DISCLOSURE DOCUMENT

DT INVESTMENT MANAGEMENT IFSC LLP

As per the requirement of Regulation 74 of the International Financial Services Centres Authority (IFSCA) (Fund Management) Regulations, 2025

Name of the Portfolio Manager	DT Investment Management IFSC LLP
IFSCA Registration Number	FDM2025FNR0790 (Registered FME – Non-Retail)
GIFT City Address	Unit No. 155, Seat No. 1-3, Ground Floor, Pragya Accelerator II, Building-15B, Block 15, Road No. 1C, Zone-1, Gift SEZ, Gandhinagar, Gujarat – 382355, India

Principal Officer Contact

Name of the Principal Officer	Mr. Rakesh Patel
Phone	+91 96622 24602
Email	compliance@dt-fund.in
Registered Office Address	Unit No. 155, Seat No. 1-3, Ground Floor, Pragya Accelerator II, Building-15B, Block 15, Road No. 1C, Zone-1, Gift SEZ, Gandhinagar Gujarat – 382355, India.

We confirm that:

- This Disclosure Document is drafted as per Regulation 74(1) of IFSCA (Fund Management) Regulations, 2025 and the guidelines and directives issued by IFSCA from time to time in this regard.
- The disclosures made in this Disclosure Document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of their portfolio to us / investment in the Portfolio Management Services.

This Disclosure Document has been prepared and issued by DT Investment Management IFSC LLP, a Registered Fund Management Entity (Non-Retail) registered with IFSCA bearing registration number FDM2025FNR0790, in accordance with Regulation 74 of the IFSCA (Fund Management) Regulations, 2025.

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1. Disclaimer

Important Disclosure

The Disclosure Document and its contents are for information only and do not constitute a distribution, an endorsement, investment advice, an offer to buy or sell, or the solicitation of an offer to buy or sell any securities or financial products mentioned herein, or an attempt to influence the opinion or behaviour of any person. The investments described herein may not be suited to all categories of investors.

Clients must make their own investment decisions based on their own specific investment objectives, financial position, and using such independent professional advisors as they believe necessary, before acting on any information in this Disclosure Document. Investments in the Portfolio Management Services stand a risk of loss of capital, and Clients should be aware that they may lose all or any part of their investments. Clients are advised to read this Disclosure Document carefully and retain it for future reference.

The particulars set out in this Disclosure Document have been prepared in accordance with the International Financial Services Centres Authority (Fund Management) Regulations, 2025 as amended from time to time. This Disclosure Document has neither been approved nor disapproved by the International Financial Services Centres Authority, nor has IFSCA certified the accuracy or adequacy of the contents of this Disclosure Document.

Words and expressions used in this Disclosure Document and not expressly defined shall be interpreted according to their general meaning and usage. The definitions are not exhaustive and have been included only for the purpose of clarity. They shall carry meanings assigned to them in regulations governing Portfolio Management Services.

The distribution of this Disclosure Document in certain jurisdictions may be restricted or totally prohibited and accordingly, persons who come into possession of this Disclosure Document are required to inform themselves about and to observe any such restrictions.

2. Definitions

The terms used in this Disclosure Document are defined as follows:

"Act"	means the International Financial Services Centres Authority Act, 2019 as amended from time to time.
"Agreement"	means the Portfolio Management Agreement and shall include any recitals, schedule(s), its Part(s), annexure(s), or exhibit(s) which may be annexed to that Agreement and any amendments made by the Parties in writing.
"Applicable Law(s)"	means relevant laws, regulations, rules, directions, requirements, and licences issued, passed or imposed from time to time by a legislature, government, governmental authority or regulatory authority whether national, state or local and includes rules and regulations issued pursuant to or under the laws in force in IFSC, including the FM Regulations.
"Assets"	means (i) the Portfolio and/or (ii) the Funds and includes all accruals, benefits, allotments, calls, refunds, returns, privileges, entitlements, substitutions and/or replacements or any other beneficial interest including

	dividend, interest, rights, bonus as well as residual cash balances, if any (represented both by quantity and in monetary value), in relation to or arising out of the Assets.
"Associates"	means (i) a company or a limited liability partnership or a body corporate in which a partner of the Portfolio Manager holds, either individually or collectively, twenty percent or more of its paid-up equity share capital or partnership interest; and (ii) a company or a limited liability partnership or a body corporate which holds, either individually or collectively, twenty percent or more of the paid-up equity share capital or partnership interest in the Portfolio Manager.
"Bank Account"	shall mean (a) a specific bank account managed by the Portfolio Manager in a Banking Unit, (b) a specific bank account of the Investor in a Banking Unit, a bank in India or a Foreign Jurisdiction, or (c) any other manner as may be specified by the IFSCA, which will be used by the Portfolio Manager to accept, deposit or withdraw funds for the purposes of this Agreement. The Portfolio Manager shall segregate each Investor's Assets in separate accounts.
"Banking Units"	means the financial institution that is licensed by the IFSCA or RBI to undertake financial services as per Applicable Law.
"Custodian"	means an IFSCA or SEBI registered custodian appointed by respective Investor as per Applicable Law, for custody of Securities of the Investors and to avail other custodial services.
"Depository Account / DP Account"	means one or more demat accounts opened, maintained, and operated by the Portfolio Manager in the name of the Investors to keep the securities of all Investors, where the securities of each Investor would be separately identified for the purpose of the Portfolio Management Services.
"Disclosure Document"	means this document provided by the Portfolio Manager to the Investor as specified in the FM Regulations.
"Discretionary Portfolio Management Services"	means the Portfolio Management Services rendered to the Investors by the Portfolio Manager on the terms and conditions contained in the Agreement, where the Portfolio Manager exercises its sole and absolute discretion with respect to investments or management of the Assets of the Investors, entirely at the Investor's risk, in such manner as the Portfolio Manager may deem fit.
"Exit Load"	means the withdrawal charge, if any, payable by the Investor to the Portfolio Manager upon early redemption of the Portfolio, as specified in the Agreement.
"FIU-IND"	means the Financial Intelligence Unit – India, established under the Ministry of Finance, Government of India, as the central national agency responsible for receiving, processing, analysing, and disseminating information relating to suspect financial transactions.

