing them and any Indian law from investing in the Scheme and are authorised to purchase units of mutual funds as per their respective constitutions, charter documents, corporate / other authorisations and relevant statutory provisions. The following persons (subject, wherever relevant, to purchase of Units, being permitted and duly authorized under their respective constitutions / bye-laws, charter documents and relevant statutory regulations) are eligible and may apply for purchase Subscription to the Units under the Scheme:<br><br>1. Indian Resident adult individuals either singly or jointly (not exceeding three) or on an Anyone or Survivor basis;<br>2. Hindu Undivided Family (HUF) through Karta;<br>3. Minor (as the first and the sole holder only) through a natural guardian (i.e. father or mother, as the case may be) or a court appointed legal guardian. There shall not be any joint holding with minor investments. Payment for investment shall be made from the bank account of the minor or from a joint account of the minor with the guardian only;<br>4. Partnership Firms including limited liability partnership firms;<br>5. Proprietorship in the name of the sole proprietor;<br>6. Companies, Bodies Corporate, Public Sector Undertakings (PSUs.), Association of Persons (AOP) or Bodies of Individuals (BOI) and societies registered under the Societies Registration Act, 1860;<br>7. Banks (including Co-operative Banks and Regional Rural Banks) and Financial Institutions;<br>8. Mutual Funds/AIF registered with SEBI;<br>9. Religious and Charitable Trusts, Wakfs or endowments of private trusts (subject to receipt of necessary approvals as “Public Securities” as required) and Private trusts authorised to invest in mutual fund schemes under their trust deeds;<br>10. Non-Resident Indians (NRIs) / Persons of Indian origin (PIOs) residing abroad on repatriation basis or on non-repatriation basis;<br>11. Foreign Institutional Investors (FIIs) and their sub accounts registered with SEBI on repatriation basis;<br>12. Foreign Portfolio Investors (FPIs) registered with SEBI;<br>13. Army, Air Force, Navy and other para-military units and bodies created by such institutions;<br>14. Scientific and Industrial Research Organisations;<br>15. Multilateral Funding Agencies / Bodies Corporate incorporated outside India with the permission of Government of India / RBI;<br>16. Provident/ Pension/ Gratuity Fund to the extent they are permitted;<br>17. Other schemes of ITI Mutual Fund or any other mutual fund subject to the conditions and limits prescribed by SEBI Regulations;<br>18. Trustee, AMC or Sponsor or their associates may subscribe to Units under the Scheme;<br>19. Such other person as maybe decided by the AMC from time to time.<br><br>The list given above is indicative and the applicable laws, if any, as amended from time to time shall supersede the list. |
| Who cannot invest | It should be noted that the following persons cannot invest in the Scheme:<br><br>1. Any individual who is a foreign national or any other entity that is not an Indian resident under the Foreign Exchange Management Act, 1999 (FEMA Act) except where registered with SEBI as a FPI or FII or sub account of FII or otherwise explicitly permitted under FEMA Act/ by RBI/ by any other applicable authority, or |

