TITANIUM SIF

Offered by Tata Mutual Fund

STATEMENT OF ADDITIONAL INFORMATION (SAI)

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Corporate Identity Number:
TAMPL - U65990-MH-1994-PTC-077090, TTCPL - U65991-MH-1995-PTC-087722

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STATEMENT OF ADDITIONAL INFORMATION (SAI)

This Statement of Additional Information (SAI) contains details of Titanium SIF 'Specialized Investment Fund' ('SIF') offered by Tata Mutual Fund (the "Mutual Fund"), its constitution, and certain tax, legal and general information. It is incorporated by reference and is legally a part of the Investment Strategy Information Document (ISID).

This SAI is dated June 29, 2026.

I. INFORMATION ABOUT SPONSOR, AMC AND TRUSTEE COMPANIES

A. **Constitution of the Mutual Fund**

Tata Mutual Fund (the "Mutual Fund") has been constituted as a trust on May 9,1995 in accordance with the provisions of the Indian Trusts Act, 1882 (2 of 1882) with Tata Sons Pvt Ltd (TSPL) and Tata Investment Corporation Ltd (TICL), as the Sponsor and Tata Trustee Company Pvt Ltd (TTCPL) as the Trustee. The Trust Deed has been registered under the Indian Registration Act, 1908. The Mutual Fund was registered with SEBI on June 30 ,1995 under Registration Code MF/023/95/9.

Tata Sons Pvt Ltd (TSPL) and Tata Investment Corporation Ltd (TICL) are the Sponsors and the Settlors and Tata Trustee Company Pvt Ltd is the Trustee Company. The Trustee Company has appointed Tata Asset Management Pvt Ltd (TAMPL) as the Asset Management Company. TSPL and TICL have made an aggregate initial contribution of Rs.1 lac towards setting up of TMF.

Share holding pattern of Tata Asset Management Pvt Ltd (TAMPL) and Tata Trustee Company Pvt Ltd (TTCPL)

	TAMPL	TTCPL
Tata Sons Pvt Ltd	67.91%	50%
Tata Investment Corporation Ltd	32.09%	50%

B. **Constitution of the Specialized Investment Fund**

Titanium SIF 'Specialized Investment Fund ('SIF') is offered by Tata Mutual Fund in terms of Regulation 48 (1) of SEBI (Mutual Funds) Regulations, 2026 ("SEBI Regulations") with Tata Trustee Company Pvt Ltd (TTCPL) as the Trustee and Tata Asset Management Pvt. Ltd. as the Asset Management Company (AMC). Tata Mutual Fund was granted approval to establish the SIF by SEBI on June 09, 2025.

C. Sponsor

Tata Mutual Fund is sponsored by Tata Sons Pvt Ltd (TSPL) and Tata Investment Corporation Ltd (TICL). The Sponsor is the Settlor of the Mutual Fund Trust. The Sponsors have entrusted a sum of Rs.1 lac to the Trustee as the initial contribution towards the corpus of the Mutual Fund.

1. **Tata Sons Pvt Ltd (TSPL)**

Tata Sons is the principal investment holding company and promoter of Tata companies. 66% of the equity share capital of Tata Sons is held by philanthropic trusts, which support education, health, livelihood generation, and art and culture. Each Tata company or enterprise operates independently under the guidance and supervision of its own Board of Directors.

Financial Performance of the TSPL (past three years):

(Rs. In crore)

Particulars	2025-26	2024-25	2023-24
Net Worth/ Total Equity	1,79,009.52	1,49,680.13	1,24,878.55
Total Income	42,366.55	38,834.58	43,893.00
Profit after tax	31,961.11	26,231.74	34,653.98
Assets Under Management (if applicable)	NA	NA	NA

2. **Tata Investment Corporation Ltd (TICL)**

Tata Investment Corporation Ltd. was promoted by Tata Sons Pvt. Ltd. in 1937, with the main objective of being an investment company, and was initially called The Investment Corporation of India Ltd. It remained closely held till 1959, when it was listed on the Bombay Stock Exchange.

Financial Performance of the TICL (past three years):

(Rs. In Crores)

Particulars	2025-26	2024-25	2023-2024
Net Worth/ Total Equity	28,834.48	30,789.77	29,691.99
Total Income	426.34	369.48	325.31
Profit after tax	350.16	282.52	283.91
Assets Under Management (if applicable)	NA	NA	NA

D. The Trustee

Tata Trustee Company Pvt Ltd. (the "Trustee"), through its Board of Directors, shall discharge its obligations as trustee of the Titanium SIF. The Trustee ensures that the transactions entered into by the AMC are in accordance with the SEBI Regulations, as amended from time to time and will also review the activities carried on by the AMC.

As regards to the SIF, the Trustee ensures that all the activities of the SIF are in accordance with the provisions of the SEBI Regulations and Circulars issued in this regard from time to time.

1. **Details of Trustee Directors:**

Name of Director	**Age**	**Educational Qualifications**	**Brief Experience**
Mrs. Varsha Purandare (Independent)	66	Bachelor of Science (Chemistry) Pune University, Diploma in Business Management Pune University	She has held the position of Managing Director & CEO with SBI Capital Markets Limited and earlier as Deputy Managing Director & Chief Credit Officer & Risk Officer with State Bank of India. She is currently holding the position as Independent Director in, The Federal Bank Limited, Tata Motors Limited, TMF Holdings Limited, Tata Autocomp Systems Limited, Protraviny Private Limited, Kirloskar Pneumatic Company Limited and Tata Play Limited.
Mr. Neeraj Jain (Independent)	63	Graduated in Commerce, Chartered Accountant, Company Secretary.	Mr. Neeraj Jain is an Independent Director on the Board. He has worked for 14 years with Johnson & Johnson in Medical Devices (MD&D) and Consumer businesses. Prior to that he has worked for 17 years with Hindustan Unilever Ltd (HUL) - the Indian subsidiary of Unilever - in varied businesses. For 4 years with AF Ferguson & Co (now part of Deloitte), Management Consulting Division and over a year with Jay Pee Hotels in New Delhi. He is currently also an invitational speaker at various finance, supply chain, legal and business events as a keynote speaker, moderator or a panelist. He is a mentor to start-ups and to some professionals in Asia, a co-founder of an Angel group in Mumbai and an Independent consultant. He is currently, Director at Value Angels Network Pvt Ltd. and an Independent Director on the Board of Tata Pension Management Private Limited, Radiowalla Network Limited, Popular Vehicles and Services Limited, Abbott India Limited, Sheela Foam Limited and Gromax Agri Equipment Limited.
Mr. Kersi R Bhagat (Associate)	66	Graduated in Commerce, Chartered Accountant and Company Secretary	Mr. Kersi R Bhagat is an Associate Director on the Board. He is currently a Director with Mohar Export Services Private Limited, Brihat Trading Private Limited, Malusha Travels Private Limited, Rapid Transporters Private Limited, Tej Transportation Private Limited, Sarash Investments Private Limited, Aida Marketing Services Private Limited, Kaygee Advertising Private Limited, Unnath Advertising Private Limited, Chic Interiors Private Limited, Panatone Finvest Limited, Indian Rotorcraft Limited, TASL Aerostructures Private Limited, Nova Integrated Systems Limited, Akashashta Technologies Private Limited, The Associated Building Company Limited. He was the Head - Legal and Secretarial with Tata Digital Private Limited and has held the position as Senior Vice President - Finance with Tata Sons Private Limited from October 1993 to November 2018.
Mr. Narayanan Nadadur Rajagopalan (Independent)	62	Engineer from IIT Roorkee, Post Graduate Diploma in Management (PGDM) from IIM Bangalore	Mr. Narayanan Nadadur Rajagopalan is currently holding the position of Independent Director on the Boards of Aditya Birla Housing Finance Limited and Equitas Small Finance Bank Limited. He held the position of Chairman & Non-Executive Independent Director of Indostar Home Finance Private Limited from February 02, 2022 to January 13, 2023. He was the Head of Retail Secured Loans business/Retail Collections at ICICI Bank Ltd. from 2017 to 2021 and served as Nominee Director on the Board of ICICI Home Finance Company Limited. He held the position of Head Branch Banking, West Zone with ICICI Bank from 2010 to 2017.

Rights and obligations of the trustees

(1) Appointment and termination of asset management company

(a) The trustee company, with prior approval from the Board, shall appoint an asset management company and shall enter into an investment management agreement with the asset management company.

(b) The investment management agreement shall include the clauses set out in the Third Schedule and any additional clauses necessary for the purpose of investments and fair and transparent functioning of an asset management company.

(c) A copy of the draft investment management agreement shall be enclosed with the trust deed.
No amendments to the Trust Deed shall be carried out without the prior approval of SEBI and Unitholders approval/ consent will be obtained where it affects the interests of Unitholders as per the procedure / provisions laid down in the Regulations.

(d) The trustees shall ensure that the asset management company has the necessary expertise, internal control systems and risk management mechanism to invest in and manage investments.

(e) The trustees shall ensure that the asset management company establishes systems and submits reports and information that the trustees may require in discharging their responsibility under these regulations including matters relating to:
(i) prevention and oversight of mis-selling;
(ii) prevention and oversight of undue influence of sponsor;
(iii) ensuring adequate systems are in place to prevent misconduct including market abuse; and
(iv) addressing potential conflict of interest.

(f) Where the trustees have reason to believe that the conduct of business of the asset management company is not in accordance with these regulations, the contraventions by asset management company and remedial action taken by the trustees shall immediately be informed to the Board.

(g) Termination of the assignment of the asset management company by the trustees may be under the below given circumstances and shall be subject to prior approval from the Board:
i. Trustees own accord if they have reasons to believe that the affairs of the asset management company are being conducted in contravention to the provisions of these regulations; or
ii. Request by the asset management company. Explanation: Termination shall become effective only after the trustees have accepted the termination of assignment and communicated their decision in writing to the asset management company.

(2) Addressing conflict of interest and broker empanelment:
The trustees shall take all necessary measures as they deem necessary to ensure that any conflict of interest involving the asset management company is effectively addressed and such measures shall include:

(a) conducting a quarterly review of reports submitted by the asset management company on transactions between the SIF and the asset management company or its associates;

(b) ensuring that the asset management company does not grant unfair advantage to its associates or engage in transactions that may prejudice the interests of unitholders;

(c) ensuring that the asset management company manages each investment strategy independently of its other business activities, and adopts safeguards to ensure fair and equitable treatment of investors across all investment strategies, without compromising the interests of one investment strategy for another or for its other businesses; and

(d) approving broker empanelment policy of the asset management company and ensuring that brokers are empaneled after requisite due diligence, and that broker transactions are monitored to avoid undue concentration of business or unfair advantage to any associate or group entity.

(3) Regulatory compliance and trustee responsibilities

(a) The trustees shall have the right to request for any information from the asset management company that they deem necessary.

(b) The trustees shall ensure that the asset management company complies with the obligations set out under regulation 22, adhere to the Code of Conduct applicable to asset management companies, and observe all other provisions of these regulations.

(c) The transactions under the investment strategies are in accordance with the provisions of these regulations and trust deed, and the asset management company makes investments only in permissible instruments, in compliance with these regulations and in alignment with the stated investment objectives of each investment strategies.

(d) The trustees shall be accountable for and be the custodian of the funds and property of the respective investment strategies and shall hold them in trust for the benefit of unitholders in accordance with these regulations and the provisions of trust deed.

(4) Trustee oversight for investor interests

(a) The trustees shall abide by the Code of Conduct as specified in Part – A of the Fourth Schedule.

(b) The trustees shall obtain unitholder consent:
(i) when required by the Board for the benefit of unitholders;

(ii) on the requisition of three-fourths of the unitholders of any investment strategy; and
(iii) when the majority of trustees decide to wind up a investment strategy or prematurely redeem units of a closed-ended investment strategy.
(c) The trustees shall request details of securities transactions by key personnel of the asset management company, whether made in their own name or in the name of the asset management company, and report to the Board when required.

(d) The trustees shall periodically review investor complaints and their resolution by the asset management company.

(e) The trustees shall appoint auditor, who is not in any manner associated with the auditor of the asset management company, for audit of annual statement of accounts of SIF investment strategies.

(f) The trustees shall submit to the Board on a half-yearly basis

(i) a report on the activities of the mutual fund;
(ii) a certificate confirming there have been no instances of self-dealing or front running by trustees, directors, or key personnel of the asset management company; and
(iii) a certificate confirming that the asset management company has managed the investment strategies independently of other activities, and any conflicts were addressed to protect unitholders' interests.

(g) The independent trustees, i.e. trustees not associated with the sponsors, shall review and give their comments on the reports received from asset management company on investments in securities of group companies of the sponsor.

(5) Additional trustee oversight
(a) The trustees shall review the asset management company's net worth quarterly to ensure compliance with clause (e) of sub-regulation (1) of regulation 5.

(b) The trustees shall ensure there is no conflict of interest in how the asset management company deploys its net worth and the interests of unitholders.

(c) The trustees shall periodically review service contracts related to custody arrangements and ensure they serve the unitholders' interests.

(d) The trustees shall review the details of securities transactions filed by directors of the asset management company on a quarterly basis.

(e) The trustees shall exercise due diligence as under:

General Due Diligence:
(i) The trustees shall be discerning in the appointment of the directors on the Board of the asset management company.
(ii) The trustees shall review the desirability or continuance of the asset management company if substantial irregularities are observed in any of the investment strategies of the SIF, and shall not permit the asset management company to float new investment strategies until such irregularities are resolved.
(iii) The trustees shall ensure that the trust property is adequately protected, held and administered by persons with necessary expertise and experience, and in a manner that ensures adequate oversight through an appropriate number of such persons.
(iv) The trustees shall ensure that all service providers are holding appropriate registrations from the Board or concerned regulatory authority.
(v) The trustees shall arrange for test checks of service contracts relating to key service providers, whose services, functions, operations and access to information or assets is critical to, or could materially influence the protection of investor interests.
(vi) The trustees shall immediately report to the Board of any special developments in the mutual fund.

Specific due diligence:
(vii) The trustees shall obtain internal audit reports at regular intervals from independent auditors appointed by them.
(viii) The trustees shall obtain compliance certificates at regular intervals from the asset management company.
(ix) The trustees shall meet periodically to review reports and functioning of asset management company and ensure compliance with these regulations.
(x) The trustees shall maintain records of the decisions of the Trustees at their meetings and of the minutes of the meetings.
(xi) The trustees shall prescribe the Code of Ethics to be adhered to by the asset management company and its personnel.
(xii) The trustees shall communicate in writing to the asset management company of the deficiencies and review the rectification of such deficiencies.

(f) The independent directors of the trustee company and asset management company shall exercise oversight over:—
(i) the investment management agreement and the compensation paid under the agreement;
(ii) fees and ensure that fees charged in service contracts entered with associates are not higher than those charged by outside contractors for the similar services;
(iii) securities transactions involving associates to the extent such transactions are permitted;
(iv) selecting and nominating individuals to fill independent directors' vacancies;
(v) ensuing code of ethics designed prevents fraudulent, deceptive or manipulative practices by insiders in connection with personal securities transactions;
(vi) the reasonableness of fees paid to sponsors, asset management company and any others for services provided; and
(vii) any service contract with the associates of the asset management company.

(g) The trustees shall not be held liable for acts done in good faith if they have exercised adequate due diligence.

(6) The trustees shall also exercise due diligence on such matters as may be specified by the Board.

(7) The trustees shall ensure that the asset management company shall comply with such other requirements related to risk management, investor protection, disclosures and reporting, as may be specified by the Board from time to time.

(8) The trustees shall ensure that all activities of the Specialized Investment Fund are in accordance with the provisions of these regulations.

During the period, April 1, 2025 to March 31, 2026, 9 meetings of the Directors of the Trustees were held. The Trustee's review the information and the operations of the Fund, presented through reports submitted at the Board Meetings of the Trustee, by reviewing the reports being submitted by the Internal Auditor and the quarterly and half-yearly compliance reports. The Trustees engage with the Statutory Auditors of the Fund on the matters emerging from the half yearly and annual financial statements.

II. Asset Management Company

Tata Asset Management Pvt Ltd (TAMPL) is a private limited company incorporated under the Companies Act, 1956/ 2013 on 15th March, 1994, having its Registered Office at 1903, B Wing, Parinee Crescenzo, G Block, Bandra Kurla Complex, Bandra East, Mumbai 400 051. TAMPL has been appointed as the Asset Management Company of the Titanium SIF by the Trustee vide Investment Management Agreement (IMA) dated May 9, 1995, and executed between TTCPL and TAMPL. TAMPL is also the AMC of Tata Mutual Fund.

Other Activities of AMC:
The Trustee Company has appointed TAMPL as the Asset Management Company for Tata Mutual Fund (TMF). The shareholders of TAMPL are TSPL and TICL. TAMPL has entered into an Investment Management Agreement dated 9th May, 1995 with TTCPL, pursuant to which TAMPL will run the operations of Tata Mutual Fund(TMF) and manage the assets of TMF's Schemes. TAMPL, is a Company incorporated under the Companies Act, 1956 on 15th March 1994 and was approved to act as an Asset Management Company for TMF by SEBI on 30th June, 1995. The unaudited net worth of TAMPL as on March 31, 2026 is approximately Rs. 1045.79 crores. TAMPL is currently (As on 31/05/2026) managing sixty six open ended mutual fund schemes and two investment strategy of Titanium SIF. The Asset Management Company shall be entitled to fees as stated in the clause on "Investment Management Fee". The appointment of TAMPL as the Asset Management Company can be terminated with the approval of SEBI and upon resolution by the Trustee Company, or by 75% of the Unitholders of the Scheme.

SEBI vide provision no. 22.3 of SEBI Master circular on Mutual Fund dated March 20, 2026 has stipulated that AMCs of Mutual Funds should set up a LPCC for clearing and settling repo transactions in corporate debt securities by contributing an amount of ₹150 Crore. Accordingly, Tata Asset Management Pvt. Ltd. has contributed their share towards the share capital of LPCC. AMC has already been allotted shares of AMC Repo Clearing Limited and is a shareholder of the company.

AMC has obtained registration from SEBI vide Registration No. INP000001058 dated September 14, 2004 to act as a Portfolio Manager under SEBI (Portfolio Managers) Regulations, 1993 (now SEBI (Portfolio Managers) Regulations, 2020). AMC has appointed separate Fund Manager(s) for the same and back office is also segregated from Mutual Fund Back Office.

AMC managing schemes of Tata Alternative Investment Fund (Alternative Investment Fund-Category II & Category III). AMC has appointed separate Fund Manager(s) for the same and back office is also segregated from Mutual Fund Back Office.

AMC has obtained no objection from SEBI for providing investment advisory services. AMC is providing investment advisory services to one Foreign Portfolio Investor (FPI) based in Australia.

AMC has also obtained no objection for investment management services to offshore funds (FPI). AMC is providing investment management services to 3 FPI's (1 based in Luxembourg and 2 based in Mauritius). For Mauritius based 2 FPI's , Tata Asset Management (Mauritius) Pvt Limited (TAMMPL), is coordinating for operations of these funds in Mauritius.

AMC has also received no objection from SEBI for providing investment management services through its subsidiary company Tata Pension Management Ltd under regulation 24(2) of SEBI (Mutual Funds) Regulations,1996(now Regulation 21(b) of of SEBI (Mutual Funds) Regulations 2026. Tata Pension Management Limited has set up the pension fund, received pension fund manager license. Since the investment activities of Pension Funds is managed by a separate company, there is no conflict with investment activities of Tata Mutual fund.".

AMC has also obtained No objection from SEBI for providing Management and Advisory Services to funds set up in Gift City & Portfolio Management Services and Advisory Services through its branch.

AMC has also obtained prior approval to establish SIF (Specialized Investment fund) and is managing various strategies under these guidelines.

AMC has also received "No Objection" from SEBI dated 04.02.2026 for obtaining registration as Point of Presence (POP) by Tata Pension Fund Management Private Limited (a subsidiary of Tata AMC).

We have also received no objection rom SEBI in respect of additional business activity under Regulation 21(b) of SEBI (Mutual Funds) Regulations 2026 to provide management and advisory services to pooled assets.

AMC has implemented necessary controls to avoid conflicts of interest in managing above activities.

Wherever required by Regulation, The AMC has systems in place to ensure that there is no conflict of interest between the activities. This includes:

- Segregation of bank and securities account

- Maintained Capital adequacy for different activities as mandated by SEBI
- Segregation of key investment personnel ad order management system wherever mandated under the regulations
- Restriction on transfer of securities in certain circumstances

All other business activities mentioned above will be explicitly forbidden from the acquisition of any asset out of the assets of the mutual fund scheme which involves the assumption of any liability which is unlimited or shall not result in encumbrance of the assets of the mutual fund scheme in any way and also should not affect the net worth requirements of Tata Asset Management Pvt Limited for mutual fund operation.

Details of AMC Directors:

Name of the Director	Age	Educational Qualification	Brief Experience
Mr. Rajiv Sabharwal (Associate)	59 years	B.Tech (Mechanical Engineering) from IIT Delhi and PGDM from IIM Lucknow.	Mr. Rajiv Sabharwal is the Chairman of Tata Asset Management Pvt Limited and an Associate Director on the Board. He is also on the Boards of Tata Securities Limited, Tata Capital Limited, Tata Capital Pte Ltd, Tata Capital Housing Finance Limited , and Finance Industry Development Council. Ltd. He has more than 30 years of experience in the banking & financial services industry. He was a Partner in True North Managers LLP, where he was mainly involved in building & managing businesses with a primary focus in the financial service sector. He also served as an Executive Director on the Board of ICICI Bank where he was responsible for several businesses including retail banking, business banking, rural banking, financial inclusion business & digital banking technology.
Mr. Prathit D. Bhobe (Associate)	54 Years	B.Com , MMS from Prof. L.N. Welingkar Institute of Management	Mr. Prathit. D Bhobe is the CEO and Managing Director of Tata Asset Management Pvt Ltd., an Associate Director on the Board. He is also on the Board of Tata Pension Management Private Ltd. Over 26 years of experience in financial services across various areas of banking and wealth management. He was with ICICI Bank for more than 11 years where he headed Retail Liabilities Product, Wealth Management and Private Banking business. Prior to ICICI Bank he was with Citibank for 8 years where he successfully ran the Banking vertical in the distribution business.
Mr. Suprakash Mukhopadhyay (Associate)	60 Years	B.Com (Hons), ACA, AICWA, ACS	Mr. Suprakash Mukhopadhyay is an Associate Director on the Board. Currently he is Tata Group Corporate Secretary & Company Secretary of Tata Sons Limited. He is a director in Jamshedpur Football and Sporting Pvt Ltd, SIMTO Investment Company Ltd, Tata Investment Corporation Limited, Tata Services Limited, Tata Motors Insurance Broking and Advisory Services Limited and Ferbine Private Limited. He was with Tata Consultancy Services Ltd (TCS) in charge of Corporate Secretarial & Governance, Treasury – Fund Management and Internal Audit activities and Compliance & Governance issues across the globe. Prior to TCS he was with Tata Financial Services as General Manager. He played a key role in TCS public offering in 2004.
Mr. Sujit Kumar Varma (Independent)	64 Years	B.A in English Certifications from: Indian Institute of Banking & Finance, Mumbai, India - Certified Associate Leading Global Businesses - Harvard Business School NYU Stern School of Business, New York, USA - Corporate Finance. Indian Institute of Management, Ahmedabad, India - Executive Programme for Banking & Financial Sector (EPBFS) Indian Institute of Management, Calcutta, India - Strategic Leadership	Mr. Sujit Kumar Varma is an Independent Director on the Board. He has worked with State Bank of India at various levels as under: Deputy Managing Director, Corporate Accounts Group (2018-21), Chief General Manager, International Banking (2015-18), General Manager, Mid-Corporate Regional Office (2013-15), Chief Executive Officer, SBI New York (2009-13). He was on the Board of Nepal SBI Bank Ltd as Chairman, Bank SBI Indonesia as President & Commissioner, Sterling Bank Lagos as Non-Executive Director, with SBI Mauritius Ltd, SBI Canada Bank, SBI U.K. Ltd and Commercial Indo Bank as Board Member. He is also on the Board of Tata Capital Limited, Tata Capital Housing Finance Limited, L&T Metro Rail (Hyderabad) Limited, Prime Securities Limited, Uflex Limited, Tata Communications Limited, and Lloyds Metals and Energy Limited.s
Mr. Gagan Rai (Independent)	69 Years	B. Com (Hons.), Cost & Management Accountant, M.A (Economics), C.A.I.I.B, Diploma - Project Planning Evaluation and Control	Mr. Gagan Rai is an Independent Director on the Board. He has served as M.D and C.E.O of NSDL e-Governance Infrastructure Limited from 2013 to 2021 and National Securities Depository Ltd. from 2008 to 2013. He has an experience of four decades in IT-enabled Governance & Financial Market solutions. He has served on several Committees of SEBI and RBI in the past including Secondary Market Advisory Committee (SEBI), Technical

Name of the Director	Age	Educational Qualification	Brief Experience
			Advisory Committee on Financial Markets (RBI) and Pension Advisory Committee (PFRDA). He has also served as Associate in Development Bank Management of Association of Development Financing Institutions (DFIs) in Asia and the Pacific (ADFIAP), Manila. He is also on the Board of Tata AIG General Insurance Company Limited.
Mrs. Punita Kumar Sinha (Independent)	63 years	PhD and a Master's in Finance from the Wharton School, University of Pennsylvania; MBA CFA Charter holder since 1993 Bachelors in chemical engineering from IIT Delhi;	Dr. Kumar-Sinha has focused on corporate governance and investment management during her 31-year career. She has been an Independent Director on global public and private company boards for over 10 years. She has chaired Audit committees, Stakeholder Relationship Committees as well as Nomination Committees. Dr. Kumar-Sinha also has significant ESG experience, is a financial expert, and has led multiple board consultations with institutional investors. She has deep knowledge of US and India listed companies including regulations, compliance, and accounting standards.

Duties and Obligations of TAMPL

Duties of Asset Management Company

(1) The asset management company shall ensure that the Specialized Investment Fund has distinct identification, separate from that of the mutual fund, to maintain a clear differentiation between the offerings of the Specialized Investment Fund and that of a mutual fund.

(2) The asset management company shall comply with the provisions relating to branding, advertising, standard disclaimers, guidelines on usage of sponsor or asset management company or mutual fund's brand name and maintenance of a separate website, as may be specified by the Board from time to time.

Obligations of TAMPL

1) Investment and operational due diligence

(a) The asset management company shall ensure that all activities of the asset management company adhere to these regulations including taking all reasonable steps and exercise due diligence to ensure that the investment of funds pertaining to any investment strategy is not contrary to the provisions of these regulations, circulars/ and guidelines issued thereunder and the trust deed.

(b) The asset management company shall exercise due diligence and reasonable care in all investment decisions consistent with the standards of other entities engaged in the same business.

(2) Operational systems and personnel:

Before launching any investment strategy, the board of directors of the asset management company shall ensure that asset management company has:

(i) established systems for its back office, dealing room and accounting;

(ii) appointed all key personnel specified by the Board, including fund managers for the investment strategies and submitted their bio-data (including educational qualifications and securities market experience) to the trustees within 15 calendar days of their appointment;

(iii) appointed auditors for audit of its accounts;

(iv) appointed a compliance officer responsible for monitoring compliance with the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by the Board or the Central Government and for addressing investors grievances;

(v) appointed a registrar to an issue and share transfer agent registered under the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2025 and established parameters for their supervision;

(vi) prepared a compliance manual and designed internal control mechanisms including internal audit systems;

(vii) specified norms for the empanelment of brokers and marketing agents; and

(viii) obtained, where required by these regulations, prior in-principle approval from the recognized stock exchange(s) where units are proposed to be listed, in the manner specified by such exchange(s).

(3) Remuneration and Investment

(a) The asset management company shall invest such amounts in such investment strategies, based on the risks associated with the investment strategies, as may be specified by the Board.

(b) The asset management company shall invest a percentage of the remuneration of employees in units of investment strategies based on the designation or roles, as specified by the Board.

(c) The asset management company shall not invest in any of its investment strategy other than as provided in clause (a) unless full disclosure of its intention to invest has been made in the offer documents.

(d) The asset management company shall not charge any fees on its own investments in a investment strategies managed by it.

(4) Responsibility of key personnel and employees:

(a) The Chief Executive Officer (whatever be the designation) of the asset management company shall ensure that:

(i) the mutual fund complies with all the provisions of these regulations and related guidelines and circulars;

(ii) investments made by the fund managers are in the interest of the unit holders;

(iii) the overall risk management function of the mutual fund is comprehensively managed; and

(iv) the asset management company has adequate systems in place to ensure adherence to the Code of Conduct for Fund Managers and Dealers (specified in PART - B of the Fourth Schedule of these regulations) and any breach of this Code of Conduct shall be immediately brought to the attention of the Board of Directors of the asset management company and trustees.

(b) The fund managers (whatever be the designation including chief investment officer) shall ensure:

(i) that investment strategy funds are invested to achieve investment strategy objectives, in the interest of unit holders and in compliance with the provisions of these regulations and related guidelines and circulars; and

(ii) adherence to the Code of Conduct for Fund Managers and Dealers (specified in PART - B of the Fourth Schedule and submit a quarterly self-certification to the trustees confirming complied or listing exceptions, if any.

(c) The Dealers (whatever be the designation) shall:

(i) ensure that orders are executed on the best available terms and in the best interest of all unit holders; and

(ii) abide by the Code of Conduct for Fund Managers and Dealers (specified in PART - B of the Fourth Schedule and submit a quarterly self-certification to the trustees confirming complied or listing exceptions, if any.

(d) The compliance officer appointed under clause (iv) of sub-regulation (2) of regulation 22 shall independently and immediately report any observed non-compliance to the Board.

(e) Employees of asset management company shall not render, directly or indirectly any investment advice about any security in the publicly accessible media, whether real-time or non-real-time, unless a disclosure of his interest including long or short position in the said security has been made, while rendering such advice:

Provided that in case of rendering investment advice, he/she shall also disclose the interest of his dependent family members and the employer including their long or short position in the said security, while rendering such advice.

(5) Financial transactions and disclosures:

(a) Brokerage transactions

(i) The asset management company shall ensure that the purchase or sale of securities through any stock broker that is an associate of the sponsor does not, on average, exceed five percent of the aggregate value of securities purchased or sold by the mutual fund across all its investment strategies.

(ii) The asset management company may undertake purchase or sale of securities through a stock broker which is not an associate of the sponsor in excess of five percent of the aggregate value of securities transacted by the mutual fund across all its investment strategies, provided that the justification for exceeding the limit is recorded in writing and reported to the trustees on a quarterly basis.

Explanation: The limits specified in clauses (i) and (ii) shall apply for each block of three months and shall exclude transactions relating to the sale and distribution of units issued by the mutual fund.

(b) **Transactions with associates/sponsor:**

(i) Where an asset management company proposes to utilise the services of the sponsor or any of its associates, employees or their relatives, for the purpose of any securities transaction, distribution and sale of securities, the proposed engagement of such persons shall be disclosed to the unitholders and the brokerage or commission paid shall be disclosed in the half-yearly and annual accounts of the mutual fund.

(ii) The half-yearly and yearly annual accounts disclosure shall include:

a. subscription by the investment strategies in the issues lead managed by associate companies; and

b. subscription to any equity or debt issue on a private placement basis where the sponsor or its associate companies acted as arranger or manager.

(iii) If the asset management company enters into any securities transactions with any of its associates, a report to that effect shall be placed before the trustees at their next meeting.

(6) **Investment concentration disclosure:**

If the investment made by any company in a investment strategy exceeds five per cent of the net asset value of the investment strategy, the investment made by that investment strategy or by any other investment strategy of the same mutual fund in that company or its subsidiaries shall be brought to the notice of the trustees by the asset management company and be disclosed in the half-yearly and annual accounts of the respective investment strategies, with justification for such investment, where the cross investment is made within a period of one year before or after the initial investment.

(7) Reporting and oversight

(a) **Quarterly reports to trustees:**

(i) The asset management company shall submit to the trustees quarterly reports on its activities and the compliance with these regulations.

(ii) The board of directors shall ensure that there has been exercise of due diligence on the reports submitted by the asset management company to the trustees.

(b) **Director and Key Personnel Disclosures:**

(i) The asset management company shall file with the trustees and the Board:

a. detailed bio-data of all its directors, along with their interest in other companies, within 15 calendar days of their appointment;

b. a half yearly report regarding any change in the interest of directors; and

c. a quarterly report to the trustees providing details and adequate justification about the purchase and sale of securities of the group companies of the sponsor or the asset management company by the mutual fund during that quarter.

(ii) Each director of the asset management company shall file with the trustees the details of their securities transactions on a quarterly basis, in the manner specified by the Board.

(iii) The asset management company shall file with trustees the details of transactions in securities by its key personnel in their own name or in the name of the asset management company, and shall report to the Board, as required.

(c) **Board of Directors' Oversight:**

The board of directors of the asset management company shall ensure that –

a. the asset management company has been diligent in empaneling brokers, monitoring securities transactions with brokers, and avoiding undue concentration of business with specific brokers;

b. the asset management company has not given any undue or unfair advantage to any associate or dealt with any associate in any manner detrimental to the interest of unit holders;

c. the transactions entered into by the asset management company align with these regulations, investment objective and asset allocation of the respective investment strategies;

d. mutual fund transactions align with the provisions of the trust deed;

e. the net worth of the asset management company is reviewed quarterly to ensure continuous compliance with the threshold provided in clause (e) of sub-regulation (1) of regulation 5;

f. all service contracts, including custody arrangements for assets and transfer agency of securities, are executed in the interest of unit holders and test checks of service contracts are arranged;

g. there is no conflict of interest between the deployment of the asset management company's net worth and the interest of unit holders;

h. investor complaints are periodically reviewed and redressed;

i. all service providers hold appropriate registrations with the Board or relevant regulatory authority;

j. any special developments in the mutual fund are immediately reported to the trustees; and

k. due diligence is exercised on such matters as specified by the Board.

(8) **Ethical Conduct and Investor Protection**

(a) **Prevention of misconduct:**

(i) The asset management company shall be responsible for acts of commission or omission by its employees or persons whose services have been procured by the asset management company, where such act or omission is committed in the course of carrying out functions under these regulations, and involves negligence, breach of duty, or failure to comply with applicable law.

(ii) The asset management company shall abide by the Code of Conduct specified in PART-A of the Fourth Schedule.

(b) **Market abuse deterrence:**

(i) The asset management company shall establish, implement and maintain an institutional mechanism (as specified by the Board), for identifying and deterring potential market abuse, including front-running and fraudulent transactions in securities.

(ii) The Chief Executive Officer or Managing Director (or equivalent or analogous rank) and Chief Compliance Officer of the asset management company shall be responsible and accountable for implementing institutional mechanism for deterring potential market abuse, including front-running and fraudulent securities transactions.

(c) **Whistleblower policy:**

The asset management company shall establish, implement and maintain a documented whistle blower policy that:

a. provides a confidential channel for employees, directors, trustees, and other stakeholders to raise concerns about suspected fraudulent, unfair or unethical practices, violations of regulatory or legal requirements or governance vulnerability; and

b. establishes procedure to ensure adequate protection of whistle blowers.

(d) **Investor grievance and protection:**

(i) The asset management company shall constitute a Unit Holder Protection Committee in the form and manner and with a mandate as specified by the Board.

(ii) Asset management company shall ensure compliance with the Investor Charter specified by the Board.

(9) **Investment strategy management and valuation:**

(a) Registrars and share transfer agents

(i) Registrars and share transfer agents appointed by the asset management company shall be registered with the Board.

(ii) If the work relating to the transfer of units is processed in-house, the charges at competitive market rates may be debited to the investment strategy and for rates higher than the competitive market rates, prior approval of the trustees shall be obtained and reasons for charging higher rates shall be disclosed in the annual accounts.

(b) Valuation and Disclosure

(i) The asset management company shall compute and carry out valuation of investments made by its investment strategy(s) in accordance with the investment valuation norms specified in the Seventh Schedule, and shall publish the same.

(ii) The asset management company and the sponsor of the mutual fund shall be liable to compensate affected investors and/or the investment strategy for any unfair treatment to an investor resulting from inappropriate valuation.

(iii) The asset management company shall report and disclose all transactions in debt and money market securities, including inter investment strategy transfers, as specified by the Board.

(c) **Changes to investment strategy attribute:**

The asset management company shall ensure that no change in the fundamental attributes of any investment strategy, fees and expenses payable or any other change that would modify the investment strategy and affect the interest of unit holders, shall be carried out unless, —

i. written communication (including digital modes such as email/sms etc.) about the proposed change is sent to each unit holder;

ii. details, as specified by the Board, are appropriately displayed on the website of asset management company; and

iii. unit holders are given an option to exit at the prevailing Net Asset Value without any exit load.

(d) **Income calculation:**

The asset management company shall be responsible for calculating any income due to be paid to the mutual fund and also any income received in the mutual fund for the unit holders of any investment strategy, in accordance with these regulations and the trust deed.

(e) **Stress testing:**

The asset management company shall conduct stress testing for such investment strategies as specified by the Board and disclose the results in the form and manner specified by the Board.

(f) **Geographic scope:**

The asset management company shall not carry out its fund management operations or execution of transactions relating to mutual funds, outside the territory of India, except for execution of trades for investment in overseas securities.

(10) Termination and Liability

(a) **Termination of assignment of asset management company:**

The asset management company may request trustees for termination of the assignment of the asset management company at any time:

Provided that such termination shall become effective only after the trustees have accepted the termination of assignment and communicated their decision in writing to the asset management company.

(b) Continuing Liability

Notwithstanding any contract, agreement or termination, the asset management company or its directors or other officers shall not be absolved of liability to the mutual fund for their acts of commission or omission, while holding such position or office.