"FM Regulations"	means the International Financial Services Centres Authority (Fund Management) Regulations, 2025 including any amendments thereto from time to time and all relevant rules, guidelines, and circulars issued by IFSCA in this regard.
"FME"	means a fund management entity as construed under the FM Regulations.
"FPI"	means a Foreign Portfolio Investor registered under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019, as amended from time to time.
"Funds"	means the monies managed by the Portfolio Manager on behalf of the Investor pursuant to the Agreement and includes any further monies placed by the Investor from time to time with the Portfolio Manager for being managed pursuant to this Agreement, the proceeds of the sale or other realisation of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the same is managed by the Portfolio Manager.
"IFSC"	means an International Financial Services Centre set up in a Special Economic Zone (SEZ) and as approved by the Central Government from time to time.
"IFSCA"	means the International Financial Services Centres Authority.
"Investment Approach"	means the investment strategy, philosophy, and methodology adopted by the Portfolio Manager for managing the Portfolio of the Investor, as described in Clause 5 of this Disclosure Document, and as may be amended from time to time in accordance with Applicable Laws.
"Investor(s)"	means a person who has entered into the Agreement with the Portfolio Manager to avail the Services offered by the Portfolio Manager.
"Investor Securities"	means the Securities which form part of the Portfolio.
"KYC"	means Know Your Customer, being the process of verifying the identity and background of an Investor in accordance with the norms prescribed under the PMLA Act and guidelines issued by IFSCA from time to time.
"Net Asset Value / NAV"	means the value of the Assets and shall be the aggregate of (a) the amount of cash in the Bank Account; (b) the value of the Investor's Securities calculated as per the Securities Valuation Policy; and (c) any form of receivable at the end of any day, net of the liabilities accrued in the Portfolio.
"Non-Discretionary Portfolio Management Services"	means the Portfolio Management Services rendered to the Investor by the Portfolio Manager on the terms and conditions contained in the Agreement, where the Portfolio Manager shall provide advice in relation to the Assets and manage the Assets in accordance with the instructions of the Investor at the absolute discretion of the Investor, and entirely at the Investor's risk.
"PMLA Act"	means the Prevention of Money Laundering Act, 2002, together with the Prevention of Money Laundering (Maintenance of Records) Rules, 2005,

	and any guidelines or circulars issued thereunder, as amended from time to time.
"Portfolio"	means the holdings of Securities managed by the Portfolio Manager on behalf of the Investor pursuant to the Agreement and includes any further securities placed by the Investor with the Portfolio Manager for being managed pursuant to the Agreement, Securities acquired by the Portfolio Manager through investment of Funds, and bonus and rights shares in respect of Securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.
"Portfolio Management Fees"	means fees payable by the Investor to the Portfolio Manager as specified in the Agreement, for the Portfolio Management Services.
"Portfolio Management Services / PMS"	means the portfolio management services rendered to the Investor by the Portfolio Manager, on the terms and conditions contained in the Agreement and in accordance with the Applicable Laws and FM Regulations, with respect to investments or management of the Portfolio of Securities and the Funds of the Investor.
"Portfolio Manager"	means DT Investment Management IFSC LLP.
"Principal Officer"	means the employee of the Portfolio Manager designated as such, who is responsible for (i) executing decisions made by the Portfolio Manager for the management or administration of the Portfolio of Securities or the Funds of the Investor; and (ii) all other operations of the Portfolio Manager, as required under the FM Regulations.
"Product"	shall mean investment products offered by the Portfolio Manager and accepted by the Investor for the purposes of investments. The details of such products / investment approaches are set out in this Disclosure Document.
"SEBI"	means the Securities and Exchange Board of India established under the Securities and Exchange Board of India Act, 1992.
"Securities"	includes “securities” as defined under the Securities Contracts (Regulation) Act, 1956 and/or financial products as defined under the IFSCA (Fund Management) Regulations, 2025 and the IFSCA Act, 2019, including any other instruments or investments as may be permitted by Applicable Law from time to time.
"Securities Valuation Policy"	means the policy of the Portfolio Manager, from time to time, for valuation of the Securities forming part of the Assets.
"Services"	means the services to be provided by the Portfolio Manager as set out in the Agreement.
"TDS"	means tax deducted at source.

3. Description

3.1. History, Present Business, and Background of the Portfolio Manager

DT Investment Management IFSC LLP, a Limited Liability Partnership having Identification Number (LLPIN) ACK-2615, was incorporated on 8th November 2024 and has its registered office at Unit No. 155, Seat No. 1-3, Ground Floor, Pragya Accelerator II, Building-15B, Block 15, Road No. 1C, Zone-1, Gift SEZ, Gandhinagar – 382355. The LLP is incorporated with the objective of carrying out portfolio management services and fund management activities. The LLP is registered with the International Financial Services Centres Authority (IFSCA) as a Registered Fund Management Entity (Non-Retail) bearing registration number FDM2025FNR0790.