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| | as stated in the exception in point no. 5 hereunder;<br>2. Overseas Corporate Bodies (OCBs)<br>3. NRIs residing in Non-Compliant Countries and Territories (NCCTs) as determined by the Financial Action Task Force (FATF), from time to time.<br>4. U.S. Persons and Residents of Canada as defined under the applicable laws of U.S. and Canada, except subscriptions received by way of lump sum/switches/systematic transactions received from Non-Resident Indians (NRIs)/ Persons of Indian Origin (PIO); and Foreign Portfolio Investors (FPI)/Foreign Institutional Investors (FII). The investors need to submit a transaction request along with such documents as may be prescribed by ITIAML/the Fund from time to time.<br>5. Persons subject to sanctions or residing in countries which are sanctioned, by any regulatory authorities.<br>**The term "U.S.person" mean any person that is a U.S.person within the meaning of Regulation S under the Securities Act of 1933 of U.S. or as defined by the U.S. Commodity Futures Trading Commission or as per such further amended definitions, interpretations, legislations, rules etc, as may be in force from time to time*<br><br>Investors may be requested to note that, neither the Scheme Information Document ("SID")/Key Information Document ("KIM")/Statement of Additional Information ("SAI") ["Scheme Related Documents"] nor the units of the scheme(s) of ITI Mutual Fund have been registered under the relevant laws, as applicable in the territorial jurisdiction of United States of America nor in any provincial/territorial jurisdiction in Canada. The distribution of the Scheme related document in certain jurisdictions may be restricted or subject to registration requirements and, accordingly, persons who come into possession of the Scheme related documents are required to inform themselves about, and to observe any such restrictions.<br><br>No persons receiving a copy of the Scheme related documents or any accompanying application form in such jurisdiction may treat these Scheme related documents or such application form as constituting an invitation to them to subscribe for units, nor should they in any event use any such application form, unless in the relevant jurisdiction such an invitation could lawfully be made to them and such application form could lawfully be used without compliance with any registration or other legal requirements.<br><br>Accordingly, the Scheme related documents do not constitute an offer or solicitation by anyone in any jurisdiction in which such offer or solicitation is not lawful or in which the person making such offer or solicitation is not qualified to do so or to anyone to whom it is unlawful to make such offer or solicitation as per applicable law.<br><br>The investor shall be responsible for complying with all applicable laws for such investments. The AMC/Trustee reserves the right to put the application form/transaction request on hold/reject the subscription/transaction request and redeem the units, if already allotted, as the case may be, at its sole discretion, as and when identified by the AMC that the same is not in compliance with the applicable laws, the terms and conditions stipulated by the AMC/Trustee from time to time and/or the documents/undertakings provided by such investors are not satisfactory. Any decision of the AMC about the eligibility or otherwise of a person to transact under the Scheme shall be final and binding on the applicant. Such redemption will be processed at the applicable Net Asset Value and subject to applicable taxes and exit load, if any.<br><br>The Mutual Fund reserves the right to include/exclude new/existing categories of investors to invest in the Scheme from time to time, subject to SEBI Regulations and other prevailing statutory regulations, if any. The Mutual Fund / Trustee / AMC may redeem Units of any Unitholder in the event it is found that the Unitholder has submitted information either in the application or otherwise that is false, misleading or incomplete or Units are held by any person in breach of the SEBI Regulations, any law or requirements of any governmental, statutory authority. |
| How to Apply (and other details) | Scheme-specific application form can be downloaded from the AMC's website, www.itiamc.com or sourced from the nearest Investor Service Centres (ISC) or Official Points of Acceptance (OPAT) of the Fund/ Registrar. The list of ISC/OPAT are available |