Information on Key Personnel:

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
Prathit D. Bhobe	55	Chief Executive Officer and Managing Director	B. Com, MMS	31	Mr. Prathit Bhobe is Chief Executive Officer and Managing Director of Tata Asset Management Pvt Ltd. since May 2018.He is on the Board of Tata Pension Management Private Ltd. July 2010 to May 2018: He was with ICICI Bank for more than 11 years where he headed Retail Liabilities Product, Wealth Management and Private Banking business. February 2003 to June 2010 with Citibank as Senior Vice President.
Anand Vardarajan	48	Chief Business Officer – Key Clients & Alternate Investments	B. Com, MBA	23	Mr. Anand Vardarajan is Chief Business Officer – Key Clients & Alternate Investments. He is with Tata Asset Management Pvt Ltd. since June 2018. Reports to Chief Executive Officer and Managing Director. June 2011 to June 2018 with ICICI Bank Ltd as DGM & Head- Investments, Wealth Management Reporting to Joint Deputy General Manager & Head – Wealth Management. December 2008 to June 2011 with Citibank N.A as Assistant Vice President & Investment Counsellor- Fort Branch. Reporting to Vice President & Regional Investment Counsellor.
Rahul Singh	54	Chief Investment Officer-Equities	B.Tech, PGDBM	30	Mr. Rahul Singh is Chief Investment Officer-Equities. He is with Tata Asset Management Pvt Ltd. since October 2018. Reports to Chief Executive Officer and Managing Director. From July 2015 to October 2018 with Ampersand Capital Investment Advisors LLP as Managing Partner. From August 2010 to March 2015 with Standard Chartered Securities Ltd. as Managing Director Reporting to CEO. From August 2005 to June 2010 with Citigroup Global Markets as Senior Research Analyst Reporting to Head of Research.
Murthy Nagarajan	57	Head-Fixed Income	B. Com, M. Com, PGPMS, ICWA (Inter)	29	Mr. Murthy Nagarajan is Head-Fixed Income. He is with Tata Asset Management Pvt Ltd. since March 2017. Reports to Chief Executive Officer and Managing Director.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
					October 2013 to February 2017 with Quantum Asset Management Co. Pvt. Ltd. as Head – Fixed Income, Reporting to Chief Executive Officer. February 2010 to October 2013 with Tata Asset Management Pvt Ltd. as Head -Fixed Income, Reporting to Chief Investment Officer. December 2007 to January 2010 with Mirae Asset Global Investment India Pvt. Ltd. as Head - Fixed Income, reporting to Managing Director. August 1999 to November 2007 with Tata Asset Management Pvt Ltd. as Head -Fixed Income, reporting to Managing Director.
Upesh Shah	57	Head – Risk Management	B. Com, ACA, ICWA	32	Mr. Upesh Shah is Head-Risk Management. He is with Tata Asset Management Pvt Ltd. since July 2005. Reports to Chief Executive Officer and Managing Director. ICICI Prudential AMC Ltd - From April 2005 to June 2005 – Assistant Vice President Internal Audit – Reporting to Senior Vice President – Compliance. Tata Asset Management Pvt Ltd - From April 2003 to March 2005 – Joined as Deputy General Manager Compliance - Reporting to the Chief Operating Officer. IDBI Principal Asset Mgt Co Ltd – From August 1996 to March 2003 as Compliance Officer.
Padmanabhan Ramanathan	59	Compliance Officer	MBA (Finance), LLM.	33	From May 2022 till date with Tata Asset Management Pvt Ltd. Reports to Chief Executive Officer and Managing Director. From July 1991 till May 2022 with UTI AMC Ltd • As Senior Vice President (last designation). Reporting to Compliance – Officer.
Arun Mahendra Jain	50	Chief Financial Officer	Chartered Accountant & Licentiate Company Secretary	24	From September 2023 onwards With Tata Asset Management Private Limited as Chief Financial Officer, having responsibilities of finance function & various enterprise vide projects. From October 2016 till September 2023 With HSBC Asset Management (I) Pvt Limited as Senior Vice President & Head of Finance, having responsibilities of finance function & various enterprise vide projects. From July 2010 till September 2016 With HSBC Asset Management (I) Pvt Limited as Senior Vice President & Head of Operations, having responsibilities of fund operations & various enterprise vide projects
Hemant Kumar	48	Chief Distribution & Digital Officer	B.E Mechanical, PGDBM from K J Somaiya Institute of Management Studies	21	Mr. Hemant Kumar is Chief Distribution & Digital Officer. He is with Tata Asset Management Pvt Ltd. since August 2018. Reports to Chief Executive Officer and Managing Director. From November 2012 to August 2018 with Citibank N. A. where he was Senior Vice President Reporting to Retail Bank Head. From June 2009 to October 2012 with ING Vyasa Bank as Cluster Head Reporting to Zonal Head. From August 2008 to May 2009 with Citi bank N. A. as Branch Manager Reporting to Cluster Head.
Arti Agarwal	44	Chief Human Resources Officer	B.Com, M.A, M.B.A	17	From March 2020 - till date with Tata Asset Management Pvt Ltd as –Chief Human Resources Officer. Reports to Chief Executive Officer and Managing Director. From April 2018 to Sept 2019 with Faber-Castell, India as Director - HR, Reporting to CEO & MD. From May 2007 to April 2018 with Essar Group as Head Corporate & International HR Reporting to Group President HR.
Shailly Kedia	44	Head - Secretarial & Legal	B.Com., ACS	23	From April 2022 onwards till date with Tata Asset Management Pvt. Ltd. Deputy Vice President -Secretarial & Legal, reporting to Chief Executive Officer and Managing Director.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
					From July 2021 to April 2022 Edelweiss Financial Services Limited Assistant Vice President -Compliance reporting to Group Compliance Officer. From February 2015 to July 2021 Daiwa Portfolio Advisory (India) Pvt. Ltd. Assistant Vice President - Compliance, Secretarial & legal reporting to Chief Executive Officer. From December 2011 to February 2015 Quantum Asset Management Company Private Ltd. Senior Manager – Compliance, Secretarial & legal reporting to Head Compliance
Abhinav Sharma	45	Head - International Business	B.Com, PGDBM (MBA)	24	From July 2021 - till date with Tata Asset Management Pvt Ltd. as Head - International Business. Reports to Chief Executive Officer and Managing Director. From April 2019 to July 2021 with Tata Capital PLC, London as Head - International Business, Reporting to Senior Manager - International Business. From Feb 2019 to April 2019 with Tata Capital Limited as DVP - Alliances & Banking PCG Sales, Reporting to CHRO. From Jan 2019 to Feb 2019 with Tata Capital Financial Services Limited as DVP - Alliances & Banking PCG Sales, Reporting to CHRO. From Oct 2013 to Jan 2019 with Tata Asset Management Limited as Head - Alliances & Banking PCG Sales, Reporting to Business Head – Banking, Alternate Products & Product Strategy. From Dec 2004 to Oct 2013 with BNP Paribas Asset Management as Head Institutional Sales & Key Accounts, Reporting to Head - Sales.
Jaideep B Shetty	57	Vice President_ Dealer	B.Com, MMS	32	Mr. Jaideep B Shetty is Equity Dealer. He is with Tata Asset Management Pvt Ltd. Since March.2006. Reports to Chief Investment Officer – Equities.
Sonam Udasi	53	Senior Fund Manager	B. Com, PGDM-Finance	28	Mr. Sonam Udasi is Fund Manager. He is with Tata Asset Management Pvt Ltd. since April 2014. Reports to Chief Investment Officer-Equities. Responsibilities held in past – Principal - PMS, Head Research. June 2010 – March 2014 with IDBI Capital Market Services Ltd as Head Research Reporting to Executive Vice President. November 2008 – April 2010 with BRICS Securities as Head – Consumer Vertical, Reporting to Head Equities. August 2007 – October 2008 with Prime Securities as Head Research Reporting to President. February 2006 – June 2007 with JM Financial AMC as Senior Analyst Reporting to Chief Investment Officer. June 2005 – January 2006 with ASK Raymond James as Lead Analyst, Reporting to Head Research.
Chandraprakash Padiyar	48	Senior Fund Manager	MBA (Finance), cleared all 3 levels of CFA Program from The CFA Institute, USA.	25	Mr. Chandraprakash Padiyar is Senior Fund Manager. He is with Tata Asset Management Pvt Ltd. since September 2018. Reports to Chief Investment Officer-Equities. From April 2007 to August 2018 with Alchemy Capital Management Pvt. Ltd. where he was & Portfolio for their onshore long only strategies. Reporting to Chief Investment Officer.
Sailesh Jain	47	Fund Manager	B.Com, MBA (Finance) from Queensland University of Technology Queensland, Australia.	23	Mr. Sailesh Jain is Fund Manager. He is with Tata Asset Management Pvt Ltd. since November 2018. Reports to Chief Investment Officer-Equities. From April 2016 to October 2018 with IDFC Securities Ltd as Head Derivatives – Institutional sales. Reporting to Managing Director and Chief Executive Officer. From January 2010 to April 2016 with Quant Broking Pvt Ltd as Vice President – Institutional Sales – Derivatives and cash. Reporting to Chief Executive Officer and Managing Director. From June 2008 to December 2009 with IIFL (India Infoline) as Vice President – Institutional Sales -Head Equity Derivatives. Reporting to Head Institutional Sales.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
Akhil Mittal	45	Senior Fund Manager	B. Com, MBA	24	Mr. Akhil Mittal is Senior Fund Manager. He is with Tata Asset Management Pvt Ltd. since June 2014. Reports to Head-Fixed Income. March 2011- June 2014 with Canara Robecco Asset Management Ltd. As Senior Fund Manager. Reporting to Head Fixed Income. November 2010- February 2011 with Principal PNB Asset Management Co Ltd. As Senior Fund Manager. Reporting to Head Fixed Income. September 2008 to November 2010 with Canara Robecco Asset Management Ltd. As Fund Manager. Reporting to Head Fixed Income. June 2006 to August 2008 with Edelweiss Securities Ltd. as Senior Manager. June 2004 to May 2006 with Rallis India Ltd as Assistant Manager reporting to DGM Treasury.
Amit Somani	48	Deputy Head of Fixed Income	B. Com, PGDBM, CFA (US)	24	Mr. Amit Somani is Senior Fund Manager. He is with Tata Asset Management Pvt Ltd since June 2010. Reports to Head -Fixed Income. September 2006 – April 2010 with Fidelity Investments as Research Associate July 2004 to August 2004 with Netscribes Pvt. Ltd as Research analyst. Jun 2003 to July 2004 with SPA Capital as debt market dealer. February 2001 to May 2003 with Khandwala Securities as debt market dealer.
Abhinav Sharma	45	Fund Manager	B.Tech, PGDM	19	Mr. Abhinav Sharma is Fund Manager for few schemes. He is with Tata Asset Management Pvt Ltd. since July 2015. Reports to Chief Investment Officer – Equities. May 2012 to July 2015 with HDFC Securities Ltd as Research Analyst. Reporting to Head of Research. August 2008 to May 2012 with JM Financial Asset Management Ltd as Research Analyst. Reporting to Head of Research.
Meeta Shetty	46	Fund Manager	Bachelor in Economics, CFA Charterholder	19	Ms. Meeta Shetty is Fund Manager for few schemes. She was Research Analyst (since March 2017), tracking Pharma, Technology and Telecom sector. Reports to the Chief Investment Officer - Equities. From Dec 2014 to Feb 2017 with Kotak Securities, tracking Pharma sector. Reporting to the Head of Research. From Jun 2013 to Nov 2014 with HDFC Securities, as Research Analyst, tracking Pharma sector. Reporting to Head of Research. From Sep 2011 to Jun 2013 with AMSEC (Asian Market Securities) as Research Analyst, tracking Pharma sector. Reporting to Head of Research. From May 2010 to Sep 2011 with Dalal & Broacha Stock Broking as Research Analyst, tracking Pharma sector. Reporting to Head of Research. From Dec 2002 to Feb 2005 with Karvy Stock Broking as Equity Advisor - Manager – PCG. Reporting to Head PCG.
Satish Chandra Mishra	44	Fund Manager	B. Tech IIT (BHU) Varanasi, PGDM (TAPMI)	19	Mr. Satish Chandra Mishra is Fund Manager for few schemes. He is with Tata Asset Management Pvt Ltd. since July 2015. Reports to Chief Investment Officer – Equities. From July 2017 till date with Tata Asset Management Pvt Ltd was Research Analyst, tracking Oil & Gas, Metals & Mining and Chemicals. Reporting to Chief Investment Officer Equities. From May 2012 to July 2017 with HDFC Securities Ltd as Assistant Vice President, tracking Oil & Gas and Chemicals. Reporting to Head of Research. From June 2008 to May 2012 with PINC Research as Research Analyst, tracking Oil & Gas, Fertilisers and Engineering sectors. Reporting to Head of Research.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
Dhawal Joshi	37	Fund Manager and Dealer – Fixed Income	Bachelor of Engineering (IT), MMS (Finance)	12	From Sep 2019 till date with Tata Asset Management Pvt Ltd, as Dealer. Reports to - Head Fixed Income. He has also been appointed as Fund Manager -Fixed Income. From Oct 2017 - Sep 2019 with A.K Capital Services Ltd, as Primary Desk Dealer. Reporting to - Head Primary Debt Securities. From July 2016 - October 2017 with Crest Capital Ltd, as Primary Desk Dealer. Reporting to - Head Primary Debt Securities. From Mar 2016 - June 2016 with A.K Capital Services Ltd, as Primary Desk Dealer. Reporting to - Head Primary Debt Securities
Tapan Mukundbhai Patel	38	Fund Manager	CFA, MFA from ICFAI. BBA from Gujarat University	12	From September 2022 onwards till date with Tata Asset Management Pvt. Ltd. Reporting to Chief Investments Officer – Equities. From May 2018 to September 2022 with HDFC Securities Limited as Senior Manager - Research, Reporting to Deputy Head of Research. From January 2017 to April 2018 with LKP Securities Ltd as Associate Vice President - Research, Reporting to CEO. From August 2013 to January 2017 with Kotak Commodity Services Pvt. Ltd. as Manager (Analyst) - Research, Reporting to Head of Research. From January 2008 to August 2013 with Edelweiss Comtrade Ltd, as Associate - Research, Reporting to Head of Research.
Jennifer Karkaria	44	Fund Manager and Assistant Vice President – Investment	B.Com, PGDBA	22	From Oct 2021 - till date with Tata Asset Management Ltd. as Assistant Vice-President - Investments (Dealing). Reports to Head - Fixed Income. She has also been appointed as Fund Manager-Fixed Income. From June 2005 to Oct 2021 with Tata Asset Management Ltd. in Investments Fixed Income.
Rakesh Indrajeet Prajapati	48	Assistant Fund Manager and Senior Manager Investment - Dealing	B.Com	20	From June 2023 onwards with Tata Asset Management Private Limited for dealing function as a Senior Manager Investment and he is also Assistant Fund Manager for select equity schemes, Reports to Chief Investment Officer - Equities From Aug 2021 till May 2023 With ICICI Securities Ltd for derivative dealing function including trade execution & sending confirmation to clients, as a Senior Associate, From Apr 2021 till Aug 2021 With JM Financial for derivative dealing function including trade execution & sending confirmation to clients, as a Senior Manager, From March 2020 till Apr 2021 With Edelweiss Securities Ltd for derivative dealing function including trade execution & sending confirmation to clients, as an Associate Sales Trader, From May 2006 till March 2020 With IDFC Securities Ltd for derivative dealing function including trade execution & sending confirmation to clients, as a Senior Manager.
Aditya Bagul	38	Fund Manager and Research Analyst	Chartered Financial Analyst (CFA), Chartered Accountant (ACA), B.Com	13	From Oct' 23 onwards With Tata Asset Management Private Limited as Assistant Fund Manager/Fund Manager & Research Analyst, having responsibilities for Consumer sector coverage & reporting to Chief Investment Officer. From Sept' 21 till Oct' 23 With Tata Asset Management Private Limited as Research Analyst, having responsibilities of Consumer sector coverage & reporting to Chief Investment Officer. From Nov' 15 till Sept' 21 With Axis Capital as Vice President, having responsibilities of Midcap Coverage Analyst & reporting to Head of Research.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
					From Sept' 14 till Oct' 15 With Ambit Capital as Research Associate, having responsibilities of Consumer coverage & reporting to Equity Analyst. From Jan' 12 till Aug' 14 With Reliance Capital Asset Management as Research Associate, having responsibilities of BFSI coverage & reporting to Assistant Fund Manager.
Jeetendra Khatri	42	Assistant Fund Manager and Research Analyst	Bachelor of Management Studies (BMS)	18	From Oct' 23 onwards With Tata Asset Management Private Limited as Assistant Fund Manager & Research Analyst, having responsibilities of tracking automotives and automotive ancillaries & reporting to Chief Investment Officer. From Jan' 22 till Oct' 23 With Tata Asset Management Private Limited as Research Analyst, having responsibilities of tracking automotives and automotive ancillaries & reporting to Chief Investment Officer. From Aug' 17 till Jan' 22 With Quantum Advisors Private Limited as Research Analyst, having responsibilities of tracking automotives and automotive ancillaries & reporting to Chief Investment Officer. From Mar' 12 till Aug' 17 With ICICI Securities as Research Analyst, having responsibilities of tracking automotives and automotive ancillaries, strategy and capital goods and utilities & reporting to Head of Equities.
Kapil Malhotra	39	Fund Manager/ Research Analyst	MBA (PGPEM) from Indian Institute of Management, Bangalore, B.Sc (Hons) in Business and Administration, Brunel University, London, U.K	16	Tata Asset Management Private Limited: From Dec-2023 onwards Fund Manager, reporting to CIO – Equities. From Jan-2023 till Dec-2023 Research Analyst, reporting to CIO - Equities Trust Financial Consultancy Services Pvt. Ltd.: From Dec-2020 till Jan-2023 Associate Vice President, Equity Advisory, reporting to Chief Executive Officer Avvanti Advisors Pvt. Ltd.: From Jul-2020 till Nov-2020 Senior Equity Research Analyst, Investments- Equity, reporting to Partner SHK India Private Limited: From Apr-2009 till Mar-2018 Business Head, Reporting to Managing Director
Rakeshkumar Madanlal Sharma	41	Senior Manager-Investments	M.Com, PGDM	18	From 9th July, 2024 onwards With Tata Asset Management Private Limited for dealing function as a Senior Manager-Investments. From August 2016 to June 2024 With Emkay Global Financial Services Ltd. as Arbitrage dealer for punching arbitrage trades. From August 2014 to August 2016 With Dolat Capital Market Pvt Ltd as Arbitrage dealer for punching arbitrage trades.
Harsh Dave	28	Fund Manager	Bachelor of Engineering (Electrical), Post Graduate Diploma in Management (BFSI)	3	From 1st August, 2024 onwards With Tata Asset Management Private Limited as Junior Fund Manager, reporting to Head Fixed Income. Currently designated as Fund Manager-Fixed Income. From April 2022 to June 2024 With ICICI Bank Ltd. as Fixed Income Trader.
Rajat Srivastava	36	Fund Manager & Research Analyst	BBA (Banking & Insurance), PGDM - IMT Ghaziabad	9	From 6th September 2024 onwards With Tata Asset Management Private Limited as Assistant Fund Manager & Research Analyst having responsibilities for Healthcare & Chemicals sector coverage, reporting to Chief Investment Officer – Equities. Currently designated as Fund Manager & Research analyst. From October 2022 to September 2024 With Incred Asset Management as AVP Investments having responsibilities for Automobile, Healthcare & Diversified sectors reporting to Fund Manager and CEO/CIO. From April 2022 to October 2022 With Kotak Investment Banking as Assistant Vice President-Corporate Advisory having responsibilities for Deal sourcing and reporting to Managing Director Corporate Advisory Group.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
					From November 2020 to April 2022 With Incred Asset Management as AVP Investments having responsibilities as Healthcare Analyst reporting to Fund Manager. From September 2019 to November 2020 With Emkay Global as Research Associate having responsibilities for coverage of healthcare sector stocks reporting to Lead Analyst. From June 2019 to September 2019 With Evalueserve (Client - Deutsche Securities) as Research Lead having responsibilities for coverage of healthcare/pharma stocks reporting to Lead Analyst. From May 2016 to June 2019 With Motilal Oswal Financial Services as Assistant manager - Research having responsibilities for coverage of healthcare/pharma stocks reporting to Lead Analyst.
Hasmukh Vishariya	30	Fund Manager & Research Analyst	Chartered Accountant	8	From 01st March, 2025 & onwards With Tata Asset Management Private Limited as Fund Manager & Research Analyst having responsibilities for covering IT, Internet, Telecom, Media & any other sectors as may be assigned from time to time and he is also looking after overseas investments and reporting to Chief Investment Officer - Equities. From Mar,24 to Feb,25 With Tata Asset Management Private Limited as Research Analyst having responsibilities for IT, Internet, Telecom & Media sector coverage and reporting to Chief Investment Officer – Equities. From Feb,19 to Mar,24 With Star Union Dai-Ichi Life Insurance Ltd as Research Analyst having responsibilities for IT, Consumer and Building Materials sector coverage and reporting to Chief Investment Officer. From Oct,17 to Jan,19 With Star Union Dai-Ichi Life Insurance Ltd as Assistant Manager having responsibilities for Investment Back & Mid Office and reporting to Financial Controller.
Nitin Bharat Sharma	40	Fund Manager and Dealer	MFM (Master's degree in financial management), BAF (Bachelor of Commerce-Accounting & Finance)	19	From July 1, 2025 onwards as Fund Manager, with Tata Asset Management Private Limited & reporting to CIO. From 24th March, 2025 onwards With Tata Asset Management Private Limited as Dealer Investments & reporting to CIO. From November 2023 to 21st March 2025 With Share India Securities Ltd as Dealer for Institutional Dealing & reporting to Head of Equities. From October 2022 to October 2023 With Sharekhan Ltd as Dealer for Institutional Dealing & reporting to Manager. From May 2021 to September 2022 With Choice Equity Broking Pvt Ltd as Dealer for HNI Dealing & reporting to Director. From November 2019 to February 2021 With Globe Capital Market Ltd as Senior Wealth Manager for Dealing & reporting to Regional Head. From January 2016 to November 2019 With Namostute Trading Pvt Ltd (Angel Broking Ltd) as Branch Manager for Dealing & reporting to Director. From June 2014 to December 2015 With Kotak Securities (HO) as Assistant Manager for Dealing & reporting to Vice-president.
Suraj Prakash Nanda	37	Fund Manager	B.E.(Electronics and Telecommunication), (PGDM(Finance)	14	From June 17th, 2025 onwards With Tata Asset Management Private Limited as Fund Manager, having Fund Management responsibilities and reporting to Chief Investment Officer. From May 23rd, 2016 till 11th June 2025 With ICICI Prudential Asset Management Private Limited as Fund Manager, having responsibilities of Research & Fund Management & reporting to Senior Fund Manager. From August 4th, 2011 till June 4th, 2014 With IBM India Private Limited as Application Developer, having responsibilities of application development/consultant.

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
Ashwini Subhashchandra Yadav	52	Chief Technology Officer	Post Graduate Diploma in Advanced Computing , Post Graduate Certificate in Business Management	28	From 28th July 2025 onwards with Tata Asset Management Private Limited as Chief Technology Officer (CTO), reporting to CEO and Managing Director. From October 2021 to June 2025 With Bajaj Financial Securities Ltd. as CTO, having responsibilities for managing the complete IT function, and reporting to CEO. From March 2021 to October 2021 With Toyota Financial Services India as Head – IT, having responsibilities for managing the complete IT function and reporting to CHRO and Admin Head. From November 2020 to February 2021 With A. K. Capital Services Ltd. as CTO, having responsibilities of managing IT infrastructure and IT development, and reporting to CEO. From October 2016 to October 2020 With RBL Bank as SVP – IT having responsibilities for managing a team for Cloud, RegTech, GRC reporting to CIO. From October 2012 to September 2016 With Motilal Oswal Securities Ltd. as SVP and Head – IT having responsibilities for Managing the complete IT function for the group reporting to COO and MD. From December 2010 to October 2012 With ICICI Bank as Chief Manager having responsibilities for Managing the team for Datacenter Migration reporting to TIG Head.
Anand Sharma	39	Fund Manager	B.E (Computer Engineering), M.M.S (Finance)	14	From October 03rd, 2025 onwards With Tata Asset Management Private Limited as Fund Manager, having Fund Management responsibilities and reporting to Chief Investment Officer. From April, 2014 till September, 2025 With ICICI Prudential Asset Management Private Limited as Fund Manager, having fund management responsibilities and reporting to Chief Investment Officer
Geeta Chainani	42	Head - Credit Strategies	B.Com, PGDBM (Finance)	14	From September 29th, 2025 onwards With Tata Asset Management Private Limited as Head - Credit Strategies, having credit - fixed income responsibilities and reporting to Deputy Head - Fixed Income. From April, 2022 till September, 2025 With CARE Ratings Limited as Associate Director, having credit ratings responsibilities and reporting to Director. From February, 2021 till April, 2022 With Acuite Ratings & Research Limited as Senior Manager, having credit ratings responsibilities and reporting to Senior Vice President. From April, 2008 till March, 2017 With CARE Ratings Limited as Senior Manager, having credit ratings responsibilities and reporting to Assistant General Manager
Vijay Ramesh Kerkar	43	Dealer and Assistant Fund Manager	B.Com, PGDM (Finance)	22	From September, 2012 till date With Tata Mutual Fund as Senior Manager - Finance, having trade settlement responsibilities and reporting to Lead - Mid office Operations. Currently he has been appointed as Assistant Fund Manager -Fixed Income and dealer. From August, 2011 till August, 2012 With Franklin Templeton Mutual Fund as Senior Executive, having trade settlement responsibilities and reporting to Manager - MID Office. From April, 2004 till August, 2011 With Nipun Sudhir & Associates as Senior Executive, having responsibilities of Monitoring of Valuation norms and designing internal controls and reporting to Partner.
Nikunj Kumar Singhal	36	Fund Manager	M.Tech (Industrial Engineering &	11	From 22nd January 2026 onwards

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
			Management) and B.Tech (Manufacturing Science & Engineering)		With Tata Asset Management Private Limited as Fund Manager, reporting to Chief Investment Officer - Equities. From September 2018 till 21st January 2026 With Tata Asset Management Private Limited as Chief Manager - Data Science, responsible for quantitative research and back-testing of factor-based and statistical investment strategies, driving portfolio optimization, reporting to Chief Business Officer - Key Clients & Alternate Investments. From May 2016 till August 2018 With Info Edge India Limited as Senior Data Scientist, responsible for data analysis, reporting to Senior Vice President - Analytics. From July 2014 till May 2016 With Impetus Infotech Private Limited as Analytics Engineer, responsible for data analysis, reporting to Head - Analytics.
Akshay Kumar Rao	36	Head of Products & Strategy	Post Graduate in Strategy and Finance, Chartered Accountant, Bachelor of Commerce	13	From 23rd February 2026 onwards With Tata Asset Management Private Limited as Head of Products & Strategy reporting to Chief Business Officer. From 24th July 2023 - 22nd February 2026 With Tata Asset Management Private Limited as EA to CEO and MD reporting to CEO and Managing Director. From December 2021 - July 2023 With Bain & Company as Consultant, reporting to Associate Partner From February 2017 - November 2021 With Deloitte India as Senior Manager, reporting to Partner From May 2016 - February 2017 With KPMG India as Senior Consultant reporting to Partner From April 2012 - March 2015 With Edelweiss Securities as Assistant Manager reporting to VP
Puja Kasat	43	Fund Manager	MBA (Finance). Bachelor of Engineering in Electronics and Telecommunication Engineering	17	From 16th March 2026 onwards With Tata Asset Management Private Limited as Fund Manager - Fixed Income, having fund management responsibilities, reporting to Deputy Head - Fixed Income. From June 2020 till March 2026 With SBI Funds Management Pvt. Ltd. as Fund Manager having fund management responsibilities for managing Provident Fund debt mandates of PMS division, reporting to Head - PMS. From February 2018 till June 2020 With Invesco Mutual Fund as Credit Analyst having responsibilities of analyzing companies in Financial and non-financial services sectors, reporting to Head - Fixed Income. From November 2014 till September 2017 With CRISIL Ratings as Credit Analyst having responsibilities of analyzing companies in nonfinancial services sectors and preparing & publishing rating reports, reporting to Associate Director.
Vaishali Koppiker	53	Head – Investor Services	Diploma in Computer Commercial Applications, B.Com	32	From 25 April 2026 onwards With Tata Asset Management Private Limited as Head – Investor Services, having responsibilities of & handling Mutual Fund and Gift City investor servicing, reporting to Chief Executive Officer and Managing Director. From March 2004 to April 2026 With Tata Asset Management Private Limited, last designation as Deputy Head – Investor Services, having responsibilities of & handling a) MIS reporting for the CEO, b) Distributor servicing, c) Investor Interactions, d) Statutory & Regulatory Report filing, e) Audits & Assessments, reporting to Head - Investor Services & Branch Operations. October 1994 to February 2004

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
					With Tata Share Registry Limited as Supervisory Executive, having responsibilities of & handling a) Registration of Legal Documents of the Transfer Lodgement Dept., b) Reissuance of Unpaid cheques & Reconciliation, c) Assisted in setting up the system and processes of Mutual Fund Unit RTA, d) Various Audits & Assessments, reporting to Chief Accountant & Company Secretary
Jyoti Rai	53	Dealer -Passives	Bachelor of Arts, Diploma in Financial Services and Investment Management, Diploma in Management & NISM Certification – Distributor Module	32	From 4th May 2026 Dealer Passives of Tata Mutual Fund. From 14th January 2026 to 03rd May 2026 With Tata Asset Management Private Limited as Dealer – AIF, handling dealing function, settlement of trade & reporting to Fund Manager – AIF. From March 2004 to 13th January 2026 With Tata Asset Management Private Limited as Lead – Registrar and Transfer Agent (RTA) Operations Investor Services (last designation), looking into RTA activities, Financial Reporting and Operations & was reporting to Head – Investor Services & Branch Operations. From 2002 to 2004: With Reliance Capital Asset Management Limited as Investor Relations Officer (IRO) - Financial Operations, Banking, and Client Services looking into financial reporting and Liaising with Fund Managers, Regulatory Compliance, and Client services & reporting to Head – Operations. From 1997 to 2000: With Karvy Consultants Limited as Assistant Manager looking into investor servicing, Transaction Processing and UCR, MIS reporting to Fund Managers, cash flow management, handling investor correspondence and grievances, and preparation of periodic reports for management & reporting to General Manager. From 1996 to 1997: With IIT Corporate Services Ltd – Custodian as Trainee looking into custodial activities and corporate action & reporting to Vice President. From 1994 to 1995: With Synectic Financial Services Ltd as Accounts Assistant looking into Accounts, Bill Processing, etc. reporting to Director
Ashish Suryakant Pawar	43	Chief Marketing Officer	MBA (Marketing)	21	From 04 May 2025 onwards With Tata Asset Management Private Limited as Chief Marketing Officer, handling Marketing function, reporting to CEO and Managing Director. From 04 May 2023 to 03 May 2025 With Tata Asset Management Private Limited as Head – Marketing & Corporate Communications looking into marketing, brand strategy, customer engagement, and business growth, reporting to Chief Distribution and Digital Officer. From Oct 2021 to May 2023 With Aditya Birla Health Insurance as Head – Channel & Product Marketing, leading product launches, channel marketing, digital initiatives, media planning, and high impact BTL campaigns, reporting to Chief Marketing Officer. From Sept 2011 to Sept 2021 With ICICI Prudential Life Insurance as Associate Vice President – Marketing, responsible for product and channel marketing, large scale product launches, digital and traditional media planning, and driving significant business impact through marketing alliances, reporting to Head – Brand & Channel Marketing From Oct 2009 to Sept 2011 With Ogilvy Action, Mumbai as Senior Manager executed campaigns, reporting to Head - Operations

Name	Age	Designation	Educational Qualification	Total No. of years of Experience	Nature of past experience including assignments held during the last 10 years
					From Nov 2004 to Sept 2009 With Grips Pro Events Pvt. Ltd., Mumbai as Manager – Events, handled large event and brand activation projects for clients, reporting to Head – Operations From Sept 2003 to May 2004 With 360 Degrees, Times of India Group as Trainee supported execution of flagship events, reporting to Client Service Manager

III. Service providers

1. **Custodian**

Sr. No.	Name and Address of Custodians	SEBI Registration Number	Investment Strategies
1	ICICI Bank Limited Securities Markets Services Empire Complex, 1st Floor E7/F7, Senapati Bapat Marg Lower Parel, Mumbai – 400013.	IN/CUS/005	Titanium Hybrid Long-Short Fund Titanium Equity Long-Short Fund

2. **Registrar and Transfer agent**

Sr. No.	Name of Registrars and Principal business address	SEBI Registration Number
1	Computer Age Management Services Ltd (CAMS), Unit: Titanium SIF No. 178 / 10 M G R Salai (Kodambakkam High Road), Opposite to Hotel Palmgrove, Nungambakkam, Chennai – 600034	INR000002813

TAMPL and TTCPL ensure that the Registrar has adequate capacity to discharge responsibilities with regard to processing of applications and dispatching account statements to unitholders within the time limit prescribed in the Regulations and also has sufficient capacity to handle investor complaints.

3. **Statutory auditor**

TTCPL shall have the financial statements for the Strategy audited by such Chartered Accountant(s) as may be appointed for that purpose by the Trustee Company.
S R Batliboi & Co. LLP Chartered Accountants, 12th Floor, The Ruby, 29 Senapati Bapat Marg, Dadar (West), Mumbai - 400 028 Maharashtra, India have been appointed in such capacity upto the financial year ending 31st March'2027.

4. **Legal counsel**
The SIF or AMC engages appropriate legal counsel as and when need arises.

5. **Fund Accountant**
Done In-house

6. **Collecting Bankers**

SR. NO.	Service provider	Name	Address	SEBI Regn. No.
1	Collecting Banker	HDFC BANK	HDFC BANK LTD, Zenith House, 2nd Floor, K K Road, Arya Nagar, Dr Babasaheb Ambedkar Colony, Mahalaxmi, Mumbai-400 034	INBI00000063
2	Collecting Banker	ICICI BANK	ICICI BANK LTD, Backbay Reclamation Branch, Mumbai-400 020	INBI00000004

The above list is indicative and not exhaustive. The AMC reserves the right to change / modify the list of collecting Bankers.

The application forms will be accepted at any of the Investor Service Centres of the AMC or the designated branch offices of Computer Age Management Services Ltd. (CAMS) as stated in the Investment Strategy Information Documents.

IV. **Condensed financial information (CFI)**

FY 24 and FY 25 fiscal years data is not available, since first investment strategy allotted in December 2025.

Sr. No.	Historical Per Unit Statistics	Titanium Hybrid Long-Short Fund
		31/03/2026
1	NAV at the beginning of the year/period (Rs.)	10
2	Income Distribution Cum Capital Withdrawal(per unit)	NIL
3	NAV at the end of the year(Rs.)	REG(D) =9.3600
		REG(G) =9.3600
		DIR(D) =9.4106
		DIR(G) =9.4106
4(a)	Absolute Return (%) –Regular Plan -Growth Option#	-6.40%
4(b)	Benchmark returns (%) #	-6.52%
5	Net Assets at the end of the period (Rs. Crores)	483.47
6	Ratio of Recurring Expenses to Daily Net Assets (%)	DIR = 0.57
		REG = 2.37

Different plans shall have a different expense structure and performance of different plans may vary accordingly.
Only for growth option. Absolute returns provided for investment strategies completed less than one year.
Titanium Hybrid Long-Short fund allotment date is 11th December 2025.

V. **RISK FACTORS**

a. Standard Risk Factors

Risk Factors:

- Investment in SIF involves investment risks such as trading volumes, settlement risk, liquidity risk, default risk including the possible loss of principal and market volatility.
- As the price / value / interest rates of the securities in which the investment strategy invests fluctuates, the value of investment in the investment strategy may go up or down.
- "Investments in Specialized Investment Fund involves relatively higher risk including potential loss of capital, liquidity risk and market volatility. Please read all investment strategy related documents carefully before making the investment decision."
- As with any investment in stocks, shares and securities, the NAV of the Units under Investment strategies can go up or down, depending on the factors and forces affecting the capital markets.
- The NAVs of the investment strategy may be affected by changes in the general market conditions, factors and forces affecting capital market, in particular, level of interest rates, various market related factors, trading volumes, settlement periods and transfer procedures.
- Past performance of the previous strategies, the Sponsors or its Group / Affiliates / AMC is not indicative of and does not guarantee the future performance of the Investment.
- Investment in equity and equity related securities including option contracts involve high degree of risks and investors should not invests in the strategies unless they can afford to take the risk of losing their investment.
- The sponsors are not responsible or liable for any loss resulting from the operations of the Titanium SIF beyond the initial contribution of Rs. 1 lakh made by them towards setting up of the Tata Mutual Fund.
- The name of the Investment Strategy does not in any manner indicate either the quality of the Strategy, portfolio its future prospects or the returns. Investors therefore are urged to study the terms of the Offer carefully and consult their Tax and Investment Advisor before they investing in the Strategy.
- SIF Investment Strategies does not provide guaranteed or assured return.
- Investors are required to invest a minimum of Rs.10 lakhs (Minimum Investment Threshold) across all investment strategies under SIF, at the Permanent Account Number ('PAN') level. The redemption by the investors under the investment strategy shall be subject to the investor maintaining the Minimum Investment Threshold amount.

b. Risks associated with different derivative strategies including derivative strategies as applicable for the SIF

- 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 Investment Strategy manager to identify such opportunities. Identification and execution of the strategies to be pursued by the Investment Strategy manager involve uncertainty and decision of Investment Strategy manager may not always be profitable. No assurance can be given that the Investment Strategy 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.
- Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative add to the portfolio and the ability to forecast price of securities being hedged and interest rate movements correctly. There is a possibility that a loss may be sustained by the portfolio as a result of the failure of another party (usually referred to as the "counterparty") to comply with the terms of the derivatives contract.
  Other risks in using derivatives include the risk of mis-pricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.

- The Investment Strategies may invest in floating rate instruments and / or interest rate derivatives. The duration of these instruments is linked to the interest rate reset period. The interest rate risk in a floating rate instrument or in a fixed rate instrument hedged with derivatives is likely to be lesser than that in an equivalent maturity fixed rate instrument. Under some market circumstances the volatility may be of an order greater than what may ordinarily be expected considering only its duration. Hence investors are recommended to consider the unadjusted portfolio maturity of the Investment Strategy as well and exercise adequate due diligence when deciding to make their investments
- The Investment Strategy may face execution risk, whereby the rates seen on the screen may not be the rate at which the ultimate execution of the derivative transaction takes place.
- The Investment Strategy may find it difficult or impossible to execute derivative transactions in certain circumstances. For example, when there are insuffi**i**cient bids or suspe**n**sion of trading due to price limit or circuit breakers, the Investment Strategy may face a liquidity issue.
- Investments in index futures face the same risk as the investments in a portfolio of shares representing an index. **T**he extent of loss is the same as in the underlying stocks.
- The Investment Strategy bea**r**s a risk that it may not be able to correctly forecast future market trends or the value of assets, indices or other financial or economic factors in establishing derivative positions for the Investment Strategy.
- There is the possibility that a loss may be sustained by the portfolio as a result of the failure of another party (usually referred to as the "counter party") to comply with the terms of the derivatives contract. The counter party may default on a transaction before settlement and therefore, the Investment Strategy is compelled to negotiate with another counterparty at the then prevailing (possibly unfavorable) market price.
- 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.
- Where derivatives are used for hedging, such use may involve a basic risk where the instrument used as a hedge does not match the movement in the inst**r**ument/underlying asset being hedged. The risk may be inter-related also e.g., interest rate movements can affect equity prices, which could influence specific issuer/industry assets.
- Unhedged naked option positions carry unlimited risk and no downside protection.

Risks associated with Swaps:
Interest rate risk is significant because interest rates do not always move as expected. Both parties have interest rate risk. The holder of the fixed rate risks the floating interest rate going higher, thereby losing interest that it would have otherwise received. The holder of the floating rate risks interest rates going lower, which results in a loss of cash flow since the fixed rate holder still has to make streams of payments to the counterparty.

The other main risk associated with swaps is counterparty risk. This is the risk that the counterparty to a swap will default and be unable to meet its obligations under the terms of the swap agreement. If the holder of the floating rate is unable to make payments under the swap agreement, the holder of the fixed rate has credit exposure to changes in the interest rate agreement. This is the risk the holder of the fixed rate was seeking to avoid.

Risks associated with Forward Rate Contracts:
When entering into an FRA, both parties to the contract entail credit risk exposure. The additional risks could be on account of lack of opportunity, illiquidity.

Risk of Writing of Call Option Under a Cover Call Strategy
Under a delivery settlement a call writer will have to part with the physical holding of security which was originally intended for long term holding. Covered call strategies offer limited downside protection and cap upside gains. Risks include poor execution due to low option liquidity, difficulty rolling positions in volatile markets, margin calls if using leverage, and forced stock sale if assigned near expiry.

Risks related to Arbitrage Strategy

- In case of a large redemption, the Investment Strategy may need to reverse the spot-futures transaction before the date of futures' settlement. This eventuality may lead to the basis risk. While reversing the spot-futures transaction on the Futures & Options settlement day on the Exchange, there could be a risk of volume-weighted-average-price of the market being different from the price at which the actual reversal is processed. This may result in basis risk.

- On the date of expiry, when the arbitrage is to be unwound, it is not necessary for the stock price and its future contract to coincide. There could be a discrepancy in their prices even a minute before the market closes. Thus, there is a possibility that the arbitrage strategy gets unwound at different prices.

c. Other risk factors (viz. Swing pricing, investment in CDMDF, LRM etc.) – Not Applicable

Special Considerations
Neither the ISID and SAI, nor the Units have been registered in any jurisdiction. No persons receiving a copy of the Investment Strategy Information Document(ISID) or any accompanying application form in such jurisdiction may treat the said ISID 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. The ISID of the respective Investment strategy does 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. It is the responsibility of any persons in possession of the respective ISID and any persons wishing to apply for units pursuant to the said ISID, to inform themselves and to observe, all applicable laws and Regulations of such relevant jurisdiction". Investors(s)/Unit holder(s) should consult their own tax advisors to understand the implications of FATCA/CRS provisions /requirements.

Investment decisions made by the Investment Manager may not always be profitable.

No person has been authorised to give any information or to make any representations not confirmed in the ISID in connection with this Offer or the issue of Units, and any information or representations not contained herein must not be relied upon as having been authorized by the SIF, the Investment Manager.

Investors/Prospective Investors are urged to read/study Investment Strategy Information Document ('ISID') and Statement of Additional Information (SAI') carefully in its entirety and should not construe the contents hereof as advise relating to legal, taxation, financial, investment or any other matters. In view of the individual nature of investment portfolio and its consequences, each Unitholder is advised to consult his/her own professional advisor concerning possible

consequences of purchasing, holding, selling, converting or otherwise disposing of the Units under the laws of his/her State/country of incorporation, establishment, citizenship, residence or domicile.

VI. HOW TO APPLY?

Investors can obtain application forms and Key Information Memorandum from the Official Points of Acceptance (OPAs) of AMC and RTA's (CAMS) branch office. Investors can also download application form / Key Information Memorandum or apply through the website of AMC viz www.tatamutualfund.com/titanium-sif

Applications for purchase/investment, complete in all respects, accompanied by cheque /fund transfer letter are to be submitted at any of the Authorized Investor Service Centers (AISC) mentioned in the Investment Strategy Information Document (ISID) or any other location designated as such by the AMC, at a later date. The addresses of the AISC are given at the end of the ISID also on the website, https://www.tatamutualfund.com/titanium-sif

Investors in cities other than where the AISC are located, may forward their application forms to any of the nearest AISC, or apply online on our website https://www.tatamutualfund.com/titanium-sif

Applications for subscription/ redemption/ switches can also be submitted on platforms of various channel partners like MF Central.

During NFO/Ongoing process (post NFO), Application forms complete in all respects, accompanied by cheque /fund transfer letter are to be submitted to any of the Authorized Investor Service Centres, as stated in the respective Investment Strategy Information Document (ISID) or as may be declared from time to time. All cheques and bank drafts accompanying the application form should contain the application form number or the Permanent Account Number (PAN) or PAN Exempt KYC Acknowledgement Number (PEKRN) and the name of the applicant/s on its reverse. For additional instructions, investors are requested to follow the application form carefully. All cheques by the applicants should be made out in favour of the Strategy and should be crossed "A/c Payee and Not Negotiable".

The investors are requested to preserve the acknowledgement slip duly stamped by the Collection Centers / Authorized Investor Service Centres / Marketing Associates. This shall be subject to final verification and scrutiny by the Trustee Company / Asset Management Company that the cheque / demand draft and application form are in order / valid.

The facility to accept payments through RTGS / NEFT / Debit mandates with select banks is also available. However, investors are requested to check with the Investor Services Centers for the applicability for various strategies, eligibility and operational processes.

The refunds will be carried out within 5 working days of the closure of NFO or receipt of funds whichever is later, Refunds may be carried out in a phased manner subject to receipt of fund and reconciliation thereof within the stipulated regulatory timeframes. In case of NFO devolvement or rejection of application for which the funds are already received by the fund house, the investors may inform the fund house to allocate the funds for purchase in any other strategy of Titanium SIF.

For ongoing purchase and redemption, applications completed in all respects, must be submitted only at the Investors Service Centers as mentioned on the back cover page of the respective strategy ISID.

Existing investors can also subscribe/redeem units through online mode. For further details kindly refer our website https://www.tatamutualfund.com/titanium-sif or contact our Investor Service Centre. New Know Your Customer (KYC) compliant investors can also subscribe units through online mode on https://www.tatamutualfund.com/titanium-sif

All investment cheques should be current dated.

Subscription by NRIs

In terms of Schedule 5 of Notification no. FEMA 20/2000 dated May 3, 2000, RBI has granted general permission to NRIs to purchase, on a repatriation basis units of domestic investment strategies. Further, the general permission is also granted to NRIs to sell the units to the investment strategies for repurchase or for the payment of maturity proceeds, provided that the units have been purchased in accordance with the conditions set out in the aforesaid notification. For the purpose of this section, the term "mutual funds" is as referred to in Clause (23D) of Section 10 of Income-Tax Act 1961. However, NRI investors, if so desired, also have the option to make their investment on a non-repatriable basis.

Mode of Payment on Repatriation basis

NRIs

In case of NRIs and persons of Indian origin residing abroad, payment may be made by way of Indian Rupee drafts purchased abroad and payable at Mumbai or by way of cheques drawn on Non-Resident (External) (NRE) Accounts payable at par at Mumbai. Payments can also be made by means of rupee drafts payable at Mumbai and purchased out of funds held in NRE / FCNR Accounts.
In case Indian rupee drafts are purchased abroad or from Foreign Currency Accounts or Non-resident Rupee Accounts an account debit certificate from the Bank issuing the draft confirming the debit shall also be enclosed.