3.2. Promoters of the Portfolio Manager and their Background

Mr. Nimit Jateen Tanna is the Promoter of the Portfolio Manager. He is a Chartered Accountant from the Institute of Chartered Accountants of India, has completed Level III of the Chartered Financial Analyst (CFA) Program, and holds an MBA from the University of Chicago Booth School of Business.

Mr. Tanna co-founded Chanakya Wealth Creation (CWC) along with the Trust Group in July 2010, where he has been instrumental in building and managing a long-only public equity investment platform focused on Indian markets. Prior to co-founding CWC, Mr. Tanna was associated with SRS Investment Management (“SRS”), a long-short global equity fund based in New York. He joined SRS shortly after its mid-2007 launch and was primarily responsible for overseeing India-focused investments, departing in April 2010 by which time the fund’s assets under management exceeded USD 0.5 billion.

3.3. Details of Designated Partners, Key Managerial Personnel (KMPs) and their Background

The Designated Partners and KMPs of the Portfolio Manager have experience in investment research and asset management. Their details are set out below.

(i) Mr. Shivam Gupta, Designated Partner

Mr. Shivam Gupta is a Chartered Financial Analyst, a Post-Graduate in Management (Finance Major) and a Bachelor of Technology.

Organisation	Designation	Period	Work Profile
DT Investment Management IFSC LLP	Designated Partner	Nov 2024 – Present	As a core member of the Investment Committee at DT IM IFSC LLP, he plays a pivotal role in shaping the firm’s investment direction. Leveraging his expertise, he develops foundational business understanding frameworks that became central to the committee’s sector allocation strategies – spanning banking, payments, technology, diagnostics, aviation, and building materials. His active participation in decision-making and portfolio construction sees him leading the evaluation and sizing of sectors that ultimately comprise a sizeable portion of the firm’s total portfolio, underscoring his influence in both strategic policy and fund outcomes.

Organisation	Designation	Period	Work Profile
Chanakya Wealth Creation (CWC)	Research Analyst	May 2015 – Apr 2025	Served as Research Analyst at Chanakya Wealth Creation (CWC) and was part of the 5-member core investment team. Developed business understanding frameworks that largely defined CWC's sector positions across banking, payments, technology, diagnostics, aviation and building materials, being a lead analyst on approximately 30% of portfolio weights.
Equirus Securities Pvt. Ltd.	Analyst – IT Sector	Dec 2013 – Apr 2015	Took over coverage of 9 IT stocks and expanded by 3 initiations within 7 months. Recognised for contrarian SHORT calls on Infosys, Wipro and NIIT Tech. Published a capstone note on the emergence of Business Platforms and their impact on the Indian IT offshore business model. Built a triangulated revenue forecasting model that reduced forecast errors by 30%.
ESO Capital Private Limited	Senior Associate	Jun 2011 – Nov 2013	Led the successful launch of Equity Research and Private Equity Capital Syndication services at ESO, managing a team of 3 finance professionals.
Tata Consultancy Services Ltd.	Assistant Systems Engineer	Sep 2005 – Feb 2010	Led a team of four engineers to develop the world's first XML powered SOAP server for Hewlett Packard (HP). Initiated and developed the Knowledge Management Initiative called MAVIN for HP Nonstop professionals.

Educational Qualifications:

- Bachelor of Technology from G.B. Pant University of Agriculture & Technology
- Post-Graduate Programme in Management, majoring in Finance, from Indian School of Business (ISB)
- CFA Level III from the Chartered Financial Analyst Program

(ii) Mr. Sanjay Bhat, Designated Partner

Mr. Sanjay Bhat is a Chartered Financial Analyst as well as a Chartered Accountant. He has obtained his bachelor's degree from R.A. Podar College of Commerce and Economics.

Organisation	Designation	Period	Work Profile
DT Investment Management IFSC LLP	Designated Partner Principal Officer	Nov 2024 – Present Nov 2024 – Nov 2025	As a key member of the Investment Committee, he conducts comprehensive fundamental analysis of publicly listed companies across several sectors including BFSI, consumer and technology, healthcare and other broader sectors, developing in-depth investment theses and detailed financial

Organisation	Designation	Period	Work Profile
			models. His focus centres on customer centricity and digital adoption, evaluating sustainability, growth prospects, and investment potential through a terminal value lens.
Chanakya Wealth Creation (CWC)	Investment Associate	Mar 2020 – Apr 2025	Conducted fundamental analysis of publicly listed companies across BFSI, Tech, Internet & Healthcare. Prepared in-depth investment theses and detailed financial models with a focus on customer centricity and digital adoption.
Thia Investments	Analyst	Jan 2017 – Feb 2020	Served as equity analyst responsible for the timely and accurate dissemination of investment ideas. Recommended security investments and formulated views on various industries and companies within those industries.
Lupin Limited	Manager Finance	Mar 2015 – Nov 2016	Key member of Plant Finance team for Goa and Nagpur plants; responsible for overall MIS and Budgeting preparation. Played a pivotal role in successfully executing a costing refinement project to transform the costing system for all formulation plants.

Educational Qualifications:

- Bachelor of Commerce from R.A. Podar College of Commerce and Economics
- Chartered Accountant from The Institute of Chartered Accountants of India
- CFA Level III from the Chartered Financial Analyst Program

(iii) Mr. Jay Thakkar, Designated Partner

Mr. Jay Thakkar is an All-India rank-holder Chartered Accountant. He has also completed his Bachelor's degree in Law from Government Law College, Mumbai and a Bachelor's degree in Commerce from R.A. Podar College of Commerce and Economics.