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| | under https://www.itiamc.com/statuory-disclosure, and also mentioned on the back cover page of this document.<br><br>**Details of Registrar:**<br><br>**KFin Technologies Limited**<br>Karvy Selenium Tower B, Plot No. 31 & 32,<br>Gachibowli, Financial District<br>Nanakramguda, Serilingampally, Hyderabad 500032<br>Ph: 18003094034 Email id investorsupport.mfs@kfintech.com<br><br>Further, Investors may also apply through ASBA facility, during the NFO period of the Scheme. Please refer to the SAI and Application form for the instructions.<br><br>As per the directives issued by SEBI it is mandatory for an investor to declare his/her bank account number. To safeguard the interest of Unitholders from loss or theft of their refund orders/redemption cheques, investors are requested to provide their bank details in the Application Form. The Bank Account details as mentioned with the Depository should be mentioned. If depository account details furnished in the application form are invalid or not confirmed in the depository system, the application may be rejected. |
| The policy regarding reissue of repurchased units, including the maximum extent, the manner of reissue, the entity (the scheme or the AMC) involved in the same. | Units once redeemed will be extinguished and will not be reissued. |
| Restrictions, if any, on the right to freely retain or dispose of units beingoffered. | The Mutual Fund will be repurchasing (subject to completion of lock-in period, if any) and issuing units of the Scheme on an ongoing basis. Any addition / deletion of name from the folio of the Unit holder is deemed as transfer of Units. In view of the same, additions / deletions of names will not be allowed under any folio of the Scheme. The said provisions in respect of deletion of names will not be applicable in case of death of a Unit holder (in respect of joint holdings) as this is treated as transmission (transfer of units by operation of law) of Units and not transfer.<br><br>The Units of the Scheme held in the dematerialised form will be fully and freely transferable (subject to lock-in period, if any and subject to lien, if any marked on the units) in accordance with the provisions of SEBI (Depositories and Participants) Regulations as may be amended from time to time.<br><br>For units held in non - demat form / by way of an Account Statement, unit holders intending to transfer units will have to get the units Certified by submitting designated form. On receipt of the said request, RTA will mark the underlying units as Certified Units and will issue a Certified SOA for those units. The AMC / RTA, on production of Designated Transfer Form together with relevant Certified SOA and requisite documents, register the transfer and provide the Certified SOA to the transferee within 10 business days from the date of such production. Investors may note that stamp duty and other statutory levies, if any, as applicable from time to time shall be borne by the transferee.<br><br>Please refer to paragraphs on 'Transfer and Transmission of units', 'Right to limit redemption', 'Suspension of purchase and / or redemption of Units and IDCW distribution' and 'Pledge of Units' in the SAI for further details.<br><br>**Right to Limit Redemptions**<br><br>Subject to the approval of Board of Directors of the AMC and Trustee Company and immediate intimation to SEBI, a restriction on redemptions may be imposed by the Scheme when there are circumstances, which the AMC / Trustee believe that may lead |