Foreign Portfolio Investors (FPI)

Subscription by Foreign Portfolio investor (FPI) means a person who satisfies the eligibility criteria prescribed under regulation 4 and has been registered under Chapter II of SEBI (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time, provided that any foreign institutional investor or qualified foreign investor who holds a valid certificate of registration shall be deemed to be a foreign portfolio investor till the expiry of the block of three years for which fees have been paid. No person shall buy, sell or otherwise deal in securities as a foreign portfolio investor unless it has obtained a certificate granted by the designated depository participant on behalf of SEBI.

Under SEBI (Foreign Portfolio Investors) Regulations, 2019 FPI (FII/Sub Account of FII/QFI's) are allowed to invest in units of schemes floated by domestic mutual fund, whether listed on a recognized stock exchange or not; subject to compliance of the investment limits and terms and conditions as may be specified by SEBI/RBI.

FPI may pay their subscription amounts either by way of inward remittance through normal banking channels or out of funds held in Foreign Currency Account or Non-resident Rupee Account maintained with a designated branch of an authorized dealer with the approval of the RBI subject to the terms and conditions set out in the aforesaid notification.

Mode of payment on Non-Repatriation basis

In case of NRIs/Persons of Indian origin seeking to apply for Units on a non-repatriation basis, payments may be made by cheques/demand drafts drawn out of Non-Resident Ordinary (NRO) accounts/ Non-Resident Special Rupee (NRSR) accounts and Non-Resident Non-Repatriable (NRNR) accounts payable at the city where the Application Form is accepted.

Refunds, interest and other distribution (if any) and maturity proceeds/repurchase price and /or income earned (if any) will be payable in Indian Rupees only. The maturity proceeds/repurchase value of units issued on repatriation basis, income earned thereon, net of taxes may be credited to NRE/FCNR account (details of which should be furnished in the space provided for this purpose in the Application Form) of the non-resident investor or remitted to the non-resident investor by way of Indian Rupees converted into US dollars or into any other currency, as may be permitted by the RBI, at the rate of exchange prevailing at the time of remittance and will be dispatched through Registered Post at the unitholders risk. The Fund will not be liable for any loss on account of exchange fluctuations, while converting the rupee amount in US dollar or any other currency. Credit of such proceeds to NRE/FCNR account or remittance thereof may be permitted by authorized dealer only on production of a certificate from the Fund that the investment was made out of inward remittance or from the Funds held in NRE/FCNR account of the investor maintained with an authorized dealer in India. However, there is no objection to credit of such proceeds to NRO/NRSR account of the investor if he so desires.

Subscription by Multilateral Funding Agencies, on full repatriation basis, is subject to approval by the Foreign Investment Promotion Board.

Uniform process shall be applicable for investments made in the name of minor through a guardian:

In case of application in the name of minor, the minor has to be the first and the sole holder. No joint holder will be allowed with the Minor as the first or sole holder. The Guardian of the minor should either be a natural guardian (i.e. father or mother) or a court appointed legal guardian. A copy of birth certificate, passport copy, etc evidencing date of birth of the minor and relationship of the guardian with the minor, should be mandatorily attached with the application.

a. AMC will follow uniform 'process for investments made in the name of a minor through a guardian' by SEBI vide provision no. 15.13 of SEBI Master circular on Mutual Fund dated March 20, 2026 which states that payment for investment by any mode shall be accepted from the bank account of the minor, parent or legal guardian of the minor, or from a joint account of the minor with parent or legal guardian. For existing folios, the AMCs shall insist upon a Change of Pay-out Bank mandate before redemption is processed. Irrespective of the source of payment for subscription, all redemption proceeds shall be credited only in the verified bank account of the minor i.e., the account the minor may hold with the parent/legal guardian after completing all KYC formalities.

b. Upon the minor attaining the status of major/attaining 18 years of age, the minor in whose name the investment was made, shall be required to complete the CKYC process and provide PAN, all the KYC details, FATCA details, updated bank account details including cancelled original cheque leaf with the name of major printed over it and by filling up a prescribed attaining Major status available on our website. No further transactions shall be allowed till the status of the minor is changed to major.

c. Any instructions registered for Systematic Investment Plan (SIP), Systematic Transfer Plan (STP), Systematic Withdrawal Plan (SWP) etc. shall be suspended when the minor attains majority, till the status is changed to major.

The major may update Nomination in favour of an individual.

The guardian cannot undertake any financial and non-financial transactions after the date of the minor attaining majority in an account (folio) where the units are held on behalf of the minor, and further, no financial and non-financial transactions can be undertaken till the time the change in the status from 'minor' to 'major' is registered in the account (folio) by the AMC/SIF.

Nomination

Investors/Unit holders are advised to Nominate the SIF units. The unit holder(s) are requested to submit either the nomination form or the declaration form for opting out of nomination in physical or online as per the choice of the unit holder(s).

Upto 3 nominees can be appointed by the United holders to a folio. The percentage of nomination cannot be in decimals and has to total 100%

In case of physical option, the forms shall carry the wet signature of all the unit holder(s). AMC at its discretion may accept nomination through online option.

In such cases, AMC shall validate the forms:

a. Using e-Sign facility recognized under Information Technology Act, 2000; or

b. Through two factor authentication (2FA) in which one of the factor shall be a One-Time Password sent to the unit holder at his/her email/phone number registered with the AMC.

The requirement of nomination specified under clause 15.14 of the Master Circular for Mutual Funds shall be optional for jointly held SIF folios.

In case of Units held in Demat account the nomination registered under demat account will be considered

Modes of Payments and Dispatch

AMCs may also use instruments or payment channels such as RTGS, NEFT, IMPS, direct credit, etc. or any other mode allowed by Reserve Bank of India from time to time, for payments including refunds to unitholders in addition to the cheque, demand draft or IDCW warrants. Investors are advised to provide valid IFSC Code for necessary validation of bank account information independently as per SEBI requirements. If IFSC code provided in application form is

Null or Incorrect/Invalid, then AMC/RTA reserves the right to update / overwrite / correct the details as per RBI master based on other information provided by the investor and no liability falls on AMC/RTA on such matters.

Further, AMCs may also use modes of dispatch such as ordinary post, speed post, courier etc. for payments including refunds to unitholders

Updation of Contact Details and Correspondence Address

a. Applicants/unitholders are requested to provide contact information such as valid email id, mobile telephone number/s and correspondence address. Please note that communication postal address is overwritten as per KYC records received from SEBI designated KYC Registration Agency (KRA. However, the fund reserves the right to update valid email id, mobile number, date of birth and other applicable information from KYC records of SEBI designated KYC Registration Authority (KRA) as per SEBI / AMFI or AMC guidelines.

b. Investors should ensure that the email id, mobile number provided in the application form should be their own or any of the immediate family member and should be same as the ones provided in the KRA. Where the email id, mobile number are not provided or where provided but the same is found to be invalid, or seems to be not pertaining to the investor or any of the immediate family member or is of a distributor or any other agency, then AMC/RTA reserves the right to remove the email id, mobile number without any notice and the email id, mobile number as per KRA records may be updated in the folio.

c. Investors will need to update the email id / mobile number in the KYC records at KRA through any one of the SEBI Registered intermediaries and to the Fund in case of any change.

d. Account statements, annual reports, portfolio and other communication, including statutory communication, will be sent through email/SMS only instead of physical, for investors who provide their email address/mobile on the application form. Should they wish to have a physical copy, they are requested to send a request to the AMC/RTA.

e. It is deemed that the applicants are aware of all the security risks associated with online communication, including possible third-party interception of documents sent via email.

f. In case of any investor being suspended / debarred by any statutory or government authority, the AMC/RTA reserves the right to reject any transaction without any notice.

Unitholders are requested to complete their KYC / Minor to Major (Tax status change) / PAN validations and Transmission if any, to avoid delay in maturity payments. Aadhaar may be inked with PAN number for smooth operation of the account as it might lead to deduction of higher TDS where applicable. No claim for refund of TDS would be entertained for non-compliance with the above requirements.

Restriction on Acceptance of Third-Party Payments for Subscription of units of strategies:

In pursuance to Best Practice Guidelines issued by Association of Mutual Funds in India [AMFI] Vide Circular No.135/BP/16/10 dated August 16th, 2010 & subsequent amendments, SEBI circular thereof for Restriction on acceptance of Third-party cheques, Tata Asset Management Pvt Ltd has decided henceforth not to accept subscriptions with Third-Party cheques* except in the following exceptional situations:

a) Payment by Employer on behalf of employee under Systematic Investment Plans or lump sum/one time subscription through Payroll deductions. or deductions out of the expense reimbursements, AMC may take extra due diligence in terms of ensuring the authenticity of such arrangements from a fraud prevention & KYC perspective.

b) Custodian on behalf of an FII/FPI or a client.

c) Payment by an AMC to an empanelled distributor on account of commission /incentive etc. in the form of the SIF units of the strategies managed by AMC through SIP or lump sum/ one time subscription, subject to compliance with SEBI Regulations and guidelines issued by AMFI from time to time.

d) Payment by a corporate to its agent/distributor/dealer (similar arrangement with principal agent relationship), on account of commission or incentive payable for sale of its goods/services, in the form of the SIF units through SIP or lump sum/one time subscription, subject to compliance with SEBI Regulations & guidelines issued by AMFI.

*** Third Party Cheque means:**

i. When payment is made through instruments issued from an account other than that of the beneficiary investor, the same is referred to as Third-Party payment.

ii. In case of payments from a joint bank account, the first holder of the SIF folio has to be one of the joint holders of the bank account from which payment is made, otherwise it will be treated as third party cheque.

iii. Investments from the investor's account with a different bank i.e., the pay-in and payout banks are different, if the pay-in bank mandate could not be established to be that of the investor, it will also be treated as third party investment.

1) Acceptance of third-party cheques in the above situation shall be subject to compliance with the KYC (Know Your Client) requirements by the person making the payment and beneficiary owner of the units. The person making payment shall give details of the bank account from which the payment is made and the relationship with the beneficiary in the application form.

In order to prevent frauds and misuse of payment instruments, the investors are mandated to make the payment instrument (cheque, demand draft, pay order, etc.) favouring either of the following (Investors are urged to follow the order of preference in making the payment instrument favouring as under):

a. "XYZ Investment Strategy A/c Permanent Account Number"
b. "XYZ Investment Strategy A/c First Investor Name"
c. "XYZ Investment Strategy A/c Existing folio number "

2) In case of an application for investment accompanied with the Pay-order, Demand Draft, Banker's cheque, the following additional documents are required to be submitted:

- A Certificate from the Issuing banker, stating the Account holder's name, PAN No, Address and the Account number which has been debited for issue of the instrument.
  The account number mentioned in the certificate should be a registered bank account or the first named applicant/ investor should be one of the account holders to the bank account debited for issue of such instruments.
- additionally if a pre-funded instrument issued by the bank against cash, it shall not be accepted for investment of Rs 50000/- or more. The investor should submit a certificate (in original) obtained from the bank giving name address and PAN (if available) of the person who has requested for the payment of instrument. The said certificate should be duly certified by the Bank Manager with his/her full signature, name, employee code, bank seal and contact number.

3) In case payment is made by RTGS, NEFT, Online Bank Transfer, etc., a copy of the instruction to the bank stating the account number debited must accompany the purchase application.

4) In case of subscription through net banking, AMC shall endeavor to obtain the details of the bank account debited from the payment gateway service provider and match the same with the registered pay-in accounts. In case it is found that the payment is not made from a registered bank account or from an account not belonging to the first-named unit holder, the AMC/R&TA shall reject the transaction with due intimation to the investor.

5) In case of rejection of the transaction for non-compliances, the amount will be refunded without any interest to the investor.

Investor may view the common application form/ application form of strategies for detail procedure/ clarification on the subject.

As recommended by AMFI vide circular no.135/BP/24/2011-12 dated June 17, 2011 for payments through net banking and debit cards, TAMPL shall endeavor to obtain the details of the bank account debited from the payment gateway service provider and match the same with the registered pay-in accounts. In case it is found that the payment is not made from a registered bank account or from an account not belonging to the first named unitholder, the AMC/ R&TA may reject the transaction with due intimation to the investor.
The above broadly covers the various modes of payment for SIF subscriptions. The above list is not a complete list and is only indicative in nature and not exhaustive.

Additional Mode of Payment through Applications Supported by Blocked Amount (ASBA):

Details in General Information section.

Rejection of applications

Applications not complete in any respect are liable to be rejected. The Trustee Company may reject any application not in accordance with the terms of the Strategy.

General Instructions

Documents to be submitted in the case of applications under Power of Attorney:

If any application is signed by a person holding a valid Power of Attorney, the original Power of Attorney or a certified copy duly notarized should be submitted with the application. The Power of Attorney has to be signed by the Applicant and Constituted Attorney. The signature in the Application Form needs to clearly indicate that the signature is on behalf of the applicant by the Constituted Attorney.

Non-individual investors (Corporates, Societies, Trusts, etc.) who are already KYC verified are required to submit Resolution and Authorized Signatory List mentioning the clause for investment in SIF, the mode of operation and specimen signatures of all authorized signatories along with the subscription application. Tata Asset Management Pvt Ltd. reserves the right to call for other documents as and when required. Units allotted to the non-individual investors are subject to scrutiny of such statutory documents. If required document(s) are not provided along with transaction or the documents provided by the non-individual investors are insufficient / inaccurate, then the transactions are liable to be reversed with all costs and consequences to the investor.

Availability of Application Forms, Statement of Additional Information (SAI) and Investment Strategy Information Document (ISID)

Application forms and copies of SAI/ISID may be obtained from the office of Tata Asset Management Pvt Ltd., Offices of the Authorized Investor Service Centres listed in the Investment Strategy Information Document or any agents of Titanium SIF. The soft copies are also available in Tata AMC website.

Weblink - https://www.tatamutualfund.com/titanium-sif

Delivery of Account Statement by Post/Courier Services (For details kindly refer ISID of individual strategies)

Account Statements would be sent to the investor registered email id wherever valid email id is registered. In case of Consolidated Account Statement on monthly/half-yearly basis, it would be sent to the registered email id failing which it would be sent by post.

The Cheques will be sent by courier/speed post/registered post. The courier and the postal department as the case may be shall be treated as agents of the investor. Delivery of the statement and cheques to the courier / postal department shall be treated as delivered to the investor. The SIF / registrars are not responsible for any delayed delivery or non-delivery or any consequences thereof.

Bank Account Details

It shall be mandatory for the Unitholders to mention their own (i.e. First Holder) bank account number(s) in their applications / requests for redemptions. Unitholders are requested to give the full particulars of their Bank Account i.e. Account Number, Account type, Nine-digit MICR code,11-digit IFSC code for NEFT and RTGS payout, branch address of the bank at the appropriate space in the application form. For electronic payout, it is mandatory to provide a cancelled cheque along with the application. In case pay-in (i.e. application) and payout (i.e. redemption) banks are different, cancelled copy of the cheque of pay out bank is required to be submitted along with the application to capture that bank details for redemption, else pay in bank details will be captured and payments will happen in this bank.

Any application for subscription / request for redemption without Bank account details will be rejected by the SIF.

The Fund will disclose details of the investor's account and all his transactions to the intermediaries whose stamp appears on the application form. In addition, the Fund will disclose details as necessary to the Fund's and investor's bankers, for the purpose of effecting payments to the investor. Further, investors' details may also be disclosed to Government Authorities such as income tax authorities, SEBI. Further, the investor's account statement may be shared with the brokers/advisors/distributors on record in the folio.

For Change of Bank Mandate details kindly refer to ISID/Addendums, Instructions form of respective strategies.

Multiple Bank Account Registration facility: An investor in Titanium SIF investment strategy may register multiple bank accounts (currently upto 5 for Individuals and 10 for Non – Individuals) for receiving redemption/ dividend proceeds etc. by providing necessary documents and filing up of Multiple Bank Accounts Registration form.

The AMC and/or its Registrars & Transfer Agent (RTA) reserve the right to disclose/share Unit holder's details of folio(s) and transaction details thereunder with the following third parties:

- RTA, Banks, postal / courier agencies, payment aggregators, EOPs, Printers, MFCentral, SMS/Email vendors and/or authorized external third parties who are involved in transaction processing, banking, reconciliation, dispatching, eCAS emailing, disclosure communication etc., of the Unitholders
- Investment in the Investment strategy
- Distributors or sub-brokers, RIAs, MFU, Exchanges and its members, EOPs through whom the applications are received for the Investment strategy
- Any other organizations for compliance with any legal or regulatory requirements or to verify the identity of the Unitholders for complying with anti-money laundering requirements

Know Your Client (KYC) & Permanent Account Number (PAN) Know Your Client (KYC):

In terms of the Prevention of Money Laundering Act, 2002, the Rules issued thereunder and the guidelines / circulars issued by SEBI regarding the Anti Money Laundering (AML Laws), all intermediaries, including Mutual Funds, have to formulate and implement a client identification i.e. Know Your Customer program, verify and maintain the record of identity and address(es) of investors.

The need to Know Your Customer (KYC) requirements is critical for the prevention of money laundering. The Trustee /AMC may seek information or obtain and retain documentation used to establish identity. It may re-verify identity and obtain any missing or additional information for this purpose. The Trustee/AMC shall have absolute discretion to reject any application or prevent further transactions by a Unit holder, if after due diligence, the Investor/Unit holder/a person making the payment on behalf of the Investor does not fulfill the requirements of the Know Your Customer (KYC).
If after due diligence the Trustee/AMC has reason to believe that any transaction is suspicious in nature as regards money laundering, the AMC shall report such transactions to competent authorities under PMLA and rules/guidelines issued thereunder by SEBI/RBI, furnish any such information in connection therewith to such authorities and take any other actions as may be required for the purposes of fulfilling its obligations under PMLA and rules/guidelines issued thereunder without obtaining prior approval of the Unitholder/any other person. In this connection, the Trustee/AMC reserves the right to reject any such application at its discretion.

Under the applicable law it is the responsibility of the unitholder to ensure that KYC documents are current and updated. Any changes are informed within due timelines to the intermediary. Updated information also help the SEBI registered intermediaries to communicate instantly or share alerts wherever applicable.

Investor can download the KYC form and submit the updated KYC form / documents at the nearest AMC / RTA branches or any other authorized online mode.

SEBI vide Circular no. CIR/MIRSD/66/2016 dated July 21, 2016 and circular no. CIR/MIRSD/120/2016 dated November 10, 2016 has intimated about the operationalization of Central KYC Records Registry ("CKYCR").

AMFI vide Best Practice Guideline circular no. 135/BP/68/2016-17 dated December 22, 2016 has prescribed guidelines including Central KYC ("CKYC") forms for implementing the CKYC norms.

In this regard, any individual customer who has not done/registered KYC under the KYC Registration Agency (KRA) regime shall fill the new CKYC form.

Non-Individual Investors to use the existing KYC forms for KYC process.

The KYC Application Forms for Individual and Non-Individuals are also available on our website https://www.tatamutualfund.com/titanium-sif The list of documents required to complete the KYC Process is given in the CKYC/KYC application form.

Units held in electronic (demat) form: For units held in demat form, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee / AMC. The AMC reserves the right to ask for further documentation if required.

Declaration For 'Ultimate Beneficial Ownership' (UBO)

Pursuant to SEBI master circular ref. no. SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2024/78 dated June 06, 2024, amendments on PMLA Rules 2005 from time to time on anti-money laundering standards and guidelines on identification of Beneficial Ownership pursuant to SEBI vide its circular ref. no. CIR/MIRSD/2/2013 dated January 24, 2013, investors (other than Individuals) are required to provide details of Ultimate Beneficial Owner(s) ('UBO') and submit proof of identity (viz. PAN with photograph or any other acceptable identity proof prescribed in common KYC form) of UBO(s).

The Ultimate Beneficial Owner means:

For Investor other than Trust:
A 'Natural Person', who, whether acting alone or together, or through one or more juridical person, exercises control through ownership or who ultimately has a controlling ownership interest. Controlling ownership interest means ownership of/entitlements to:

- more than 10% of shares or capital or profits of the juridical person, where the juridical person is a company;
- more than 10% of the capital or profits of the juridical person, where the juridical person is a partnership; or
- more than 15% of the property or capital or profits of the juridical person, where the juridical person is an unincorporated association or body of individuals.

In cases where there exists doubt as to whether the person with the controlling ownership interest is the beneficial owner or where no natural person exerts control through ownership interests, the identity details should be provided of the natural person who is exercising control over the juridical person through other means (i.e. control exercised through voting rights, agreement, arrangements or in any other manner). However, where no natural person is identified, the identity of the relevant natural person who holds the position of senior managing official should be provided.

For Trust:
The settler of the trust, the trustees, the protector, the beneficiaries with 10% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.
Exemption in case of listed companies:
The provisions w.r.t. Identification of UBO are not applicable to the investor or the owner of the controlling interest is a company listed on a stock exchange or is a majority-owned subsidiary of such a company.

Applicability for foreign investors:
The identification of ultimate beneficial ownership in case of Foreign Institutional Investors (FIIs), their sub-accounts and Multilateral Funding Agencies/Bodies Corporate incorporated outside India with the permission of Government of India/Reserve Bank of India are guided by the clarifications issued vide SEBI circular CIR/MIRSD/11/2012 dated September 5, 2012. As per said circular, list of beneficial owners with shareholding or beneficial interest in the applicant/investor equal to or above 25% is required or the Global Custodian/Local Custodian may provide an undertaking to submit these details. Any change in the list may be required to be submitted to the SIF/Authorized parties.

Tata AMC has the right to cancel any application in case of inadequate/inappropriate disclosure by the investor.

Foreign Account Tax Compliance Act (FATCA)

United States of America (US) has introduced chapter no. 4 in the US Internal Revenue Code as a part of the Hiring Incentives to Restore Employment (HIRE) Act, which was enacted by the US legislature to create employment opportunities in US. The HIRE Act includes Foreign Account Tax Compliance Act (FATCA), which now forms a part of the US-IR Code. The regulations for FATCA have undergone revision since 2010 and the final regulations make the FATCA provisions effective from July 1, 2014.

The objective of FATCA is to detect "US Persons", who evade US taxes by using financial account maintained outside US. The US persons are defined as those who have either US citizenship or US residency. The FATCA stipulates reporting on - i. US taxpayers about certain foreign financial accounts and offshore assets.
ii. Foreign Financial Institutions (FFIs) about financial accounts with them of US taxpayers or foreign entities in which US taxpayers hold substantial ownership interest.

FFIs (including mutual funds in India) are required to periodically report information on accounts of US persons, who maintain balances above a threshold. In the event of a default in the reporting of information on accounts of US taxpayers, a withholding of 30% of the payment made from US sources will be imposed on the recalcitrant account holders and non-participating Financial Institutions. SEBI vide its circular no. CIR/MIRSD/2/2014 dated June 30, 2014, has advised that Government of India and US Government have reached an agreement in substance on the terms of an Inter-Governmental Agreement (IGA) to implement FATCA and India is now treated as having an IGA in effect from April 11, 2014. Tata Asset Management Company Pvt Limited (TAMPL) is classified as a Foreign Financial Institution (FFI) under the FATCA provisions and in accordance therewith, the AMC would be required to comply with the rules & regulations of FATCA, from time to time.

Common Reporting Standard (CRS)
On similar lines of FATCA, the Organization of Economic Development (OECD), along with the G 20 countries, of which India is a member, has released a 'Standard for Automatic Exchange of Financial Account Information in Tax matters'. In order to combat the problem of offshore tax evasion and avoidance and stashing of unaccounted money abroad, the G 20 & OECD countries have together developed a common reporting standard(CRS) on automatic exchange of information(AEOI). On June 3,2015 India has joined the Multilateral Competent Authority Agreement(MCAA) on AEOI. The CRS on AEOI requires the financial institutions of the 'source' jurisdiction to collect and report information to their tax authorities about account holders 'resident' in other countries. The information to be exchanged relates not only to individuals, but also to shell companies and trusts having beneficial ownership or interest in the 'resident' countries.

In view of India's commitment to implement the CRS on AEOI and also the IGA with USA and with a view to provide information to other countries necessary legislative changes has already been made in Finance Act & by inserting Rules 114F to 114H and Form 61B to provide a legal basis for the Reporting Financial Institutions (RFIs) for maintaining and reporting information about the reportable accounts.

Applicants are required to refer to the "FATCA/CRS information" section in the application and mandatorily fill/sign off on the same. Applications without this information / declaration being filled/signed off will be deemed as incomplete and are liable to be rejected. Investors are requested to note that the contents of the information to be provided/ declaration in the application form may undergo a change on receipt of communication / guidelines from Government of India or AMFI or SEBI or any other regulatory authority.

With the change in guidelines, investors may be called for additional information required by the law. Investors are requested to keep SIF updated with change in information already submitted by them with SIF. FATCA provisions are relevant not only at on-boarding stage of investor(s)/unit holder(s) but also throughout the life cycle of investment with the Fund/the AMC. In view of this, Investors should immediately intimate to the Fund/the AMC, in case of any change in their status with respect to FATCA/CRS related declaration provided by them previously.

Investors(s)/Unit holder(s) should consult their own tax advisors to understand the implications of FATCA/CRS provisions /requirements.

It is mandatory to provide the valid Tax Identification Number (TIN) of the country where the investor's tax residency is other than India. TAMPL reserves the right to recover any financial liability imposed on the Asset Management Company due to incorrect data filing in the FATCA / CRS where no / incorrect / incomplete information has been provided by the investor.

Facilitating transactions in SIF investment strategies through the Stock Exchange infrastructure:

Following strategies of Titanium SIF have been admitted on the order routing platform of Bombay Stock Exchange Ltd ("BSE") & National Stock Exchange of India Ltd ("NSE"). Under this facility, investors can submit the application for subscription & redemption of units of following strategies of Titanium SIF though the Stock Exchange platform. The introduction of this facility is pursuant to provision no. 17.12 of SEBI Master circular on Mutual Fund dated March 20, 2026 & the Stock Exchanges viz. BSE & NSE:

Investment Strategies routed through Exchange Platform BSE/NSE : Demat & Physical Mode
Titanium Hybrid Long-Short Fund Regular Plan IDCW Reinvestment
Titanium Hybrid Long-Short Fund Direct Plan IDCW Reinvestment
Titanium Hybrid Long-Short Fund Regular Plan Growth
Titanium Hybrid Long-Short Fund Direct Plan Growth
Titanium Hybrid Long-Short Fund Regular Plan IDCW Payout
Titanium Hybrid Long-Short Fund Direct Plan IDCW Payout
Titanium Equity Long-Short Fund Regular Plan IDCW Reinvestment
Titanium Equity Long-Short Fund Direct Plan IDCW Reinvestment
Titanium Equity Long-Short Fund Regular Plan Growth
Titanium Equity Long-Short Fund Direct Plan Growth
Titanium Equity Long-Short Fund Regular Plan IDCW Payout
Titanium Equity Long-Short Fund Direct Plan IDCW Payout

Provision no. 17.12 of SEBI Master circular on Mutual Fund dated March 20, 2026 on "Facilitating transactions in MF investment through the Stock Exchange Infrastructure" is also apply to the Investment Strategies launched by Titanium SIF, the stockbrokers who extend the transactions in SIF through stock exchange mechanism are required to (i) pass the certification examination and (ii) get registered with AMFI & obtain ARN and abide by the Code of Conduct. Further, as per clause 17.2.2(b)(iii) of the above circular, SEBI has clarified that, stock exchanges will monitor the compliance of the code of conduct specified in the SEBI circular MFD/CIR/20/23230/02 dated November 28, 2002 by the stock brokers.

Option to hold units in dematerialized (demat) form including SIP:

Pursuant to provision no. 15.7.3 of SEBI Master circular on Mutual Fund dated March 20, 2026 and further as per AMFI Circular No 35P/MEMCOR/35/11-12 dated Dec 23, 2011, SIF shall provide an option to investors to hold units in demat mode. Hence investors opting for allotment of units in demat form shall mention demat account details in the application form. Demat facility is available for all strategies of Titanium SIF except for subscription in Plans / Options where dividend distribution frequency is less than one month.

Subscription by way of Systematic Investment Plan option shall also be available for SIP transactions and units will be allotted based on the applicable NAV as per respective ISID and will be credited to investors Demat Account as per process.

Employee Unique Identity Number (EUIN) :
Investor/s shall have the provision in the application / transaction form to specify the unique identity number (EUIN) of the employee/relationship manager/sales person (sales person) of the distributor interacting with the investor/s for the sale of SIF products, along with the Association of Mutual Fund in India (AMFI) Registration Number (ARN) of the SIF distributor. Investors are hereby requested to note the following with respect to EUIN:

1. AMFI has allotted EUIN to all the sales person of AMFI registered SIF distributors.
2. Investor/s shall specify the valid SIF ARN code, and the valid EUIN of the sales person in the application/transaction form. This will assist in handling the complaints of mis-selling, if any, even if the sales person on whose advice the transaction was executed leaves the employment of the distributor.
3. Investors are requested to use the application /transaction forms which have space for sub-broker ARN code and EUIN.

Pursuant to AMFI Best Circular No 135/BP/81/2019-20 dated September 24,2019 on standard process for treatment of business received through suspended distributors:

The financial transactions of an investor where his distributor's AMFI Registration Number (ARN) has been suspended temporarily or terminated permanently by Association of Mutual Funds in India (AMFI) shall be processed as follows:

1. All purchase and switch transactions including SIP/STP registered prior to the date of suspension and fresh SIP/STP registrations received under the ARN code of a suspended distributor during the period of suspension, shall be processed under 'Direct Plan' and shall be continued under Direct Plan perpetually except in case where TAMPL receives any written request/ instructions from the unitholder/s to shift back to Regular Plan under the ARN of the distributor post the revocation of suspension of ARN.

2. All Purchase and Switch Transactions including SIP/STP transactions received through the stock exchange platform through a distributor whose ARN is suspended shall be rejected.

Transactions through online facilities / electronic modes:
The time of transaction done through various online facilities / electronic modes offered by the AMC, for the purpose of determining the applicability of NAV, would be the time when the request for purchase / sale / switch of units is received in the servers of AMC/RTA.

In case of transactions through online facilities / electronic modes, the movement of funds from the investors' bank account to the Strategy's bank account may happen via the Intermediary / Aggregator service provider through a Nodal bank account and post reconciliation of fund. The process of movement of funds from the investors' bank account into the Strategy's Bank account in case of online transaction is governed by Reserve Bank of India (RBI)vide their circular Ref. RBI/2009-10/231 DPSS.CO.PD.No.1102/02.14.08/2009-10 dated 24th November, 2009. The process followed by the aggregator and the time lines within which the Funds are credited into the Strategy's bank account is within the time lines provided by RBI which is T+3 settlement cycle / business days, where T is the date of Transaction / day of intimation regarding completion of transaction. The nodal bank account as stated above is an internal account of the bank and such accounts are not maintained or operated by the intermediary / aggregator or by the SIF.

While the movement of Funds out of the investors' Bank account may have happened on T day, however post reconciliation and as per statutory norms the allotment can happen only on availability of Funds for utilization by the AMC/MF and accordingly the transaction will processed as per the applicable NAV based on availability of funds for utilization. This lag may impact the applicability of NAV for transactions where NAV is to be applied, based on actual realization of funds by the Strategy. Under no circumstances will Tata Asset Management Pvt Limited or its bankers or its service providers be liable for any lag / delay in realization of funds and consequent pricing of units.

The AMC has the right to amend cut off timings subject to SEBI (MF) Regulations for the smooth and efficient functioning of the Strategy(s).

In case of fresh/additional purchases, if the name of a particular Strategy on the application form/transaction slip differs from the name of the strategy on the Payment instrument, the application will be processed and units allotted at applicable NAV of the strategy mentioned in the application form / transaction slip duly signed by investor(s).

Tata Asset Management Pvt Ltd. (AMC) reserves the right to call for other additional documents as may be required, for processing such transactions. The AMC also reserves the right to reject such transactions.

eSign mechanism of Aadhaar shall be accepted in lieu of a Digital Signature
SEBI, from time to time has issued various circulars to simplify, harmonize the process of KYC by investors / RI. Constant technology evolution has taken place in the market and innovative platforms are being created to allow investors to complete KYC process online. SEBI held discussions with various market participants and based on their feedback and with a view to allow ease of doing business in the securities market, it has been decided to make use of following technological innovations which can facilitate online KYC:

a. eSign service is an online electronic signature service that can facilitate an Aadhaar holder to forward the document after digitally signing the same provided the eSign signature framework is operated under the provisions of Second schedule of the Information Technology Act and guidelines issued by the controller.
b. In terms of PML Rule 2 (1) (cb) "equivalent e-document" means an electronic equivalent of a document, issued by the issuing authority of such document with its valid digital signature, including documents issued to the Digital Locker account of the investor as per Rule 9 of the Information Technology (Preservation and Retention of Information by Intermediaries Providing Digital Locker Facilities) Rules, 2016.
c. Section 5 of the Information Technology Act, 2000 recognizes electronic signatures (which includes digital signature) and states that where any law provides that information or any other matter shall be authenticated by affixing the signature or any document shall be signed or bear the signature of any person then such requirement shall be deemed to have been satisfied, if such information or matter is authenticated by means of a digital signature affixed in such manner as prescribed by the Central Government. Therefore, the eSign mechanism of Aadhaar shall be accepted in lieu of wet signature on the documents provided by the investor. Even the cropped signature affixed on the online KYC form under eSign shall also be accepted as valid signature.

Legal Entity Identifier (LEI):
Reference to circular from RBI on mandatory requirement of LEI (Legal Entity Identifier) for all payment transactions of value ₹50 crore and above undertaken by entities (non-individuals) through RTGS and NEFT. As per the circular LEI will have to be mandatorily included as part of the RTGS / NEFT instructions for any non-individual transactions beyond 50 crores w.e.f. 1st April'2021. Hence, LEI details are to be updated in the registrars records.

Application Under Power of Attorney:
Application under Power of Attorney/ Body Corporate/ Registered Society/ Partnership/ Sole Proprietorship Account Every investor, depending on the category under which he/she/ it falls, is required to provide the relevant documents along with the application form as may be prescribed by AMC. In case of an application under the Power of Attorney or by a limited company, body corporate, registered society or partnership etc., the relevant Power of Attorney or the relevant resolution or authority to make the application as the case may be, or duly certified copy thereof, along with the memorandum and articles of association/bye-laws must be lodged at the Registrar's Office at the time of submission of application. In case an investor has issued Power of Attorney (POA) for making investments, switches, redemptions etc. under his folio, both the signature of the investor and the POA holder have to be clearly captured in the POA document to be accepted as a valid document. At the time of making redemption / switches the fund would not be in a position to process the transaction unless, POA holder's signature is available in the POA. Original or certified true copies of the following documents should be submitted by Companies/Bodies Corporate/PSUs/Banks and Financial Institutions along-with the application form: · Board resolution authorizing the investment · List of authorized officials to make such investment along with the specimen signature of such authorized officials · Know Your Client (KYC), FATCA, CRS & Ultimate Beneficial Ownership (UBO) Self Certification.

Transactions through Electronic/Digital mode

Investors / unit holders will be allowed to transact in strategies of the Fund through secured internet sites operated by CAMS and or by distributors with whom AMC has entered into specific arrangements.

The uniform cut off time will be applicable for transactions received through electronic platforms and the time of receipt of transaction recorded on the server of CAMS will be reckoned as the time of receipt of transaction for the purpose of determining applicability of NAV, subject to credit of funds to bank account of strategy(s), wherever applicable.

Acceptance of electronic transactions(including internet technology or mobile technology) will be as per processes / methodologies permitted by SEBI or other regulatory authorities from time to time and will be solely at the risk of the investor using the electronic transaction ('Investor') and Titanium SIF shall not be in any way liable or responsible for any loss, damage, caused to the Investor directly or indirectly, for transactions made through electronic platform of CAMS or any other third party. The investor acknowledges that electronic transaction is not a secure means of giving instructions / transaction requests and that the investor is aware of the risk involved including those arising out of such transmission being inaccurate, illegible, having a lack of quality or clarity ,distorted, not timely etc. and that the Investor's request to the SIF to act on electronic transaction is for the investor's convenience and the AMC / Trustee / SIF shall not be obliged or bound to act on the same.

The facility to transact in electronic platforms is available subject to such operating guidelines, terms and conditions like KYC/CKYC / restriction on acceptance of third party payments for subscription of units of strategies as may be prescribed from time to time by CAMS/Tata AMC Ltd./Distributors and applicable laws for the time being in force.

SEBI has issued instructions regarding transactions in unjts of SIF on digital platforms and other issues on July 10,2020, AMC will ensure that digital platforms selling products shall adhere to SEBI Circular.

MF Utility (MFU): MF Utility (MFU) is an innovative "Shared Services" initiative by the Mutual Fund industry under the aegis of Association of Mutual Funds in India (AMFI), which acts as a "Transaction Aggregation Portal" through which a Mutual Fund customer is enabled to transact in multiple Investment strategies across Mutual Funds using a single form/payment.
It provides browser based access to Mutual Fund customers, with connectivity to Registrars and Transfer Agents (RTA), Banks, Asset Management Companies (AMC), Payment Gateways (PG) and KYC Registration Agencies (KRAs) and enables online transaction submission in multiple strategies across Mutual Funds through a single form/payment.

All financial and non-financial transactions pertaining to Investment Strategies of Titanium SIF can be done through MFU either electronically on www.mfuonline.com as and when such a facility is made available by MFUI or physically through the authorized Points of Service ("POS") of MFUI with effect from the respective dates as published on MFUI website against the POS locations. The list of POS of MFUI is published on the website of MFUI at www.mfuindia.com. Applicability of NAV shall be based on time stamping of application and realization of funds in the bank account of Titanium SIF within the applicable cut-off timing. The uniform cut-off time as prescribed by SEBI and as mentioned in the ISID / KIM of respective Investment Strategy shall be applicable for applications received by MFU (physical/online). However, investors should note that transactions on the MFUI portal shall be subject to the eligibility of the investors, any terms & conditions as stipulated by MFUI / Titanium SIF / the AMC from time to time and any law for the time being in force.

MF Utility (MFU) provides a whole lot of features to Investors as given below:

- Common Account Number (CAN) – a single reference for all the SIF investments
- KYC Registration facility for the purpose of CAN creation
- Multiple modes of transaction submission – Online and Offline
- Neutral Points of Service (POS) – irrespective of the RTA servicing the SIF
- Common Transaction Form to transact in multiple strategies at a time, across SIF
- Single payment facility for investments in multiple strategies across SIF, using a single form
- Multiple modes of payments for investments through physical and electronic means
- Consolidated view of investments across the industry using CAN
- Industry level alerts, triggers, reminders etc. for transactions, SIP expiry
- Centralized complaint management and tracking system to login complaints across the industry

MF Utility (MFU) is operated by MF Utilities India Pvt Ltd (MFUI) which is equally owned by the participating AMCs listed under http://www .mfuindia.com /Participating AMCs. Tata AMC is a participating AMC in MF utility initiative.

MF Central: MF Central platform enables a user-friendly digital interface for investors for execution of mutual fund transactions for all Mutual Funds in an integrated manner subject to applicable terms and conditions of the Platform. MFCentral will be operational in phased manner starting with non-financial transactions. MF Central can be accessed using https://mfcentral.com/ and a Mobile App which will be launched in future. Any registered user of MFCentral, requiring submission of physical document as per the requirements of MFCentral, may do so at any of the designated Investor Service centres or collection centres of Kfintech or CAMS. MF Central application will be available as and when the same is launched.

MFCentral has roll out financial transactions live for all users in MF Central portal w.e.f. 24th May 2022. The website https://www.mfcentral.com.

In the initial phase of roll-out, they have enabled the same for existing Individual investor (with any of the Mutual funds in India) with single mode of holding to carry out the following financial transactions:

1. New purchase
2. Additional investments
3. Redemption
4. Switch

5. SIP registrations (with existing mandates at funds level, RTA level or registration of new mandates)

A. Special Products / Facilities offered by the AMC / Strategies

Systematic Investment Plan: - The SIP allows the unitholders to invest a fixed amount of Rupees at regular intervals for purchasing additional units of the fund at NAV based prices. Investment can be done with the minimum / maximum amount and number of cheques specified by AMC from time to time. The cheques will be presented on the dates mentioned on the cheque and subject to realization. Units will be allotted at the applicable NAV along with applicable load (if any). "SIP facility is available subject to terms and conditions. Please refer to the SIP Enrolment form for terms and conditions before enrolment."

SIP with Top-up SIP facility:

SIP with Top-up SIP is a facility whereby an investor has an option to increase the amount of the SIP Installment by a fixed amount at predefined intervals. This will enhance the flexibility of the investor to invest higher amounts during the tenure of the SIP.

Terms and conditions of top-up SIP are as follows:
The Top-up option must be specified by the investors while enrolling for the SIP facility.

The minimum SIP Top-up amount is to be referred in application form of respective strategies.

The Top-up details cannot be modified once enrolled. In order to make any changes, the investor must cancel the existing SIP and enroll for a fresh SIP with Top-up option.

Under monthly SIP investors can opt for top up amount at half-yearly and yearly intervals. If the investor does not specify the frequency, the default interval for Top-up will be considered as Yearly.

In case of Quarterly SIP, investors can opt for only Yearly interval top-up frequency.

For complete details regarding the SIP with top-up facility please refer to SIP Auto Debt Form with Top up facility enrollment form.

Systematic Transfer Plan: - A unitholder may establish a Systematic Transfer Plan (STP) and choose to transfer an amount from one Titanium Strategy (Source Strategy) to another Titanium Strategy (Target Strategy) on a date/ frequency prescribed by the Investment Manager. The amount thus withdrawn by redemption shall be converted into units at the applicable NAV on the scheduled day and such units will be subtracted from the unit balance of that unitholder. The net amount will be considered for allotment in the target investment strategy and units will be allotted as per the applicable NAV of the target investment strategy.

For further details of above special products / facilities and Terms & Conditions, please refer "Other Strategy Specific Disclosures" of this ISID, KIM/Application/enrollment form and SAI.

For detailed terms & conditions, unitholders are requested to contact investor service centre of Titanium SIF.

B. Default scenarios available to the investors under plans/options of the Strategies.

Investors subscribing under Direct Plan of a Strategy will have to indicate "Direct Plan" against the strategy name in the application form e.g. "Titanium Hybrid Long-Short Fund"".

B. Default scenarios available to the investors under Growth/dividend plans of the Investment Strategies.

Default Option: Investor should appropriately tick the 'option' (Growth or IDCW- Payout, IDCW- Reinvestment) in the application form while investing in the Strategy. If no option is mentioned / indicated in the application form by the investor then the units will, by default, be allotted under the Direct Plan-Growth Option. If no sub-option is mentioned / indicated in the application form by the investor then the units will, by default, be allotted under the IDCW-Monthly Reinvestment option.