Organisation	Designation	Period	Work Profile
DT Investment Management IFSC LLP	Designated Partner	Nov 2024 – Present	Leads risk management and portfolio construction, ensuring disciplined risk-return balance and strategic alignment with investment objectives. Plays a key role in the Investment Committee, driving policy formulation and fund outcomes through active participation in decision-making and portfolio oversight. Heads operational, financial, and regulatory aspects of portfolio

Organisation	Designation	Period	Work Profile
			management, overseeing compliance, internal controls, and reporting frameworks.
Chanakya Capital Partners IFSC LLP	Designated Partner	Aug 2023 – Present	Was Chanakya's Compliance Officer from Aug 2023 to Apr 2025. Managed the operational, financial, and regulatory responsibilities, covering key frameworks such as SEC, IFSCA, SEBI FPI, SEZ, CRS, and FATCA compliance requirements.
Chanakya Capital Partners	Director, CCO, COO, and CFO	Apr 2014 – Jun 2023	Oversaw the operational, financial, and regulatory aspects including SEC, FSC, SEBI PMS, CRS and FATCA regulations. Assisted investment portfolio decisions as a key member of the Investment Committee. Instrumental in several key portfolio positions including sizing them to generate the alpha. Managed LP relationships including US endowments, family offices, and institutions.
Ernst & Young LLP, Mumbai	Manager, Direct Tax and Regulatory Services	Aug 2009 – Apr 2014	Advised international and domestic clientele (specialising in Media & Entertainment and Sports sectors) on tax and regulatory implications including cross-border tax issues.

Educational Qualifications:

- Bachelor of Commerce from R.A. Podar College of Commerce and Economics, University of Mumbai
- Chartered Accountant (All-India Rank Holder) from The Institute of Chartered Accountants of India
- Bachelor of Law (LLB) from Government Law College, University of Mumbai

(iv) Mr. Rakesh Patel, Principal Officer

Mr. Rakesh Patel completed his Bachelor of Commerce from University of Mumbai. He brings extensive experience in equity markets and trade execution, as detailed below.

Organisation	Designation	Period	Work Profile
DT Investment Management IFSC LLP	Principal Officer	Nov 2025 – Present	Optimising trade execution and minimising transaction costs. Monitors market liquidity, manages counterparty relationships, and provides market colour and insights to support strategic investment decisions. Independently, undertaking small positions or flow driven tweaks in the portfolio, and executing trades thereof.
East India Securities Ltd.	Sales Trader	Aug 2020 – Oct 2025	Accountable for executing buy/sell and rebalancing trades across client portfolios while

Organisation	Designation	Period	Work Profile
			consistently delivering best execution. Collaborated with sales traders, clients, and cross-functional teams to ensure accurate reporting, seamless trade processing, and successful implementation of system enhancements.
Max Wealth Management Pvt. Ltd.	Relationship Manager, Dealing	Feb 2006 – Aug 2020	Assisted traders in executing buy and sell orders across multiple securities with accuracy and awareness of market conditions.
Unique Stockbroking Pvt. Ltd.	Dealer	May 2004 – Feb 2006	Assisted traders in executing buy and sell orders across various securities, ensuring accuracy, timely processing, and adherence to market conditions.

Educational Qualifications:

- Bachelor of Commerce from University of Mumbai
- NISM Series VIII (Derivatives) Certified

(v) Ms. Deepika Jain, Compliance Officer

Ms. Deepika Jain is a Chartered Accountant from the Institute of Chartered Accountants of India and has completed her Bachelor of Law (LLB) from Government Law College, University of Mumbai. Her experience spans financial management, regulatory compliance, and audit functions in the asset management industry.

Organisation	Designation	Period	Work Profile
DT Investment Management IFSC LLP	Compliance Officer	Dec 2024 – Present	Ensures compliance with all regulatory requirements governing investment schemes and internal policies; regularly monitors, reports, and updates compliance controls and assurance frameworks. Liaises with management, regulators, and stakeholders by facilitating audits, reporting compliance status, and leading training and communication on relevant legal and regulatory updates within the organisation.
Mirae Asset Global Investments (India) Pvt. Ltd.	Senior Manager / Manager, Finance & Accounts	Nov 2010 – Jun 2017	Oversaw the operational, financial, and regulatory reporting aspects and managed audits, financial reporting, and tax compliances. Implemented process improvements and systems updates and supported management with financial analysis, forecasting, and strategic planning.

Organisation	Designation	Period	Work Profile
HSBC Asset Management (India) Pvt. Ltd.	Assistant Manager, Finance	May 2009 – Oct 2010	Prepared financial reports, ensured tax and statutory compliance, supported audits, maintained books per accounting standards, and monitored AUM and revenue projections for the HSBC Group.

Educational Qualifications:

- Bachelor of Commerce from H.R. College of Commerce and Economics, University of Mumbai
- Chartered Accountant from The Institute of Chartered Accountants of India
- Bachelor of Law (LLB) from Government Law College, University of Mumbai

3.4. Group Company Information

- DT Portfolio Managers LLP
- Chanakya Capital Partners IFSC LLP
- Chanakya Capital Partners, Mauritius
- Zen Sports Academy LLP
- On Target Sports Technology LLP
- Tam Wildlife Properties LLP

4. Penalties, Pending Litigation and Regulatory Proceedings

	Item	Status
4.1	Penalties imposed by IFSCA or directions issued under the Act	None.
4.2	Nature of penalty / direction	None.
4.3	Penalties imposed for economic offences or violation of securities laws	None.
4.4	Pending material litigation / legal proceedings	None.
4.5	Deficiency in systems and operations observed by IFSCA or any regulatory agency	None.
4.6	Enquiry / adjudication proceedings initiated by SEBI / IFSCA	None.