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<td>to a systemic crisis or event that constrict liquidity of most securities or the efficient functioning of markets such as:<br><br>1. Liquidity issues - when market at large becomes illiquid affecting almost all securities rather than any issuer specific security.<br>2. Market failures, exchange closures - when markets are affected by unexpected events which impact the functioning of exchanges or the regular course of transactions. Such unexpected events could also be related to political, economic, military, monetary or other emergencies.<br>3. Operational issues – when exceptional circumstances are caused by force majeure, unpredictable operational problems and technical failures (e.g. a black out). Such cases can only be considered if they are reasonably unpredictable and occur in spite of appropriate diligence of third parties, adequate and effective disaster recovery procedures and systems.<br><br>Such restriction on redemption may be imposed for a specified period of time not exceeding 10 working days in any 90 days period. However, if exceptional circumstances / systemic crisis referred above continues beyond the expected timelines, the restriction may be extended further subject to the prior approval of Board of Directors of the AMC and Trustee Company giving details of circumstances and justification for seeking such extension shall also be informed to SEBI in advance<br><br>Procedure to be followed while imposing restriction on redemptions:<br>No redemption requests upto Rs. 2 lakhs per request shall be subject to such restriction;<br>Where redemption requests are above Rs. 2 lakhs:<br>The AMC shall redeem the first Rs. 2 lakhs of each redemption request, without such restriction;<br>ii. Remaining part over and above Rs. 2 lakhs shall be subject to such restriction and be dealt as under:<br>- Any Units which are not redeemed on a particular Business Day will be carried forward for Redemption to the next Business Day, in order of receipt.<br>- Redemptions so carried forward will be priced on the basis of the Applicable NAV (subject to the prevailing Load, if any) of the subsequent Business Day(s) on which redemptions are being processed.<br>Under such circumstances, to the extent multiple redemption requests are received at the same time on a single Business Day, redemptions will be made on a prorate basis based on the size of each redemption request, the balance amount being carried forward for redemption to the next Business Day.</td>
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<td>Cut off timing for subscriptions/ redemptions/ switches<br><br>This is the time before which your application (complete in all respects) should reach the official points of acceptance.</td>
<td>In accordance with provisions of SEBI Master circular dated May 19, 2023, Chapter 8.4 – ‘Uniform Cut off Timings for applicability of Net Asset Value of Mutual Fund scheme(s) and/ or plans’, and further amendments if any, thereto, the following cut-off timings shall be observed by Mutual Fund in respect of purchase/redemption/ switches of units of the scheme (irrespective of application amount):<br><br>For Purchases (including switch-in)<br>
<table>
<tr><td>In respect of valid applications received upto 3.00 p.m on a business day at the official point(s) of acceptance and funds for the entire amount of subscription / purchase (including switch-in) as per the application are credited to the bank account of the respective scheme before the cut-off time i.e. available for utilization before the cut-off time</td><td>closing NAV of the day shall be applicable</td></tr>
<tr><td>In respect of valid applications received after 3.00 p.m on a business day at the official point(s) of acceptance and funds for the entire amount of subscription / purchase (including switch-in) as per the application are credited to the bank account of the respective scheme before the cut-off time of the next business day i.e. available for utilization before the cut-off time of the next business day</td><td>closing NAV of the next business day shall be applicable</td></tr>
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<tr><td>Irrespective of the time of receipt of application at the official point(s) of acceptance, where funds for the entire amount of subscription / purchase as per the application are credited to the bank account of the respective scheme before the cut-off time on any subsequent business day i.e. available for utilisation before the cut-off time on any subsequent business day</td><td>closing NAV of such subsequent business day shall be applicable</td></tr>
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For Redemption / switch out under both the Plans
<table>
<tr><td>where the application is received upto 3.00 p.m.</td><td>closing NAV of the day;</td></tr>
<tr><td>where the application is received after 3.00 p.m</td><td>closing NAV of the next Business Day.</td></tr>
</table>
Note: In case the application is received on a Non-Business Day, it will be considered as if received on the Next Business Day.
The above-mentioned cut-off timing shall also be applicable to transactions through the online trading platform.
In case of Transaction through Stock Exchange Infrastructure, the Date of Acceptance will be reckoned as per the date & time; the transaction is entered in stock exchange’s infrastructure for which a system generated confirmation slip will be issued to the investor.
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<tr>
<td>Minimum amount for purchase/ redemption / switches</td>
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Minimum amount for new purchase/switch in :<br>Rs. 5,000 and in multiples of Re.1 thereafter<br>For Systematic Investment Plan (SIP): Rs. 500 and in multiples of Rs. 1 thereafter
For Systematic Transfer Plan (STP): Rs. 1,000 and in multiples of Rs. 1 thereafter
For Systematic Withdrawal Plan (SWP): Rs. 1,000 and in multiples of Rs. 1 thereafter
Minimum additional amount for purchase / switch in: Rs. 1,000 and in multiples of Rs. 1 thereafter.
The minimum subscription limits for new purchases/additional purchases will apply to each Plan/option separately.
Minimum amount for redemption / switch out:
Rs. 1,000/- and in multiples of Rs. 1/- thereafter or the account balance, whichever is lower.
In case the investor specifies the number of units and amount to be redeemed, the number of units shall be considered for redemption. In case the unitholder does not specify the number of units or amount to be redeemed, the redemption request will not be processed.
The AMC reserves the right to change the minimum amounts for various purchase/ redemption/ switch. Such changes shall only be applicable to transactions on a prospective basis.
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<td>Account Statements</td>
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The AMC shall send an allotment confirmation specifying the units allotted by way of email and/or SMS within 5 working days of receipt of valid application/transaction to the Unit holders registered e-mail address and/ or mobile number (whether units are held in demat mode or in account statement form).
A Consolidated Account Statement (CAS) detailing all the transactions across all mutual funds (including transaction charges paid to the distributor) and holding at the end of the month shall be sent to the Unit holders in whose folio(s) transaction(s) have taken place during the month by mail or email on or before 15th of the succeeding month.
Half-yearly CAS shall be issued at the end of every six months (i.e. September/ March) on or before 21st day of succeeding month, to all investors providing the prescribed details across all schemes of mutual funds and securities held in dematerialized form
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| | across demat accounts, if applicable<br><br>**Option to hold units in dematerialised (demat) form**<br><br>The Unit holders would have an option to hold the Units in electronic i.e. demat form. The Applicants intending to hold Units in demat form will be required to have a beneficiary account with a Depository Participant (DP) of the NSDL/CDSL and will be required to mention in the application form DP's Name, DP ID No. and Beneficiary Account No. with the DP at the time of purchasing Units. In case investors desire to convert their existing physical units (represented by statement of account) into dematerialized form or vice versa, the request for conversion of units held in physical form into Demat (electronic) form or vice versa should be submitted along with a Demat/Remat Request Form to their Depository Participants. In case the units are desired to be held by investor in dematerialized form, the KYC performed by Depository Participant shall be considered compliance of the applicable SEBI norms.Investors desirous of having the Units of the Scheme in dematerialized form should contact the ISCs of the AMC/Registrar. For details, Investors may contact any of the Investor Service Centres of the AMC.<br><br>**Account Statement for demat account holders**<br><br>In case of Unit Holders holding units in the dematerialized mode, the AMC will not send the account statement to the Unit Holders. The demat statement issued by the Depository Participant would be deemed adequate compliance with the requirements in respect of dispatch of statements of account.<br>For further details, refer SAI. |
| Dividend/ IDCW | The payment of dividend/IDCW to the unitholders shall be made within seven working days from the record date. |
| Redemption | • The redemption or repurchase proceeds shall be dispatched to the unitholders within three working days from the date ofredemption or repurchase.<br>• It shall be mandatory for the investors of mutual fund schemes to mention their bank account numbers in their applications/requests for redemption<br>• For list of exceptional circumstances, refer para 14.1.3 of SEBI Master Circular for Mutual Funds dated May 19, 2023. |
| Bank Mandate | All cheques and bank drafts accompanying the application form should contain the application form number on its reverse. Pursuant to para-No.14.11 and 14.12 of Master Circular it is mandatory for applicants to mention their bank account numbers in their PAN and applications for purchase or redemption of Units. This is to prevent fraudulent encashment of IDCW /redemption / refund cheques. The verification procedures for registration of bank mandates will be applicable at the time of fresh subscription/new folio creation with the Fund i.e. in case the fresh subscription cheque does not belong to the bank mandate mentioned in the application form, the AMC shall seek the additional documents before registering the bank mandate in the new folio. |
| Delay in payment of redemption / repurchase proceeds/dividend | The AMC shall be liable to pay interest to unitholders at rate as specified vide clause 14.2 of SEBI Master Circular for Mutual Funds dated May 19, 2023 by SEBI for the period of such delay. |
| Unclaimed Redemption and Income Distribution cum Capital WithdrawalAmount | As per Master circular dated May 19, 2023, Chapter 14.3-'Unclaimed Redemption and Dividend Amount', the unclaimed redemption and IDCW amounts shall be deployed by the Fund in call money market or money market instruments or in a separate plan of Liquid scheme / Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts.<br><br>The investment management fee charged by the AMC for managing such unclaimed amounts shall not exceed 50 basis points. Investors claiming these amounts during a period of three years from the due date shall be paid initial unclaimed amount along-with the income earned on its deployment. Investors, who claim these amounts after 3 years, shall be paid initial unclaimed amount along-with the income earned on its deployment till the end of the third year. After the third year, the income earned on such |