Default Plan: Investors are requested to note the following scenarios for the applicability of "Direct Plan (application not routed through distributor) or Regular Plan (application routed through distributor)" for valid applications received under the strategy:

Scenario	Broker Code mentioned by the investor	Plan mentioned by the investor	Default Plan to be captured
1	Not mentioned	Not mentioned	Direct Plan
2	Not mentioned	Direct Plan	Direct Plan
3	Not mentioned	Regular Plan	Direct Plan
4	Mentioned	Direct Plan	Direct Plan
5	Direct Plan	Not Mentioned	Direct Plan
6	Direct Plan	Regular Plan	Direct Plan
7	Mentioned	Regular Plan	Regular Plan
8	Mentioned	Not Mentioned	Regular Plan

In cases of wrong/ invalid/ incomplete ARN codes mentioned on the application form, the application shall be processed under Regular Plan. The AMC shall contact 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.

VII. **RIGHTS OF UNITHOLDERS OF THE INVESTMENT STRATEGY**

1. Unit holders have a proportionate right in the beneficial ownership of the assets of the Investment Strategy.
   When the SIF declares an Income Distribution cum Capital Withdrawal (IDCW) under an Investment Strategy, IDCW payments shall be completed to the Unit Holders within 7 working days from the record date of IDCW.

   Consolidated Account Statement ('CAS') at SIF level for each calendar month will be issued on or before 15th day of succeeding month to all unit holders having financial transactions and who have provided valid Permanent Account Number (PAN). For folios not included in the CAS, the AMC shall issue a monthly account statement to the unit holders, pursuant to any financial transaction done in such folios; the monthly statement will be send on or before 15th day of succeeding month. In case of a specific request received from the unit holders, the AMC shall provide the account statement to the unit holder within 5 business days from the receipt of such request. If a Unit holder so desires the SIF shall issue a Unit certificate (non- transferable) within 5 Business Days of the receipt of request for the certificate.

2. The SIF shall dispatch redemption or repurchase proceeds within 3 working days of accepting the valid redemption or repurchase request. Provided that, processing of redemption(s) in the SIF Investment Strategies shall be subject to appropriate notice period(s), if any, as may be implemented by the AMC, based on structure of the Investment Strategy and the liquidity risk associated with it.

3. The Trustee is bound to make such disclosures to the Unit holders as are essential in order to keep the unitholders informed about any information known to the Trustee which may have a material adverse bearing on their investments.

4. The appointment of the AMC for the SIF can be terminated by majority of the Directors of the Trustee Board or by 75% of the Unit holders of the investment strategy.

5. 75% of the Unit holders can pass a resolution to wind- up an Investment strategy.

6. The Trustee shall obtain the consent of the Unit holders:

   – whenever required to do so by SEBI, in the interest of the Unit holders.

   – whenever required to do so if a requisition is made by three- fourths of the Unit holders of the Investment strategy.

   – when the majority of the trustees decide to wind up a investment strategy in terms of Regulation 36(2)(a) of SEBI (Mutual Funds) Regulations, 2026 or prematurely redeem the units of a close ended investment strategy.

   – when the majority of the trustees decide to wind up the Investment Strategy or prematurely redeem the units of an Investment Strategy.

7. The trustees shall ensure that no change in the fundamental attributes of any Investment strategy, the fees and expenses payable or any other change which would modify the Investment strategy and affect the interest of the unit holders is carried out by the asset management company, unless it complies with Regulation 22(9)(c) of SEBI (Mutual Funds) Regulations, 2026.

8. The Trustee shall ensure that no change in the fundamental attributes of any Investment strategy or the trust or fees and expenses payable or any other change which would modify the Investment strategy and affects the interest of Unit holders of the Investment Strategy, shall be carried out by the AMC, unless the AMC ensures compliance with requirements listed hereunder:

   i. written communication (including digital modes such as email/sms etc.) about the proposed change is sent to each unit holder;
   ii. details, as specified by the Board, are appropriately displayed on the website of asset management company; and
   iii. unit holders are given an option to exit at the prevailing Net Asset Value without any exit load.

9. In specific circumstances, where the approval of unitholders is sought on any matter, the same shall be obtained by way of a postal ballot or such other means as may be approved by SEBI.

VIII. INVESTMENT VALUATION NORMS FOR SECURITIES AND OTHER ASSETS

I EQUITY / EQUITY RELATED SECURITIES

A Equity Shares

1. **Traded Securities:** For the purpose of valuation, TAMPL has adopted National Stock Exchange (NSE) as the Primary Stock Exchange and Bombay Stock Exchange (BSE) as the Secondary Stock Exchange,

(a) The securities shall be valued at the closing price on the Primary Stock Exchange.

(b) When on a particular valuation day, a security has not been traded on the Primary Stock Exchange; the value at which it is traded on the Secondary Stock Exchange will be considered.

(c) When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date. If no price is available on any Stock Exchange for more than 30 days, than the security will be treated as a nontraded security and valued accordingly.

(d) The Securities held under the portfolio of Index Scheme(s) and Exchange Traded Fund(s) will be valued using the closing value of underlying index of the Scheme(s)

2. Thinly Traded Equity / Equity Related Securities.

(a) When trading in an equity/equity related security (such as convertible debentures, equity warrants, etc.) in a month is both less than Rs.5 lacs and the total volume is less than 50,000 shares, it shall be considered as a thinly traded security and valued accordingly.

(b) In order to determine whether a security is thinly traded or not, the volumes traded in all recognised stock exchanges in India may be taken into account.

3. (i) Non-Traded Equity securities When a security is not traded on any stock exchange for a period of thirty calendar days prior to the valuation date, the scrip must be treated as a 'non-traded' security.

(ii) Non-traded / thinly traded equity securities:

Non-traded /thinly traded securities shall be valued 'in good faith' by TAMPL on the basis of the valuation principles laid down below:

(a) Based on the latest available Balance Sheet, net worth shall be calculated as follows:

Methodology:

(b) Net Worth per share = [share capital+ free reserves (excluding revaluation reserves) – Misc. expenditure and Debit Balance in P&L A/c, intangible assets and accumulated losses] Divided by No. of Paid up Shares.

(c) Average capitalization rate (P/E ratio) for the industry based upon either NSE or BSE data (which should be followed consistently and changes, if any, to be noted with proper justification thereof) shall be taken and discounted by 75% i.e. only 25% of the Industry Average P/E shall be taken as capitalization rate (P/E ratio). Earnings per share of the latest audited annual accounts will be considered for this purpose.

(d) The value as per the net worth value per share and the capital earning value calculated as above shall be averaged so as to arrive at the fair value per share.

Conditions:

(e) In case the EPS is negative, EPS value for that year shall be taken as zero for arriving at capitalized earning.

(f) In case where the latest balance sheet of the company is not available within nine months from the close of the year, unless the accounting year is changed, the shares of such companies shall be valued at zero.

(g) In case an individual security accounts for more than 5% of the total assets of the scheme, an independent valuer shall be appointed for the valuation of the said security.

"To determine if a security accounts for more than 5% of the total assets of the scheme, it should be valued by the procedure above and the proportion which it bears to the total net assets of the scheme to which it belongs would be compared on the date of valuation".

(h) If the net worth of the company is negative, the share would be marked down to zero.

(i) All calculation as aforesaid shall be based on audited accounts.

(j) In case an individual security accounts for more than 5 percent of the total assets of the scheme, an independent valuer shall be appointed for the valuation of the said security. To determine if a security accounts for more than 5 per cent. of the total assets of the scheme, it shall be valued by the procedure above and the proportion which it bears to the total net assets of the scheme to which it belongs will be compared on the date of valuation.

(k) In case trading in an equity security is suspended up to thirty days, then the last traded price shall be considered for valuation of that security. If an equity security is suspended for more than thirty days, then the AMC(s) or Trustees shall decide the valuation norms to be followed, and such norms shall be documented and recorded.

(iii) Unlisted equity shares:

Unlisted equity shares will be valued as per the following methodology.

a. Based on the latest available audited balance sheet, Net Worth shall be calculated as the lower of item (1) and (2) below:

1. Net Worth per share = [Share Capital + Free Reserves - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] / Number of Paid-up Shares.
2. After taking into account the outstanding warrants and options, Net Worth per share shall again be calculated and shall be = [Share Capital + consideration on exercise of Option and/or Warrants received/receivable by the Company + Free Reserves (excluding Revaluation Reserves) - Miscellaneous expenditure not written off or deferred revenue expenditure, intangible assets and accumulated losses] / Number of Paid up Shares plus Number of Shares that would be obtained on conversion and/or exercise of Outstanding Warrants and Options.
3. The lower of (1) and (2) above shall be used for calculation of Net Worth per share and for further calculation in (c) below.

b. Average capitalisation rate (P/E ratio) for the industry based upon either BSE or NSE data (which shall be followed consistently and changes, if any, noted with proper justification thereof) shall be taken and discounted by 75 per cent. i.e. only 25 per cent of the industry average P/E shall be taken as capitalisation rate (P/E ratio). Earnings per share (EPS) of the latest audited annual accounts will be considered for this purpose.

c. The value as per the Net Worth value per share and the capital earning value calculated as above shall be averaged and further discounted by 15 per cent for illiquidity so as to arrive at the fair value per share.

In the event that an unlisted equity share is given due to merger of companies, the average cost of the existing company should continue in the new unlisted company, and the last market price of the existing company should be considered for valuation of the new unlisted company till such time that the shares are listed.

(iv) Tracking mechanism for 'thinly' / 'non-traded' securities:

Fund has appointed an independent agency for providing the data for thinly traded / non-traded securities.

(v) Initial Public Offer / Anchor investments / Other Public Offers:

Stocks allotted under IPO / Anchor investments / Other Public Offers will be held at cost until listing.

B Compulsory Convertible debentures (CCD)

(a) CCD shall be valued at the closing price available on the Primary Stock Exchange as on the valuation date.

(b) When on a particular valuation day, CCD has not been traded on the Primary Stock Exchange; the value at which it is traded on the Secondary Stock Exchange will be considered.

(c) When a CCD is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date. If no price is available on any Stock Exchange for more than 30 days, than the security will be treated as a non-traded security and valued accordingly.

CCD with implicit characteristics of a debenture will be considered as a NCD and valued accordingly.

C Preference Shares

(i) Preference shares are valued at cost till the time they are listed and traded on a stock exchange.

(ii) The Preference shares when traded shall be valued at the closing price on the Primary Stock Exchange.

(iii) When on a particular valuation day, a Preference share has not been traded on the Primary Stock Exchange; the value at which it is traded on the Secondary Stock Exchange will be used.

(iv) When a Preference share is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date. If no price is available on any Stock Exchange for more than 30 days, the Preference share will be valued at average cost.

D Warrants

(i) Warrants are valued at the value of the shares which would be obtained on exercise of the warrants as reduced by the amount which would be payable on exercise of the warrant.

(ii) The warrants when traded shall be valued at the closing price on the Primary Stock Exchange.

(iii) When on a particular valuation day, a warrant has not been traded on the Primary Stock Exchange; the value at which it is traded on the Secondary Stock Exchange will be considered.

E Rights Entitlement

Right entitlements if traded will be valued at the closing price on the Principal stock exchange (NSE). If the entitlements are not traded on NSE but are traded on any other stock exchange the closing price of the exchange where it is traded will be considered for valuation.

When a traded rights entitlement is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date. If no price is available on any Stock Exchange for more than 30 days, than the security will be treated as a non-traded security and valued accordingly.

Non-traded rights entitlement will be valued as the difference between the ex-rights price of the underlying equity share and the rights offer price. In case the rights offer price is greater than the ex-rights price, the value of the rights share is to be taken as zero.

Value of right entitlement = No. of rights X (ex-rights price of the underlying shares at primary stock exchange – rights offer price)

Where it is decided not to subscribe for the rights but to renounce them and renunciations are being traded, the rights can be valued at the renunciation value.

Partly paid-up equity shares issued as rights will be valued at the value of the underlying fully paid up share less amount payable in future.

F Merger /Demerger

Merger
In case of merger, when company ‘A’ is merged with company ‘B’ and company ‘B’ continues to be listed, the proportionate shares allotted of ‘B’ company against company ‘A’ will be valued at the closing price of company ‘B’ on the stock exchange. The cost of company ‘A’ shares will be added to the cost of company ‘B’ shares.

In case of merger when company ‘A’ and company ‘B’ are merged to form company ‘C’, the value of unlisted company ‘C’ will be the total valuation price of company ‘A’ and company ‘B’ before the ex-date till the new entity company ‘C’ is listed and traded on a stock exchange. The cost of company ‘A’ and company ‘B’ shares will be added to derive the cost of company ‘C’ shares.

Demerger
In case one entity is demerged into two or more entities and one of those entities continues to be listed:
(1) If Special Pre-Opening Session (SPOS) is conducted by the exchange on ex-date:

The unlisted entity shall be valued as the difference between:
- Closing value of the continuing listed security on the previous trading day (pre-demerger) and
- Value discovered in the SPOS on the ex-date (post-demerger)

(2) If Special Pre-Opening Session (SPOS) is not conducted by the exchange on ex-date:

The unlisted entity shall be valued as the difference between:
- Closing value of the continuing listed security on the previous trading day (pre-demerger) and
- Closing value of the continuing listed security on the ex-date (post-demerger)

In either case, if the value computed for the unlisted security is **negative**, the security shall be valued at **Zero**

The benefit of this method of valuation is that it is not a subject matter and is determined based on the market price.
In case of a demerger in which the resultant security is the same as the base security, then the price of the base security will be considered.

On merger / demerger, in case the company specifies any regulations / method for cost bifurcation or valuation the same will be adopted. In case there are no details available by the company, the same will be valued at fair value as determined by the valuation committee.

If the above companies remained unlisted for more than 3 months, illiquidity discount on the derived prices may be applied. Valuation committee will take decision regarding discount to be given on the basis of the market capitalization of the issuer not less than 5%, 10% and 15%, for Large cap, Mid cap, and Small cap respectively. Discount will be re-visited after every three months.

However, if more than 9 months have elapsed from the date of corporate action and the security is still not listed, the same shall be valued at the higher discount as decided by the Valuation Committee on case to case basis.

G **Stock Split/ Face value change**

In case of stock split, the face value of a stock is reduced and proportionately number of shares is increased. The valuation price will be derived on the basis of the closing price before the ex-date and adjusted in proportion of stock split, till the new stock split shares are listed and traded on a stock exchange. The cost of one share will be proportionately adjusted in line with stock split change, to derive the new cost of share.

On stock split/face value change, in case the company specifies any regulations/ method for cost bifurcation or valuation the same will be adopted.

H Derivative Product – Index and Stock Futures

(1) Valuation of Traded Futures

Futures are valued at the settlement price on the valuation day provided by the respective stock exchanges.

(2) Valuation of Non -Traded Futures

When the security is not traded on the respective stock exchange on the date of valuation, then any other derived price provided by the respective stock exchange will be used.

Derivative Product – Index and Stock Options

(1) Valuation of Traded Options

Options are valued at the settlement price on the valuation day provided by the respective stock exchanges.

(2) Valuation of Non -Traded Options

When the security is not traded on the respective stock exchange on the date of valuation, then any other derived price provided by the respective stock exchange will be used.

I Partly / Fully Convertible debentures and bonds.

In respect of convertible debentures, the non-convertible and convertible components shall be valued separately. The non-convertible component should be valued on the same basis as would be applicable to a debt instrument. The convertible component should be valued on the same basis as would be applicable to an equity instrument. If, after conversion the resultant equity instrument would be traded paripassu with an existing instrument which is traded, the value of the latter instrument can be adopted during the period preceding the conversion. While valuing such instruments, the fact whether the conversion is optional should also be factored in.

J. **Partly Paid-up Equity shares.**

1. Listed partly paid-up Equity shares will be valued in the same manner as Equity shares.

2. Exception will be made when the shares are suspended for instalments due and in that case, the last traded price plus the current amount of instalment paid will be considered from the date of payment. Till the payment is made it will be valued at the last traded price.

3. On paying the last instalment the security will be merged with the main security and valued accordingly.

K. **Pre-IPO to be listed Equity Shares :**

Where investment is made in equity shares as part of pre-IPO transaction and the IPO for such shares is proposed to be launched within 30 days, the Pre-IPO placement shares so bought will be valued at the price at which they are purchased till the date of listing. In case the proposed IPO launch date

of Pre-IPO placement shares falls beyond 30 days from the date of Pre-IPO allotment, the valuation Committee shall apply a suitable illiquidity discount to the purchase price till the date of listing.

II Debt Securities and Money Market instruments including Interest Rate Swaps, Bills Rediscounting and Sovereign Securities

A. Debt Securities and Money Market instrument including Interest Rate Swaps, Bills Rediscounting and Sovereign Securities

Debt Securities and Money Market instrument including Interest Rate Swaps, Bills Rediscounting and Sovereign Securities will be valued based on the Average of security level prices obtained from valuation agencies. If no price is provided by valuation agencies on the first day of purchase of an instrument, the same will be valued at purchase price plus amortisation, till such time the scrip level price is provided by the rating agencies.

B Valuation of Tri-Party Repo (TREPS)

a) Valuation of TREPS, except overnight TREPS, will be valued at average of security level prices obtained from valuation agencies appointed by AMFI. In case security level prices given by valuation agencies are not available for a new TREPS (which is currently not held by any Mutual Fund), then such TREPS may be valued at purchase price plus amortisation, till such time the scrip level price is provided by the rating agencies.

b) Overnight TREPS will be valued on cost plus accrual basis.

Note: Overnight TREPS refers to TREPS maturing on immediately following working day from the date of lending by Tata Mutual Fund

C. Valuation of Reverse Repo (including Corporate Reverse Repo)

a) Valuation of Reverse Repo transactions, except overnight Reverse Repo, will be valued at average of security level prices obtained from valuation agencies appointed by AMFI. In case security level prices given by valuation agencies are not available for a new Reverse Repo (which is currently not held by any Mutual Fund), then such Reverse Repo may be valued at purchase price plus amortisation, till such time the scrip level price is provided by the rating agencies.

b) Overnight Reverse Repos will be valued on cost plus accrual basis.

Note: Overnight Repo refers to Repo maturing on immediately following working day from the date of lending by Tata Mutual Fund

Waterfall mechanism for valuation of money market and debt securities to the used by the valuation agencies
The waterfall mechanism for valuation of money market and debt securities to be used by valuation agencies as per SEBI circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated 24 September 2019 and AMFI circular no. 135/ BP/ 83/ 2019-20 dated 18 November 2019 is given in the enclosed Annexure.

Polling process by valuation agencies
The polling process by valuation agencies as per SEBI circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated 24 September 2019 and AMFI circular no. 135/ BP/ 83/ 2019-20 dated 18 November 2019 is given in the enclosed Annexure.

Other Instruments:

Investments in short-term deposits with banks (pending deployment) with tenure of upto 30 days, shall be valued on cost plus accrual basis.
The interest accruals / amortisation on the above instruments will be booked separately as income.

D. Guidelines for inter-scheme transfer of debt and money market instruments:

Inter Scheme Transfer
Inter scheme transfers will now be carried out as per the guidelines prescribed by SEBI as follows:

1. AMCs shall seek prices for IST of any money market or debt security (irrespective of maturity), from the valuation agencies.
2. The valuation agencies shall provide these prices to all AMC's irrespective whether they have asked for it or not twice a day at pre-agreed time.
3. If prices from both the valuation agencies are received, an average of the prices so received shall be used for IST pricing.
4. If price from only one valuation agency is received, that price may be used for IST pricing.
5. If prices are not received from any of the valuation agencies, AMCs may determine the price for the IST, in accordance with the Seventh Schedule of SEBI (Mutual Funds) Regulations, 2026,

If prices are not received from any agency, the below methodology will be used to carry out inter scheme transfers:
The traded price of the same or similar securities available on public platform before concluding inter scheme transfers should be verified. All inter-scheme transfer shall be done at weighted average YTM. Trades shall be spooled only after 12.00 p.m. reported on the public platform to be considered for inter scheme of any debt and money market instrument, after excluding any abnormal trades reported. Own trades price will not be used for valuation of inter-scheme transfers.

The weighted average YTM will be used only if the following criteria's are met:

For securities having maturity upto 1 year:
All trades with minimum traded lot of INR 25 crores of face value or more will be aggregated for same or similar security on a public platform

For securities having maturity of more than 1 year:
All trades with minimum traded lot of INR 5 crores of face value or more will be aggregated for same or similar security on a public platform.

In case a closed ended scheme is in need of liquidity for making payment of expenses only, where value of inter-scheme transfer will be upto 2 crores, above volume condition will not be applicable and price of a single trade in same or similar security irrespective of the volume will be considered for inter-scheme.
If same or similar security on a public platform is not available at the time of inter-scheme, previous day closing price would be used for valuation or any other method as may be approved by the valuation committee.

Criteria for identifying the similar securities:

For the purpose of valuation, similar security shall be identified by the following means:

[i] Securities having maturity upto 30 days:

1. Same issuer having maturity within +/- 15 days
2. In case of Private Bank CDs and CPs and NCDs issued by NBFC, manufacturing companies and PSUs:

- Having long term rating of AAA and AA+ and short-term rating of A1+ will be considered as comparable.
- Having long term rating of AA and AA- and short-term rating of A1+ will be considered as comparable.

Securities having maturity within a period of +/- 15 days same calendar quarter* fulfilling the above criteria would be considered.

[ii] Securities having maturity of more than 30 days:

1. Same issuer
2. Similar short term and long-term rating
3. Similar industry

We will classify the same into three sectors Banking, Manufacturing and Non-Banking Finance Companies (NBFC). Bank CDs will be inter-schemed against bank CDs (within bank CDs PSU CDs will be compared to PSU CDs and Private / Foreign bank CDs will be compared to Private / Foreign bank CDs, Manufacturing papers will be inter schemed against manufacturing papers and NBFC will be inter schemed against NBFC.

4. Similar characteristics e.g. Floating rate paper will be compared with another floating rate paper only

5. Maturity near to the maturity of the security being transferred as mentioned in the table below:

Sr. No.	Maturity of Security being transferred	Maturity of the benchmark security
1	Between 31 days to 91 days maturity	+/- 15 days from the maturity of security transferred provided the benchmark security is maturing in the same calendar quarter*
2	between 92 days to 365 days	+/-45 days from the maturity of security transferred
3	above 365 days - 1 – 3 Years - 3 years and above	 +/- 06 months from the maturity of security transferred +/- 12 months from the maturity of security transferred

*For example, if a security maturing on 28th June has to be transferred on 20th of June and traded price of 3rd July is available, It can never be fairly priced for inter-scheme because the yields of 28th June paper and 3rd July paper will be different. Today the yield of 28th June paper in market is 8.50% and that of 3rd July paper is 9.30%. Thus, in case the above safeguard is not incorporated the inter-scheme can happen at wrong prices. This happens at every quarter end. Notes:

a. Public Platform refers to FTRAC / FIMMDA for commercial papers or certificate of deposits and NSE / BSE for corporate bonds / debentures (including securitized assets) and any other platform as available from time to time as may be notified. For Treasury bills and Government securities, it refers to NDS OM.
b. Units / shares of mutual funds will be valued at the last published NAV.
c. Weighted average YTM shall be rounded up to two digits after decimal point.
d. Outlier trades, if any, shall be ignored after suitable justification by Fund Managers is provided.

C. **Valuation of money market and debt securities which are rated below investment grade:** All money market and Debt Securities below investment grade (i.e. if the long term rating of the security issued by a SEBI registered Credit Rating agency (CRA) is below BBB- or if the short term rating of the security is below A3) and "Default" security shall be valued at a aggregated price provided by the Valuation Agencies.

Till such time the valuation agencies compute the valuation of money market and debt securities classified as below investment grade, such securities shall be valued on the basis of indicative haircuts provided by these agencies. These indicative haircuts shall be applied on the date of credit event i.e. migration of the security to sub investment grade and shall continue till the valuation agencies compute the valuation price of such securities. Further, these haircuts shall be updated and refined, as and when there is availability of material information which impacts the haircuts.
AMCs may deviate from the indicative haircuts and/or the valuation price for money market and debt securities rated below investment grade provided

by the valuation agencies subject to the following:

- The detailed rationale for deviation from the price post haircuts or the price provided by the valuation agencies shall be recorded by the AMC.
- The rationale for deviation along-with details such as information about the security (ISIN, issuer name, rating etc.), price at which the security was valued visa-vis the price post haircuts or the average of the price provided by the valuation agencies (as applicable) and the impact of such deviation on scheme NAV (in amount and percentage terms) shall be reported to the Board of AMC and Trustees.
- The rationale for deviation along-with details as mentioned above shall also be disclosed to investors. In this regard, all AMCs shall immediately disclose instances of deviations under a separate head on their website. Further, the total number of such instances shall also be disclosed in the monthly portfolio statements for the relevant period along-with an exact link to the website wherein the details of all such instances of deviation are available.

D. Inflation Index Bonds:

Inflation Index Bonds will be valued based on the aggregated prices provided by valuation agencies.

E. Interest Rate Futures:

The exchange traded Interest Rate Futures would be valued based on the Daily settlement price or any other derived price provided by the exchange.

F. Interest Rate Swaps:

Interest Rate Swaps would be valued as per the aggregated valuation provided by the valuation agencies, in line with the valuation policy for NCD's

G. Commodities:

Exchange Traded Commodities – Futures and Options:

- For the purpose of valuation, Exchange Traded Commodities – Futures and Options will be valued at the price as provided by the exchange from where the same was purchased.
- When a security is not traded on the stock exchange from where the commodity was purchased on a particular valuation day, the value at which it was traded on the on the earliest previous day may be used provided such date is not more than 30 days prior to valuation date. If no price is available for more than 30 days, then the security will be treated as a non-traded security and valued accordingly.

Valuation of physical commodities (including Gold and Silver)

ETF Schemes

Physical commodities will be valued by using the polled spot prices published by the recognized stock exchanges which are used for settlement of physically delivered gold /silver/Other commodity derivates contracts. The Multi Commodity Exchange of India Limited (MCX) would be considered as principal stock exchange. If on any day such polled spot prices are not available, then the earliest previous day polled spot prices shall be considered. If the prices as per above do not represent fair value, the Valuation Committee will determine the price based on the available information, in order to ensure fair valuation.

Other than ETF schemes

For non-ETF schemes, in order to ensure that the valuation remains reflective of realisable value, the physical commodity shall be valued by adjusting the ETCD (MCX) closing futures prices with the observed spread between MCX spot (session 2) and MCX futures prices at the defined valuation cut-off time

If on any day the market prices of the ETCD as above are not available due to holiday, then the prices of immediately preceding day will be considered for the purpose of valuation of such commodity.

III Foreign Securities

1 Foreign Securities includes:

(a) ADRs/ GDRs issued by Indian or foreign companies

(b) Equity of overseas companies listed on recognized stock exchanges overseas

(c) Initial and follow-on public offerings for listing at recognized Stock Exchanges Overseas

(d) Foreign debt securities in the countries with fully convertible currencies, short term as well as long term debt instruments with rating not below investment grade by accredited/registered credit rating agencies.

(e) Money market instruments rated not below investment grade.

(f) Repos in the form of investment, where the counterparty is rated not below investment grade; repos should not however, involve any borrowing of funds by mutual funds.

(g) Government securities where the countries are rated not below investment grade.

(h) Derivatives traded on recognized stock exchanges overseas only for hedging and portfolio balancing with underlying as securities

(i) Short term deposits with banks overseas where the issuer is rated not below investment grade

(j) Units/securities issued by overseas mutual funds or unit trusts registered with overseas regulators and investing in (a) aforesaid securities, (b) Real Estate Investment Trusts (REITs) listed in recognized stock exchanges overseas or (c) unlisted overseas securities (not exceeding 10% of their net assets).

(k) Overseas Exchange Traded Funds (ETFs).

2. Valuation of Foreign Securities

Valuation of traded securities:
On the valuation day, the securities issued outside India and listed on the stock Exchanges outside India shall be valued at the closing price on the stock exchange at which it is listed or at the last traded price reported on the exchange platform/ Bloomberg price. In case a security is listed on more than one stock exchange,
TAMPL reserves the right to determine the stock exchange, the price of which would be used for the purpose of valuation of that security.

Valuation of non-traded securities:
In case any particular security is not traded on the Valuation Day, the same shall be valued the previous days price will be used for a period not more than 30 days 'in good faith' by TAMPL on the basis of the valuation principles laid down by SEBI.

Investments in Units of overseas mutual fund scheme (Offshore Units). Such offshore units shall be valued at last available Net Asset Value (less exit charge if applicable).

On the valuation day, prices in foreign currency will be valued in Indian Rupees at the FBIL reference rate as at the close of banking hours on that day in India.

IV Investment in Mutual Fund Units
Mutual Fund Units including Fund of Funds investing in Exchange Traded Funds which are listed and traded on exchanges would be valued at the closing traded price on the valuation date.

Unlisted Mutual Fund Units and listed but not traded Mutual Fund Units will be valued at the NAV as on the valuation day.

Overseas Mutual Fund units would be valued at the NAV as on the valuation day.

V Investment in Corporate Debt Market Development Fund
Units of Corporate Debt Market Development Fund will be valued at the NAV per unit released on each of the valuation day by the asset manager appointed by SEBI.

VI Investment in ReITs, InvITs

The units of InvIT and REIT will be valued at the closing market price at the principal stock exchange.

If units are not traded on principal stock exchange on a particular valuation day, the closing market price on any other stock exchange where units are traded will be used.

If units are not traded on any stock exchange on a particular valuation day, then closing market price at which it traded on the principal stock exchange or any other stock exchange, as the case may be, on the earliest previous day will be used provided such date is not more than 30 days prior to valuation date.

Deviations:

The investments of TMF schemes shall be valued as per the methodologies mentioned in this Valuation Policy, which shall endeavor true and fairness in valuing them. However, if the valuation of any particular security does not result in a fair valuation, the Valuation Committee would have the right to deviate from the established policies in order to value the security at fair value.

Deviations from the valuation policy and principles, if any, will be informed to the AMC and Trustee Boards alongwith detailed rationale. This information will also be displayed on our website and will be disclosed in the monthly portfolio statements.

Conflict of interest:

In case if any situation arises that leads to conflict of interest, the same shall be raised to the Valuation Committee and the Committee shall endeavor to resolve the same such that the valuation provides for fair treatment to all investors including existing and prospective investors.

Audit review:

The valuation policies and procedures shall be reviewed yearly by the internal auditors to ensure their continued appropriateness.

Annexure to the Valuation Policy

Part A: Valuation of Money Market and Debt Securities other than G-Secs

1. Waterfall Mechanism for valuation of market and debt securities:

The following shall be the broad sequence of the waterfall for valuation of money market and debt securities:

i. Volume Weighted Average Yield (VWAY) of primary reissuances of the same ISIN (whether through book building or fixed price) and secondary trades in the same ISIN
ii. VWAY of primary issuances through book building of same issuer, similar maturity (Refer Note 1 below)
iii. VWAY of secondary trades of same issuer, similar maturity
iv. VWAY of primary issuances through fixed price auction of same issuer, similar maturity

v. VWAY of primary issuances through book building of similar issuer, similar maturity (Refer Note 1 below) vi. VWAY of secondary trades of similar issuer, similar maturity. vii. VWAY of primary issuance through fixed price auction of similar issuer, similar maturity viii. Construction of matrix (polling may also be used for matrix construction) ix. In case of exceptional circumstances, polling for security level valuation (Refer Note 2 below)

Note 1

Except for primary issuance through book building, polling shall be conducted to identify outlier trades. However, in case of any issuance through book building which is less than INR 100 Cr, polling shall be conducted to identify outlier trades.

Note 2

Some examples of exceptional circumstance would be stale spreads, any event/news in particular sector/issuer, rating changes, high volatility, corporate action or such other event as may be considered by valuation agencies. Here stale spreads are defined as spreads of issuer which were not reviewed/updated through trades/primary/polls in same or similar security/issuers of same/similar maturities in waterfall approach in last 6 months.

Further, the exact details and reasons for the exceptional circumstances which led to polling shall be documented and reported to AMCs. Further, a record of all such instances shall be maintained by AMCs and shall be subject to verification during SEBI inspections.

Note 3

All trades on stock exchanges and trades reported on trade reporting platforms till end of trade reporting time (excluding Inter-investment strategy transfers) should be considered for valuation on that day.

Note 4

It is understood that there are certain exceptional events, occurrence of which during market hours may lead to significant change in the yield of the debt securities. Hence, such exceptional events need to be factored in while calculating the price of the securities. Thus, for the purpose of calculation of VWAY of trades and identification of outliers, on the day of such exceptional events, rather than considering whole day trades, only those trades shall be considered which have occurred post the event (on the same day).

In addition to the above, valuation agencies may determine any other event as an exceptional event. All exceptional events along-with valuation carried out on such dates shall be documented with adequate justification.

The following events would be considered exceptional events:

i. Monetary/Credit Policy

ii. Union Budget

iii. Government Borrowing/ Auction Days

iv. Material Statements on Sovereign Rating

v. Issuer or Sector Specific events which have a material impact on yields

vi. Central Government Election Days

vii. Quarter end days

2. Definition of tenure buckets for Similar Maturity

When a trade in the same ISIN has not taken place, reference should be taken to trades of either the same issuer or a similar issuer, where the residual tenure matches the tenure of the bond to be priced. However, as it may not be possible to match the exact tenure, it is proposed that tenure buckets are created and trades falling within such similar maturity be used as per table below.

[1] **Residual Tenure of Bond to be priced**	**Criteria for similar maturity**
Upto 1 month	Calendar Weekly Bucket
Greater than 1 month to 3 months	Calendar Fortnightly Bucket
Greater than 3 months to 1 year	Calendar Monthly Bucket
Greater than 1 year to 3 years	Calendar Quarterly Bucket
Greater than 3 years	Calendar Half Yearly or Greater Bucket

In addition to the above:

a. In case of market events, or to account for specific market nuances, valuation agencies may be permitted to vary the bucket in which the trade is matched or to split buckets to finer time periods as necessary. Such changes shall be auditable. Some examples of market events / nuances include cases where traded yields for securities with residual tenure of less than 90 days and more than 90 days are markedly different even though both may fall within the same maturity bucket, similarly for less than 30 days and more than 30 days or cases where yields for the last week v/s second last week of certain months such as calendar quarter ends can differ.

b. In the case of illiquid/ semi liquid bonds, it is proposed that traded spreads be permitted to be used for longer maturity buckets (1 year and above). However, the yield should be adjusted to account for steepness of the yield curve across maturities.

c. The changes / deviations mentioned in clauses a and b, above, should be documented, along with the detailed rationale for the same. Process for making any such deviations shall also be recorded. Such records shall be preserved for verification.

3. Process for determination of similar issuer

Valuation agencies shall determine similar issuers using one or a combination of the following criteria. Similar issuer do not always refer to issuers which trade at same yields, but may carry spreads amongst themselves & move in tandem or they are sensitive to specific market factor/s hence warrant review of spreads when such factors are triggered.

i. Issuers within same sector/industry and/or
ii. Issuers within same rating band and/or
iii. Issuers with same parent/ within same group and/or
iv. Issuers with debt securities having same guarantors and/or
v. Issuers with securities having similar terms like Loan Against Shares (LAS)/ Loan Against Property (LAP)

The above criteria are stated as principles and the final determination on criteria, and whether in combination or isolation shall be determined by the valuation agencies. The criteria used for such determination should be documented along with the detailed rationale for the same in each instance. Such records shall be preserved for verification. Similar issuers which trade at same level or replicate each other's movements are used in waterfall approach for valuations. However, similar issuer may also be used just to trigger the review of spreads for other securities in the similar issuer category basis the trade/news/action in any security/ies within the similar issuer group.

4. Recognition of trades and outlier criteria i. Volume criteria for recognition of trades (marketable lot)

Paragraph 1.1.1.1(a) of SEBI vide circular no. SEBI/HO/IMD/DF4/CIR/P/2019/102 dated September 24, 2019 on Valuation of money market and debt securities, prescribes that the marketable lots shall be defined by AMFI, in consultation with SEBI. In this regard, marketable lot is defined as under. The following volume criteria shall be used for

Parameter	Minimum Volume Criteria for marketable lot
Primary	INR 25 cr for both Bonds/NCD/CP/ CD and other money market instruments
Secondary	INR 25 cr for CP/ CD, T-Bills and other money market instruments
Secondary	INR 5 Cr for Bonds/NCD/ G-secs

Trades not meeting the minimum volume criteria i.e. the marketable lot criteria as stated above shall be ignored.

ii. Outlier criteria

It is critical to identify and disregard trades which are aberrations, do not reflect market levels and may potentially lead to mispricing of a security or group of securities. Hence, the following broad principles would be followed by valuation agencies for determining outlier criteria.

a. Outlier trades shall be classified on the basis of liquidity buckets (Liquid, Semi-liquid, Illiquid). Price discovery for liquid issuers is generally easier than that of illiquid issuers and hence a tighter pricing band as compared to illiquid issuers would be appropriate.

b. The outlier trades shall be determined basis the yield movement of the trade, over and above the yield movement of the matrix. Relative movement ensures that general market movements are accounted for in determining trades that are outliers. Hence, relative movement over and above benchmark movement shall be used to identify outlier trades.

c. Potential outlier trades which are identified through objective criteria defined above will be validated through polling from market participants. Potential outlier trades that are not validated through polling shall be ignored for the purpose of valuation.

d. The following criteria shall be used by valuation agencies in determining Outlier Trades

Liquidity Classification	Bps Criteria (Yield movement over Previous Day yield after accounting for yield movement of matrix)		
	Upto 15 days	15-30 days	Greater than 30 days
Liquid	30 bps	20 bps	10 bps
Semi-liquid	45 bps	35 bps	20 bps
Illiquid	70 bps	50 bps	35 bps

The above criteria shall be followed consistently and would be subject to review on a periodic basis by valuation agencies and any change would be carried in consultation with AMFI.

e. In order to ensure uniform process in determination of outlier trades the criteria for liquidity classification shall be as detailed below.

Liquidity classification criteria — Liquid, semi-liquid and Illiquid definition

Valuation agencies shall use standard criteria for classifying trades as Liquid, Semi-Liquid and illiquid basis the following two criteria

a. Trading Volume

b. Spread over reference yield

Such criteria shall be reviewed on periodic basis in consultation with

AMFI. **Trading Volume (Traded daysl based** criteria:

Number of unique days an issuer trades in the secondary market or issues a new security in the primary market in a calendar quarter

- Liquid -> >=50% of trade days
- Semi liquid-* >=10% to 50% trade days
- Illiquid-> <10 % of trade days

Spread based criteria:

Spread over the matrix shall be computed and based on thresholds defined, issuers shall be classified as liquid, semi liquid and illiquid. For bonds thresholds are defined as upto 15 bps for liquid; >15-75 bps for semi-liquid; > 75 bps for illiquid. (Here, spread is computed as average spread of issuer over AAA Public Sector Undertakings/Financial Institutions/Banks matrix), For CP/ CD- upto 25 bps for liquid; >25-50 bps for semiliquid; > 50 bps for illiquid. (Here, spread is computed as average spread of issuer over A1+/AAA CD Bank matrix).

The thresholds shall be periodically reviewed and updated having regard to the market. The best classification (liquid being the best) from the above two criteria (trading volume and spread based) shall be considered as the final liquidity classification of the issuer. The above classification shall be carried out separately for money market instruments (CP/ CDs) and bonds.

5. Process for construction of spread mix

Valuation agencies shall follow the below process in terms of calculating spreads and constructing the matrix:

Steps	Detailed Process
Step 1 Step 1	**Segmentation of corporates –** The entire corporate sector is first categorised across following four sectors i.e. all the corporates will be catalogued under one of the below mentioned bucket: 1. Public Sector Undertakings/Financial Institutions/Banks; 2. Non-Banking Finance Companies -except Housing Finance Companies; 3. Housing Finance Companies; 4. Other corporate
Step 2	Representative issuers – For the aforesaid four sectors, representative issuers (Benchmark Issuers) shall be chosen by the valuation agencies for only higher rating {I.e. "AAA" or AA+). Benchmark/Representative Issuers will be identified basis high liquidity, availability across tenure in AAA/AA+ category and having lower credit/liquidity premium. Benchmark Issuers can be single or multiple for each sector.
Step 3	**Calculation of benchmark curve and calculation of spread —** 1. Yield curve to be calculated for representative issuers for each sector for maturities ranging from 1 month till 20 years and above. 2. Waterfall approach as defined in Part A (1) above will be used for construction of yield curve of each sector. 3. In the event of no data related to trades/primary issuances in the securities of the representative issuer is available, polling shall be conducted from market participants 4. Yield curve for Representative Issuers will be created on daily basis for all 4 sectors. All other issuers will be pegged to the respective benchmark issuers depending on the sector, parentage and characteristics. Spread over the benchmark curve for each security is computed using latest available trades/primaries/polls for respective maturity bucket over the Benchmark Issuer. 5. Spreads will be carried forward in case no data points in terms of trades/primaries/polls are available for any issuer and respective benchmark movement will be given
Step 4	1. The principles of VWAY, outlier trades and exceptional events shall be applicable while constructing the benchmark curve on the basis of trades/primary issuances. 2. In case of rating downgrade/credit event/change in liquidity or any other material event in Representative Issuers, new Representative Issuers will be identified. Also, in case there are two credit ratings, the lower rating to be considered. 3. Residual tenure of the securities of representative issuers shall be used for construction of yield curve.

Part B : Valuation of G-Secs (T-Bill, Cash management bills, G-Sec and SDL)

The following is the waterfall mechanism for valuation of Government securities:

- VWAY of last one hour, subject to outlier validation
- VWAY for the day (including a two quote, not wider than 5 bps on NDSOM), subject to outlier validation
- Two quote, not wider than 5 bps on NDSOM, subject to outlier validation • Carry forward of spreads over the benchmark

- Polling etc.

Note:

1. VWAY shall be computed from trades which meet the marketable lot criteria stated in Part A of these Guidelines.
2. Outlier criteria: Any trade deviating by more than +/- 5 bps post factoring the movement of benchmark security shall be identified as outlier. Such outlier shall be validated through polling for inclusion in valuations. If the trades are not validated, such trades shall be ignored.

II. AMFI GUIDELINES ON POLLING PROCESS FOR MONEY MARKET AND DEBT SECURITIES

As per clause 10.2.3 (b) (ii) (V) SEBI Master Circular on Mutual funds dated March 20,2026 on Valuation of money market and debt securities, which prescribes that considering the importance of polling in the valuation process, guidelines shall be issued by AMFI on polling by valuation agencies and on the responsibilities of Mutual Funds in the polling process, as part of the waterfall approach for valuation of money market and debt securities. In this regard, the following Guidelines were approved by the Board of AMFI, in consultation with SEBI.