5. Services Offered / Proposed to be Offered

The Portfolio Manager may offer services of Discretionary Portfolio Management, Non-Discretionary Portfolio Management and Investment Advisory as set out below.

5.1. Discretionary Services

Under Discretionary Portfolio Management Services, the choice as well as the timing of investment decisions rests solely with the Portfolio Manager, which may exercise any degree of discretion in the investments or management of the Assets of the Client. The Securities invested by the Portfolio Manager for Clients may differ from Client to Client. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's funds is absolute and final, subject to compliance with Applicable Laws and the Agreement, except on grounds of fraud, conflict of interest or gross negligence. Statements in respect of each Client's Portfolio shall be sent to the respective Client at a frequency not less than as determined by law.

5.2. Non-Discretionary Services

Under Non-Discretionary Portfolio Management Services, the Assets of the Client are managed in consultation with the Client after due consultation. The Client has complete discretion to decide on the investment (quantity and price or amount). The Portfolio Manager may manage transaction execution, accounting, recording of corporate benefits, valuation and reporting aspects on behalf of the Client. The Non-Discretionary Service will be subject to a minimum portfolio value as may be prescribed by IFSCA from time to time.

5.3. Advisory Services

Under Advisory Services, the Portfolio Manager advises the Client on investments in general or as per any specific advice required by the Client and agreed upon in the Client agreement. The Portfolio Manager will render the best possible advice having regard to the Client's needs and the environment. The advice may be binding or non-binding in nature in accordance with the terms mentioned in the Agreement. Entry / exit timing, execution and settlement are solely the Client's responsibility. The Advisory Service will be subject to a minimum portfolio value as may be prescribed by IFSCA from time to time.

5.4. Presently Offered: Discretionary Portfolio Management Services

The Portfolio Manager presently offers Discretionary Portfolio Management Services with the following characteristics:

Parameter	Details
Investment Objective	Follows a long-only, multi-cap, sector-agnostic strategy with an objective to generate superior risk-adjusted long-term returns. Investments will be made primarily in Indian public equities and equity-like instruments.
Philosophy & Strategy	Based on the idea of terminal value – centred around partnering with high-quality businesses exhibiting strong fundamentals, consistent and increasing relevance, sustainable competitive advantages, and market share/mind share over time while maintaining profitability. The approach emphasises bottom-up stock selection, disciplined risk management, and low portfolio churn to achieve long-term wealth creation.
Description of Securities	Client monies will primarily be invested in equity shares and equity-linked instruments of companies listed in India. A portion of Client monies may be invested in units of debt mutual funds for cash management purposes, and a portion may be retained as bank balance.

<table>
<tr><th>Parameter</th><th>Details</th></tr>
<tr><td>Basis of Selection</td><td>Equities selected based on fundamental analysis, growth potential, and alignment with the investment philosophy.</td></tr>
<tr><td>Minimum Investment</td><td>USD 150,000 (or such other minimum as may be imposed by IFSCA regulations from time to time) or such higher amount as may be decided by the Portfolio Manager.</td></tr>
<tr><td>Indicative Investment Horizon</td><td>5+ years. This is an open-ended strategy with no mandatory minimum tenure; however, investors should consider a minimum 5 to 7 years horizon for meaningful wealth creation.</td></tr>
<tr><td>Exit Load</td><td>The Portfolio Manager may impose exit loads subject to conditions as detailed in the respective Agreement.</td></tr>
<tr><td>Partial Withdrawals</td><td>Partial withdrawal shall be allowed only to such extent that the portfolio value net of fees, charges and payment of the withdrawal amount is not less than the minimum investment amount as mandated by IFSCA regulations or such higher amount as may be decided by the Portfolio Manager.</td></tr>
<tr><td>Appropriate Benchmark</td><td>The Portfolio Manager shall use Nifty 50 and/or MSCI India Index as the appropriate benchmark for comparison of Portfolio performance. The basis for selection of these benchmarks and further details are set out in the respective Investment Management Agreement or Private Placement Memorandum, as applicable to the relevant product / service.</td></tr>
<tr><td>Indicative Asset Allocation</td><td>
<table>
<tr><th>Type of security</th><th>Indicative Allocation</th></tr>
<tr><td>Equity and equity-linked instruments</td><td>≥75%</td></tr>
<tr><td>Cash, liquid/debt mutual funds, bank balance</td><td>≤ 25%</td></tr>
</table>
Note: The above allocation ranges are indicative and may vary based on market conditions and the investment approach. The Portfolio Manager's discretion in asset allocation shall be governed by the Agreement, as applicable.
</td></tr>
</table>

5.5. Use of Derivatives

The Portfolio Manager does not intend to use derivatives as part of its primary investment strategy. However, should the Portfolio Manager intend to transact in derivatives, it will do so only after obtaining prior written consent from the Investor (if not already provided as part of the Investment Management Agreement) and will solely be for the purpose of hedging or portfolio protection. If the Investor does not wish the Portfolio Manager to use derivatives in their Portfolio, the Investor may notify the Portfolio Manager in writing and derivatives shall not be used.

6. Risk Factors

The risk factors set out below have been identified by the management of the Portfolio Manager. They should be read in conjunction with the risk factors outlined in the Agreement or any other regulatory filings by the Portfolio Manager. This list is not exhaustive.