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| | unclaimed amounts shall be used for the purpose of investor education. The AMC shall make a continuous effort to remind investors through letters to take their unclaimed amounts. |
| Disclosure w.r.t investment by minors | Pursuant to SEBI Master circular May 19, 2023 - Chapter 17.6,the following uniform process shall be applicable with respect to Investments made in the name of a minor through a guardian.<br><br>i. Payment for investment by means of Cheque, Demand Draft or any other mode shall be accepted from the bank account of minor, parent or legal guardian of minor, or from the joint account of the minor with parent or legal guardian. For existing folios, the AMC shall insist upon a Change of payout bank mandate before redemption is processed. H[1]owever, all redemptions from investments made in the name of a minor shall be credited only to the verified bank account of the minor, with effect from June 15, 2023.<br>ii. Existing unit holders are requested to review the Bank Account registered in the folio and ensure that the registered Bank Mandate is in favour of minor or joint with registered guardian in folio. If the registered Bank Account is not in favour of minor or not joint with registered guardian, unit holders will be required to submit the change of bank mandate, where minor is also a bank account holder (either single or joint with registered guardian), before initiation any redemption transaction in the folio, else the transaction is liable to get rejected.<br>iii. Upon the minor attaining the status of major, the minor in whose name the investment was made, shall be required to provide all the KYC/FATCA details, updated bank account details including cancelled original cheque leaf of the new account and his/her specimen signature duly authenticated by banker/guardian. Investors shall additionally note that, upon the minor attaining the status of major, no further transactions shall be allowed till the status of the minor is changed to major.<br>The standing instructions registered for Systematic Investment Plan (SIP), Systematic Transfer Investment Plan (STP), Systematic Withdrawal Plan (SWP), IDCW Transfer Plan (DTP), etc., shall be suspended when the minor attains majority, till the status is changed to major. |