Polling Guidelines:

1 Valuation agencies shall identify the Mutual Funds who shall participate in the polling process on a particular day, taking into account factors such as diversification of poll submitters and portfolio holding of the Mutual Funds. Mutual Funds who are identified by the valuation agencies shall necessarily participate in the polling process. However, in case any Mutual Fund does not participate in the polling process, detailed reason for the same shall be recorded at the time and subsequently made available during SEBI inspections. In this respect, since a Mutual Fund may have investments in similar securities, a security not forming part of investment universe may not be considered as an adequate reason for not participating in the polling process.

2. Polling will be carried out on a daily basis by the valuation agencies, in terms of points below.

3. Each valuation agency needs to take polls from at least 5 unique Mutual Funds on a daily basis. Hence, between the two valuation agencies 10 unique Mutual Funds to be polled. They may cover more Mutual Funds, over and above this. For benchmark securities a poll constituting at least 5 responses will be considered as valid. In case of non-benchmark securities a poll constituting at least 3 responses will be considered as valid. The responses received by each valuation agency will be shared with the other agency also.

4. Median of polls shall be taken for usage in valuation process.

5. The valuation agencies will also need to cover as many non- Mutual Fund participants as possible, over and above the Mutual Funds, to improve on the polling output quality.

6. Endeavour would be made to have adequate representation of both holders and nonholders of the same bond/same issuer for non-benchmark securities in the poll process. Where this is not possible, valuation agencies may seek polls from holders of bonds with a similar structure.

7. In the case of issuers with multiple notch rating upgrades / downgrades over short periods of time, valuation agencies shall:

a. Conduct polls with a larger universe of pollers.

b. Increase the frequency of polling

8. Suo moto feedback on valuations should be entertained only through formal mails from persons designated by AMC for said purpose, and the same shall be validated through repolling. Any such feedback shall be duly recorded by the valuation agencies, including the reason for the challenge, results of repolling and subsequent changes in valuation on repolling, if any. Such records shall be preserved by the valuation agencies, for verification.

9. Polling will be done for two sets of securities, Benchmark & Others.

10. Benchmark will be defined for the following categories across tenors.
    a. Treasury Bills
    b. Central Government Securities
    c. State Government Securities
    d. AAA PSU / PFI / PSU Banks
    e. AAA Private
    f. NBFC
    g. HFC
    h. Any other as required for improving fair valuations*
11. Polling shall be conducted in the following two scenarios:
    a. Validation of traded levels if they are outlier trades.

    b. Non traded Securities (in exceptional circumstances as defined in the waterfall mechanism for valuation of money market and debt securities).

12. Best efforts should be made by poll submitters to provide fair valuation of a security.

13. The polling process will be revalidated by external audit of the valuation agencies with at least an annual frequency

14. AMCs shall have a written policy, approved by the Board of AMC and Trustees, on governance of the polling process. The aforesaid policy shall include measures for mitigation of potential conflicts of interest in the polling process and shall identify senior officials, with requisite knowledge and expertise, who shall be responsible for polling. Further, the policy should outline the following aspects.
    a. the process of participating in a polling exercise.

    b. identify the roles and responsibilities of persons participating in the polling.

c. include policies and procedures for arriving at the poll submission.

d. cover the role of the Board of AMC and Trustees, and the periodic reporting that needs to be submitted to them.

e. All polling should be preferably over email. In case for any reason, the polling is done by way of a telephonic call then such a call should be over recorded lines, followed subsequently by an email.

f. AMCs should have adequate business continuity arrangements for polling, with the necessary infrastructure / skill to ensure that consistent delivery of poll submissions is made without material interruption due to any failure, human or technical.

15. All polling done will have to be documented and preserved in format approved by the Board of AMC, for a period of eight years, along-with details of the basis of polling (such as market transactions, market quotes, expert judgement etc.).

16. AMCs shall ensure that participation in the polling process is not mis-used to inappropriately influence the valuation of securities. The officials of the AMC who are responsible for polling in terms of point no. 14 above, shall also be personally liable for any misuse of the polling process.

17. AMCs shall maintain an audit trail for all polls submitted to valuation agencies.

IX. **COMPUTATION OF NAV**

A. Policy of computation of NAV

1) For Ongoing Sale/Redemption/ Switch in the fund

Net Asset Value ("NAV") of the Units shall be determined as of the close of each Business Day. NAV shall be calculated in accordance with the following formula:

$$NAV = \frac{\text{Market Value of Strategy's Investments + Accrued Income + Receivables + Other Assets - Accrued Expenses - Payables - Other Liabilities}}{\text{Number of Units Outstanding}}$$

The computation of Net Asset Value, valuation of Assets, computation of applicable Net Asset Value (related price) for ongoing Sale, Redemption, Switch and their frequency of disclosure shall be based upon a formula in accordance with the Regulations and as amended from time to time including by way of Circulars, Press Releases, or Notifications issued by SEBI or the Government of India to regulate the activities and growth of Mutual Funds. The NAVs per unit of the fund shall be rounded off upto four decimals.

The valuation of investments shall be based on the principles of fair valuation specified in Seventh Schedule of the SEBI (Mutual Funds) Regulations, 2026 and guidelines issued by SEBI /AMFI from time to time. * Please refer Para VIII. of SAI on 'Investment valuation norms for securities & other assets' for details.
Each option of the Regular Plan & Direct Plan will have a separate NAV.

In the event NAV cannot be calculated and / or published, such as because of the suspension of RBI Clearing, Bank strikes, during the existence of a state of emergency and / or a breakdown in communications, the Board of Trustees may temporarily suspend determination and / or publication of the NAV of the Units.

While determining the price of the units, the fund will ensure that the repurchase price is not lower than 97 per cent of the Net Asset Value.

2) In case of winding up of the Fund

In respect of a Unit, the amount that would be payable to the holder of that Unit on any date if the fund were to be wound up and its assets distributed on that date (valuing assets and liabilities in accordance with the normal accounting policies of the Fund, but ignoring net distributable income of the current financial year and winding up expenses)

B. Policy for computation of NAV in foreign securities

Net Asset Value ("NAV") of the Units shall be determined as of the close of each Business Day.

NAV shall be calculated in accordance with the following formula:

$$NAV = \frac{\text{Market Value of Strategy's Investments + Accrued Income + Receivables + Other Assets – Accrued Expenses - Payables - Other Liabilities}}{\text{Number of Units Outstanding}}$$

The computation of Net Asset Value, valuation of Assets, computation of applicable Net Asset Value (related price) for ongoing Sale, Redemption, Switch and their frequency of disclosure shall be based upon a formula in accordance with the Regulations and as amended from time to time including by way of Circulars, Press Releases, or Notifications issued by SEBI or the Government of India to regulate the activities and growth of Mutual Funds. The NAVs of the fund shall be rounded off upto four decimals.

Valuation Of Overseas Investments: On the valuation day, securities issued outside India and listed on the stock exchanges outside India shall be valued at the closing price on the stock exchange at which it is listed or at the last available price from Bloomberg services. If a security is listed on more than one stock exchange, the AMC reserves the right to determine the stock exchange for price purposes. In exceptional circumstances international markets, if prices are not available, the securities listed in overseas markets may be valued on fair value basis.

Foreign Exchange Conversion: On the valuation day, all assets and liabilities in foreign currency will be valued in Indian Rupees at the FBIL reference rate as at the close of banking hours on that day in India. In case the FBIL reference rate is not available for a particular currency the cross currency rate available

on the date shall be the reference rate. The Trustees reserve the right to change the source for determining the exchange rate at a future date after recording the reason for such change.

The valuation of investments shall be based on the principles of fair valuation specified in the Seventh Schedule of the SEBI (Mutual Funds) Regulations, 2026 and guidelines issued by SEBI /AMFI from time to time.* Please refer Para VIII. of SAI on 'Investment valuation norms for securities & other assets' for details.

Each option of the Regular Plan & Direct Plan will have a separate NAV.

Repurchase/ Resale is at Net Asset Value (NAV) related prices with repurchase/ resale loads as applicable (within limits) as specified under SEBI Regulations 2026, While determining the price of the units, the fund will ensure that the repurchase price is not lower than 97 per cent of the Net Asset Value.

C. **Disclosure of NAV**

NAVs for all the funds shall be calculated and disclosed on every business day. The following disclosure timelines shall apply for each funds. These timelines have been determined in accordance with the Regulations and as amended from time to time including by way of Circulars,
Press Releases, or Notifications issued by SEBI

Strategy Type	Disclosure timelines
Strategies having ETCD exposure	NAV Information The NAVs will be calculated and disclosed on every Business Day. The AMC will prominently disclose the NAVs under a separate head on the website of the Fund (https://www.tatamutualfund.c om/titaniumsif) and of the Association of Mutual Funds in India-AMFI (www.amfiindia.com) before 9.00 A.M. on the next Business Day ^. However, due to inability in capturing same day valuation of underlying investments, the NAV shall be disclosed by 11 PM. on the next Business Day. ^ If the NAVs are not available before the commencement of Business Hours on the following day due to any reason, the SIF shall issue a press release giving reasons for the delay and explain by when the SIF would be able to publish the NAV.
All other existing strategies	NAV Information The NAVs will be calculated and disclosed on every Business Day. The AMC will prominently disclose the NAVs under a separate head on the website of the Fund (https://www.tatamutualfund.c om/titaniumsif) and of the Association of Mutual Funds in India-AMFI (www.amfiindia.com) by 11 P.M. on every business day^. However, due to inability in capturing same day valuation of underlying investments, the NAV shall be disclosed by 11 P.M. of the next business day^. ^ If the NAVs are not available before the commencement of Business Hours on the following day (i.e., next day after the respective business day) due to any reason, the SIF shall issue a press release giving reasons for the delay and explain by when the SIF would be able to publish the NAV

D. **Procedure in case of delay in disclosure of NAV**

Delay beyond the timelines as mentioned in Point C. above, the same shall be explained in writing to AMFI and in the quarterly Compliance Test Reports (CTRs) the number of days when SIF were not able to adhere to the above mentioned time limit for uploading their NAVs on the AMFI website with reasons thereof and the corrective action taken by the TAMPL to reduce the number of such occurrences. In case the NAVs are not available before the commencement of business hours on the following day due to any reason, the SIF shall issue a press release giving reasons for the delay and explain when they would be able to publish the NAVs.

X. **TAX & LEGAL & GENERAL INFORMATION**

Taxation on investing in SIF

The tax benefits set out in the SAI are for general purposes only and do not constitute tax advice. The tax information provided in the SAI does not purport to be a complete description of all potential tax costs, incidence and risks inherent in subscribing to the Units of investment strategies of Titanium SIF offered by TATA Mutual Fund ('Fund'). Investors should be aware that the tax laws may change and there can be no guarantee that the current tax position as laid out may continue indefinitely. The applicability of tax laws, if any, on Fund/ Scheme(s)/ investments made by the Scheme(s) and/ or investors and/ or income attributable to or distributions or other payments made to Unit holders are based on the understanding of the prevailing tax legislations and are subject to adverse interpretations adopted by the relevant authorities resulting in tax liability being imposed on Fund/ Investment Strategies/Scheme(s)/ Unit holders/ Trustee/ AMC.

In view of the individual nature of the tax consequences, each investor is advised to consult his/her own professional tax advisor. The tax information contained in SAI alone is not sufficient and should not be used for the development or implementation of an investment strategy or construed as investment advice. Investors alone shall be fully responsible/ liable for any decision taken on the basis of this document. Neither the Mutual Fund nor the AMC nor any person connected with it accepts any liability arising from the use of this information. Investors should study this SAI carefully in its entirety and should not construe the contents as advice relating to taxation. Investors are advised to consult their tax, investment and other professional advisors to determine possible tax, financial or other considerations of subscribing to or redeeming Units, before making a decision to invest/ redeem Units.

A) TAX IMPLICATIONS FOR THE TATA MUTUAL FUND

Tata Mutual Fund is a Mutual Fund registered with SEBI and hence the entire income of the Fund will be exempt from income-tax in accordance with the provisions of Section 11(3) read with Sr. No. 20 of the table provided in Schedule VII of the Income-tax Act, 2025 ('the Act'). Further, the Fund is entitled to receive all income without any deduction of tax at source under the provisions of Section 393(5) of the Act.

B) TAX IMPLICATIONS TO UNIT HOLDERS

I. TAX TREATMENT OF INVESTMENTS IN EQUITY-ORIENTED FUNDS

For this purpose, an equity-oriented mutual fund is defined in section 198(8) of the Act to mean the Securities and Exchange Board of India (SEBI) registered fund where minimum 65% of the total proceeds are invested in the equity shares of a listed domestic company. The percentage of equity shareholding of the fund shall be computed with reference to the annual average of the monthly averages of the opening and closing figures.

i) Income from units

As per the Finance Act 2020, Dividend Distribution Tax ('DDT') has been abolished with effect from 1 April 2020, thereby the tax burden in relation to dividend distributed has been transferred in the hands of unit holders. As a result, any dividend income and any interest on securities is taxable in the hands of unit holders under section 92 of the Act under the head 'Income from Other Sources' at normal applicable rates and subject to withholding at prescribed rates.

Therefore, income received from Mutual Funds will be taxable in the hands of unitholders at the tax rates applicable to them. Further, it is to be noted that section 93(2) of the Act provides that no deduction is to be allowed to the unit holders in respect of any dividend income or income from units of a Mutual Fund as specified under schedule VII (Table Sr. No. 20 or 21) of the Act.

ii) Capital Gains Taxation

	Resident Investors/NRI's $	Domestic Company @
Tax rate on Capital Gains (Payable by the Investors)		
Long Term capital gains	12.5%*	12.5%*
Short Term capital gains	20%	20%

*Income tax at the rate of 12.5% (without indexation benefit and foreign exchange fluctuation) to be levied on long term capital gains exceeding Rs.1.25 lakh provided transfer of such units is subject to Securities Transaction Tax ('STT').

In case of non-resident investors, short term/ long term capital gain tax (along with applicable surcharge and health and education cess) will be deducted at the time of redemption of units as per the Act.

$ Surcharge to be levied at:

- 37% on base tax where specified income** exceeds Rs. 5 crore;
- 25% where specified income** exceeds Rs. 2 crore but does not exceed Rs. 5 crore;
- 15% where total income exceeds Rs. 1 crore but does not exceed Rs. 2 crores; and
- 10% where total income exceeds Rs. 50 lakhs but does not exceed Rs. 1 crore.

Further, health and education cess to be levied at the rate of 4% on aggregate of base tax and surcharge.

** Specified income refers to total income excluding income by way of dividend on shares and (short-term capital gains in case of listed equity shares, equity oriented mutual fund, units of business trust) and long-term capital gains. In case the total income includes such specified income, surcharge on such specified income shall not exceed 15%.

@ Surcharge at 7% on base tax is applicable where total income of domestic corporate unit holders exceeds Rs. 1 crore but does not exceed Rs. 10 crores and at 12% where total income exceeds Rs. 10 crores. However, surcharge at flat rate of 10% to be levied on base tax for the companies opting for lower rate of tax of 22%/ 15%. Further, health and education cess to be levied at the rate of 4% on aggregate of base tax and surcharge.

Further, the domestic companies are subject to minimum alternate tax (except for those who opt for lower rate of tax of 22%/ 15%) not specified in above tax rates.

iii) Withholding tax on income distribution

Type of Investor	Withholding tax rate
Resident***	10%*
NRI	20%** or rate as per applicable tax treaty*** (whichever is lower)

* Tax not deductible if income distributed in respect of units of a mutual fund is below Rs.10,000 in a tax year.

** The base tax is to be further increased by surcharge at the rate of:

- 37% on base tax where total income exceed Rs. 5 crore;
- 25% where total income exceeds Rs. 2 crore but does not exceed Rs. 5 crore;
- 15% where total income exceeds Rs. 1 crore but does not exceed Rs. 2 crore; and
- 10% where total income exceeds Rs. 50 lakhs but does not exceed Rs. 1 crore.

*** The income distributed by mutual fund to unitholders is unlikely to fall within the definition of dividend under the tax treaty. Given this and the language as provided in Sr. No. 10 of Table to section 393(2) of the Act read with note 2, claiming tax treaty benefit in respect of income distributed by mutual fund to unitholders for withholding tax purpose may not be possible.

Withholding tax applicability in case of inoperative PAN

In the case of a resident person, if PAN has become inoperative due to PAN-Aadhaar not being linked, tax could be withheld at a higher rate of 20%.

iv) Securities Transaction Tax

STT is applicable on transactions of purchase or sale of units of an equity-oriented fund entered into on a recognized stock exchange or on sale of units of equity-oriented fund to the Fund. The STT rates as applicable are given in the following table:

Taxable Securities Transaction	Rate	Payable By
Purchase of a unit of an equity-oriented fund, where –The transaction of such purchase is entered into in a recognised stock exchange; and the contract for the purchase of such unit is settled by the actual delivery or transfer of such unit (delivery based).	NIL	Purchaser
Sale of a unit of an equity-oriented fund, where – The transaction of such sale is entered into in a recognised stock exchange; and The contract for the sale of such unit is settled by the actual delivery or transfer of such unit.	0.001%	Seller
Purchase/ Sale of an equity share in a company or a unit of a business trust, where – The transaction of such sale is entered into in a recognised stock exchange; and The contract for the sale of such share or unit is settled by the actual delivery or transfer of such share or unit	0.1%	Purchaser/Seller
Sale of an equity share in a company or a unit of an equity-oriented fund or a unit of business trust, where – The transaction of such sale is entered into in a recognised stock exchange; and The contract for the sale of such share is settled otherwise than by the actual delivery or transfer of such share or unit	0.025%	Seller
Sale of unit of an equity-oriented fund to the Mutual Fund	0.001%	Seller
Sale of an option in securities	0.15%	Seller
In case of sale of option in securities, where option is exercised	0.15%	Purchaser
Sale of a futures in securities	0.05%	Seller

The Fund is responsible for collecting the STT from every person who sells the Units to it at the rate mentioned above. The STT collected by the Fund during any month will have to be deposited with the Central Government by the seventh day of the month immediately following the said month.

v) Stamp Duty

With effect from 1st July 2020 a stamp duty @ 0.005% of the transaction value would be levied on mutual fund investment transactions. Accordingly, the number of units allotted on purchases, switch-ins, SIP/STP instalments and including IDCW reinvestment to the unitholders would be reduced to that extent.

II. TAX TREATMENT OF INVESTMENTS IN OTHER THAN EQUITY-ORIENTED FUNDS

i) Income from units

As mentioned in above section, DDT has been abolished with effect from 1 April 2020 as per the Finance Act 2020, thereby the tax burden in relation to dividend distributed has been transferred in the hands of unit holders. As a result, any dividend income and any interest on securities is taxable in the hands of unit holders under section 92 of the Act under the head 'Income from Other Sources' at normal applicable rates and subject to withholding at prescribed rates.

Therefore, income received from Mutual Funds will be taxable in the hands of unitholders at the tax rates applicable to them. Further, it is to be noted that section 93(2) of the Act provides that no deduction is to be allowed to the unit holders in respect of any dividend income or income from units of a Mutual Fund as specified under schedule VII (Table Sr. No. 20 or 21) of the Act.

ii) Capital Gains Taxation

	Individual/ HUF/ Non Resident $ #	Domestic Company @
Short Term Capital Gains (Units held for 24 months or less) – Also refer to Note 1 and 2	30%^	30%/25%^^/22%^^^/15%^^^^
Long Term Capital Gains	12.5%*	12.5%*

	Individual/ HUF/ Non Resident $ #	Domestic Company @
(Units held for more than 24 months) (Not Applicable for units of Specified Mutual Fund) – Also refer to Note 1 and 2		

*Without indexation
^ Assuming the investor falls into highest tax bracket.
^^ If total turnover or gross receipts in the tax year 2024-25 does not exceed Rs. 400 crores.
^^^ This lower rate is optional and subject to fulfilment of certain conditions as provided in section 200 of the Act.
^^^^ This lower rate is optional for companies engaged in manufacturing business (set-up & registered on or after 1 October 2019) subject to fulfilment of certain conditions as provided in section 201.

Note 1 - Capital gains from transfer of units of "specified mutual fund schemes" acquired on or after 1st April 2023 are treated as short term capital gains taxable at applicable slab rates, irrespective of the period of holding of such mutual fund units.
For this purpose, "specified mutual fund" means (a) a mutual fund scheme investing more than 65% of its total proceeds in debt and money market instruments; or (b) a fund of fund investing 65% or more of its total proceeds in units of a mutual fund scheme referred to in (a).

Note 2 - Based on our interpretation of the relevant provisions of the Act, Titanium Hybrid Long-Short SIF ought to be classified as other than equity-oriented mutual fund, based on the following considerations:

- Investment in equity shares of a listed company is likely to be less than 65%;
- The exposure in debt and money market instruments is expected to remain upto 65%; and
- The Titanium Hybrid Long-Short Fund is listed on a recognised stock exchange in India.

The aforesaid information is based on the understanding of Tata Mutual Fund of the tax laws and only for the purpose of providing general information to the unit holders of the scheme. In view of the individual nature of tax implications, each investor is strongly advised to consult his or her professional tax advisors for specific tax and other implications arising at the time of income distribution/ redemption of units of the Titanium Hybrid Long-Short SIF.

$ Surcharge to be levied at:
- 37% on base tax where specified income** exceeds Rs. 5 crore;
- 25% where specified income** exceeds Rs. 2 crore but does not exceed Rs. 5 crore;
- 15% where total income exceeds Rs. 1 crore but does not exceed Rs. 2 crore; and
- 10% where total income exceeds Rs. 50 lakhs but does not exceed Rs. 1 crore.

** Specified income refers to total income excluding income by way of dividend on shares and (short-term capital gains in case of listed equity shares, equity oriented mutual fund units, units of a business trust) and long-term capital gains. In case the total income includes such specified income, surcharge on such specified income shall not exceed 15%.

Further, health and education cess to be levied at the rate of 4% on aggregate of base tax and surcharge.

@ Surcharge at 7% on base tax is applicable where total income of domestic corporate unit holders exceeds Rs. 1 crore but does not exceed Rs. 10 crores and at 12% where total income exceeds Rs. 10 crores. However, surcharge at flat rate of 10% to be levied on base tax for the companies opting for lower rate of tax of 22%/ 15%. Further, health and education cess to be levied at the rate of 4% on aggregate of base tax and surcharge.

Further, the domestic companies are subject to minimum alternate tax (except for those who opt for lower rate of tax of 22%/ 15%) not specified in above tax rates.

Short term/ long term capital gain tax (along with applicable surcharge and health and education cess) will be deducted at applicable rate at the time of redemption of units in case of NRI investors. Tax Treaty benefit can be availed for withholding tax on capital gains subject to fulfilment of stipulated conditions.

iii) Withholding tax on income distribution

Type of Investor	Withholding Tax Rate
Resident	10%*
NRI	20%** or rate as per applicable tax treaty*** (whichever is lower)

* Tax not deductible if income distributed in respect of units of a mutual fund is below Rs. 10,000 in a tax year.
** The base tax is to be further increased by surcharge at the rate of:
- 37% on base tax where total income exceeds Rs. 5 crore;
- 25% where total income exceeds Rs. 2 crore but does not exceed Rs. 5 crore;
- 15% where total income exceeds Rs. 1 crore but does not exceed Rs. 2 crore; and
- 10% where total income exceeds Rs. 50 lakhs but does not exceed Rs. 1 crore

*** The income distributed by mutual fund to unitholders is unlikely to fall within the definition of dividend under the tax treaty. Given this and the language of the as provided in Sr. No. 10 of Table to section 393(2) of the Income-tax Act, 2025 ('Act') read with note 2, claiming tax treaty benefit in respect of income distributed by mutual fund to unitholders for withholding tax purpose may not be possible.

Further, health and education cess is to be levied at 4% on aggregate of base tax and surcharge.

Withholding tax applicability in case of Inoperative PAN

In the case of a resident investors, if PAN has become inoperative due to Pan-Aadhaar not being linked, tax could be withheld at a higher rate of 20%.

iv) **Stamp Duty**

With effect from 1st July 2020 a stamp duty @ 0.005% of the transaction value would be levied on mutual fund investment transactions. Accordingly, the number of units allotted on purchases, switch-ins, SIP/STP installments and including dividend reinvestment to the unitholders would be reduced to that extent.

III. Segregation of portfolios of a SIF scheme –

As per clause (101) of the section 2 of the Act , in case of a capital asset, being a unit or units in a segregated portfolio referred to in section 73(1) of the Act, there shall be included the period for which the original unit or units in the main portfolio were held by the assessee..
As per Sr. No. 11 and 12 of Table to section 73(1) of the Act, the cost of acquisition for units of segregated portfolios and main portfolio to be computed as provided in column C of the below table, namely:–

Sl. No.	*Description of the capital asset*	*Cost of acquisition*
A	**B**	**C**
11	Capital asset being a unit or units in the segregated portfolio.	Computed as per the following formula: X = (A*B) / C where, X = cost of acquisition of the unit or units in segregated portfolio; A = cost of acquisition of unit or units in the total portfolio; B = Net Asset Value of the asset transferred to the segregated portfolio; and C = Net Asset Value of the total portfolio immediately before segregation of portfolios.
12	Capital asset being original units held by the unit holder in the main portfolio.	The cost of acquisition of such original units as reduced by the amount as so arrived at under serial number 11.

Note: For the purposes of the table in sub-section (1) of section 73 of the Act, in respect of the entries against serial number 11 and 12, the expressions “main portfolio”, “segregated portfolio” and “total portfolio” shall have the same meanings as respectively assigned to them in in applicable Securities and Exchange Board of India regulations.

A per sub-clause (a) of clause (101) section 2 of the Act defines the expression “short term capital asset” to be a capital asset held by an assessee for not more than twenty-four months immediately preceding the date of its transfer. Further, sub-clause (b) of clause (101) section 2 of the Act provides that where the capital asset is a security listed on a recognised stock exchange in India, the provisions of this sub-clause shall have effect as if for the words "twenty-four", the words "twelve months" had been substituted.

Example:

Suppose Mr. X had invested in a scheme of a mutual fund on 01-01-2015 when the NAV was Rs. 10. On May 1, 2019, when NAV of the scheme was Rs. 20, segregation of portfolio was created due to a credit event.
Post creation of the segregated portfolio, the NAV of the main portfolio was Rs. 16 and the segregated portfolio was Rs 4. Hence, the proportion is 80:20 of the total portfolio. The cost of acquisition of the main portfolio and the segregated portfolio should be taken as Rs. 8 and Rs. 2 respectively.

Similarly, the period of holding of the units of the main portfolio and the segregated portfolio should be reckoned from 1st January 2015.

IV. **Capital Losses –**

Losses under the head "Capital Gains" cannot be set off against income under any head other than capital gains. Further within the head "Capital Gains", losses arising from the transfer of long-term capital assets cannot be adjusted against gains arising from the transfer of a short-term capital asset. However, losses arising from the transfer of short-term capital assets can be adjusted against gains arising from the transfer of either a long-term or a short-term capital asset. Unabsorbed loss under the head capital gains can be carried forward and set-off against the income under the head Capital Gains in subsequent eight tax years, except that loss arising from transfer of long-term capital assets cannot be set-off against gain arising from transfer of short-term capital assets.

V. Dividend Stripping & Bonus Stripping –

As per Section 175(8) of the Act, if any person buys or acquires units within a period of three months prior to the record date fixed for declaration of dividend or distribution of income and sells or transfers the same within a period of nine months from such record date, then losses arising from such sale to the extent of income received or receivable on such units, which are exempt under the Act, will be ignored for the purpose of computing his income chargeable to tax.

Further, Section 175(9) of the Act provides that, where additional units have been issued to any person without any payment on the basis of existing units held by such person then the loss on sale of original units shall be ignored for the purpose of computing income chargeable to tax, if the original units were acquired within three months prior to the record date fixed for receipt of bonus units and sold within nine months from such record date. However, the loss so ignored shall be considered as the cost of acquisition of such additional units held on the date of sale by such person.

VI. Clubbing of Income –

Subject to the provisions of section 99(1)(c) read with section 99(5)(b) of the Act, taxable income accruing or arising in the case of a minor child (not being a minor child suffering from disability of the nature specified in section 154 of the Act) shall be included in the income of the parent whose total income is greater or where the marriage of the parents does not subsist, in the income of that parent who maintains the minor child. An exemption under section 11 read with Sr. No. 17 of table provided in schedule VII of the Act is granted to the parent in whose hand the income is included upto Rs. 1,500/- per minor child. When the child attains majority, the tax liability will be on the child.

VII. MAT/ AMT liability –

The income on the transfer of Mutual Fund units by a company would be taken into account in computing the book profits and Minimum Alternative Tax ('MAT'), if any, under section 206(1) of the Act.
The taxable income on transfer of Mutual Fund units would be taken into account in computing the Adjusted Total Income and Alternate Minimum Tax, if any, under section 206(2) of the Act.

VIII. Consolidating scheme of Mutual Fund –

Transfer not chargeable to tax at the time of consolidation of Scheme of Mutual fund:

Capital gains shall not apply to any transfer by a unit holder of a capital asset, being a unit or units, held by him in the consolidating scheme of a mutual fund, if the transfer is made in consideration of the allotment to him of any unit or units in the consolidated scheme of the mutual fund under the process of consolidation of the schemes of mutual fund.

The consolidation should be of two or more schemes of equity-oriented fund or of two or more schemes of a fund other than equity-oriented fund.

"Consolidating scheme" means the scheme of a mutual fund which merges under the process of consolidation of the schemes of mutual fund in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations, 2026 made under the Securities and Exchange Board of India Act, 1992;

"Consolidated scheme" means the scheme with which the consolidating scheme merges or which is formed as a result of such merger.

a) Cost of Units in consolidating Scheme of Mutual Fund:

The cost of acquisition of the units in the consolidated scheme shall be deemed to be the cost of acquisition to the investor of the unit or units in the consolidating scheme of the mutual fund.

b) Holding period:

In the case of a capital asset, being a unit or units, which becomes the property of the assessee in consideration of a transfer on account of consolidation of Scheme of Mutual Fund, there shall be included the period for which the unit or units in the consolidating scheme of the mutual fund were held by the assessee.

IX. Consolidating plan of a Mutual Fund scheme –

Transfer not chargeable to tax at the time of consolidation of plans of a Mutual fund scheme any transfer by a unit holder of a capital asset, being a unit or units, held by him in the consolidating plan of a mutual fund scheme, made in consideration of the allotment to him of a capital asset, being a unit or units, in the consolidated plan of that scheme of the mutual fund.
"Consolidating plan" means the plan within a scheme of a mutual fund which merges under the process of consolidation of the plans within a scheme of mutual fund in accordance with the Securities and Exchange Board of India (Mutual Funds) Regulations, 2026 made under the Securities and Exchange Board of India Act, 1992;

"Consolidated plan" means the plan with which the consolidating plan merges or which is formed as a result of such merger;

a) Cost of Units in consolidating plan of Mutual Fund:

Cost of acquisition of a unit or units in consolidated plan of a mutual fund scheme shall be deemed to be the cost of acquisition to the investor of the unit or units in the consolidating plan of the SIF scheme.

b) Holding period:

In the case of a capital asset, being a unit or units, which becomes the property of the assessee in consideration of a transfer on account of consolidation of plans of a Mutual Fund scheme, there shall be included the period for which the unit or units in the consolidating plan of the mutual fund scheme were held by the assessee.

X. Religious & Charitable Trust –

Investment in Units of the Mutual Fund by Religious and Charitable Trusts is an eligible investment under section 350 read with Schedule XVI of the Act. However, such investment may be permitted only subject to the state legislation governing Religious and Charitable Trusts in this regard, wherever applicable.

XI. **Goods and Service Tax (GST)**

Services provided by mutual fund agents/distributors to a mutual fund or asset management company are subject to GST under the forward charge mechanism, wherein the agent or distributor is liable to pay GST as the service provider. However, in case of services provided by overseas agents/distributors, the mutual fund or asset management company is required to discharge GST under the reverse charge mechanism. The applicable GST rate on such services is currently 18%

B. Legal Information

Investment Decision Process:

The Investment Managers take day to day decisions on buying or selling of securities which are part of the approved universe. Investment Managers ensure that investments are being made in accordance with the regulatory guidelines and internal investment policy. Justification of each investment decision is maintained (in writing or electronically).

In case of equity, investment universe is approved by the Equity Investment Committee comprising of Chief Investment Officer Equities and Equity Fund Managers. In case of Fixed Income Securities, investment universe is approved by the credit committee consisting of the Head fixed Income, CIO- Equity, Fund managers, Credit analyst.

In case of equity, the stock selection is based on various criteria but not limited to, business fundamentals, management quality, valuations, stock liquidity, benchmark weight etc. In case of fixed income, issues are approved based on internal rating criteria based on business fundamentals, financial analysis, macro environment, management quality to evaluate corporate governance standard, etc.

Debt investment committee and Equity Investment Committee meet at regular intervals to review portfolios, strategy performance, market outlook/trends, past events etc.

The investment committee comprises of Managing Director/CEO, Chief Operating Officer, Chief Investment Officer-Equities, Head of Fixed Income, Head-Risk, Head-Product Development, Head Compliance, Business Head- Banking, Alternate Products and Product Strategy and Fund Managers. The team periodically reviews the portfolio risk and performance of the strategies relative to respective peer's /benchmark index.

Performance of the strategies vis a vis benchmark index and peers are placed for before the Board of Directors of the AMC and the Trustee Company for review and comments.

Conflict of interest

The Trustee Company, the Asset Management Company, the Custodian, the Registrar, any Associate, any Distributor, Dealer, other companies within the Tata group, etc. may from time to time act (individually and / or jointly) as manager, custodian, registrar, administrator, investment adviser, distributor or dealer or agent or marketing associate, respectively in relation to, or be otherwise involved in, other Strategies / Funds / Activities (in the same or different capacity) (to the extent permitted under various relevant Regulations), which may have similar investment objectives to those of the Strategy/ Fund. The Asset Management Company, may for example, make investments for other permitted business activities or on its own behalf without making the same available to the Strategy / Fund. The Asset Management Company/Trustee Company will, at all times, have regard in such event to its obligations to act in the best interests of the Strategy / Fund so far as is practicable, having regard to its obligations to other permitted business activities and will ensure that such transactions are conducted with / by the Strategy / Fund purely on commercial terms / on an arm's length basis as principal to principal.

TAMPL may, utilise the services of the Companies stated in the clause "Associate Transactions" (& to whom selling commission has been paid/provided for their marketing efforts in mobilising subscription for the units of the previous strategies of the Fund)and/or the Sponsors, Associates, other Companies within the TATA group, Employees or their relatives, etc. for the purpose of any securities transactions & distribution & sale of Units / securities, provided that any deal in securities through any broker associated with the Sponsors should not be beyond 5% of the quarterly aggregate purchase & sale of securities by TITANIUM SIF, as per SEBI Regulations & the brokerage or commission paid as per prevailing market practice and/or approved rates is disclosed in the half yearly annual accounts of the Fund. TAMPL may, invest in Units of the Funds / Strategies in TITANIUM SIF (the existing Funds / Strategies including the present Strategy & others as may be announced / launched from time to time), only after full disclosure of its intention to invest has been made in the Offering Circulars. TAMPL shall not charge any fees on its investment in Units of the Funds / Strategies in TITANIUM SIF.

TAMPL shall not act as a Trustee of any Mutual Fund and shall not undertake any business activities except activities in the nature of management and advisory services provided to pooled assets including offshore funds, pension funds, provident funds, insurance funds, , if any of such activities are not in conflict with the activities of the mutual fund. Provided that TAMPL may itself or through its subsidiaries undertake such activities if it satisfies SEBI to undertake such activities as permitted under clause (b) of Section 21 of SEBI (Mutual Fund) Regulations, 2026.

Listing, Transfer & Pledge of Units

a) Listing

For open ended investment strategy:

As the Fund will be repurchasing the Units on an ongoing basis, the units of the Strategies are not proposed to be listed on any Stock Exchange. The Trustee may, at its sole discretion, cause the units under the Strategy to be listed on one or more Stock Exchange. Notification of the same will be made through Investor Service Centers or the AMC and as may be required by the respective Stock Exchanges.

For close ended investment strategy:

In accordance with SEBI Circular SEBI/HO/IMD/IMD-PoD-1/P/CIR/2025/26 dated February 27, 2025, to provide an exit option for the redeeming investors, the units of all close ended SIF shall be mandatorily listed on recognized stock exchange(s).

For Interval investment strategy:

In accordance with SEBI Circular SEBI/HO/IMD/IMD-PoD-1/P/CIR/2025/26 dated February 27, 2025, to provide an exit option for the redeeming investors, the units of interval investment strategies of SIF shall be mandatorily listed on recognized stock exchange(s). b) Transfer

Units of the strategies are freely transferable on demat or non demat mode. As per SEBI (Mutual fund) Regulation 2026, Regulation 35 all units held in dematerialized mode with the depository, such units will be transferable in accordance with the provisions of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018.

Unitholders desirous of transferring units shall submit the transfer request in the prescribed form or convert his/her holding in non demat mode or demat mode. Any addition / deletion of name from the folio of the unitholder is deemed as transfer of unit. Transfer of unit(s) shall be subject to payment of applicable stamp duty by the unitholder(s) and applicable laws.

The above provisions in respect of deletion of names will not be applicable in case of death of unitholder (in respect of joint holdings) as this is treated as transmission of units and not transfer. For detail transmission process refer website or contact investor service centre.

Transfer would be only in favor of transferees who are capable of holding units. The Fund will not be bound to recognize any other transfer. The delivery instructions for transfer of units will have to be lodged with the DP in the requisite form as may be required from time to time and transfer will be affected in accordance with such rules/regulations as may be in force governing transfer of securities in dematerialized mode.

c) Pledge

Units under the strategies can be pledged (converted into money) with scheduled banks, financial institutions, NBFCB, or any other body by the unitholders as security for raising loans. Titanium SIF will take note of such pledge / charge in its records. A standard form / appropriate documentation has been drafted for this purpose and is available on request. However, disbursement of such loans will be at the entire discretion of scheduled banks, financial institutions, NBFCB, or any other body concerned and Titanium SIF assumes no responsibility therefore.

For units of the strategies held in demat form, the rules/byelaws of Depository is applicable for lien/pledge will be applicable to the units of the strategies. The unitholder and lender must have a beneficial account with the depository.

Nomination Facility

As per AMFI Circular No. 35/MEM-COR/65/07-08 dated February 15, 2008, The Fund proposes to follow following procedure with respect to Multiple Nomination:

An Investor can have a maximum of three nominees. It is mandatory for the investor to indicate clearly the percentage of allocation / share (in case of more than one nominee) in favour of each of the nominees against their name and such allocation / share should be in whole number without any decimals making a total of 100%. If percentage of allocation / share for each of the nominees is not indicated by the investor, the AMC, by invoking default option shall settle the claim equally amongst all the nominees.

payments and settlements made to such nominee and a receipt thereof shall be a valid discharge by the Fund. Unitholders being either parent or lawful guardian on behalf of a minor and power of attorney holder of an eligible institution, societies, Funds, bodies corporate, partnership firms and HUF shall have no right to make any nomination. Nomination in favour of Non-Residents will be governed by the rules formulated by Reserve Bank of India from time to time.
The provisions for nomination with regard to Mutual Funds would be as per Section 56 and Section 69 (regarding the right of the beneficiary to transfer possession) of the Indian Trusts Act, 1882 since the Mutual Fund is formed as a Trust under the said Act.

The AMC has provided this nomination facility as an additional feature available free of cost. By provision of this facility the AMC is not in any way attempting to grant any rights other than those granted by law to the nominee. A nomination in respect of the Units does not create an interest in the property after the death of the Unitholder. The nominee shall receive the units only as an agent and trustee for the legal heirs or legatees as the case may be. It is hereby clarified that the nominees under the nomination facility provided herein shall not necessarily acquire any title or beneficial interest in the property by virtue of this nomination & the transmission of units would normally be governed as per succession certificate/probate of the will.

Nomination can be made only by individuals applying / holding units on their own behalf singly or jointly. Non-individuals including society, trust other than a religious or charitable trust, body corporate, partnership firm, Karta of Hindu Undivided Family, holder of Power of Attorney or any other artificial/judicial person cannot nominate. Nomination can also be in favour of the Central Government, State Government, a local authority, any person designated by virtue of his office or a religious or charitable trust. A non-resident Indian can be a nominee subject to exchange controls in force and as decided by Asset Management Company from time to time.

A minor can be made a nominee and the name and address of the guardian of the nominee minor shall be provided by the unitholder. Nomination shall not be allowed in a folio held on behalf of a minor and where a folio has joint holders, all joint holders should sign the request for nomination /cancellation of nomination, irrespective of the mode of holding. It is to be noted that nomination form cannot be signed by Power of Attorney (PoA) holders.

Nomination in respect of the units stands rescinded upon the transfer of units. Transfer of units in favour of a Nominee shall be valid discharge by the asset management company against the legal heir. The cancellation of nomination can be made only by those individuals who hold units on their own behalf singly or jointly and who made the original nomination. On cancellation of the nomination, the nomination shall stand rescinded and the asset management company shall not be under any obligation to transfer the units in favour of the Nominee.

As per provision no. 15.14 of SEBI Master circular on Mutual Fund dated March 20, 2026 on “Nomination for Mutual Fund Unit Holders”, Investors subscribing to SIF units shall have the choice of (a) Providing nomination (or) (b) Opting out of nomination through a signed Declaration form as provided in Format No. 9F of Master Circular either in physical or online mode.

The circular also prescribes the following:-

1. All the unitholders are required to provide wet signature in case of nomination made by submitting physical form.
2. In case of online option, the forms, instead of wet signature(s) of all the unit holder(s) shall be using:
   a. e-Sign facility recognized under Information Technology Act, 2000 or
   b. Through two factor authentication (2FA) in which one of the factor shall be a One-Time Password sent to the unit holder at his/her email/phone number registered with the AMC.
3. Ensure that adequate systems are in place for providing the e- Sign facility and take all necessary steps to maintain confidentiality and safety of client records.
4. For all existing individual unit holder(s) holding SIF units are requested for registering nomination / opting out of nomination process failing which the folios shall be frozen for debits. However the said requirement shall be optional for jointly held SIF folios.