6.1. General Risks

- Investments in Securities are subject to market risk and there is no assurance or guarantee that the objectives of the Portfolio Management Services will be achieved.
- The past performance of the Portfolio Manager or its Key Managerial Personnel does not indicate future performance.
- New Entity Risk: DT Investment Management IFSC LLP was incorporated in November 2024. As a newly incorporated entity, there is no track record of performance of the Portfolio Manager as an entity. Investors are advised to consider this risk while making investment decisions.
- Risk arising from the Investment Approach, investment objective, investment strategy and asset allocation, market risk, political and geopolitical risk, and risk arising from changing business dynamics may adversely affect Portfolio returns.
- Risk arising out of concentration: At times, Portfolios of individual Investors may be concentrated in certain companies, industries, or sectors. The performance of the Portfolio would depend on the performance of such companies, industries, or sectors of the economy.
- The Portfolio Manager's investment decisions may not always be profitable, as actual market movements may be at variance with anticipated trends.
- The Portfolio Manager is neither responsible nor liable for any losses resulting from the operations of the Portfolio.
- The liquidity of Portfolio investments is inherently restricted by trading volumes in the Securities in which investments are made.
- The Portfolio Manager does not guarantee or assure any return on investment, whether of principal, appreciation, or preservation of capital.
- The valuation of the Portfolio's investments may be affected by factors such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in government policies, and political and economic developments. There will be no prior intimation given to the Investor when the composition or asset allocation changes.
- Any act or omission of the Portfolio Manager undertaken in good faith shall be solely at the risk of the Investor, and the Portfolio Manager shall not be liable except in cases of gross negligence, wilful default, or fraud.

6.2. Risks Associated with Investments in Listed Indian Equities

- The Portfolio Manager invests primarily in equity shares and equity-linked instruments of companies listed on recognised Indian stock exchanges.
- Indian stock exchanges have experienced problems affecting market price and liquidity, including temporary exchange closures, broker defaults, settlement delays, and strikes by brokers. There can be no assurance that such problems will not occur in the future.
- Equity and equity-related securities are by nature volatile and prone to daily price fluctuations due to macro and micro factors, including economic conditions, industry trends, company-specific developments, and changes in investor sentiment.

- Equity and equity-related instruments are risk capital and are subordinate in the right of payment to other securities, including debt securities, in the event of liquidation or insolvency of a Portfolio Entity. The entire investment in such a Portfolio Entity may be lost.
- Trading volumes, settlement periods, and transfer procedures may restrict the liquidity of Portfolio investments. In the event of inordinately low volumes, there may be delays in unwinding the Portfolio and transferring redemption proceeds.
- The Portfolio is invested in a concentrated set of Indian listed equities. Poor performance of even a few holdings could have a disproportionately adverse effect on overall Portfolio returns.
- Securities of small and mid-cap companies may be thinly traded, subject to wider price swings, and followed by fewer investment research analysts, resulting in reduced liquidity and greater susceptibility to sharp price movements.
- FPI Registration Risk: The Portfolio Manager and the Clients invest in India through respective FPI registrations. The ability to execute the Investment Approach is dependent on continuation of the FPI licence. Any regulatory action or sanction against the Portfolio Manager or its Clients as FPIs could adversely affect the ability to make or dispose of investments in a timely manner.

6.3. Risks Associated with Investments in Debt and Money Market Instruments

A portion of the Portfolio may, from time to time, be maintained in units of debt mutual funds, liquid funds, or bank balances pending deployment. Such instruments carry the following risks:

- **Interest Rate Risk:** Changes in interest rates affect the valuation of fixed income instruments. Prices generally increase as interest rates decline and decrease as interest rates rise.
- **Credit Risk:** The risk that an issuer of a fixed income instrument may default on the timely payment of principal and/or interest, adversely affecting the value of the instrument.
- **Liquidity / Marketability Risk:** Money market securities, while generally liquid, may lack a well-developed secondary market, which may restrict the ability to exit positions quickly without a price impact.

6.4. Currency and Exchange Rate Risk

The Portfolio invests in Indian listed equities denominated in Indian Rupees. The Portfolio Manager operates from GIFT City IFSC, and Investors may invest in or repatriate returns in foreign currencies. Any change in the value of the Indian Rupee against the US Dollar or other currencies will cause a corresponding change in the value of the Portfolio as expressed in foreign currency terms.

6.5. Management and Operational Risks

- **Reliance on Key Personnel:** The success of the Portfolio Management Services depends substantially on the ability of the Portfolio Manager and its Key Managerial Personnel. The loss of one or more key personnel could have a material adverse effect on Portfolio returns.
- **Counterparty Risk:** The Portfolio will be exposed to counterparty risk in relation to brokers, custodians, banking units, and other service providers. The failure of any such counterparty to meet its obligations could result in losses to the Portfolio.
- **Cyber Security Risk:** The Portfolio Manager and its service providers are susceptible to operational and information security risks from cyber incidents, including unauthorised access, malicious software, hacking, and denial-of-service attacks. Such incidents could disrupt business operations and result in financial losses.

- **Systems and Technology Risk:** The Portfolio Manager relies on technology systems for investment management, trade execution, reporting, and compliance. Any failure or deficiency in such systems could adversely affect the performance of Portfolio Management Services.