## III. Other Details

### A. Periodic Disclosures

**Monthly/Half yearly Disclosures*** (Portfolio This is a list of securities where the corpus of the scheme is currently invested. The market value of these investments is also stated in portfolio disclosures.)

The Fund shall disclose within ten days from the close of each month/half year (i.e. 31st March and 30th September), the complete statement of the Scheme's portfolio (alongwith ISIN) as on the last day of the month/half year for all its schemes on the websites of the Fund and AMFI in a user friendly and downloadable spreadsheet format.

The link of Fund website for Monthly/Half yearly portfolio is https://www.itiamc.com/statuory-disclosure

The Link of AMFI website is amfiindia.com/investor-corner/online-center/portfoliodisclosure

The Fund shall send email regarding the monthly and half-yearly portfolio within 10 days from the close of each month/half year (i.e. March 31st & September 30th) to the unitholders whose email ad- dresses are registered with the Fund.

The Fund will publish an advertisement in the all India edition of atleast two daily newspapers, one each in English and Hindi,regarding the hosting of the half yearly statement of the Scheme's portfolio on the websites of the Fund and AMFI and also the modes through which unitholders can submit a re- quest for a physical or electronic copy of the Scheme portfolio. The Fund shall provide a physical copy of the portfolio, without charging any cost, upon specific request from a unitholder.

**Half-Yearly Results:**

The Fund and asset management company shall within one month from the close of each half year, that is on 31st March and on 30th September, host a soft copy of its unaudited / audited financial results on its website.

The Fund shall give an advertisement disclosing the hosting of the financial results on the website and in atleast one English daily newspaper having nationwide circulation and in a newspaper having wide circulation published in the regional language where the Corporate Office of the Fund is situated.

The link of Fund website for Half Yearly Result is https://www.itiamc.com/statuory-disclosure

**Annual Report:**

The scheme wise annual report shall be hosted on the website of the AMC / Mutual Fund (www.itiamc.com) and AMFI (www.amfiindia.com) not later than four months (or such other period as may be specified by SEBI from time to time) from the date of closure of the relevant accounting year (i.e. 31st March each year). Further, the physical copy of the scheme wise annual report shall be made available to the Unitholders at the registered /corporate office of the AMC at all times.

In case of Unitholders whose e-mail addresses are registered with the Fund, the AMC shall e-mail the annual report or an abridged summary thereof to such Unitholders. The Unitholders whose e-mail addresses are not registered with the Fund may submit a request to the AMC / Registrar & Transfer Agent to update their email ids or communicate their preference to continue receiving a physical copy of the scheme wise annual report or an abridged summary thereof. Unitholders may also request for a physical or electronic copy of the annual report / abridged summary, by writing to the AMC at mfassist@itiorg.com from their registered email ids or calling the AMC on the toll free number 1800-266- 9603 or by submitting a written request at any of the nearest investor service centers of the Fund.

Further, the AMC shall publish an advertisement in all India edition of at least two daily newspapers, one each in English and Hindi, every year disclosing the hosting of the scheme wise annual report on its website and on the website of AMFI. The AMC shall provide a physical copy of the abridged summary of the annual report, without charging any cost, on specific request received from a Unitholder.