5. Ensure that a communication on fortnightly basis by way of emails and SMS to all such unit holder(s) who are not in compliance with the requirement of nomination/opting out of nomination. The communication shall provide guidance by which the unit holder(s) can provide nomination or opt out of nomination

Transmission of Units

If Units are held by more than one registered Unit Holder, then, upon death of one of the Unit Holders, the Units shall be transmitted in favour of the remaining Holder(s) (in the order in which the names appear in the register of Unit Holders with the Registrar) on production of a death certificate and / or any other documents to the satisfaction of the AMC / Registrar. In case of death of all the unitholders, units shall be transmitted in favour of the nominee.

If Units are held in a single name by the Unit Holder, Units shall be transmitted in favour of the nominee where the Unit Holder has appointed a nominee upon production of death certificate or any other documents to the satisfaction of the AMC / Registrar. If the Unit Holder has not appointed a nominee or in the case where the nominee dies before the Unit Holder, the Units shall be transmitted in favour of or as otherwise directed by the Unit Holder's legal heir(s)on production of the death certificate and / or any other documents to the satisfaction of the AMC / Registrar.

Transmission cum redemption/switch request at the same point of time will not be accepted. A standalone request is required to be submitted for the transmission of units. A new folio is created on transmission of units. Unit holder can submit redemption/switch request only after the transmission of units is through.

As per AMFI Best Practice Guidelines:
In case of transmission of units, the claimants of units will be required to submit the prescribed documents as may be applicable. Investors may refer the funds website www.tatamutualfund.com/titanium-sif for a ready reckoner matrix of various documents required.

In the event of transmission of units to a claimant who is a minor, the prescribed documents like PAN, KYC, Bank Details, Indemnity, etc of the guardian will be required. AMC/ Titanium SIF reserves the right to seek additional documents from the claimants of the units.

In addition to the para on transmission of units in the SAI it is clarified that in case of death of unitholder:

- In case of units under close ended strategies in case of death of the sole unitholder or all unitholders the claimant i.e the nominee or the legal heir shall be able to withdraw the investment only after maturity period of the strategy. The transmission of units in favour of the claimants may be completed before the maturity date of the strategy provided the claimant is otherwise eligible to hold the units under the respective strategy and has completed the KYC process. If the claimant desires to redeem the units before the maturity date, he/she may be advised to - a) Complete the transmission procedure first. b) Apply for dematerialisation of the units (after the units are transmitted in favour of the claimant). c) Subsequently sell the units in the secondary market.

Investors are requested to visit Titanium SIF website for the list of prescribed documents under any of the above producers or call the investors service centers for any clarification on the above.

Process for transmission of Units

a. In order to improve the processing turnaround time for transmission requests, AMC will implement image based processing wherever the claimant is a nominee or a joint holder in the investor folio.

b. AMC will have a dedicated, Central Help Desk and a webpage carrying relevant information and instructions in order to provide assistance on the transmission process.

c. AMC will adopt a common Transmission Request Form (common fields) and NOC form as and when provided by AMFI.

d. AMC will implement a common set of document requirements for transmission of units to claimant who are nominees or joint holders in the investor account.

e. AMC will implement a uniform process for treatment of unclaimed funds to be transferred to the claimant including the unclaimed dividends.

f. AMCs will not accept requests for redemption from a claimant pending completion of the transmission of units in his / her favour.

g. The Stamp duty payable by the claimant with respect to the indemnity bond and affidavit, shall be in accordance with the stamp duty prescribed by law and will be borne by the unitholders.

Application 'On behalf of Minor' Accounts:
Where the account/folio (account) is opened on behalf of a minor, mutual funds and RTA should follow these guidelines:

1 The minor shall be the sole holder in an account. There shall not be any joint accounts with the minor, either as the first holder or as joint holder.

2 Guardian in the folio on behalf of the minor should either be a natural guardian (i.e. father or mother) or a court appointed legal guardian.
2.1 AMCs shall mandatorily obtain information on the relationship/status of the guardian as father, mother or legal guardian in the application form.
2.2 In case of natural guardian, AMC shall obtain a document evidencing the relationship with the minor, if the same is not available as part of the documents submitted as per 2.3 below.
2.3 In case of court appointed legal guardian, a copy of the court order in respect of the appointment of the Legal Guardian shall be obtained.

3 Date of birth of the minor along with photocopies of the supporting documents as enumerated below shall be mandatory while opening the account on behalf of minor:
3.1 Birth certificate of the minor, or
3.2 School leaving certificate / Mark sheet issued by Higher Secondary Board of respective states, ICSE, CBSE etc., or
3.3 Passport of the minor, or
3.4 Any other suitable proof evidencing the date of birth of the minor.

4 Standing instructions like SIP, SWP, STP in respect of a minor's folio shall be registered / executed only till prior to the date of the minor attaining majority, even if the standing instructions in the SIP, SWP, STP mandate form might be for a period beyond that date.

Minor Attaining Majority – Status Change: In case the units are held on behalf of the minor, the ownership of the units rests with the minor. A guardian operates the account until the minor attains the age of majority. on minor attaining majority the minor shall submit an application form along with the following documents to change the status to 'major':

In this regard, SEBI has, vide provision no. 15.13 of SEBI Master circular on Mutual Fund dated March 20, 2026 mandated that 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 details, updated bank account details including cancelled original cheque leaf of the new account. No further transactions shall be allowed till the status of the minor is changed to major.

Accordingly, when a minor turns a major, AMCs shall obtain relevant documents and follow the guidelines as mentioned below:

1. The AMC shall send an advance intimation to the registered address of the minor unitholder at least 30 days prior to the minor attaining the age of majority, advising the unitholder to submit a prescribed application form for change in status of the Unitholder from Minor to Major, along with the prescribed documents. The prescribed form shall be enclosed with the above intimation. AMCs may also consider sending a reminder via email / SMS advising the unitholder to complete the process for change in status from minor to major.

1.1 It should also be stated in the advance intimation that before submitting the Minor Attaining Majority (MAM) application form for change in status from Minor to Major, the unitholder should –

i. Apply for PAN & obtain a PAN card;

ii. Complete the KYC process; and

iii. Change his/her status in his/her existing bank account from Minor to Major OR open a new bank account immediately upon becoming a major and procure a new cheque book with his/her name pre-printed on the cheque.

Only after fulfilling the above steps, he/she should submit the prescribed MAM form duly completed to the AMC/ Registrar along with the requisite supporting documents.

1.2 It shall also be clearly stated in the above communication that –

a. The guardian shall not be allowed undertake any financial or non-financial transactions from the date of the minor attaining majority.

b. All existing standing instructions like SIP, SWP & STP, if registered for a period beyond the date on which the minor attains majority, will cease to be executed from the date of the minor attaining majority.

c. The unitholder (erstwhile minor) will need to submit a fresh SIP, STP, SWP mandate in the prescribed form while applying for change in status from minor to major, in order to continue the SIP, STP, SWP.

2 The minor's account shall be frozen for operation by the guardian on the day the minor attains the age of majority and no further customer-initiated transactions shall be permitted till the status is changed from minor to major.

Note: Dividend pay-out or dividend reinvestment shall continue to be processed, being a corporate action and not investor initiated. In such cases, dividend amount, net of TDS (wherever applicable), shall be credited to the unitholder's registered bank account or reinvested in the folio, as the case may be.

3 AMC shall discontinue all standing instructions like SIPs, SWPs, STPs etc. with effect from the date of the minor attaining majority. In other words, all existing running SIP, STP, SWP transactions shall be discontinued from the date on which the minor attains the age of majority.

4. List of documents to be obtained to change the status from minor to major:

i. The prescribed MAM form as per specimen attached, duly filled in all respects.

Signature of the applicant (minor who has turned major) in the MAM form shall be duly attested in the space provided therein by the parent/ legal guardian whose signature is registered in the records of the SIF against the folio of the minor unitholder or by a Notary or a Judicial Magistrate First Class. Alternatively, the applicant's signature may be attested by the unitholder's bankers in the prescribed form.

ii. Copy of PAN Card of the applicant

iii. KYC Acknowledgment or a duly competed KYC form.

iv. A cancelled cheque leaf with the applicant's name pre-printed or the applicant's latest Bank Statement/Passbook.

v. Nomination Form.

Change in Guardian:

When there is a change of guardian of the minor unitholder either due to mutual consent between the parents or due to demise of the existing guardian, SIFshall seek the following documents prior to registering the new guardian:

1 An application for change in guardian of the minor unitholder in a standard / prescribed form, as per the format attached hereto along with PAN card copy and KYC acknowledgement of the new guardian and a cancelled cheque evidencing the change of guardian in respect of the minor's registered bank account with the new guardian's name.

2 A Consent Letter from existing guardian or Court Order for new guardian, in case the existing guardian is alive.

3 A copy of the Death Certificate of the deceased guardian, where applicable duly attested by a Notary Public or a Judicial Magistrate First Class (JMFC) or a Gazetted Officer. The attestation may also be done by authorised official of the AMC after verifying the original.

4 The new guardian must be a natural guardian (i.e. father or mother) or a court appointed legal guardian and the new guardian's name & signature should have been registered as the guardian with the minor's bankers in respect of the minor's bank account.

4.1 AMCs shall invariably obtain the information regarding the relationship/ status of the guardian as father, mother or legal guardian in the application form.

4.2 In case of natural guardian, AMC shall obtain a document evidencing the relationship with the minor, if the same is not available as part of the documents submitted as per 2.3 above.

4.3 In the case of a court appointed legal guardian, a copy of the court order in respect of the appointment of Legal Guardian shall be obtained.

5 In case of change in guardian with mutual consent between the parents, the signature of the new guardian shall be duly attested by the existing guardian whose signature is registered in the records of the SIF against the folio of the minor unitholder in the space provided in the form.

6 In all other cases, Bank attestation in respect of the signature of the new guardian shall be obtained on a separate letter / form as per format given in Annexure 1 hereto, from the bank where the bank account of the minor where the new guardian should have been registered as the guardian.

7 The new guardian shall be registered as the guardian in respect of the registered bank account of the minor unitholder. A cancelled cheque evidencing the change of guardian in respect of the minor's registered bank account shall be attached to the application for change in Guardian of Minor Unitholder.

8 Wherever the minor's PAN has been provided in the MF folio, TDS should be paid against / quoting the minor's PAN. This would enable the parents of the minor to report the minor's dividend amount against the PAN of the parent in whose income the minor's income needs to be clubbed while filing their tax returns.

Prevention of Money Laundering and Know Your Client (KYC) Compliance
In terms of the Prevention of Money Laundering Act, 2002, the Rules issued there under and the guidelines/circulars issued by SEBI regarding the Anti Money Laundering (AML Laws), all intermediaries, including Mutual Funds, have to formulate and implement a client identification programme, verify and maintain the record of identity and address(es) of investors.

SEBI vide Circular no. CIR/MIRSD/66/2016 dated July 21, 2016 and circular no. CIR/MIRSD/120/2016 dated November 10, 2016 has intimated about the operationalization of Central KYC Records Registry ("CKYCR").

AMFI vide Best Practice Guideline circular no. 135/BP/68/2016-17 dated December 22, 2016 has prescribed guidelines including Central KYC ("CKYC") forms for implementing the CKYC norms.

In this regard, any individual customer who has not done KYC under the KYC Registration Agency (KRA) regime shall fill the new CKYC form.

In accordance with the aforesaid SEBI circulars and AMFI best practice guidelines for implementation of CKYC norms with effect from February 1, 2017:

a) Individual investors who have never done KYC process under KRA regime i.e. a new investor who is new to KRA system and whose KYC is not registered or verified in the KRA system shall be required to provide KYC details in the CKYC Form to the SIF/ AMC.

b) Individual investor who fills old KRA KYC Form, should provide additional / missing information using Supplementary KYC Form or fill CKYC Form.

c) Details of investors shall be uploaded on the system of CKYCR and a 14 digit unique KYC identifier ('KIN') will be generated for such customer.

d) New investors, who have completed CKYC process & have obtained KIN may quote their KIN in the application form instead of submitting CKYC Form.

e) If the PAN of investor is not updated on CKYCR system, the investor should submit self-certified copy of PAN card to the SIF/ AMC.
The AMC reserves the right to reject transaction application in case the investor(s) fails to submit information and/or documentation as mentioned above. In the event of non-compliance of KYC requirements, the Trustee / AMC reserves the right to freeze the folio of the investor(s).

Non-Individual Investors to use the existing KYC forms for KYC process.

Units held in electronic (demat) form: For units held in demat form, the KYC performed by the Depository Participant of the applicants will be considered as KYC verification done by the Trustee / AMC. The AMC reserves the right to ask for further documentation if required. For DP account held in joint names, the rules of he depository for operation of such DP account will be applicable.

As per provision no. 17.6 of SEBI Master circular on Mutual Fund dated March 20,2026 SEBI had permitted cash transaction in mutual funds to the extent of Rs.50000/- per investor, per mutual fund, per financial year subject to

(i) compliance with Prevention of Money Laundering Act, 2002 and Rules framed there under the SEBI Circular(s) on Anti Money Laundering (AML) and other applicable AML rules, regulations and guidelines and

(ii) sufficient systems and procedures in place. At present, Tata SIF investment strategies are not accepting cash transaction.

SEBI vide circular dated 20th July'2017, had given exemption of certain KYC requirement under Rule 9 of the Prevention of Money Laundering (Maintenance of Records) Rules, 2005.

Investors are requested to note that the Ministry of Finance (Department of Revenue) in consultation with the Reserve Bank of India has made certain amendments to the Prevention of Money-laundering (Maintenance of Records) Rules, 2005, namely, the Prevention of Money-laundering (Maintenance of Records) Second Amendment Rules, 2017. These Rules have come into force with effect from June 1, 2017.

Accordingly, investors are requested to note the following requirements in relation to submission of Aadhaar number (not mandatory) and other prescribed details to Titanium SIF / Tata Asset Management Pvt Limited ("the AMC") / Computer Age Management Services Limited (CAMS) its Registrar and Transfer Agent:

i. Where the investor is an individual, who is eligible to be enrolled for Aadhaar number, the investor may submit the Aadhaar (not mandatory) issued by UIDAI. If such an individual investor is not eligible to be enrolled for Aadhaar number, and in case the Permanent Account Number (PAN) is not submitted, the investor shall submit the PAN or one certified copy of an officially valid document containing details of his identity and address and one recent photograph along with such other details as may be required by the SIF.

The investor is required to submit PAN as defined in the Income Tax Rules, 1962.

ii. Where the investor is a non-individual, Aadhaar numbers (not mandatory) and PANs (as defined in Income-tax Act) of managers, officers or employees or persons holding an attorney to transact on the investor's behalf is required to be submitted, apart from the constitution documents. In case PAN is not submitted, an officially valid document is required to be submitted. If a person holding an authority to transact on behalf of such an entity is not eligible to be enrolled for Aadhaar and does not submit the PAN, certified copy of an officially valid document containing details of identity, address, photograph and such other documents as prescribed is required to be submitted.

Where the investors who are individuals or in the case of investors who are non-individuals, managers, officers or employees or persons holding an attorney to transact on the investor's behalf, as the case may be, do not have an Aadhaar number, the proof of enrolment for Aadhaar can be submitted. However, in such cases, the Aadhaar number shall be required to be provided for eventual authentication within the prescribed timeframe of 6 months as aforesaid, failing which the account / folio shall cease to be operational.

Kindly note that all Joint holders, Parents/legal Guardian/ in case of Minor, Karta in case of HUF, Sole Proprietors, Partners in case of Partnership, Directors/Manager etc in case of Companies, POA holder's, Third party investment with proper documentation and verification, are covered for seeding of Aadhaar number. It may also be noted that the requirement of submitting Form 60 as prescribed in the aforesaid notification is not applicable for investment in SIF units.

Investors were requested to provide primary holders email address and mobile number for speed and ease of communication and for 2 factor authentication in order to help prevent fraudulent transactions.

Mandatory Up-dation of Know Your Customer (KYC) requirements for processing of SIF transactions

With reference to communication on updation of Permanent Account Number (PAN)/Know Your Customer (KYC) for processing redemption and related transactions in Non-PAN exempt folios from time to time, unitholders may note that it is mandatory to complete the KYC requirements for all applicants/investors (including existing investors and joint holders) and in case of folio of a minor investor, the KYC of the legal guardian is mandatory irrespective of the amount of investment.

Accordingly, financial transactions (including Fresh Purchases, Additional Purchases, Switch transactions, Redemption and all types of systematic plans) and non-financial requests will not be processed if the applicants (including existing investors and joint holders) and unitholders have not completed KYC requirements.

Unitholders are advised to use the applicable KYC Form for completing the KYC requirements and submit the form at the point of acceptance. Further, upon updation of PAN/PEKRN details with the KRA (KRA-KYC)/CERSAI (CKYC), the unitholders are requested to intimate us/our Registrar and Transfer Agent i.e. Computer Age Management Services Limited (CAMS) their PAN information along with the folio details for updation in our records.

SEBI vide its circular MIRSD/Cir- 26 /2011 dated December 23,2011 had issued guidelines to implement the SEBI {KYC Registration Agency (KRA)} Regulations, 2011. SEBI KRA Regulations, 2011, has been amended on January 28,2022 vide a Gazette Notification No. SEBI/LAD-NRO/GN/2022/72. With a view to implement the regulations effectively, additional guidelines has been issued by SEBI for implementation.

E-KYC: Clarification on Know Your Client (KYC) Process and Use of Technology for KYC

SEBI vide circular dt 24th April 2020 has clarified process to be followed while using technology for KYC verification. The process is summarized below:

1.The KYC process requires every SEBI registered intermediary (hereinafter referred to as 'RI') to collect and verify the Proof of Identity (PoI) and Proof of Address (PoA) from the investor.

2.The provisions as laid down under the Prevention of Money-Laundering Act, 2002, Prevention of Money-Laundering (Maintenance of Records) Rules, 2005, SEBI Master Circular on Anti Money Laundering (AML) dated October 15, 2019 and relevant KYC / AML circulars issued from time to time shall continue to remain applicable.

3.SEBI registered intermediary shall continue to ensure to obtain the express consent of the investor before undertaking online KYC.

4.The eSign mechanism of Aadhaar shall be accepted in lieu of wet signature on the documents provided by the investor. Even the cropped signature affixed on the online KYC form under eSign shall also be accepted as valid signature.

5.Online KYC process shall be completed in the following manner:

a. The investor visits the website/App/digital platform of the Regulated Intermediary (RI) and fills up the online KYC form and submits requisite documents online.
b. The name, photograph, address, mobile number, email ID, Bank details of the investor shall be captured online and OVD / PAN / signed cancelled cheque shall be provided as a photo / scan of the original under eSign and the same shall be verified as under:
c. Mobile and email is verified through One Time Password (OTP) or other verifiable mechanism. The mobile number/s of investor accepted as part of KYC should preferably be the one seeded with Aadhaar.
d. Aadhaar is verified through UIDAIs authentication / verification mechanism. (The usage of Aadhaar is optional and purely on a voluntary basis by the investor. RI should not store/save Aadhaar in their system)
e. PAN is verified online using the Income Tax Database (PAN is mandatory)
f. Bank account details are verified by Penny Drop mechanism or any other mechanism using API of the Bank . The name and bank details as obtained shall be verified with the information provided by investor.
g. Any OVD other than Aadhaar shall be submitted through DigiLocker / under eSign mechanism.

6.Once all the information as required as per the online KYC form is filled up by the investor, KYC process could be completed as under:

I. The investor would take a print out of the completed KYC form and after affixing their wet signature, send the photograph of the same to the RI under eSign, or
II. Affix online the cropped signature on the filled KYC form and submit the same to the RI under eSign.

7. The RI shall forward the KYC completion intimation letter through registered post/ speed post or courier, to the address of the investor in cases where the investor has given address other than as given in the OVD. In such cases of return of the intimation letter for wrong / incorrect address, addressee not available etc, at the discretion of the AMC/MF no transactions shall be allowed in such account and intimation may also sent to the Stock Exchange and Depository.

8. IPV/ VIPV would not be required when the KYC of the investor is completed using the Aadhaar authentication / verification of UIDAI.

9. IPV / VIPV shall not be required by the RI when the KYC form has been submitted online, documents have been provided through DigiLocker or any other source which could be verified online.

Duration of the Strategy

Regarding open ended strategies:

The Strategies have been structured as open-ended Strategies. Investors can invest on an ongoing basis on Business Days at prevailing NAV related price. The Units under the Strategy stand redeemed on happening of various events as stated elsewhere in this SAI. As such except on the happening of any event as stated in the clause relating to winding up, the Strategy has perpetual existence and therefore there is no fixed duration of the Strategy.

Regarding close ended strategies:
Duration of Strategies under the fund are fixed. The units under various Strategies of the fund stand redeemed on maturity or on happening of various events as stated elsewhere in this SAI. The AMC and the Trustee reserve the right to make such change/alterations in each Strategy (including the charging of fees and expenses) offered under this SAI to the extent permitted by the applicable Regulations.

Kindly refer to the Investment strategy information document for the exact duration of the strategy.

Winding Up

(1) A close-ended scheme shall be wound up by redemption of the units on the expiry of duration fixed in the scheme, unless the scheme is rolled over for a further period as specified under sub-regulation (4) of regulation 30.

(2) A scheme of a mutual fund, including a close ended scheme proposed to be wound up before the expiry of its fixed duration, shall be wound up:

(a) on the occurrence of any event which, in the opinion of the trustees, requires the scheme to be wound up;
(b) if seventy-five per cent of the unit holders of a scheme pass a resolution for its winding up; or
(c) if the Board so directs in the interest of the unitholders.

(3) Where a scheme is required to be wound up under sub-regulation (2), the trustees shall, within one day, give notice disclosing the circumstances leading to the winding up of the scheme, -
(a) to the Board; and
(b) in two daily newspapers having nationwide circulation and in one vernacular newspaper circulating at the place where the mutual fund is formed.

(4) Where a scheme is required to be wound up under clause (a) of sub-regulation (2), the trustees shall obtain consent of the unit holders, by simple majority of unitholders participating in the voting on the basis of one vote per unit, and shall publish the results of such voting within forty-five calendar days from the date of publication of notice under sub regulation (3).

(5) Where the trustees fail to obtain the consent of the unitholders under sub-regulation (4), the scheme shall be reopened for business activities with effect from the second business day following the publication of results of the voting.

Procedure for Winding Up

(1) Winding up of a scheme under sub-regulation (2) of regulation 36, after compliance with sub-regulation (3) of regulation 36 and sub-regulation (4) of regulation 36, shall be carried out in accordance with the following:

(a) the trustees shall call a meeting of the unitholders to seek approval with simple majority of the unitholders authorizing the trustees or any other person to take steps for winding up of the scheme under clauses (a) and (b) of sub-regulation (2) of regulation 36;

(b) the trustees or any other person shall proceed with the winding up as directed by the Board or in the manner otherwise specified by the Board for winding up of the scheme under clause (c) of sub-regulation (2) of regulation 36;

(c) the trustees or the person so authorised under clause (a) or clause (b) shall dispose of the assets of the scheme in the best interest of the unitholders;

(d) the proceeds realized from the sale of assets under clause (c), shall be: (i) first, utilised towards discharging all liabilities that are due and payable under the scheme; and (ii) thereafter, after making appropriate provision for expenses connected with the winding up, paid to the unitholders in proportion to their respective interest in the assets of the scheme as on the date on which the decision for winding up was taken;

Explanation: For the purpose of this clause: i. The costs related to custodian fees, audit fees and investor communication are unavoidable till the schemes are wound-up and therefore the said costs can be considered as winding up costs for terminating a fund or a scheme; and ii. investment and advisory fees and distribution commission shall not be considered as winding up costs for terminating a fund or a scheme;

(e) upon completion of the winding up, the trustee shall submit to the Board and to the unitholders a report on the winding up containing particulars such as:

(i) the circumstances leading to the winding up;

(ii) the steps taken for disposal of assets of the fund before winding up;

(iii) the expenses incurred in connection with the winding up;

(iv) the net assets available for distribution to the unit holders; and

(v) a certificate from the auditors of the fund;

(f) the provisions of these regulations in respect of disclosures of half-yearly and annual reports shall continue to be applicable until winding up is completed or the scheme ceases to exist.

(2) Upon receipt of the report referred to in clause (e) of sub-regulation (1), and upon being satisfied that all measures for winding up of the scheme have been complied with, the Board shall record and communicate to trustees that the scheme ceases to exist.

Effect of winding up

On and from the date of the publication of notice under clause (b) of sub-regulation (3) of regulation 36, the trustees or the asset management company, as the case may be, shall:

(a) cease to carry on any business activities in respect of the scheme being wound up;

(b) cease to create or cancel units of the scheme;

(c) cease to issue or redeem units of the scheme; and

(d) list the units of mutual fund scheme under winding up on a recognised stock exchange.

Listing of SIF investment strategies that are in the process of winding up:

Every close-ended strategy and units of segregated portfolio shall be listed on recognized stock exchanges. SEBI has extended the provisions for listing of the mutual funds units which are in the process of winding up. Accordingly in terms of regulation 36(2) i.e on the happening of any event which, in the opinion of the trustees, requires the strategy to be wound up, the units of SIF investment strategies which are in the process of winding-up shall be listed on the recognized stock exchange to allow the investor an exit option.

However, SEBI has also clarified that the trading of the investor on the stock exchange is not mandatory, This is an exit option given to investor if they desire to take exit from the strategy. Trading in such listed strategy which is under process of winding up, shall be done only in demat form. AMCs shall enable transfer of such units which are held in form of Statement of Account (SoA) / unit certificates.

Transaction through Channel Partners:

Those investors, who have invested in the strategies of Titanium SIF through the channel partners of Titanium SIF, can approach directly to the Titanium SIF / TAMPL for financial and non-financial transactions with respect to their investments.

Investors may enter into an agreement with certain distributors (with whom AMC also has a tie up) referred to as "Channel Distributors" who provide the facility to investors to transact in units of SIFs through various modes such as their website / other electronic means or through Power of Attorney in favour of the Channel Distributor, as the case may be. Under such arrangement, the Channel Distributors will aggregate the details of transactions (viz. subscriptions/ redemptions/switches) of their various investors and forward the same electronically to the AMC / R&TA for processing on daily basis as per the cut-off timings applicable to the relevant strategies.

Securities Lending by the Fund

Subject to the SEBI Regulations as applicable from time to time the Fund may, if the Trustee permits, engage in Stock Lending. Stock Lending means the lending of securities to SEBI approved intermediaries for a fixed period of time at a negotiated compensation in order to enhance returns of the strategy portfolio. The securities lent will be returned by the borrower on the expiry of the stipulated period. The AMC will adhere to the following strict internal limits should it engage in Stock Lending.

Generally not more than 25% of the net assets of the strategy/s can generally be deployed in stock lending Collateral would always be obtained by the approved intermediary. Collateral value would always be more than the value of the security lent. Collateral can be in form of cash, bank guarantee, government securities, as may be agreed upon with the approved intermediary, and would also be subject to a mark to market valuation on a daily basis.

Example:
A fund has an equity share of a company which it would wish to hold for a long period of time as a core holding in the portfolio as per the fund manager's plan. In that case the investors would be benefited only to the extent of the rise in the value of the share, from time to time if any, on the exchange. If the fund is enabled to lend the said security to a borrower who would be wanting to take advantage of the market fluctuations in its price, the borrower would return the security to the lender (strategy) at a stipulated time or on demand for a negotiated compensation. The fund's unitholders can enhance their returns to the extent of the compensation it will earn for lending the same. An adequate security or collateral will have to be maintained by the intermediary. This should always be higher than the cost of the security. Thus it is in the interest of the investors that returns can be enhanced by way of stock lending rather than hold the security only for capital appreciation potential.

Thus the scenario under which the fund would participate in stock lending would be:

1. There is a holding of security eg 1 lakh shares of XYZ Ltd in the fund which the fund manager wants to be the core holding of the strategy for approximately 6 to 12 months.
2. There is a borrower (not mutual fund) for the security, (who has taken a short position in the market and needs XYZ Ltd shares to settle it) who is willing to put up a proper collateral for the same.(In all cases higher than the price of the script).
3. The borrower is represented by a proper recognized intermediary.
4. The agreement is to return the security or the amount so negotiated at a particular period of time or on demand.

Then the security will be lent by the fund and the unitholders would benefit from the additional compensation earned for lending, apart from the capital appreciation which also happens in that stock. Thus, to summarize, stock lending would be done by the strategy only in the following circumstances:

a) If permitted by trustees and the extent SEBI regulations in that regard, from time to time.

b) If such activity generates additional returns for the strategy and helps to enhance the strategy returns.

c) If considering the above, and other factors all considered in totality, such activity is in the interest of unitholders in the strategy.

Underwriting by the Fund
The Strategy may also undertake underwriting and sub underwriting activities (only for equity and equity related instruments) in order to augment its income, after complying with the approval and compliance process specified in the SEBI (underwriters) Rules & Regulations, 1993 and further subject to the following norms:

- The capital adequacy norms for the purposes of SEBI (Underwriters) Rules and Regulations, 1993 shall be the net assets of the schemes.
- The total underwriting obligation of the Strategy shall not exceed 25% of the total net asset value of the Strategy.
- No Underwriting commitment may be undertaken in respect of the Strategy during the period of 6 months prior to the date of redemption of the Strategy.
- The decision to take up any underwriting commitment shall be made as if the Strategy is actually investing in that particular security.
- As such, all investment restrictions and prudential guidelines relating to investments, individually and in aggregate as mentioned in SEBI Regulations shall, in so far as may be applicable, apply to underwriting commitments which may be undertaken under the Strategy.

These underwriting norms / parameters (as expressed / linked to the net asset/ net asset value/ capital) shall in the ordinary course apply as at the date of the most recent transaction of commitment to underwrite, and changes do not have to be effected merely because, owing to appreciations or depreciations in value or by reason of the receipt of any rights, bonuses or benefits in the nature of capital or of any strategy of arrangement or for amalgamation, reconstruction or exchange, or at any repayment or redemption or other reason outside the control of the Fund, any such limits would thereby be breached. If these limits are exceeded for reasons beyond its control, TAMPL shall adopt as a priority objective the remedying of that situation, taking due account of the interests of the Unitholders.

As such all underwriting and sub-underwriting activities of the Fund will be undertaken in accordance with SEBI (Underwriters) Rules and Regulations, 1993, and the norms as laid down by SEBI Circular dated June 30, 1994, and as amended from time to time.

Suspension of ongoing Sale/Switch-in of Units

The ongoing Sale/Switch-in of Units may be suspended temporarily or indefinitely under any of the following circumstances:

1)Stock markets stop functioning or trading is restricted.

2)Periods of extreme volatility in the capital / stock markets, which in the opinion of the Asset Management Company is prejudicial to the interests of the Unitholders.

3)A complete breakdown or dislocation of business in the major financial markets.

4)Natural calamities.

5)Declaration of war or occurrence of insurrection, civil commotion or any other serious or sustained financial, political or industrial emergency or disturbance.

6)SEBI, by order, so directs.

7)On a requisition made by three-fourths of the Unitholders.

8)If in the opinion of the AMC further sale of units is not in the interest of unitholders.

Additionally the AMC reserves the right in its sole discretion to withdraw the facility of Sale (including switch-in) of Units into and out of the Strategy(s) (including any one Plan / Option of the Strategy), temporarily or indefinitely, if AMC views that changing the size of the corpus may prove detrimental to the existing Unit holders of the Strategy(s).

Restriction on Redemptions / Switch out of units

The Asset Management Company (AMC) may, in the general interest of the Unit holders of the Strategy, keeping in view the unforeseen circumstances/unsure conditions, limit the total number of Units which may be redeemed on any Business Day. Restrictions may be imposed under the following circumstances that leads to a systemic crisis or event that severely constricts market liquidity or the efficient functioning of markets.

a) Liquidity issues - When markets at large become illiquid affecting almost all securities rather than any issuer specific security.

b) 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.

c) Operational issues - When exceptional circumstances are caused by force majeure, unpredictable operational problems and technical failures (e.g. a black out).

Under the aforesaid circumstances, the AMC / Trustee may restrict redemption for a specified period of time not exceeding 10 working days in any 90 calendar days period.
Any imposition of restriction on redemption / switch of units would require specific approval of Board of AMCs and Trustees and the same should be informed to SEBI immediately.
Unitholders should note that the following provisions shall be applicable when redemption requests are placed during such restricted period.
i) No redemption requests upto Rs. 2 lakh shall be subject to such restriction and
ii) Where redemption requests are above Rs. 2 lakh, AMCs shall redeem the first Rs. 2 lakh without such restriction and remaining part over and above Rs. 2 lakh shall be subject to such restriction.

Suspension or restriction of repurchase / redemption facility under any investment strategy of the SIF shall be made applicable only after the approval from the Board of Directors of the Asset Management Company and the Trustees. The approval from the AMC Board and the Trustees giving details of circumstances and justification for the proposed action shall also be informed to SEBI in advance.

The investment strategy may allow partial redemption during this period as per the amount notified in the notice issued by Titanium SIF.

Breach of Minimum Investment Threshold:

The AMC shall monitor compliance with the Minimum Investment Threshold on a daily basis and ensure that there are no active breaches. The AMC shall ensure that the investor's total investment value does not fall below the Minimum Investment Threshold due to redemption transactions initiated by the investor.

Passive breaches (occurrence of instances not arising out of omission and commission by AMC), such as those caused by a decline in Net Asset Value (NAV), shall not be treated as a violation of the Minimum Investment Threshold. However, if the total investment value falls below the threshold due to a passive breach, the investor shall only be permitted to redeem the entire remaining investment amount from the SIF.

In case of any active breach of the Minimum Investment Threshold by an investor, including through transactions on stock exchanges or offmarket transfers:

a) All units of such investor held across investment strategies of the concerned SIF shall be frozen for debit, and
b) A notice of 30 calendar days shall be given to such investor to rebalance the investments in order to comply with the Minimum Investment Threshold.

Pursuant to the notice under above provision:-

a) In case investor rebalances his/her investments in SIF within the notice period of 30 calendar days, the units of SIF of such investor shall be unfreezed, and no further action shall be taken with regard to compliance with Minimum Investment Threshold.
b) In case the investor fails to rebalance the investments within the aforesaid 30 calendar day period, the frozen units shall be automatically redeemed by the AMC, at the applicable Net Asset Value of the next immediate business day after the 30th calendar day of the notice period.

For the purpose of SIF, the ‘Active Breach’ shall mean fall in the aggregate value of an investor’s total investment across all investment strategies of SIF, below the Minimum Investment Threshold of INR 10 lakh, on account of any transactions (i.e. redemption, transfer, sale etc.) initiated by the investor.

The 30-day notice/rebalancing period shall commence from the date the AMC/RTA communicates the breach to the investor.

Unclaimed Redemption/ Income Distribution cum Capital Withdrawal Amount

Unclaimed redemption and dividend amounts, that are currently allowed to be deployed only in call money market or money market instruments, shall also be allowed to be invested in a separate plan of Overnight scheme / Liquid scheme/ Money Market Mutual Fund scheme floated by Mutual Funds specifically for deployment of the unclaimed amounts, provided such schemes are placed in A-1 cell (Relatively Low Interest Rate Risk and Relatively Low Credit Risk) of Potential Risk Class matrix..

Investors who claims 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 amount 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 unclaimed amounts shall be used for the purpose of investor education.

AMC shall play a proactive role in tracing the rightful owner of the unclaimed amounts considering the steps suggested by regulator vide provision no. 15.5 of SEBI Master circular on Mutual Fund dated March 20, 2026 as stated below

(a) AMCs shall provide on their website, the list of names and addresses of investors in whose folios there are unclaimed amounts.
(b) AMFI shall also provide on its website, the consolidated list of investors across Mutual Fund industry, in whose folios there are unclaimed amounts including the name of investor, address of investor and name of Mutual Fund(s) with whom unclaimed amount lies.
(c) Information at Paragraph (a) & (b) above may be obtained by investor only upon providing his appropriate credentials (like PAN, date of birth, etc.) along with adequate security control measures being put in place by Mutual Fund / AMFI.
(d) The website of Mutual Funds and AMFI shall also provide information on the process of claiming the unclaimed amount and the necessary forms / documents required for the same.
(e) Further, the information on unclaimed amount along with its prevailing value (based on income earned on deployment of such unclaimed amount), shall be separately disclosed to investors through the periodic SOA / CAS sent to the investors.

AMC shall not charge any exit load in this plan and BER (Base Expense Ratio) of such plan shall be capped as per the BER of direct plan of such strategy or at 50 bps, whichever is lower.

Borrowing by the SIF

Under the SEBI Regulations, the Mutual Fund is allowed to borrow to meet the temporary liquidity requirements of its Scheme for the purpose of repurchase or redemption of Units or the payment of interest or Income Distribution cum Capital Withdrawal payout to the Unit holders

Further, as per the SEBI Regulations, the Mutual Fund shall not borrow more than 20% of the Net Assets of the Scheme and the duration of such borrowing shall not exceed a period of six months. However, the fund may borrow in excess of 20% of the net asset of the scheme subject to the prior approval of SEBI. The borrowing limit of 20% shall not be applicable for intraday borrowing.

Intraday borrowings shall be used only for the purpose of repurchase or redemption of units or payment of interest or Income Distribution cum Capital Withdrawal payout to the unitholders. The amount of intraday borrowings shall not exceed the guaranteed receivables due on the same day from Government of India, Reserve Bank of India and Clearing Corporation of India Limited. The cost of intraday borrowing, if any, shall be borne by the AMC.

Titanium SIF may raise such borrowings from the Sponsor or its group companies, subsidiaries, associates, etc., or Banks in India or any other entity at market related rates prevailing at the time and applicable to similar borrowings. The security for such borrowings, if required, will be as determined by the Trustee. Cost associated (including interest) with the borrowing may be charged to the scheme.

C. General Information

1. Inter- scheme transfer of investments:

Transfers of investments from one Investment Strategy to another Investment Strategy in the same SIF 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 Investment Strategy to which such transfer has been made.

^Note: SEBI vide provision no. 10.13 of SEBI Master Circular on Mutual Fund dated March 20, 2026 has prescribed the methodology for determination of price to be considered for inter scheme transfers. Inter scheme transfers (ISTs) will be done in accordance with additional safeguard prescribed in terms of provision no. 13.19 of SEBI Master Circular on Mutual Fund dated March 20, 2026.

If any security gets downgraded following ISTs, within a period of four months, Fund Manager of buying scheme has to provide detailed justification /rationale to the trustees for buying such security.

2. **Aggregate investment in the Investment Strategy under the following categories:**

In accordance with Paragraph on 'Scheme Related Disclosures' of SEBI Master Circular for Mutual Funds dated March 20, 2026, please find below the aggregate investment in the respective Investment Strategy by Board of Directors of Tata Asset Management Private Limited (AMC) and key personnel as on May 31,2026:

Name of Investment Strategy	Aggregate amount invested in the Investment Strategy (market value in Rs.)		
	AMC's Board of Directors	Key personnel (excluding Fund Manager)	Fund Manager
Titanium Hybrid Long-Short Fund	16,088.54	5,89,814.68	38,279.69

Titanium Equity Long-Short Fund – Allotment date 14th May 2026 and reopen date 20th May 2026

3. **Dematerialisation and Rematerialisation procedures**

1. How to apply for / get allotment of units in Demat mode:
The investors who intend to deal in depository mode (Demat mode) are required to have a demat account with Central Depository Services (India) Ltd ("CDSL") / National Securities Depository Ltd. ("NSDL"). The investors who subscribe for units through Exchange (BSE / NSE) and wish to have units in Dematerialised form, are required to place an order for purchase of units with the AMFI certified SIF distributor or SEBI registered investment advisors. The investor should provide their depository account details to AMFI certified SIF distributor or SEBI registered investment advisors.
The purchase order will be entered in the Stock Exchange system by AMFI certified distributor or SEBI registered investment advisors & an order confirmation slip will be issued to investor.
The investor will transfer the funds to the clearing corporation. For purchases through other modes, depository account details to be mentioned in the transactions if the units are required in Demat mode. Such units, post allotment, will be credited to the mentioned depository account post validation.

2. How to convert the units held in SoA mode to Demat mode:
Investors desiring to convert the physical units (SoA mode) into dematerialized form, need to submit the dematerialized request along with their latest account statement with their Depository Participant.

3. How to convert the units held in Demat mode to Remat mode:
Investor has to apply for Remat through his Depository Participant (DP) and complete the prescribed applications available at DP end. Once this is done, DP will send the same to RTA for processing.

4. How to redeem the units held in Demat mode:
The investors who hold units in dematerialised form are required to place an order for redemption with the AMFI certified distributor or SEBI registered investment advisors. The investors should provide their AMFI certified distributor or SEBI registered investment advisors with Depository Instruction Slip with relevant units to be debited from his account.
The redemption order will be entered in the system & an order confirmation slip will be issued to investor. Presently no limit is applicable for the redemption of units. However, redemptions can be placed only in terms of units.
Investors also have an option of placing redemption on dematerialised units directly through their depository participant, wherein DP will upload redemptions directly with the depository which will be picked by RTA for processing.

5. Is switch-transaction permissible if the units are held in Demat:
Investors who intend to switch their demat units (Switch-in and switch-out transactions), need to submit the request through Stock Exchange platforms.

6. The procedure for change in investor's profile / bank account details etc. in respect of units held in demat mode (i.e., To whom the investor is required to approach, in case of such requests):
In case of non-financial requests/ applications such as change of investor's profile, address, bank details, complaints etc. investors should approach their respective Depository Participant(s) if units are held in demat mode.

4. ASBA Disclosures

ASBA facility is available only during NFO period. In line with provision no. 15.10 of SEBI Master circular on Mutual Fund dated March 20, 2026, an investor can subscribe to the New Fund Offer (NFO) launched on or after October 01, 2010 through ASBA facility by applying for the units offered under the Option(s)/Plan(s) of the Strategy(s) in the ASBA* Application Form and following the procedure as prescribed in the form. This facility shall co-exist with the current process, wherein cheques/ demand drafts are used as a mode of payment.

*Application Supported by Blocked Amount or ASBA - An application containing an authorization given by the Investor to block the Amount" or "ASBA" application money in his specified bank account towards the subscription of Units offered during the NFO of the Strategy. If an investor is applying through ASBA facility, the application money towards the subscription of Units shall be debited from his specified bank account only if his/her application is selected for allotment of units.

Benefits of Applying through ASBA facility:

I. Writing cheques and demand drafts is not required, as investor needs to submit ASBA application Form accompanying an authorization to block the account to the extent of application money towards subscription of Units. The balance money, if any, in the account can be used for other purposes by the investors.