6.6. Market and Macro-Economic Risks

- Indian equity markets are sensitive to global financial instability, monetary policy changes, inflation, energy costs, geopolitical tensions, and broader global economic conditions.
- **Emerging Market Risk:** Investing in Indian securities involves risks including the risk of nationalisation or expropriation of assets, social, economic and political uncertainty, currency exchange rate fluctuations, differences in financial reporting standards, and less extensive regulation of the securities markets.
- **Political and Regulatory Risk:** Political instability, changes in government or policy, and regulatory developments in India could adversely affect economic conditions and Portfolio performance. Changes in tax laws or exchange control regulations may have a material adverse effect on the Portfolio's returns.
- **Pandemic and Force Majeure Risk:** Future outbreaks of infectious diseases, pandemics, natural calamities, acts of war, or other force majeure events could disrupt markets and business operations, adversely impacting the Portfolio.
- **Model Risk:** The Portfolio Manager employs qualitative and quantitative frameworks to evaluate and select investments. Such frameworks involve inherent subjectivity and may not always accurately predict investment outcomes.
- **Benchmark Mismatch Risk:** The benchmark selected may not always represent the most accurate or relevant comparator for the investment strategy pursued. Benchmark mismatch can lead to a false perception of underperformance or excess risk relative to the benchmark.

6.7. Legal and Tax Risks

- **Tax Risk:** The tax laws applicable to the Portfolio and Investors are subject to change, and tax liabilities could be incurred by Investors as a result. Any increase in taxes, duties, or levies may materially affect the Portfolio's profitability. Investors should consult their own tax advisors prior to investing.
- **Regulatory and Legal Risk:** Compliance requirements in India are complex and evolving. Any policy announcement or legal or regulatory change may require changes to the structure or operations of the Portfolio and may adversely affect its performance. Any denial or withdrawal of "Specified Fund" status or similar regulatory benefits, if claimed by an Investor, could significantly increase tax liabilities and adversely affect returns.
- **Bankruptcy of Portfolio Entity:** In the event a Portfolio Entity becomes insolvent or files for bankruptcy, there is a risk that the Portfolio's equity claim may be subordinated to other creditors, resulting in a partial or total loss of investment in such entity.

6.8. Other Risks

- **Valuation Risk:** For listed investments, market prices can generally be obtained from stock exchanges or verifiable sources. However, in circumstances such as trading suspensions or extreme market dislocations, objective verification may not be possible and any fair value determination may involve assumptions and subjectivity.

- **Settlement and Transfer Risk:** The inability of the Portfolio to make intended securities purchases due to settlement problems could cause the Portfolio to miss investment opportunities. Similarly, the inability to sell Securities held in the Portfolio could result in potential losses.
- **Non-Guarantee of Returns:** Investments in Securities are subject to market risks, and the Portfolio Manager does not in any manner assure or guarantee that the investment objectives will be achieved. The value of the Portfolio may increase or decrease depending upon various market forces.

7. Conflict of Interest

Subject to: (1) the regulatory requirements, and (2) any specific agreements entered into with the Investor, the Portfolio Manager hereby provides the following disclosures. Please do note that this list is not exhaustive.

- The Portfolio Manager may receive corporate support services from its Promoter.
- The Portfolio Manager may acquire, have and/or maintain a position in any security similar to the securities held, purchased or sold for the Investor forming part of the Assets of the Investor.
- The Portfolio Manager may purchase or sell on behalf of the Investor any Security which forms part of the Assets of the Portfolio Manager's other Investors or which is otherwise purchased, sold or traded in by the Portfolio Manager on its own account or on account of its other Investors.
- The Portfolio Manager may execute cross transactions, whereby one Investor's portfolio buys Securities that another Investor's portfolio simultaneously sells, or vice versa, provided such transactions are executed at prevailing market prices, are in the best interest of both Investors, and comply with Applicable Laws.
- The Promoter and entities advised or managed by the Promoter may, from time to time, purchase or sell Securities that are also being purchased or sold for the Investor's Portfolio. The Portfolio Manager operates independently of the Promoter's investment activities and may not have prior knowledge of, or access to, information regarding such transactions. The Portfolio Manager shall bear no responsibility for any coincidence of trading activity between its Investors' Portfolios and the Promoter's portfolio.
- The Portfolio Manager may have a commercial or other business relationship or arrangement with stock-brokers, Banking Units, Mutual Funds, Intermediaries or companies with whom or through whom transactions are carried out for purchase or sale of any of the securities or with any issuer of securities whose securities are purchased and/or sold for the Investor.
- The Portfolio Manager may deal on the Investor's behalf with any Associate of the Portfolio Manager as long as the terms are as favourable to the Investor as would be ordinarily obtained from a concern which is not an Associate.
- The Portfolio Manager may purchase or sell securities from or to anyone with whom the Portfolio Manager has a commercial or other relationship or agreement, including selling or purchasing the securities to or from the account of the Portfolio Manager or another Investor of the Portfolio Manager and/ or the Promoter or any entities advised or managed by the Promoter.

- The Portfolio Manager may deal with any Associates of the Portfolio Manager on a principal-to-principal basis for any buying, selling or otherwise in any act relating to the Discretionary Portfolio Management Services provided to the Investor.
- The Portfolio Manager may invest in securities for the issue of which the Portfolio Manager or its Associates is the lead manager, underwriter, merchant banker, advisor or other Intermediary.

The Portfolio Manager maintains robust internal policies to manage conflicts of interest, including best-execution standards and segregation of duties. All transactions with Associates are conducted on arm's-length terms and in compliance with IFSCA regulations. Where applicable, transactions requiring investor consent (such as related-party dealings under schemes) will be executed only after obtaining the requisite approvals.

8. Audit Observations

The Portfolio Manager was incorporated in November 2024. There are no adverse statutory audit observations for the first year (FY 2024-25) and second year (2025-26) of operations.