The link for Annual Report on our website is https://www.itiamc.com/statuory-disclosure

**Risk-o-meters/ Procut labelling**

In accordance with Para 17.4.1 of SEBI Master Circular on Mutual Funds dated May 19, 2023, the AMC shall assign risk level of the scheme based on the scheme characteristics at the time of launch of scheme. Any change in risk-o meter shall be communicated by way of Notice cum Addendum and by way of an e-mail or SMS to unitholders of that particular scheme. Further, the AMC shall evaluate Risk-o-meter on a monthly basis and shall disclose the Risk-o-meter along with portfolio disclosure for all their schemes on AMC website https://www.itiamc.com/statuory-disclosure and on AMFI website within 10 days from the close of each month. The AMC shall also disclose the risk level of all schemes as on March 31 of every year, along with number of times the risk level has changed over the year, on their website and AMFI website. The table of scheme wise changes in Risk-o-meter shall also be disclosed in scheme wise Annual Reports and Abridged summary thereof.

**Scheme Summary Document**

The AMC will provide on its website a standalone scheme document for all the Schemes which contains all the details of the Scheme including but not limited to Scheme features, Fund Manager details, investment details, investment objective, expense ratios, portfolio details, etc. Scheme summary document will be uploaded on the websites of AMC, AMFI and stock exchanges in 3 data formats i.e. PDF, Spreadsheet and a machine-readable format)

The link for Scheme Summary Document on our website is https://www.itiamc.com/statuory-disclosure

**Investment by the Designated Employees of AMC in the Scheme:**

Pursuant to para 6.10 of SEBI Master circular SEBI/HO/IMD/IMD-PoD-1/P/CIR/2023/74 dated May 19, 2023 pertaining to 'Alignment of interest of Designated Employees of AMC's with the Unitholders of the Mutual Fund Schemes', investors are requested to note that a part of compensation of the Designated Employees of AMC, as defined by SEBI, shall be mandatorily invested in units of the schemes in which they have a role/oversight effective October 01, 2021. Further, investors are requested to note that such mandatory investment in units of the scheme shall be made on the day of payment of salary and in proportion to the AUM of the schemes in which such Designated Employee has a role/oversight. AMC shall ensure compliance with the provisions of the said circular and further, the disclosure of such investment shall be made at monthly aggregate level showing the total investment across all relevant employees in scheme on website of AMC https://www.itiamc.com/statuory-disclosure. Further, in accordance with the said regulatory requirement, the minimum application amount and minimum redemption amount as specified for the scheme will not be applicable for investment made in scheme in compliance with the aforesaid guidelines.

**B. *Transparency/NAV Disclosure***

- The AMC will calculate and disclose the NAV of the Scheme on all business days.
- Subsequently, the AMC will calculate and disclose the NAVs on all the Business Days. The AMC shall update the NAVs on its website (www.itiamc.com) and of the Association of Mutual Funds in India - AMFI (www.amfiindia.com) before 11.00 p.m. on every Business Day.
- In case of any delay in NAV declaration, the reasons for such delay would be explained to AMFI in writing. If the NAVs are not available before the commencement of Business Hours on the following day due to any reason, the Mutual Fund shall issue a press release giving reasons and explaining when the Mutual Fund would be able to publish the NAV.
- Information regarding NAV can be obtained by the Unitholders / Investors by calling or visiting the nearest ISC. Investors may also call our Toll free number 1800-266-9603.

**C. Transaction charges and stamp duty:**

- Transaction charges shall be deducted for applications for purchase/subscription received through distributor/ agent as under (only if that distributor / agent has opted to receive the transaction charges):

| Investor Type | Transaction Charges |
|---|---|
| New Investor (First Time Mutual Fund Investor) | Transaction charge of Rs.150/- for per purchase / subscription of Rs.10,000 and above will be deducted from the subscription amount and paid to the distributor/agent of the first time investor. The balance of the subscription amount shall be invested. |
| Existing Investor | Transaction charge of Rs.100/- for per purchase / subscription of Rs.10,000 and above will be deducted from the subscription amount and paid to the distributor/agent of the first time investor. The balance of the subscription amount shall be invested. |