II. Release/Unblocking of blocked funds after allotment is done instantaneously.

III. Unlike other modes of payment, ASBA facility prevents the loss of interest income on the application money towards subscription of Units as it remains in the bank account of the investor till the allotment is made.

IV. Refunds of money to the investors do not arise as the application money towards subscription of Units gets blocked only on the allotment of Units.

V. The investor deals with the known intermediary i.e. his/her own bank.

VI. The application form is simpler as the application form for ASBA will be different from the NFO application form.

ASBA Procedure

(a) An Investor intending to subscribe to the Units of the NFO through ASBA, shall submit a duly completed ASBA Application Form to a Self Certified Syndicate Bank (SCSB), with whom his/her bank account is maintained.

Note: Self Certified Syndicate Bank (SCSB): Self Certified Syndicate Bank (SCSB) means a bank registered with SEBI to offer the facility of applying through the ASBA process. ASBAs can be accepted only by SCSBs, whose name appears in the list of SCSBs as displayed by SEBI on its website at www.sebi.gov.in.

(b) The ASBA Application Form towards the subscription of Units can be submitted through one of the following Modes:

i) Submit the form physically with the Designated Branches (DBs) of the SCSB ("Physical ASBA"); or

Note: Designated Branches (DBs) of the SCSB: Designated Branches (DBs) of the SCSBs are the branches of the SCSBs which shall collect the ASBA Application form duly filled by the Investors towards the subscription to the Units of the Strategy offered during the NFO. The list of these Designated Branches shall be available at www.sebi.gov.in/pmd/scsb.pdf.

ii) Submit the form electronically through the internet banking facility offered by the SCSB ("Electronic ASBA").

(c) An acknowledgement will be given by the SCSB in the form of the counter foil or specifying the application number for reference. Such acknowledgement does not guarantee, in any manner that the investors will be allotted the Units applied for.

Note: if the bank account specified in the ASBA Application Form does not have sufficient credit balance to meet the application money towards the subscription of Units, the Bank shall reject the ASBA application form.

(d) On acceptance of Physical or Electronic ASBA, the SCSB shall block funds available in the bank account specified to the extent of the application money specified in the ASBA Application Form.

(e) The application money towards the Subscription of Units shall be blocked in the account until

(i) Allotment of Units is made or (ii) Rejection of the application or (iii) Winding up of the Strategy, as the case may be.

(f) SCSBs shall unblock the bank accounts for (i) Transfer of requisite money to the SIF / Strategy bank account against each valid application on allotment or (ii) in case the application is rejected.

(g) The list of SCSBs and their DBs where ASBA application form can be submitted is available on the websites of BSE (www.bseindia.com), NSE (www.nseindia.com) and SEBI (www.sebi.gov.in) and shall also be given in the ASBA application form.

Note: No request for withdrawal of ASBA application form made during the NFO Period will be allowed.

Grounds for Technical Rejections of ASBA application forms

ASBA Application Forms can be rejected, at the discretion of Registrar and Transfer Agent of Titanium SIF or SCSBs including but not limited on the following grounds-:

1. Applications by persons not competent to contract under the Indian Contract Act, 1872, including but not limited to minors, insane persons etc.
2. Mode of ASBA i.e. either Physical ASBA or Electronic ASBA, not selected or ticked.
3. ASBA Application Form without the stamp of the SCSB.
4. Application by any person outside India if not in compliance with applicable foreign and Indian laws.
5. Bank account details not given/incorrect details given.
6. Duly certified Power of Attorney, if applicable, not submitted alongwith the ASBA application form.

No corresponding records available with the Depositories matching the parameters namely (a) Names of the ASBA applicants (including the order of names of joint holders) (b) DP ID (c) Beneficiary account number or any other relevant details pertaining to the Depository Account.

5. Portfolio Turnover Details :

"Portfolio Turnover" is the term used by any SIF for measuring the amount of trading that occurs in a strategy's portfolio during the given period. It is expected that there would be a number of subscriptions and repurchase on a daily basis. Consequently, it is difficult to estimate with any reasonable measure of accuracy, the likely annual turnover in the portfolio. However, a high turnover would not significantly affect the brokerage and transaction costs.

D. Associate Transactions

Transactions with associate or group companies of sponsor:

a) The strategies of the SIF have not made any investments in the unlisted securities of an associate or group company of the sponsor.
b) The strategies will not invest securities issued by way of private placement by an associate or group company of the Sponsor.
c) The strategies will not invest in the listed securities of the group companies of the Sponsors in excess of 25% of NAV.

The AMC, on behalf of the Fund, may utilise the services of Sponsors, group companies and any other subsidiary or associate company of the Sponsors established or to be established at a later date, in case such a company (including their employees or relatives) is in a position to provide the requisite services to the AMC. The AMC will conduct its business with the aforesaid companies (including their employees or relatives) on commercial terms and on arms-length basis and at a mutually agreed terms and conditions to the extent and limits permitted under the SEBI Regulations. Appropriate disclosures, wherever required, shall be made by the AMC.

The AMC will, before investing in the securities of the group companies of the Sponsor, evaluate such investments, the criteria for the evaluation being the same as is applied to other similar investments to be made under the Strategy. Investments by the Strategy in the securities of the group companies will be subject to the limits under the Regulations.

a) Policy regarding investment in Group Companies:

As per SEBI (Mutual Funds) Regulations 2026, the Fund shall not make any investments in any unlisted securities of associate / group companies of the Sponsors. The Fund will also not make investment in privately placed securities issued by associate / group companies of the Sponsors. The Fund may invest not more than 25% of the net assets in listed securities of Group companies.

Aggregate market value of investments in group companies / associate of the sponsors and AMC by all Investment strategies:

Period	Investment made (market value) in Associate Companies (Rs. In crore)	% of total AUM of the Fund
2025-2026*	31.94	6.61

* As on March 31, 2026, Unaudited data.

b) Details of investments by the Fund in group companies in excess of 25% of the net assets: Nil

c) Name of the Associates of the sponsor or the AMC with which the SIF proposes to have dealing, transactions and those whose services may be used for marketing and distributing the investment strategies and the commissions that may be paid:

The fund will/is utilizing services of following associate entities and brokerage and commissions paid/payable to them are competitive:

For Distribution of Investment strategies' units	For Securities Transactions
Tata Capital Ltd	Tata Securities Ltd
Tata International Ltd	-
Tata Securities Ltd	-
Tata Sons Ltd	-
Tata Capital Financial Services Ltd	-

Brokerage Paid to associates related parties group companies of sponsor / AMC: Period April 2025 to March 2026:

Scheme	Name of associate / related parties/group companies of sponsor/AMC	Nature of Association/ Nature of relation	Period Covered	Value of transaction & % of total value of transaction of the fund		Brokerage excl. statutory levies		All statutory levies (Rs.)	
				Business given Rs.	% of total business received by the fund	Amount	& % of total brokerage paid by the fund	Amount	& % of total brokerage paid by the fund
Titanium Hybrid Long-Short Fund	Tata Capital Limited	Group Company	1st Apr 2025 to 31st Mar 2026	5,24,97,375.00	1.01	1,46,893.95	2.21	22,407.55	0.40

E. Documents Available for Inspection

The following documents will be available for inspection at the office of at Head office of Tata Mutual Fund during business hours on any day (excluding Saturdays, Sundays and public holidays):

- Memorandum and Articles of Association of the AMC
- Investment Management Agreement
- Trust Deed and amendments thereto, if any
- Mutual Fund Registration Certificate
- No objection from SEBI to establish SIF
- Agreement between the Mutual Fund and the Custodian
- Agreement with Registrar and Share Transfer Agents
- Consent of Auditors to act in the said capacity
- Consent of Legal Advisors to act in the said capacity
- Securities and Exchange Board of India (Mutual Funds) Regulations, 2026 and amendments from time to time thereto.
- Indian Trusts Act, 1882.

F. Investor Grievances Redressal Mechanism

Given below is the status of Investor Complaints of the existing investment strategies:-

Up to	Opening Balance	Complaints Received	Total	Complaints Attended	Complaints Balance
31/03/2024	NA	NA	NA	NA	NA
31/03/2025	NA	NA	NA	NA	NA
31/03/2026	0	10	10	9	1

No. of complaints (including complaints received through SCORES) of Titanium SIF

SN	Month	Carried forward from previous month	Received	Redressed*	Pending**
1	Dec-25	0	4	1	3
2	Jan-26	3	4	6	1
3	Feb-26	1	1	1	1
4	Mar-26	1	1	1	1
5	Apr-26	1	0	1	0
6	May-26	0	2	2	0

* include complaints of previous months resolved in the current month, if any.
** include total complaints pending as on the last day of the month, if any.

Since first investment strategy allotted on 11th December 2025 hence provided Statistics from Dec-25.

Data on complaints is being regularly placed before the Board of Directors of Tata Asset Management Pvt Ltd & Tata Trustee Company Pvt Ltd. on a Quarterly basis. For data relating to the recently updated number of investor complaints received, redressed and pending with the SIF, please visit **Disclosure of Investor Complaints** tab under other statutory disclosures on Titanium SIF webpage.
Link: https://www.tatamutualfund.com/titanium-sif/statutory-disclosures

Online Resolution of Disputes through Conciliation / Arbitration (Smart ODR):
Investors are requested to note that pursuant to SEBI circular number SEBI/HO/OIAE/OIAE_IAD1/P/CIR/2023/131 dated July 31, 2023 read with SEBI circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/135 dated August 04, 2023 on Online Resolution of Disputes in the Indian Securities Market, a link for Online Dispute Resolution (ODR) is uploaded on our webpage.

This facility can be availed by Investors who have:
1. First lodged their grievance with the SIF and the grievance is not redressed satisfactorily.
2. After escalation of the grievance through SEBI's scores Portal.
3. After exhausting all available options for resolution of the grievance, if the investor is still not satisfied with the outcome. For further information on Online Dispute Resolution, Conciliation and Arbitration process, Investors are requested to refer to the above-mentioned SEBI circulars.

G. Information pertaining to Investments by the Investment Strategies of SIF

1. Derivative strategies

Subject to SEBI (Mutual Fund) Regulations, 2026, the Investment Strategy may use techniques and instruments such as trading in derivative instruments to hedge the risk of fluctuations in the value of the investment portfolio. In accordance with the guidelines issued by the SEBI, exposure to derivative instruments will be restricted to the limit as specified along with the asset allocation pattern of the Investment Strategy.

A derivative is an instrument whose value is derived from the value of one or more of the underlying assets which can be commodities, precious metals, bonds, currency, etc. Common examples of Derivative instruments are Interest Rate Swaps, Forward Rate Agreements, Futures, Options, etc.

The Investment Strategy may use techniques and instruments such as trading in derivative instruments to hedge the risk of fluctuations in the value of the investment portfolio. A derivative is an instrument whose value is derived from the value of one or more of the underlying assets which can be commodities, precious metals, bonds, currency, etc. Common examples of Derivative instruments are Interest Rate Swaps, Forward Rate Agreements, Futures, Options, etc. The Investment Strategy may purchase call and put options in securities in which it invests and on securities indices based on securities in which the Investment Strategy invests. Through the purchase and sale of futures contracts and purchase of related options on those contracts the Fund would seek to hedge against a decline in securities owned by the Fund or an increase in the prices of securities which the Fund plans to purchase. The Fund would sell futures contracts on securities indices in anticipation of a fall in stock prices, to offset a decline in the value of its equity portfolio. When this type of hedging is successful, the futures contract increase in value while the Fund's investment portfolio declines in value and thereby keep the Fund's net asset value from declining as much as it otherwise would. Similarly, when the Fund is not fully invested, and an increase in the price of equities is expected, the Fund would purchase futures contracts to gain rapid market exposure that may partially or entirely offset increase in the cost of the equity securities it intends to purchase.

Derivative Instruments & Related Examples:

Futures:

A futures contract is an agreement between the buyer and the seller for the purchase and sale of a particular asset at a specific price on a specific future date. The price at which the underlying asset would change hands in the future is agreed upon at the time of entering into the contract. The actual purchase or sale of the underlying asset involving payment of cash and delivery of the instrument does not take place until the contracted date of delivery. A futures contract involves an obligation on both the parties to fulfill the terms of the contract. Currently, futures contracts have a maximum expiration cycle of 3-months. A futures contract on the stock market index gives its owner the right and obligation to buy or sell the portfolio of stocks characterized by the index. Stock index futures are cash settled; there is no delivery of the underlying stocks.

Example:

Index Future	
Assume, 1-month Nifty Future price on day 1:	10110
Investment Strategy Buys	100 Future Contracts
(1 lot =Nominal Value equivalent to 75 units of the underlying index)	
Scenario 1	

On the date of Settlement, the future price (closing spot price of the index)	10200
Profit for the Investment Strategy (10200-10110) *100*75	675000
Scenario 2	
On the date of Settlement, the future price (closing spot price of the index)	10050
Loss for the Investment Strategy (10050-10110) *100*75	-450000

Risks associated with Future Contracts: Investments in index futures face the same risk as the investments in a portfolio of shares representing an index. The extent of loss is the same as in the underlying stocks. 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. Additional risks could be on account of illiquidity and potential mispricing of the futures.

Options:

An option gives a person the right but not an obligation to buy or sell something. An option is a contract between two parties wherein the buyer receives a privilege for which he pays a fee (premium) and the seller accepts an obligation for which he receives a fee. The premium is the price negotiated and set when the option is bought or sold. A person who buys an option is said to be long in the option. A person who sells (or writes) an option is said to be short in the option.

Example:

Call Option	
Say, Investment Strategy buys 1 lot of Nifty Index	75 Units
Spot price	10000
Strike price	10100
Premium	100
Total amount paid as premium (Rs.) (100X75)	Rs.7500
Scenario 1: The Nifty Index goes up (i.e Nifty Spot)	10250
Investment Strategy has reversed the position before expiry of the contract	
Current Premium at the time of reversal	200
Net Gain Rs. (200-100)	100
Total gain on 1 lot of Nifty (75 units) Rs. (75x100)	Rs.7500
Investment Strategy has reversed the position (i.e. Nifty Option) at expiry	
Nifty Spot on expiry	10275
Premium Paid (Rs.)	100
Exercise price	10100
Receivables on Exercise (10275-10100)	175
Total gain (Rs.) (175 -100) *75	Rs.5625
Scenario 2: The Nifty index moves to the level below 10100	
Investment Strategy does not gain anything but the loss to the Investment Strategy (limited to the actual premium paid)	Rs. 7500

Put Option	
Say, Investment Strategy buys 1 lot of Nifty Index	75 Units
Spot Price	10000
Strike Price	9450
Premium	50
Total Amount Paid by the Investment Strategy (75*50)	3750
Scenario 1: Nifty Index goes down	
Investment Strategy has reversed the position before expiry of the contract	
Nifty Spot	9300
Current Premium at the time of reversal	80
Premium Paid (Rs.)	50
Net Gain (Rs.80-50)	30
Total Gain on 1 lot of Nifty (Rs.) (75x30)	Rs.2250
Investment Strategy has reversed the position at expiry	
Nifty Spot	9375
Premium Paid (Rs.)	50
Exercise Price	9450
Gain on Exercise	75
Total Gain Rs. (75-50)*75)	Rs.1875
Scenario 2: If Nifty Index Stays over the Strike price of 9450	
Say Nifty Spot	9500
Net Loss to the Investment Strategy will be premium paid	Rs.3750

Risks associated with Option Contracts: The option contracts give a person the right but not an obligation to buy or sell. The risk is potential mispricing and exposure to options can limit the profits from a genuine investment transaction.

Various Derivatives Strategies:

1. Writing of call options under covered call strategy

The Investment Strategy may write call options under covered call strategy subject to conditions specified by SEBI which includes the following:

1) Call option writing under a cover call strategy is allowed for constituent stocks of NIFTY 50 and BSE SENSEX.

2) The total notional value (taking into account strike price as well as premium value) of call options written by a Investment Strategy shall not exceed 15% of the total market value of equity shares held in the Investment Strategy.

3) 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 Investment Strategy. The unencumbered shares in a Investment Strategy shall mean shares that are not part of Securities Lending and Borrowing Mechanism (SLBM), margin or any other kind of encumbrance.

4) In no case, the Investment Strategy 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.

5) The total gross exposure related to option premium paid and received must not exceed 20% of the net assets of the Investment Strategy.

6) The call option written shall be marked to market daily and the respective gains or losses factored into the daily NAV of the Investment Strategy until the position is closed or expired.

Benefit of Writing of Call Option Under a Cover Call Strategy

a. Holders with Long term view on the stock can write options and reduce the portfolio costs.

b. Writing can also act as a good alternative for playing relative outperformance for stocks held in portfolios within same sector.

c. Stocks held in the portfolio can be effectively hedged in extreme volatility in the market

Illustration

For example, if the Investment Strategy buy a stock A at Rs.900, receive a Rs.100 option premium from writing a Rs.1050 strike price call of stock A, then it can maintain the stock position as long as the stock price stays below Rs.1150 at expiry. If the stock price moves above Rs.1150, the Investment Strategy may have to give delivery of long position to meet obligation of call writing.

2. Index / Stock spot - Index / Stock Futures

The pricing of the futures is derived from underlying Index spot or the underlying stock. It is the cost of carry that binds the value of the futures to the underlying portfolio. When the two go out of sync, there are opportunities.

The cost of carry links the futures price to the price of the underlying asset. The price of the futures at any given instance should typically be more than the level of the spot price at that point. Theoretically, the fair value of the futures is equal to the spot price of the underlying plus the cost of carry i.e. the interest rate prevailing for an equivalent credit risk. Cash and carry trades at times provide higher than the prevailing interest rates. There is an opportunity to exploit by selling the overpriced futures and buying the underlying portfolio. It may also happen that the Index / Stock Future may be at a discount. In such cases, the Investment Strategy may buy the future and sell the stock after borrowing the same. The Investment Strategy shall enter into a combination of these transactions simultaneously.

If the Investment Strategy has to unwind the positions prior to the expiry on account of redemptions or any other reason, the returns would depend on the spread between the spot and futures price at which the position is unwound. If the price differential between the spot and futures position of the subsequent month maturity is attractive near the expiry date, then the Investment Strategy may rollover the futures position and continue with the position in the spot market. The Investment Strategy shall endeavour to deploy its assets through transactions in the above pattern, which may involve Index Futures with Stock Futures or Futures of the same stock with different expiry months.

3. Cash Futures Arbitrage Strategy

The fund would look for market opportunities between the spot and the futures market. The cash futures arbitrage strategy can be employed when the price of the futures exceeds the price of the underlying stock. The fund would first buy the stocks in cash market and then sell in the futures market to lock the spread.

Buying the stock in cash market and selling the futures results in a hedge where the fund portfolio has locked in a spread and is not affected by the price movements in the spot and futures markets. The arbitrage position can be continued till expiry of the futures contracts. The futures contracts are settled based on the last half an hour's weighted average trade of the cash market. There is a convergence between the cash market and the futures market on expiry and this convergence results in the portfolio being able to generate the arbitrage return locked in earlier. However, the position may even be closed earlier in the event of the price differential being realized before expiry or better opportunities being available in other stocks / indexes. The strategy is attractive if this price differential (post all costs) is higher than the investor's cost-of capital.

Illustration of a Cash Futures Arbitrage Strategy: -

Buy 100 shares of Company X at Rs 1000 and sell the same quantity of stock's futures of the Company X at Rs 1100.

1. Market goes up and the price on the expiry day is Rs 2000.

At the end of the month (expiry day) the futures expire automatically:

Settlement price of futures = closing spot price = Rs 2000

Gain on stock is 100*(2000-1000) = Rs 100,000

Loss on futures is 100*(1100-2000) = Rs – 90,000

Net gain is 100,000 – 90,000 = Rs 10,000

2. Market goes down and the price on the expiry day is Rs 500.

At the end of the month (expiry day) the futures expire automatically:

Settlement price of futures = closing spot price = Rs 500

Loss on stock is 100*(500-1000) = Rs – 50,000

Gain on futures is 100*(1100-500) = Rs 60,000

Net gain is 60,000 – 50,000 = Rs 10,000

Unwinding the position:

Buy 100 shares of Company X at Rs 1000 and sell the same quantity of stock's futures of the Company X at Rs 1100.

The market goes up and at some point of time during the month (before expiry) the stock trades at Rs 1200 and the futures trades at Rs 1190 then

Fund Manager will unwind the position:

Buy back the futures at Rs 1190: loss incurred is (1100- 1190) *100 = Rs – 9,000

Sell the stock at Rs 1200: gain realized: (1200-1000) *100 = Rs 20,000

Net gain is 20,000 – 9,000 = Rs 11,000

Rolling over the futures:

The Investment Strategy may continue to stay invested in the stock in the Cash market. Close to expiry, if the stock's price is at Rs 1500 then the stock's futures is close to Rs 1500 as well. Also, if the price of the current month stock futures is below the current price of the next month stock futures, the Investment Strategy may roll over the futures position to the next expiry:

The price of the stock futures next month contract is at Rs 1510

The price of the stock futures current month contract is at Rs 1500

Then sell the futures next month contract at Rs 1510 and buy back current month futures contract at Rs 1500 = gain of 100*(1510-1500) = Rs 9,000 and the arbitrage position is rolled over.

4. Use of derivative for other Arbitrage Opportunities

a. Dividend Arbitrage

At the time of declaration of dividend, the stock futures / options market can provide a profitable opportunity. Generally, the stock prices decline by the dividend amount when the stock becomes ex-dividend.

b. Buy-Back / Open Offer Arbitrage

When the Company announces the buy-back or open offer of its own shares, there could be opportunities due to price differential in buyback price and traded price.

c. Weighted average price of futures on expiry.

The fund manager will aim at liquidating the cash market position in the last half an hour on expiry day at a rate that will be closed to weighted price in the spot market. However, the extreme volatility in last half an hour may effect the price and accordingly affect the return. Accordingly, fund will aim at taking exposure to those stocks where the bid and ask spread is minimum.

d. Reverse cash and carry arbitrage

If permitted by SEBI, the Investment Strategy may enter into reverse cash and carry arbitrage. This will involve borrowing stock for a defined period from a recognized counter-party and selling it in the market while simultaneously taking a long position in the stock futures. The above trade will be remunerative in scenarios where the stock/ index futures are trading at a discount to the underlying cash market. Once the discount narrows or converts to a premium, the position is unwound by buying back the stock/index and squaring off the futures transaction. The purchased stock/ index is returned to the lender as per the agreed terms.

The Investment Strategy may use fixed income derivative instruments like Interest Rate Swaps, Forward Rate Agreements or such other derivative instruments as may be introduced from time to time and as may be permitted under the SEBI (Mutual Fund) Regulations

Illustration of Commodity Trade

Long Future contract of Silver, with a Hypothetical value of 1 lot of trading.
Silver Type: Future Contracts
Traded Contracts: March, May, July, September and December
Types of Contracts: Compulsory Delivery
Hypothetical Price: Rs. 40,000 per Kg
Contract size: 30Kg
Contract Value: Rs. 40,000/kg * 30kg= 12,00,000
Expiry Date: 5th of particular contract month. (September contract expires on 5th Sept)
Example: Long Silver Sept Contract on 2nd August at 40,000 per kg
The value of contract is Rs. 12,00,000
Margin based trading. Initial Margin is decided by the exchange. As per recent data, silver margin is 5% of the value I.e 60,000.
Initial Investment to trade one lot of Silver: Rs. 60,000
1 rupee change in price determine Rs. 30 plus/ Minus
Daily Mark to Market Margin is subject to market price change
Example on next trading day silver price rises to Rs. 41000

So, the net gain will be Rs. 30,000 per kg. That is 1000 rupees appreciation silver price makes Rs. 30000 gain in the value as price.

However, similar amount could be at loss if price falls to say Rs. 39,0000
One may decide to exit the position at a profit or loss much before the contract expiry date.
In this example on 3rd August silver position can be squared off at a profit since the price has reached to Rs. 41000 per kg.
The above example is a cash settled trade.

In any case if a buyer/ long future holder would like to take physical delivery of the position the implication and process is as follows:

The existing long position can be converted into physical settlement subject to the holder gives delivery intension 5 days prior to the contract expiry.
In this example since silver September contract is expiring on 5th September, the buyer needs to intimate his or her broker by 30th of August that he is willing to take physical delivery of the trade.

Upon intimation of intension the daily incremental margin will be levied on the trade from 30th of August to 5th of September. On last day the contract will be settled with buyer and seller matching of intension. The funds will be settled on expiry plus 2 working days and physical stock will also be transferred in the buyer name and shall be deposited at the respective location in the warehouse and an electronic receipt will be issued.

Illustration of calendar Contract Spread, converting into delivery trade:

Take the same example of Silver as mentioned above.

To execute a calendar spread two contracts are to be traded. Here in case of Silver we shall deal with September and December contract.

Since it's a calendar spread one contract needs to be bought and other sold.

So long September contract and Short December contract.

Note, this sort of trade shall be executed by a fund manager subject to market opportunity when he or she thinks the spread will either widen or narrow to make trade benefit.

During the course of trade and before the first month contract nears its expiry period and if the trade is earning financial gain then the fund manager may have the option of squaring off the position with cash settled trade.

However, in any case if the fund manager is willing to take physical delivery in September contract the aforementioned mentioned process of taking delivery will be followed. So once the September contract get settled, he or she holds the physical silver at the vault and against that December short future contract is open. Later once the December contract will reach its expiry period the seller (since holding physical silver and short future contract) will have to give delivery intension to offload the stocks at the exchange. The settlement will be done on 5th December and position will be square off automatically. The net difference will be the financial gain of the fund manager for his or her investor in a Investment Strategy.

The Investment Strategy may use debt derivative instruments like Interest Rate Swaps, Forward Rate Agreements or such other derivative instruments as may be introduced from time to time and as may be permitted under the SEBI (Mutual Fund) Regulations.

Interest Rate Swaps: An Interest Rate Swap is an agreement whereby two parties agree to exchange periodic interest payments. The amount of interest payments exchanged is based on some predetermined principal, called notional principal amount. The amount each counterparty pays to the other upon periodic interest rate multiplied by the notional principal amount. The only amount that is exchanged between the parties is the interest payment, not the notional principal amount.

Example: Use of IRS

The fund is reasonably invested, and the view of the fund manager, interest rates are expected to move up due to certain negative events which have occurred. In such cases the fund can enter into a paid position (IRS) where the fund will pay a fixed rate for a specified maturity and receive the floating rate of interest. This is illustrated below:

Example A: Use of IRS

Assuming the Investment Strategy is having 10% of the portfolio in cash. The fund manager has a view that the interest rate scenario is bearish and call rates are likely to spurt over the next three months. The fund manager would therefore prefer to pay fixed rate of return on his cash, which he is lending in the overnight call market. In other words, he would like to move to a 91 days floating interest rate from overnight fixed rate.

1. Say Notional Amount: Rs. 2 crores

2. Benchmark: NSE MIBOR

3. Tenor: 91 Days

4. Fixed Rate: 9.90%

5. At the end of 91 days;

6. The Investment Strategy pays: fixed rates for 91 days is 9.90%

7. TMF receives: compounded call rate at 10.25% for 91 days.

In practice, however the difference of the two amounts is settled. Here the Investment Strategy receives Rs. 2,00,00,000 x 0.35% x91 / 365 = 17,452. The players in IRS are scheduled commercial banks, primary dealers, corporate, mutual funds and All India Financial Institutions.

In view of the fund manager interest rates are expected to move down due to certain positive events which have occurred. In such cases the Investment Strategy can enter into a received position (IRS) where the Investment Strategy will receive a fixed rate for a specified maturity and pay the floating rate of interest. This is illustrated below:

Example B: Use of IRS

Assuming the Investment Strategy is having 10% of the portfolio in cash. The fund manager has a view that the interest rate scenario is soft and call rates are unlikely to spurt over the next three months. The fund manager would therefore prefer to receive a higher rate of return on his cash, which he is lending in the overnight call market. In other words, he would like to move to a 91 days fixed interest rate from overnight floating rate.

1. Say Notional Amount: Rs. 2 crores

2. Benchmark: NSE MIBOR

3. Tenor: 91 Days

4. Fixed Rate: 10.25%

5. At the end of 91 days;

6. The Investment Strategy pays: compounded call rates for 91 days is 9.90%

7. TMF receives: Fixed rate at 10.25% for 91 days.

In practice, however the difference of the two amounts is settled. Here the Investment Strategy receives Rs. 2,00,00,000 x 0.35% x91 / 365 = 17,452. The players in IRS are scheduled commercial banks, primary dealers, corporate, mutual funds and All India Financial Institutions.

Forward Rate Agreements (FRA):

This is an agreement between two counterparties to pay or to receive the difference between an agreed fixed rate (the FRA rate) and the interest rate prevailing on a stipulated future date based on the notional amount, for an agreed period. .In short , in a FRA , interest rate is fixed now for a future period.

This is illustrated below:

Assume that on September 1, 2023, the 30-day commercial paper (CP) rate is 7.75% and the Investment Strategy has an investment in a CP of face value Rs. 50 crores, which is going to mature on September 30, 2023. If the interest rates are likely to remain stable or decline after September 30, 2023, and if the fund manager, who wants to re-deploy the maturity proceeds for 1 more month, does not want to take the risk of interest rates going down, he can then enter into a following forward rate agreement (FRA) say as on September 30, 2023:

He can receive 1 X 2 FRA on September 30, 2023 at 7.75% (FRA rate for 1-month lending in 2 months' time) on the notional amount of Rs.50 crores, with a reference rate of 30-day CP benchmark. If the CP benchmark on the settlement date i.e. September 30, 2023 falls to 7.50%, then the Investment Strategy receives the difference 7.75 - 7.50 i.e. 25 basis points on the notional amount Rs. 50 crores for 1 month. The maturity proceeds are then reinvested at say 7.50% (close to the benchmark). The Investment Strategy, however, would have locked in the rate prevailing on September 30, 2023 (7.75%) as it would have received 25 basis points more as settlement amount from FRA. Thus the fund manager can use FRA to mitigate the reinvestment risk.
In this example, if the rates move up by 25 basis points to 8% on the settlement date (September 30, 2023), the Investment Strategy loses 25 basis points but since the reinvestment will then happen at 8%, effective returns for the Investment Strategy is unchanged at 7.75%, which is the prevailing rate on September 30, 2023.

Risks associated with Forward Rate Contracts:

When entering into an FRA, both parties to the contract entail credit risk exposure. The additional risks could be on account of lack of opportunity, illiquidity.

Interest Rate Future (IRF)

An interest rate future is a contract (future contract) with an interest-bearing instrument as the underlying asset. Interest rate futures are used when there is an expectation of interest rate movement in adverse direction.

For example, if fund manager expects rise in interest rate. He may sell interest rate future today. If interest rates rise in the future, the value of the future will fall (as it is linked to the underlying asset, bond prices), and hence a profit can be made when closing out of the future (i.e. buying the future). However, in case interest rate falls, loss may be incurred on IRF position.

Illustration of Use of IRF (For Hedging)

A – Perfect Hedge

1) Assume a portfolio has 100 crores of Government security 7.59% GOI 2026 with face value Rs. 100/. The bond is currently trading in market at 105.00.
2) The futures on 7.59% GOI 2026, expiring on 27th October 2016 is trading on exchange at 105.10.
3) Instead of exiting the cash position, the fund manager can decide to hedge the position by selling the same quantity in futures. Since one contract of IRF has a notional of 2 lacs, in this example the fund manager sells 100 crs/2 lakhs = 5000 contracts, to hedge long position.
4) At maturity, the settlement price of the futures will be almost same as closing price of the underlying security.

At maturity of the Interest Rate Futures

Case 1: At expiry Bonds close higher than the price at which fund manager hedged the position, but below the futures price at which he hedged

Closing price of Bonds on day of maturity of futures = 105.05

Settlement price of futures = 105.05

MTM gain on the underlying bond = (105.05-105.00) * 100 crs / 100 (i.e. face value of bond) = Rs. 5,00,000

The profit on the futures leg is = 5000*2lacs *(105.10-105.05)/ 100 (i.e. face value of bond) = Rs 5,00,000

Overall profit to the fund = Rs 10,00,000

Case 2: At maturity bonds close higher than the level at which futures were sold

In case, the closing price of bonds on the day of maturity of futures = 105.20,

Settlement price of futures = 105.20

The MTM gain on underlying bond = (105.20-105.00) * 100 crs /100 (i.e. face value of bond) = Rs. 20,00,000

Loss on futures leg is = 5000*2 lacs * (105.10-105.20) /100 (i.e. face value of bond) = - Rs 10,00,000

Total Profit to the fund= Rs 10,00,000

As can be seen above, by selling the future contract instead of the underlying, the fund manager has locked in the Rs. 10, 00,000 profit and at the same time cash holding position will be hedged against the adverse market movements.

B – imperfect hedging

Assume the portfolio of market value worth INR 1000 crore has a modified duration of 5. This is being hedged with an IRF that has a modified duration of 10. Considering that fund manager choose to hedge 20% of the portfolio the maximum extent of short position that may be taken in IRF is as below

(Portfolio Modified Duration*Market Value of the Portfolio)

(Futures Modified Duration*Futures Price/PAR)

(5*(0.2*1000))
= ----------
(10*(101/100)

=Rs.99.01 Crores.

Hence the Investment Strategy can sell IRFs worth Rs.99.01 Crores and with duration of 10 to hedge Rs.200 Crores of portfolio with a duration of 5.

For detailed risk associated with use of derivatives, please refer paragraph "Investment Strategy Specific risk factors"

Position Limits for IRF Contracts:

Investment Strategy Level: The gross open positions across all contracts shall not exceed 3 % of the total open interest or INR 200 crores- whichever is higher.
Mutual Fund: The gross open positions across all contracts shall not exceed 10 % of the total open interest or INR 600 crores- whichever is higher.

Subject to SEBI (Mutual Fund) Regulations, 2026, The Investment Strategy may invest in Derivative Instruments to the extent permitted under 13.18, 21.5 and paragraph 21.6 of SEBI Master Circular on Mutual Fund dated March 20, 2026.

The cumulative gross exposure through equity, debt and derivative positions should not exceed 100% of the net assets of the Investment Strategy.

For other option contracts, the total exposure related to option premium paid will not exceed 20% of the net assets of the Investment Strategy. Cash or cash equivalents with residual maturity of less than 91 days may be treated as not creating any exposure.

Exposure due to hedging positions shall not be included in the above-mentioned limits subject to the following:

1. Hedging positions are the derivatives positions that reduce possible losses on an existing position in securities and till existing position remains.

2. Exposure due to derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall have to be added and treated under the limits mentioned above.

3. Any derivative instrument used to hedge has the same underlying security as the existing position being hedged.

4. 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.

In order to reduce interest rate risk, the 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:

(Portfolio Modified Duration*Market Value of the Portfolio)

(Futures Modified Duration*Futures Price/PAR)

In case IRF contract has different underlying security(s) than the existing position being hedged, it would result in imperfect hedging. Imperfect edging using IRFs is exempted from the gross exposure, up to maximum of 20% of the net assets of the Investment Strategy, subject to following conditions:

1. Exposure to IRFs is created only for hedging the interest rate risk based on the weighted average modified duration of the bond portfolio or part of the portfolio.

2. Imperfect hedging is permitted without it being considered under the gross exposure limits, if and only if, the correlation between the portfolio or part of the portfolio (excluding the hedged portions, if any) and the IRF is at least 0.9 at the time of initiation of hedge. In case of any subsequent deviation from the correlation criteria, the same may be rebalanced within 5 working days and if not rebalanced within the timeline, the derivative positions created for hedging shall be considered under the gross exposure. The correlation should be calculated for a period of last 90 days.

3. The portion of imperfect hedging in excess of 20% of the net assets of the Investment Strategy should be considered as creating exposure and shall be included in the computation of cumulative gross exposure through equity, debt and derivative positions which should not exceed 100% of the net assets of the Investment Strategy.

At no point of time, the net modified duration of part of the portfolio being hedged should be negative.

In Addition to the above, SEBI has also prescribed following derivative limits:

As per provision no. 8.6 of SEBI Master Circular on Mutual Fund dated March 20, 2026, Mutual Funds are allowed to participate in derivatives market at par with Foreign Portfolio Investors (FPI). Accordingly, Mutual Funds shall be treated at par with a registered FII in respect of position limits in index futures, index options, stock options and stock futures contracts.

The position limits for trading in derivatives by Mutual Fund specified by SEBI are as follows:

Position Limits for Mutual Fund and its scheme

Position limit for Index Options and Index Futures contracts	
Index Options Contract*	On a particular underlying index Rs.500 Crore or 15% of the total open interest of the market in equity Index options contracts, whichever is higher.
Index Futures Contract**	On a particular underlying index Rs.500 Crore or 15% of the total open interest of the market in equity Index futures contracts, whichever is higher.

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

Additional position limit for hedging	
In addition to the position limits as mentioned above, Mutual Funds may take exposure in equity index derivatives subject to the following limits:	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.
	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.
Position limit for Stock Options and Stock Futures contracts	
The combined futures and options position limit shall be 20% of the applicable Market Wide Position Limit (MWPL). This limit would be applicable on aggregate open positions in all futures and all option contracts on a particular underlying stock.	

Position limit for each scheme of a Mutual Fund

The scheme-wise position limit requirements shall be:

1. 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 capitalization (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)

2. This position limits shall be applicable on the combined position in all derivative contracts on an underlying stock at a Stock Exchange.

3. 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.

Position limits for Exchange Traded Commodity Derivatives (ETCDs)
For Agri commodities- For Clients (scheme Wise)

- Near month contract Level- Fixed number of lots as defined by the Exchanges.
- For over all contracts- Fixed number of lots as defined by the Exchanges.

For Agri commodities- For Trading Members (Fund Level)

- Near month contract Level- Fixed Limit as defined by the Exchanges OR 25% of overall positions Limits in that commodity, whichever is higher.
- For over all contracts - Fixed Limit as defined by the Exchanges OR 15% Overall Open Interest positions Limits in that commodity, whichever is higher.

For Non-Agri commodities- For Clients (scheme Wise)

- Near month contract Level- Not Applicable
- For over all contracts- Fixed Lots as defined by the Exchanges or 5% of the Open Interests whichever is higher.

For Non-Agri commodities- For Trading Members (Fund Level)

- Near month contract Level- Not applicable.
- For over all contracts - Fixed Limit as defined by the Exchanges OR 20% of the Overall OI positions Limits in that commodity, whichever is higher.

The Exchanges, however, in their own judgment, may prescribe limits lower than what is prescribed by SEBI by giving advance notice to the market under intimation to SEBI.

Further the exposure limits for trading in derivatives by SIFs specified by paragraph 13.18, 21.5 and paragraph 21.6 of SEBI Master Circulars for Mutual Funds dated March 20, 2026 are as follows:

1. Investment by SIF in eligible derivative products shall be as follows:

2. (a) The investment strategies under the SIF may take exposure of up to 25% of the net assets in permissible exchange traded derivative instruments, specifically for purposes other than hedging and portfolio rebalancing.

Explanation: This provision allows an investment strategy under the SIF to take unhedged short exposure through derivative instruments of up to 25% of net assets, in addition to derivative exposure undertaken for hedging and portfolio rebalancing purposes.

(b) The exposure to derivative contracts for the investment strategies under SIF shall be computed as follows:

- Futures (long and short) = Futures Price * Lot Size * Number of Contracts
- Options bought = Option premium paid * Lot size * Number of contracts
- Options sold = Market price of the underlying * Lot size * Number of contracts
- In case of any other derivative exposure, the exposure shall be calculated as the notional market value of the contract.

(c) The total exposure at any point of time shall be the sum of exposure through instruments in both the cash market and derivatives market.
(d) Offsetting of exposure at the portfolio level shall be allowed for:
(i) Cash and derivative positions on the same underlying security
(ii) Between derivative positions on the same underlying security
The illustration on exposure calculation and offsetting of derivative positions is provided in Annexure 13A.

3. The cumulative gross exposure through equity, debt, derivative positions (including commodity and fixed income derivatives), repo transactions and credit default swaps in corporate debt securities, InvITs, other permitted securities/assets and such other securities/assets as may be permitted by the Board from time to time shall not exceed 100% of the net assets of the investment strategy.
4. SIFs shall not write options or purchase instruments with embedded written options except for the covered call strategy.
5. The total exposure related to option premium paid and received must not exceed 20% of the net assets of the investment strategy.
6. Derivative positions taken for hedging purposes in excess of the underlying position against which the hedging position has been taken, shall be treated under the limits of Gross Exposure
   Explanation: Hedging positions are the derivative positions that reduce possible losses on an existing position in securities and till the existing position remains. Hedging positions cannot be taken for existing derivative positions.

7. The portion of imperfect hedging using IRFs as per Item No. (d) under Paragraph 13.18.6 in excess of 20% of the Net Assets of the Investment Strategy shall be considered as creating exposure and shall be included in the computation of gross exposure in terms of Paragraph 13.18.1 above.
8. As per 13.8.6. of SEBI Master circular Exemptions from the gross exposure limits:-

Sl No	**Exemption from gross exposure limit for exposure in**	**Additional conditions for exemption, if any**
(a)	Cash or cash equivalents with residual maturity of less than 91 calendar days	NA
(b)	Exposure due to hedging positions: hedging position shall be exempted from the exposure limits mentioned in Paragraph 13.18.1 above, subject to the conditions mentioned alongside.	(i) Hedging positions are not taken for existing derivative positions; (ii) Any derivative instrument used to hedge has the same underlying security as the existing position being hedged; (iii) 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.
(c)	The exposure on account of the call option written under the covered call strategy as mentioned in Paragraph 13.15.1 above.	NA
(d)	Imperfect hedging using IRFs as per Paragraph 13.15.2 up to maximum 20% of the Net Assets of the Investment Strategy	i) Exposure to IRFs is created only for hedging the interest rate risk based on the weighted average modified duration of the bond portfolio or part of the portfolio. ii)The correlation between the portfolio or part of the portfolio (excluding the hedged portions, if any) and the IRF, calculated for the past 90 calendar days is at least 0.9 at the time of initiation of hedge. Any subsequent deviation from the correlation criteria shall be rebalanced within 5 working days and if not rebalanced within the timeline, the derivative positions created for hedging shall be considered under the gross exposure computed in terms of Paragraph 13.18.1 above. ***Explanation****: If the fund manager intends to do imperfect hedging up to 15% of the portfolio using IRFs on weighted average modified*

		duration basis, either of the following conditions need to be complied with for the purpose of exemption from gross exposure: I) The correlation for past 90 calendar days between the portfolio and the IRF is at least 0.9 or II)The correlation for past 90 days between the part of the portfolio (excluding the hedged portions, if any) i.e. at least 15% of the net asset of the Investment Strategy (including one or more securities) and the IRF is at least 0.9. (iii) At no point of time, the net modified duration of part of the portfolio being hedged should be negative.
(e)	Short position in Exchange Traded Commodity Derivatives (ETCDs) not exceeding the holding of the underlying goods received in physical settlement of ETCD contracts	The mutual funds shall not write options, or purchase instruments with embedded written options in goods or on commodity futures.
(f)	Short position in ETCDs not exceeding the long position in ETCDs on the same goods.	
(g)	CDS bought for the purpose of hedging credit risk on debt securities	The exposure to CDS shall not exceed respective debt security exposure.