- **Stamp duty** - Pursuant to Notification No. S.O. 1226(E) and G.S.R. 226(E) dated March 30, 2020 issued by Department of Revenue, Ministry of Finance, Government of India, read with Part I of Chapter IV of The Finance Act, 2019, notified on February 21, 2019 issued by Legislative Department, Ministry of Law and Justice, Government of India, a stamp duty @0.005% of the transaction value of units would be levied on applicable mutual fund inflow transactions, with effect from July 1, 2020. Accordingly, pursuant to levy of stamp duty, the number of units allotted on purchase transactions (including Reinvestment of Income Distribution cum capital withdrawal and Transfer of Income Distribution cum capital withdrawal) to the unitholders would be reduced to that extent.

  For more details please refer to SAI.

**D. Associate Transactions**- Please refer to Statement of Additional Information (SAI)

**E. Taxation**- For details on taxation please refer to the clause on Taxation in the SAI apart from the following:

| Tax* | Resident Investors | Mutual Fund |
|---|---|---|
| Tax on IDCW (dividend) | Taxable at slab rates | Nil |
| Capital gains: | | |
| Long Term | 10%^ | Nil |
| Short Term | 15%** | Nil |

1) *plus surcharge and health & education cess as applicable.
2) ^ Any Long Term Capital Gains arising on transfer of unit of an equity oriented mutual fund will be taxable at 10% without indexation benefit of such capital gains exceeding Rs.1,00,000/-. Equity scheme will also attract securities transaction tax (STT) at applicable rates. Surcharge and health & educational cess will be payable in addition to the applicable taxes.
3) ** These should be increased by the applicable surcharge i.e. in the case of individual, HUF, AOP, BOI and Artificial Juridical Person where the income exceeds Rs. 50 Lakhs but less than Rs. 1 crore surcharge @ 10% will be applicable and where the income exceeds Rs. 1 crore surcharge @ 15% shall be applicable. In the case of domestic company having total income exceeding Rs. 1 crore but less than Rs. 10 crore the surcharge applicable is 7% and on total income exceeding Rs. 10 crore surcharge applicable is 12%. In the case of foreign company having income exceeding Rs. 1 crore but less than Rs. 10 crore the surcharge rate is 2% and on income exceeding Rs. 10 crore the surcharge rate is 5%. In case of Firm, Cooperative Society and Local Authorities, surcharge @ 12% if the total income exceeds Rs. 1 Crore. Health & educational cess will be payable in addition to the applicable taxes.
4) W.e.f. April 1, 2020, Mutual Funds are required to deduct TDS at 10% only on IDCW payment (Above Rs 5000) & no tax shall be required to be deducted by the mutual fund on income which is in the nature of capital gain.

F. **Rights of Unitholders-** Please refer to SAI for details.

G. **List of official points of acceptance:** Kindly refer the link https://www.itiamc.com/statuory-disclosure for list of Official points of acceptance.

H. ***Penalties, Pending Litigation or Proceedings, Findings of Inspections or Investigations For Which Action May Have Been Taken Or Is In The Process Of Being Taken By Any Regulatory Authority :*** *Kindly refer the link https://www.itiamc.com/statuory-disclosure for details*

The Scheme under this Scheme Information Document was approved by the Board of Directors of ITI Mutual Fund Trustee Private Limited (Trustee to ITI Mutual Fund ) on March 29 2023 & ratified on February 02, 2024. The Trustee has ensured that the Scheme is a new product offered by ITI Mutual Fund and is not a minor modification of its existing schemes.

**NOTWITHSTANDING ANYTHING CONTAINED IN THIS SCHEME INFORMATION DOCUMENT, THE PROVISIONS OF THE SEBI (MUTUAL FUNDS) REGULATIONS, 1996 AND THE GUIDELINES/CIRCULARS THERE UNDER SHALL BE APPLICABLE.**

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**For behalf of ITI Asset Management Limited**

**Sd/-**

**Hitesh Thakkar**

**Acting CEO**

**Date: July 23, 2024**