6. SIFs may enter into plain vanilla Interest Rate Swaps (IRS) for hedging purposes. The value of the notional principal in such cases must not exceed the value of respective existing assets being hedged by the investment strategy.

In case of participation in IRS is through over the counter transactions, the counter party has to be an entity recognized as a market maker by RBI and exposure to a single counterparty in such transactions should not exceed 10% of the net assets of the investment strategy. However, if SIFs are transacting in IRS through an electronic trading platform offered by the Clearing Corporation of India Ltd. (CCIL) and CCIL is the central counterparty for such transactions guaranteeing settlement, the single counterparty limit of 10% shall not be applicable

II. The risks involved in derivatives are:

1. The cost of hedge can be higher than adverse impact of market movements
2. The derivatives will entail a counter-party risk to the extent of amount that can become due from the party.
3. An exposure to derivatives in excess of the hedging requirements can lead to losses.
4. An exposure to derivatives can also limit the profits from a genuine investment transaction.
5. Efficiency of a derivatives market depends on the development of a liquid and efficient market for underlying securities and also on the suitable and acceptable benchmarks.
6. 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.

III. Methods to tackle these risks:

1. Hedging will not be done on a carpet basis but based on a view about interest rates, economy and expected adverse impact.
2. Limits of appropriate nature will be developed for counter parties
3. Such an exposure will be backed by assets in the form of cash or securities adequate to meet cost of derivative trading and loss, if any, due to unfavorable movements in the market.

IV. The losses that may be suffered by the investors as a consequence of such investments:

1. As the use of derivatives is based on the judgment of the Fund Manger, the view on market taken may prove wrong resulting in losses.
2. The upside potential of investments may be limited on account of hedging which may cause opportunity losses.

V. The use of derivatives for hedging will give benefit of:

1. Curtailing the losses due to adverse movement in interest rates

2. Securing upside gains at cost

VI. VALUATION OF DERIVATIVES

i. The traded derivatives shall be valued at market price in conformity with the stipulations of 10.2.1 of SEBI Master Circular for Mutual Funds dated March 20, 2026

ii. The valuation of untraded derivatives shall be done in accordance with the valuation method for untraded investments prescribed in 10.2.2 of SEBI Master Circular for Mutual Funds dated March 20, 2026.

VII. REPORTING OF DERIVATIVES

The AMC shall cover the following aspects in their reports to trustees periodically, as provided for in the Regulations:

i. Transactions in derivatives, both in volume and value terms.

ii. Market value of cash or cash equivalents / securities held to cover the exposure.

iii. Any breach of the exposure limit laid down in the Investment strategy Information document.

iv. Shortfall, if any, in the assets covering investment in derivative products and the manner of bridging it.

The Trustees shall offer their comments on the above aspects in the report filed with SEBI under sub regulation (4) (f) of regulation 12 of SEBI Regulations.

2. **Swing Pricing – Not Applicable**

3. **Provisions on creation of Segregated portfolio/Side pocketing**

Process for Creation of Segregated Portfolio

(a) AMC shall decide on creation of segregated portfolio on the day of credit event. Once an AMC decides to segregate portfolio, it shall
  (i) seek approval of trustees prior to creation of the segregated portfolio.
  (ii) immediately issue a press release disclosing its intention to segregate such debt and money market instrument and its impact on the investors. The AMC should also disclose that the segregation shall be subject to trustee approval. Additionally, the said press release shall be prominently disclosed on the website of the AMC.
  (iii) ensure that till the time the trustee approval is received, which in no case shall exceed 1 business day from the day of credit event, the subscription and redemption in the Investment Strategy shall be suspended.

(b) Once trustee approval is received by the AMC:
  (i) Segregated portfolio shall be effective from the day of credit event
  (ii) AMC shall issue a press release immediately with all relevant information pertaining to the segregated portfolio. The said information shall also be submitted to the Board.
  (iii) An e-mail or SMS should be sent to all unit holders of the concerned Investment Strategy.
  (iv) The NAV of both segregated and main portfolio shall be disclosed from the day of the credit event.
  (v) All existing investors in the Investment Strategy as on the day of the credit event shall be allotted equal number of units in the segregated portfolio as held in the main portfolio.
  (vi) No redemption/ subscription shall be allowed in the segregated portfolio. However, in order to facilitate exit to unit holders in segregated portfolio, AMC shall enable listing of units of segregated portfolio on the recognized stock exchange within 10 business days of creation of segregated portfolio and also enable transfer of such units on receipt of transfer requests.

(c) If the trustees do not approve the proposal to segregate portfolio, AMC shall issue a press release immediately informing investors of the same.

<u>Valuation and processing of subscriptions and redemptions:</u>

(a) Notwithstanding the decision to segregate the debt and money market instrument, the valuation shall take into account the credit event and the portfolio shall be valued based on the principles of fair valuation (i.e. realizable value of the assets) in terms of the relevant provisions of MF Regulations and Circular(s) issued thereunder.
(b) All subscription and redemption requests for which NAV of the day of credit event or subsequent day is applicable will be processed as per the provisions on applicability of NAV as under:
(i) Upon trustees' approval to create a segregated portfolio -
(I) Investors redeeming their units shall get redemption proceeds based on the NAV of main portfolio and shall continue to hold the units of segregated portfolio.
(II) Investors subscribing to the Investment Strategy shall be allotted units only in the main portfolio based on its NAV.
(ii) In case trustees do not approve the proposal to segregate the portfolio, subscription and redemption applications shall be processed based on the NAV of total portfolio.

<u>BER for the Segregated Portfolio</u>:

(a) AMC shall not charge investment and advisory fees on the segregated portfolio. However, BER (excluding the investment and advisory fees) can be charged, on a pro-rata basis only upon recovery of the investments in segregated portfolio.

(b) The BER so levied shall not exceed the simple average of such expenses (excluding the investment and advisory fees) charged on daily basis on the main portfolio (in percentage terms) during the period for which the segregated portfolio was in existence.

(c) The legal charges related to recovery of the investments of the segregated portfolio may be charged to the segregated portfolio in proportion to the amount of recovery. However, the same shall be within the maximum BER limit as applicable to the main portfolio. The legal charges in excess of the BER limits, if any, shall be borne by the AMC.

(d) The costs related to segregated portfolio shall in no case be charged to the main portfolio.

Disclosure Requirements:

(a) A statement of holding indicating the units held by the investors in the segregated portfolio along with the NAV of both segregated portfolio and main portfolio as on the day of the credit event shall be communicated to the investors within 5 business days of creation of the segregated portfolio.

(b) Adequate disclosure of the segregated portfolio shall appear in all Investment Strategy related documents, in monthly portfolio disclosures and in the annual report of the mutual fund and the Investment Strategy.

(c) The Net Asset Value (NAV) of the segregated portfolio shall be declared on every business day.

(d) The information regarding number of segregated portfolios created in a Investment Strategy shall appear prominently under the name of the Investment Strategy at all relevant places such as SID, KIM-cum-Application Form, advertisement, AMC and AMFI websites, etc.

(e) The Investment Strategy performance required to be disclosed at various places shall include the impact of creation of segregated portfolio. The Investment Strategy performance should clearly reflect the fall in NAV to the extent of the portfolio segregated due to the credit event and the said fall in NAV along with recovery(ies), if any, shall be disclosed as a footnote to the Investment Strategy performance.

(f) The disclosures at Paragraphs (d) and (e) above regarding the segregated portfolio shall be carried out for a period of at least 3 years after the investments in segregated portfolio are fully recovered/ written-off.

(g) The investors of the segregated portfolio shall be duly informed of the recovery proceedings of the investments of the segregated portfolio. Status update may be provided to the investors at the time of recovery and also at the time of writing-off of the segregated securities.

Monitoring by Trustees:

(a) Trustees shall ensure that:

(i) The AMC puts in sincere efforts to recover the investments of the segregated portfolio.

(ii) Upon recovery of money, whether partial or full, it shall be immediately distributed to the investors in proportion to their holding in the segregated portfolio. Any recovery of amount of the security in the segregated portfolio even after the write off shall be distributed to the investors of the segregated portfolio.

(iii) An Action Taken Report (ATR) on the efforts made by the AMC to recover the investments of the segregated portfolio shall be placed in every trustee meeting till the investments are fully recovered/ written-off.

(iv) The trustees shall monitor compliance with the guidelines issued by the Board regarding segregation of portfolio in mutual fund Investment Strategys, in respect of every segregated portfolio created and report the same in the half-yearly trustee reports filed with the Board.

(b) To avoid misuse of segregated portfolio, trustees shall ensure to have a mechanism in place to negatively impact the performance incentives of Fund Managers, Chief Investment Officers (CIOs), etc. involved in the investment process of securities under the segregated portfolio, mirroring the existing mechanism for performance incentives of the AMC, including claw back of such amount to the segregated portfolio of the Investment Strategy.

(c) The existence of the provisions for segregated portfolio shall not encourage the AMCs to take undue credit risk in the Investment Strategy portfolio. Any misuse of the provisions of segregated portfolio, shall be considered serious and stringent action shall be taken.

Illustration of Segregated Portfolio

Portfolio Date 31-March-2025

Downgrade Event Date 31-March-2025

Downgrade Security 7.65% C Ltd from AA+ to B

Valuation Marked Down 25%

Mr. X is holding 1000 Units of the Strategy, amounting to (1000*15.0573) Rs.15057.30

Portfolio Before Segregation of Portfolio

Security	Rating	Type of the Security	Qty	Price Per Unit	Market Value (Rs. in Lacs)	% of Net Assets
7.80% A FINANCE LTD	CRISIL AAA	NCD	3200000	102.812	3289.98	21.850
7.70 % B LTD	CRISIL AAA	NCD	3230000	98.5139	3182.00	21.133
7.65 % C Ltd	CRISIL B*	NCD	3200000	73.843	2362.97	15.693
7.00 % D Ltd	ICRA A1+	CP	3200000	98.3641	3147.65	20.904
7.65 % E LTD	CRISIL AA	NCD	3000000	98.6757	2960.27	19.660
Cash / Cash Equivalents					114.47	0.760
		Net Assets			15057.34	
		Unit Capital (no of units)			1000.00	
			NAV (Rs.)		15.0573	

* Marked down by 25% on the date of credit event. Before Marked down suppose the security was valued at Rs.98.4570 per unit. On the date of credit event i.e on 30th September 2023, NCD of C Ltd (7.65%) will be segregated as separate portfolio

Main Portfolio as on 31 March 2025

Security	Rating	Type of the Security	Qty	Price Per Unit	Market Value (Rs. in Lacs)	% of Net Assets
7.80% A FINANCE LTD	CRISIL AAA	NCD	3200000	102.812	3289.98	21.850
7.70 % B LTD	CRISIL AAA	NCD	3230000	98.5139	3182.00	21.133
D Ltd (15/May/2019)	ICRA A1+	CP	3200000	98.3641	3147.65	20.904
7.65 %E LTD	CRISIL AA	NCD	3000000	98.6757	2960.27	19.660
Cash / Cash Equivalents					114.47	0.760
		Net Assets			12694.37	
		Unit Capital (no of units)			1000.00	
		NAV(Rs.)			12.6944	

Segregated Portfolio as on 31 March 2025

Security	Rating	Type of the Security	Qty	Price Per Unit	Market Value (Rs. in Lacs)	% of Net Assets
7.65 % C Ltd	CRISIL B*	NCD	3200000	73.843	2362.97	15.693
		Unit Capital (no of units)			1000.00	
			NAV(Rs)		2.3630	

Value of Holding of Mr. X after creation of Segregated Portfolio

Particulars	Segregated Portfolio	Main Portfolio	Total Value (Rs.)
No of units	1000	1000	
NAV	2.3630	12.6944	
Total value (Rs.)	2362.97	12694.33	15057.30

1. Short selling / stock lending:

Securities Lending by the SIF

Strategies may engage in short selling of securities as well as lending and borrowing of securities after making additional disclosures including risk factors in the SID in accordance with Paragraph 1.2.2 of SEBI Master circular on Mutual Fund dated March 20, 2026, as amended from time to time. The activity shall be carried out through an approved intermediary.

The Strategy shall not deploy more than 25% of its net assets in securities lending, and a single intermediary exposure shall not exceed 5% of the net assets of the Strategy.

H. Transaction Charges and Stamp Duty

TRANSACTION CHARGES – Not Applicable

STAMP DUTY

With effect from 1st July 2020 a stamp duty @ 0.005% of the transaction value would be levied on mutual fund investment transactions. Accordingly, the number of units allotted on purchases, switch-ins, SIP/STP instalments and including IDCW reinvestment to the unitholders would be reduced to that extent.

XI. Disclosures and Reports by The Fund

1. Account Statement/Consolidated Account Statement
2. Portfolio Disclosures
3. Half Yearly Results
4. Annual Report

1. Account Statement/Consolidated Account Statement:

Accounts Statement/Consolidated Accounts Statements (CAS):

1. An applicant in a strategy whose application has been accepted shall have the option either to receive the statement of accounts or to hold the units in dematerialized 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.

2. On acceptance of application for financial transaction, a confirmation specifying the number of Units allotted/redeemed will be sent by way of e-mail and/or SMS to the applicant's registered e-mail address and/or mobile number within 5 working Days from the date of transaction/closure of New Fund Offer (NFO) Period.

3. Titanium SIF will send account statement with all details registered in the folio by way of an e-mail and/ or SMS to the investor's registered address/email address/registered mobile number not later than 5 working days from the date of subscription/closure of New Fund Offer (NFO) period or by way of physical statement not later than 5 working days from the date of receipt of request from the unitholder.

In compliance with the SEBI Circulars, Titanium SIF will send the Consolidated Account Statement (CAS) to investors as follows:

1. A single Consolidated Account Statement (CAS) on basis of PAN (PAN of the first holder & pattern of holding, in case of multiple holding) will be dispatched to unitholders having Mutual Fund investments & holding Demat accounts by Depositories as per the specified timeline specified by board at the end of the month in which transaction (the word 'transaction' shall include all financial transactions in demat accounts/Mutual Fund folios of the investor) takes place.
   If there is any transaction in any of the Demat accounts of the investor or in any of his mutual fund folios, depositories shall send the CAS within twelve (12) days from the month end and to investors that have opted for delivery via physical mode, within fifteen (15) days from the month end w.e.f May 14, 2025 pursuant to SEBI Circular No. SEBI/HO/MRD/PoD1/CIR/P/2025/16 dated February 14, 2025.

2. The CAS will not be received by the investors for the folio(s) not updated with PAN details. The Unit holders are therefore requested to ensure that the folio(s) are updated with their PAN. Such investors will get monthly account statement from Titanium SIF in respect of transactions carried out in the strategies of Titanium SIF during the month on or within fifteenth day of the succeeding month.

3. In other cases i.e. where unitholders having no Demat account & only Titanium SIF units holding, SIF shall shall send the CAS within twelve (12) days from the month end and to investors that have opted for delivery via physical mode, within fifteen (15) days from the month end.

4. In case statements are presently being dispatched by e-mail either by the Fund or the Depository then CAS will be sent through email. However the Unitholders have an option to receive CAS in physical form at the address registered in the Depository system.

5. The dispatch of CAS by Depositories to Unitholders would constitute compliance by Tata Asset Management Pvt Ltd / the Fund with the requirements under Regulation 34 of SEBI (Mutual Funds) Regulations 2026.

6. Each CAS issued to the investors shall also provide the total purchase value / cost of investment in each strategy.

7. In case if no transaction has taken place in a folio during the period of six months ended September 30 and March 31, the CAS detailing the holdings across all strategies of all mutual funds, shall be emailed on half yearly basis, as per the specified timeline i.e. 18th day of April and October, unless a specific request is made to receive the same in physical form, then the physical CAS will be sent by 21st day of April and October.

8. Half-yearly CAS shall be issued to all Mutual Fund investors, excluding those investors who do not have any holdings in MF strategies and where no commission against their investment has been paid to distributors, during the concerned half-year period on or within twenty first day of the succeeding month and to investors that have opted for delivery via electronic mode (e-CAS) within eighteenth day of the succeeding month . Further, CAS issued for the half-year(September/March) shall also provide:

a. The amount of actual commission paid by Tata AMC/Mutual Fund to distributors (in absolute terms) during the half-year period against the concerned investor's total investments in each mutual fund strategy. The term "commission" here refers to all direct monetary payments and other payments made in the form of gifts / rewards, trips, event sponsorships etc. by Tata AMC/MF to distributors. Further, a mention may be made in such CAS indicating that the commission disclosed is gross commission and does not exclude costs incurred by distributors such as Goods & Services Tax (wherever applicable, as per existing rates), operating expenses, etc.

b. The strategy's average Total Expense Ratio (in percentage terms) along with the break up between Investment and Advisory fees, Commission paid to the distributor and Other expenses for the period for each strategy's applicable plan (regular or direct or both) where the concerned investor has actually invested in.

2. **Portfolio Disclosures:**

Titanium SIF shall disclose portfolio (along with ISIN), including derivative instruments, as on the last day of every alternate month (i.e. as on the end of May, July, September, November, January and March) for all its investment strategies (including debt based investment strategies) on the respective AMC website (https://www.tatamutualfund.com/titanium-sif) and on the website of AMFI website (www.amfiindia.com) within 10 days from the close of such month in a user friendly and downloadable spreadsheet format.

Portfolio shall also be sent by e-mail to all investors by the AMC/SIF. Titanium SIF will provide physical copy of the statement of investment strategy portfolio without any cost, on specific request received from a unitholder.

3. **Half Yearly Results**

Unaudited Financial Results:

Titanium SIF / Tata Asset Management Pvt Ltd shall within one month after the end of each half year (half year ending as on 31st March & on 30th September), host a soft copy of its unaudited financial results on its respective AMC website https://www.tatamutualfund.com/titanium-sif/statutory-disclosures and on the website of AMFI website (www.amfiindia.com) in the format specified in SEBI Master Circular.

4. **Annual Report**

Annual report or Abridged Summary, in the format prescribed by SEBI, will be hosted on AMC's website, functional Weblink: https://www.tatamutualfund.com/titanium-sif/statutory-disclosures and on the website of AMFI www.amfiindia.com. Physical copies will be available to the unit holders, at AMC registered office at all times.

The strategy-wise annual report or an abridged summary thereof, in the format prescribed, shall be sent by way of e-mail to the investor's registered e-mail address within 4 months from the date of closure of the relevant financial year.

The said communication will also include details of modes such as SMS, telephone, email or written request (letter), etc. through which unit holders can submit a request for a physical copy of the investment strategy wise annual report or abridged summary thereof.

The AMC shall provide physical copy of the abridged summary of the Annual Report without any cost, if a specific request through above mode is received from a unitholder. Full Annual Report shall be available for inspection at the Head Office of the mutual fund and a copy thereof shall be made available to unitholder on payment of such nominal fees as may be specified by the mutual fund/AMC.

Risk-Band for Strategies

In accordance with para 21.12 of SEBI Master Circular for Mutual Fund dated March 20, 2026, Risk-band shall be evaluated on a monthly basis and SIF/AMCs shall disclose the risk-band for all their investment strategies on their respective websites and on website of AMFI within 10 days from the close of each month.

Any change in risk band shall be communicated by way of Notice cum Addendum and by way of an e-mail or SMS to unitholders of that particular investment strategy

SIFs shall disclose the risk level of investment strategies as on March 31st of every year, along with number of times the risk level has changed over the year, on their websites and AMFI website.

All offer documents (i.e. ISID/SAI/KIM) shall be available publicly and also on the website of the SIF and AMFI.

Notwithstanding anything contained in this Statement of Additional Information, the provisions of the SEBI (Mutual Funds) Regulations, 2026 and the guidelines thereunder shall be applicable.

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TRANSACTION ACCEPTANCE POINTS
COMPUTER AGE MANAGEMENT SERVICES LTD.



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Email: camsgaya@camsonline.com **Ghaziabad:** First Floor, C-10 RDC Rajnagar, Opp. Kacheri Gate No.2, Ghaziabad - 201 002. Tel: (0120) 6510540, Email: camsgha@camsonline.com Tel: (0120) 6510540, Fax: 4154476 **Goa: Goa (Panaji):** Office No. 103, 1st Floor, Unitech City Centre, M. G. Road, Panaji, Goa - 403 001 Email: camsgoa@camsonline.com Tel: (0832) 6450439, 6450441, Fax: 2424527 **Gondal (Parent Rajkot):** A/177, Kailash Complex, Opp. Khedut Décor, Gondal – 360311, Gujarat, Email: camsgdl@camsonline.com Tel: 8000920007 **Gorakhpur:** Shop No. 3, 2nd Floor, The Mall Cross Road, A.D. 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Mukherjee Road, 3rd Floor, Office space-3C, Kolkata - 700 001, Email: camscal@camsonline.com Tel: (033) 46022413 / 2414, Fax: (033) 30582288 **Kolkata-CC (Kolkata Central):** 2A, Ganesh Chandra Avenue, Room No.3A, Commerce House, 04th Floor), Kolkata – 700013, West Bengal Tel: (033) 32011192 **Kollam:** Uthram Chambers (Ground Floor), Thamarakulam, Kollam - 691 006. Email: camsklm@camsonline.com, Tel:0474-2742823 **Korba:** Shop No. 6, Shriram Commercial Complex, In front of Hotel Blue Diamond, Ground Floor, T. P. Nagar, Korba, West Bengal - 495677. Email: camskrba@camsonline.com Tel: 7759 356037 **Kota:** B-33, Kalyan Bhawan, Triangle Part, Vallabh Nagar, Kota – 324007, Rajasthan, Email: camskot@camsonline.com Tel: (0744) 2502555 **Kottayam:** 1307-B, Puthenparambil Building, KSACS Road, Opp. ESIC Office, Behind Malayala Manorama, Muttambalam P.O., Kottayam - 686 501. Tel: 9207760018. Email: camsktm@camsonline.com **Kumbakonam:** No. 28/8, 1st Floor, Balakrishna Colony, Pachaiappa Street, Near VPV Lodge, Kumbakonam - 612001. Tel: (0435) 2403747. Email: camskum@camsonline.com **Kurnool:** H.No. 43/8, Upstairs Uppini Arcade, N. R. Peta, Kurnool – 518004, Andhra Pradesh, Email: camskrl@camsonline.com Tel: (8518) 650391, Fax: 329504 **Lucknow:** Office no,107,1st Floor, Vaishali Arcade Building, Plot No. 11, 6 Park Road, Lucknow - 226001. Tel: 0522-4007938, Email: camsluc@camsonline.com **Ludhiana:** U/ GF, Prince Market, Green Field, Near Traffic Lights, Sarabha Nagar Pulli, Pakhowal Road, Ludhiana – 141002, Punjab, Email: camsldh@camsonline.com Tel: (0161) 3018000/01/02/03, Fax: 5016811 Madurai: Shop No. 3, Suriya Towers, 2nd Floor, 272/273 – Goodshed Street, Madurai - 625001. Email: camsmdu@camsonline.com Tel: (0452) 2483515 **Malda:** Daxhinapan Abasan, Opp. Lane of Hotel Kalinga, S.M. 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Tel: (0268) 2550075, Email: camsndi@camsonline.com **Nagpur:** 145, Lendra, New Ramdaspeth, Nagpur – 440010, Maharashtra, Email: camsnpr@camsonline.com Tel: (0712) 2541449, Fax: 2432447 **Namakkal:** 156A / 1, 01st Floor, Lakshmi Vilas Building, Opp. to District Registrar Office, Trichy Road, Namakkal – 637001, Tamilnadu, Email: camsnmk@camsonline.com Tel: 9244900217. **Nasik:** 1st Floor, "Shraddha Niketan" Tilak Wadi, Opp. Hotel City Pride, Sharanpur Road, Nasik - 422 002, Email id: camsnsk@camsonline.com, Tel. No: 0253 - 6450102. **Navsari:** C/o Vedant Shukla Associates, 16 Shivani Park, Opp. Shankeshwar Complex, Kaliawadi, Navsari – 396445, Gujarat, Email: camsnvs@camsonline.com Tel: (0861) 2302398, Fax: 248744 **Nellore:** Shop No. 2, 1st Floor, NSR Complex, James Garden, Near Flower Market, Nellore - 524001. 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Email id: camsvsh@camsonline.com. **Vasco (Parent Goa):** No. DU 8, Upper Ground Floor, Behind Techoclean Clinic, Suvidha Complex, Near ICICI Bank, Vasco – 403802, Goa, Tel: (0832) 3251755 **Vellore:** Door No 86, BA Complex, 1st Floor, Shop No 3, Anna Salai (Officer Line), Tollgate, Vellore - 632 001. Tel: (0416) 2900062, Email: camsvel@camsonline.com **Vijayawada:** 40-1-68, Rao & Ratnam Complex, Near Chennupati Petrol Pump, M. G. Road, Labbipet, Vijayawada – 520010, Andhra Pradesh, Email: camsvij@camsonline.com Tel: 0866-2488047, Fax: 6695657 **Visakhapatnam:** Flat No GF2, D NO 47-3-2/2, Vigneswara Plaza, 5th Lane, Dwarakanagar, Andhra Pradesh, Visakhapatnam - 530 016, Tel: (0891) 2791940 **Warangal:** Hno. 2-4-641, F-7, 01st Floor, A.B.K Mall, Old Bus Depot Road, Ramnagar, Hanamkonda, Warangal - 506001, Telengana, Email: camswgl@camsonline.com Tel: (0870) 6560141, Fax: 2554888 **Yamuna Nagar:** 124-B/R, Model Town Yamunanagar - 135001, Haryana, Email: camsynr@camsonline.com Tel: 01732-796099, Fax: 225339 **Yavatmal:** Pushpam, Tilakwadi, Opp. Dr. Shrotri Hospital, Yavatmal – 445001, Maharashtra, Email: camsyav@camsonline.com Tel: (07232) 237045, Fax: 237045.

OFFICIAL POINT OF ACCEPTANCE FOR TRANSACTIONS IN ELECTRONIC FORM

Eligible investors can undertake any transaction, including purchase / redemption / switch and avail of any services as may be provided by Tata Asset Management Private Limited (AMC) from time to time through the online / electronic modes via various sources like its official website - www.tatamutualfund.com, mobile handsets, designated email-id(s), etc. Additionally, this will also cover transactions submitted in electronic mode by specified banks, financial institutions, distributors etc., on behalf of investors, with whom AMC has entered or may enter specific arrangements or directly by investors through secured internet sites operated by CAMS. The servers including email servers (maintained at various locations) of AMC and CAMS will be the official point of acceptance for all such online / electronic transaction facilities offered by the AMC to eligible investors.

POINTS OF SERVICE ("POS") OF MF UTILITIES INDIA PRIVATE LIMITED ('MFUI') AS OFFICIAL POINTS OF ACCEPTANCE (OPA) FOR TRANSACTIONS THROUGH MF UTILITY ("MFU")

Both financial and non-financial transactions pertaining to scheme(s) of Tata Mutual Fund ('the Fund') can be done through MFU at the authorized POS of MFUI. The details of POS published on MFU website at www.mfuindia.com will be considered as Official Point of Acceptance (OPA) for transactions in the Scheme.

AMFI CERTIFIED STOCK EXCHANGE BROKERS/ CLEARING MEMBERS / DEPOSITORY PARTICIPANTS# AS OFFICIAL POINTS OF ACCEPTANCE FOR TRANSACTIONS (PURCHASE/ REDEMPTION) OF UNITS OF TATA MUTUAL FUND SCHEMES THROUGH THE STOCK EXCHANGE(S) INFRASTRUCTURE

For Processing only Redemption Request of Units Held in Demat Form. The eligible AMFI certified stock exchange Brokers/ Clearing Members/ Depository Participants who have complied with the conditions stipulated in clause 16.2.4.8 of Master Circular for stockbrokers viz. AMFI/ NISM certification, code of conduct prescribed by SEBI for Intermediaries of Mutual Fund will be considered as Official Points of Acceptance (OPA) of the Mutual Fund.

DETAILS FOR ONGOING COLLECTION BANKERS:

Bank Name / Address	IFSC Code
HDFC BANK LIMITED - MOTWANI CHAMBERS - FORT BRANCH	HDFC0000060
ICICI BANK LIMITED - CAPITAL MARKET BRANCH	ICIC0000004

MF CENTRAL AS OFFICIAL POINTS OF ACCEPTANCE (OPA) FOR TRANSACTIONS

As per clause 16.6 of Master Circular, Kfin Technologies Private Limited ("KFintech") and Computer Age Management Services Limited ("CAMS") have jointly developed MFCentral - A digital platform for transactions/ service requests by Mutual Fund investors. Accordingly, MF Central will be considered as an Official Point of Acceptance (OPA) for transactions in the Scheme.

INVESTOR SERVICE CENTRES - AMC OFFICES

Call: (022) 6282 7777

(Monday to Saturday 9:00 am to 5:30 pm)

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Offered by Tata Mutual Fund

WEST ZONE:

Aurangabad: Plot No 66, Bhagya Nagar, Near S T Office, Kranti Chowk Police Station to Employment Office Road, Aurangabad - 431001. Tel: (0240) 2351591/90. **Ahmedabad:** 402, 'Megha House', Mithakhali - Law Garden Road, Netaji Marg, Ahmedabad - 380 006. Tel.: 079 - 26466080 / 40076949. **Anand:** 103, First Floor, Ashwamegh Complex, Opp. Vyayam Shala, Sardar Gunj Road, Anand - 388 001. Tel.: (02692) 360330. **Bhopal:** 131/8 MP Nagar, Zone 2, Near Jhoomerwala Pragati Petrol Pump, Bhopal - 462011. Tel.: 0755 - 2574198 / 4209752. **Borivali:** Shop No. 1 and 2, Ground Floor, Ganjawalla Residency, Ganjawalla Lane, Borivali West, Mumbai - 400092. Tel.: 022- 28945923 / 8655421234. **Goa:** F-7, 1st Floor, Edcon Tower, Next to Hotel Salida Del Sol, Near Apple Corner, Menezes Braganza Road, Panaji, Goa - 403001. Tel.: 7888051135, Fax: 0832-2422135. **Jabalpur:** Office No. 4, 1178, Napier Town, Home Science College Road, Jabalpur - 482 001(M.P.). Tel.: 0761-4074263 **Kolhapur:** Gemstone Building, Ground Floor, Opposite Parikh Pool North Side, Near Central Bus Stand, Kolhapur - 416001, Maharashtra. **Kota:** A-6 Vallabh Bari, 1st Floor, In front of Seven Wonders Main Gate, Kota, Rajasthan - 324007. **Mumbai:** Mulla House, Ground Floor, 51, M. G. Road, Near Flora Fountain, Mumbai - 400 001. Tel: 022- 66505243 / 66505201, Fax: 022- 66315194. **Nagpur:** 104, Shivaji Complex, Near Times of India, Dharampeth, WHC Road, Nagpur - 440 010, Tel.: 0712 - 6630425 / 6502885. **Nashik:** 5, Samriddhi Residency, Opp Hotel City Pride, Tilakwadi, Nashik - 422 002. Tel.: (0253) 2959098, Fax: 0253-2579098. **Navsari:** Shop No.1, Swiss Cottage, Ashanagar Main Road, Navsari - 396 445. Tel: 02637 - 281991. **Pune:** Kohinoor B-Zone, Shop no. 110, 1st Floor, Old Mumbai-Pune Highway, Near Pimple Petroleum, Above Maharashtra Electronics, Pimpri, Pune - 411 017. Tel.: 020-41204949 / 950. **Rajkot:** 402, The Imperia, Opp. Shastri Maidan, Limda Chowk, Rajkot - 360 001. Tel: (0281) 2964848 / 849 **Surat:** G-18, Ground Floor, ITC Building, Near Majuragate, Ring Road, Surat – 395 002. Tel.: 0261 - 4012140, Fax: 0261-2470326. **Thane:** Shop No. 9, Konark Tower, Ghantali Devi Road, Thane (West) - 400 602. Tel.: 022 – 25300912. **Vadodara:** Emerald One, 314, 3rd Floor, Jetalpur Main Road, Before Jetalpur Bridge, Jetalpur, Vadodara - 390 007. Tel.: (0265) 2991037, Fax: 0265-6641999. **Vashi:** Shop No. 16, Vardhaman Chambers, Plot No. 84, Sector 17, Near Babubhai Jagjivan Das, Vashi, Navi Mumbai - 400 703. Tel: (022) 45118998.

EAST ZONE:

Bhubaneswar: Room-309, 3rd Floor, Janpath Tower, Ashok Nagar, Bhubaneswar - 751009. Tel.: 0674 -2533818/ 7064678888. **Chhattisgarh:** B06 Ground floor, Narayan Plaza, Link Road, Bilaspur Chhattisgarh 495001, Tel.: 07752454333**. Dhanbad:** Shri Ram Plaza, 2nd Floor, Room No. 202-B, Bank More, Dhanbad - 826001. Tel.: 0326-2300304 / 9234302478. **Durgapur:** 8C, 8th Floor, Pushpanjali, C-71/A, Saheed Khudiram Sarani, City Centre, Durgapur - 713 216. Tel: (0343) 2544463/65. **Guwahati:** Jain Complex, 4th Floor, Beside Axis Bank, G. S. Road, Guwahati - 781005. Tel: (0361) 2343084. **Jamshedpur:** Voltas House, Mezzanine Floor, Main Road Bistupur, Jamshedpur - 831001. Tel.: 0657-2321302 / 363 / 6576911. **Kolkata:** Apeejay House, Ground Floor, 15, Park Street, Kolkata - 700016. Tel.: (033) 44063300/3301/3331/3319. Fax: 033-4406 3315. **Patna:** 301, 3rd Floor, Grand Plaza, Frazer Road, Patna - 800 001. Tel.: (0612) 2216994. **Raipur:** Shop No. S-10, 2nd Floor, Raheja Tower, Near Fafadhi Chowk, Jail Road, Raipur (Chhattisgarh) 492001. Tel.: 0771-4040069 / 6537340. **Ranchi:** 406 - A, 4th Floor, Satya Ganga Arcade, Sarjana Chowk, Lalji Hirji Road, Ranchi - 834001. Tel.: 0651-2210226 / 8235050200. **Siliguri:** Shop No. 10, 1st Floor, Block-C, Shelcon Plaza, Kartar Market, Sevoke Road, Siliguri, Darjeeling - 734001.

NORTH ZONE:

Ajmer: 02 Floor, Agra Gate Circle, P. R. Marg, Behind Chandak Eye Hospital, Ajmer - 305 001. Tel: (0145) 2625316. **Agra:** G-10, 20/4, Near Shaheed Smarak, Maruti Tower, Sanjay Place, Agra - 282002. Tel: (0562) 2525195. **Allahabad:** Shop No. 10, Upper Ground Floor, Vashistha Vinayak Tower, Tashkand Marg, Civil Lines, Allahabad -211 001. Tel.:- 0532-2260974. **Amritsar:** Mezzanine Floor, S.C.O – 25, B Block, District Shopping Complex, Ranjit Avenue, Amritsar – 143 001. Tel.: 0183-5011181/5011190. **Chandigarh:** SCO - 2473-74, 1st Floor, Sector- 22C, Chandigarh - 160 022. Tel.: 0172-5037205/5087322, Fax: 0172 - 2603770. **Dehradun:** Shop No. 19, Ground Floor, Shree Radha Palace, 78, Rajpur Road, Dehradun – 248 001, Uttarakhand. Tel.: 0135-2740877 / 2741877. **Gorakhpur:** Shop No. 4, Cross Road Mall, First Floor, A.D. Chowk, Bank Road, Gorakhpur - 273001 (UP). Tel: (0551) 4051010, Mob: 91 8924951944. **Ghaziabad:** Office No. 7, Second Floor, Astoria Boulevard, RDC, Ghaziabad - 201 002 U.P. Tel: (0120) 3592835 **Gurgaon:** Unit No. 209, 2nd Floor, Vipul Agora Mall, Sector 28, M. G. Road, Gurgaon - 122 001. **Indore:** 204, D.M. Tower, Race Course Road, Near Zanjeerwala Chourha, Indore - 452

003. Tel.: 0731-4201806, Fax 0731-4201807. **Jaipur:** Office Number 52-53, 1 Floor, Laxmi Complex, Subhash Marg, M.I. Road Corner, C Scheme, Jaipur - 302 001. Tel.: 0141 - 5105177 / 78 / 2389387, Fax: 5105178. **Jalandhar:** Office No-36, Second Floor, One Park Side Building, Guru Nanak Mission Chowk adjoining Care Max Hospital. Jalandhar- 144001. Tel: (0181) 5001025 **Jammu:** Hall No. - 312/A2, South Block, Bahu Plaza, Jammu - 180 012. Tel.: (0191) 4504744. **Jodhpur:** Satyam, 26-C, 11th A, Pal Road, Sardarpura, Jodhpur, Rajasthan Pincode – 342003, Tel – 0291-2631257. **Kanpur:** 4th Floor, Office No. 412 - 413, KAN Chambers, 14 / 113, Civil Lines, Kanpur - 208 001. Tel.: 0512-2306065 / 6066, Fax: 0512 - 2306065. **Lucknow:** 11 B & 12, Ground Floor, Saran Chamber II, Vikramaditya Marg, 5 Park Road, Lucknow - 226001. Tel: (0522) 4001731 / 4308904 **Ludhiana:** Cabin No. 201, 2nd. Floor, SCO 18, Opp Ludhiana Stock Exchange, Feroze Gandhi Market, Ludhiana - 141 001. Tel.: 0161-5089667 / 668, Fax: 0161-2413498. **Meerut:** G-13, Rama Plaza, Near Bachha Park, Western Kutchery Road, Meerut (U.P.) – 250 001. Tel.: 0121-4035585. **Moradabad:** Ground Floor, Near Hotel Rajmahal, Civil Lines, Moradabad – 244 001, Tel.: 0591-2410667. **New Delhi:** Flat No. 506 - 507, Kailash Building, 26, Kasturba Gandhi Marg, Connaught Place, New Delhi - 110001. Tel.: 011-66324101/102/103/104/105, Fax: 011-66303202. **Noida:** Shop No - 2, First Floor, Wave Silver Tower, Noida, Sector 18, Noida - 201301 U.P. Tel.: (0120) 6662083. **Panipat:** 0298A, Ground Floor, Shree Ji Tower, Behind Hotel Hive, Near Kishore Cinema, Vrinda Market, Panipat, Haryana - 132 103. **Udaipur:** 222/16, First Floor, Mumal Tower, Above IDBI Bank, Saheli Marg, Udaipur- 313001. Tel: (0294) 2429371 / 7230029371, Fax: 011-66303202. **Varanasi:** D-64/127, 2nd Floor, C-H Arihant Complex, Sigra, Varanasi - 221010 Tel.: 0542-2222179 / 2221822.

SOUTH ZONE:

Bengaluru: 91, Springboard Business Hub Private Ltd. Gopala Krishna Complex, 45/3, Residency Road, MG Road, Shanthala Nagar, Ashok Nagar, Bengaluru, Karnataka 560025. Tel.: 080 45570100. Fax: 080-22370512. **Chennai:** 3rd Floor, Sri Bala Vinayagar Square, No.2, North Boag Road, Near AGS Complex, T Nagar, Chennai - 600 017. Tel.: 044 - 48641878 / 48631868 / 48676454. Fax: 044-43546313. **Cochin:** 2nd Floor, Ajay Vihar, Near Hotel Avenue Regent, M. G. Road, Cochin - 682 016. Tel.: 0484-4865813 / 814 / 815. Fax: 0484 - 2377581. **Coimbatore:** Tulsi Chambers, 195-F, Ground Floor, West T V Swamy Road, R S Puram, Coimbatore – 641002. Tel.: 0422-4365635, Fax: 2546585. **Hyderabad:** 1st Floor, Nerella House, Nagarjuna Hills, Above Kotak Mahindra Bank, Punjagutta, Hyderabad - 500082. Tel.: 040-67308989 / 8901 / 8902. Fax: 040-67308990. **Hubli:** No 19 & 20, 1st Floor, Eureka Junction, T B Road, Hubli – 580029. Tel.: 0836 - 4251510 Fax: 4251510. **Kottayam:** CSI Ascention Square, Logos Junction, Collectorate P. O., Kottayam - 686 002. Tel.: 0481 2568450. **Mangalore:** Essel Towers, 1st Floor, Bunts Hostel Circle, Above UTI Bank, Mangalore - 575 003. Tel.: 0824 - 4260308. **Madurai:** 1st Floor, Old No. 11B, Opp. Sethupathy Higher Secondary School, North Veli Street, Madurai – 625 001. Tel.: 0452-4246315 Fax: 0452-4246315. **Mysore:** CH-16, 1st Floor, Prashanth Plaza, 4th Main, 5th Cross, Saraswathipuram, Mysore - 570009. Tel.: 0821 - 4246676 Fax: 4246676. **Salem:** Kandaswarna Shopping Mall, First Floor, 1/194/4, Saradha College Main Road, Fairlands, Salem - 636016, Tamil Nadu. Tel: (0427) 4042028. **Thrissur:** 4th Floor, Pathayappura Buildings, Round South, Thrissur - 680 001. Tel.: 0487 - 2423330. **Trivandrum:** Ground Floor, Sai Kripa Building, TC-1956/3, Ganapthi Temple Road, Vazhuthacaud, Trivandrum – 695 014. Tel.: 0471 - 4851431. **Trichy:** C-53/4, Sky Tower, 4th Floor, 5th Cross, Thillai Nagar, North East, Trichy - 620018. Tel.: (0431) 4024060. **Vijaywada:** D No: 38-8-42, Plot No - 303, White House Complex, 3rd Floor, M G Road, Vijayawada - 520010, Tel: (0891) 2503292. **Visakhapatnam:** Door No: 47-15-13/35, Navaratna Jewel Square, Shop No. 7, 3rd Floor, Near Khajana to Jyothi Book Depot Station Road, Dwarakanagar, Visakhapatnam - 530016, Tel: (0891) 2503292.