9. Nature of Expenses

The following are indicative types of costs and expenses for Investors availing the Portfolio Management Services:

9.1. Management Fees

The management fee relates to the portfolio management services offered to the Clients. The fee may be a fixed charge or a percentage of the quantum of the funds being managed as agreed in the Agreement.

9.2. Performance Fee

The performance fee relates to the share of profits charged by the Portfolio Manager, subject to a hurdle rate as per the details provided in the Agreement.

9.3. Exit Load

The Portfolio Manager may charge an early withdrawal fee as a percentage of the value of the Portfolio / withdrawn Portfolio as per the terms and conditions of a particular Product as agreed in the Agreement.

9.4. Other Fees and Expenses

The Portfolio Manager may incur the following expenses which may be charged / borne by the Client:

- Transaction expenses including but not limited to statutory fees, statutory levies, stamp duty, registration charges, commissions, charges for transactions in Securities, custodial fees, depository charges, and other similar or associated fees, charges and levies, legal fees, incidental expenses, etc.
- Brokerage and Goods and Service Tax ("GST") shall be charged at actuals.
- Legal and statutory expenses in relation to the Portfolio and/or in relation to the portfolio management services and advisory services being provided under the licence.
- Statutory taxes and levies, if any, payable in connection with the Portfolio.

- All other costs, expenses, charges, levies, duties, administrative, statutory, revenue levies and other incidental costs, fees and expenses not specifically covered above, as agreed upon in the Agreement, arising out of or in the course of managing or operating the Portfolio.

All fees and expenses shall be payable by the Investor separately to the Portfolio Manager in the manner specified in the Agreement. The Portfolio Manager shall not directly debit the Investor's bank or demat account for fees and expenses, in accordance with applicable FPI regulations.

The fees charged for rendering Portfolio Management Services are subject to the limits prescribed by IFSCA from time to time, if any, and do not guarantee or assure, either directly or indirectly, any return on the investment made by the Investor.

The exact fees charged to the Investor will vary depending upon the exact nature of the services to be provided. These shall be annexed to the Agreement depending upon the services to be provided by the Portfolio Manager to the Investor at the time of execution of the Agreement.

In addition to the expenses listed above, expenses as detailed in the respective Investment Management Agreement or Private Placement Memorandum, as applicable to the relevant product / service, shall also be applicable, including establishment expenses, operating expenses, and extraordinary costs, all charged at actuals. For a comprehensive list of expenses, please refer to the applicable Investment Management Agreement or Private Placement Memorandum.

10. Taxation

The Investor shall be liable for all tax liabilities on income arising out of his/her/its investments in the Portfolio Management Services or Advisory Services. The Investor is strongly advised to consult his/her/their tax advisor/consultant for appropriate advice on the tax treatment arising on such income, including but not limited to the implications of capital gains tax, TDS, GST, FEMA and applicable DTAA provisions.

11. Accounting Policies

11.1. Basis of Accounting

- Books and Records for each Product are separately maintained in the name of the Investor to account for the Assets and any additions, income, receipts and disbursements in connection therewith, as provided by the IFSCA (Fund Management) Regulations, 2025, as amended from time to time.
- Accounting under the respective Portfolios is done in accordance with Generally Accepted Accounting Principles.
- **Independent NAV Computation:** The computation of Net Asset Value (NAV) and portfolio valuation for PMS accounts is performed by Apex Fincore LLP ("Apex"), the independent Fund Administrator appointed by the Portfolio Manager. Apex operates independently of the investment management function, with portfolio data sourced from the Custodian – as appointed by respective Investor. The ultimate responsibility for the true and fairness of valuation rests with the Portfolio Manager, in accordance with IFSCA (Fund Management) Regulations, 2025.
- Transactions for purchase and sale of investments are recognised as of the trade date at cost of acquisition / disposal. In determining the holding cost of investments and the gain or loss on sale of investment, the 'first-in-first-out' method ("FIFO") will be followed. The cost of investments acquired or purchased would include brokerage, stamp charges and any charges customarily included in the broker's contract note or levied by any statute, except STT

(Securities Transaction Tax). Securities Transaction Tax incurred on buying and selling of securities is charged to the revenue account.

- Listed equity shares and equity-linked instruments are valued at the official closing price of the National Stock Exchange of India Limited (NSE) on the relevant valuation date. Where a security is not traded on NSE, the official closing price on BSE Limited (BSE) shall be used. Where the security is not traded on either NSE or BSE on the relevant valuation date, the most recent available closing price (not older than 30 calendar days) shall be used; if no price is available within 30 days, the security shall be treated as non-traded and shall be valued at fair value in accordance with the Securities Valuation Policy.
- Units of debt mutual funds and liquid funds held as cash management instruments are valued at the published Net Asset Value (NAV) declared by the respective mutual fund as at the relevant valuation date.
- Where eligible Securities have been received from the Investor towards initial / additional corpus, the closing market value of the previous Business Day of activation of account / receipt of Securities (in case of additional corpus) is considered as capital contribution and deemed to be the cost of investments for the purpose of tracking performance.
- Where Securities have been withdrawn by the Investor towards Partial / Full redemption, the closing market value of the previous Business Day of such Securities is considered for the purpose of determining the capital withdrawal value. The difference in cost and market value of the Securities at the time of partial / full redemption is recorded as gain / loss of the Portfolio for accounting purposes.

11.2. Income / Expenses

- All investment income and expenses are accounted for on an accrual basis, except Custodian and Depository charges which are recorded on a payment basis based on actual bills received.
- Dividend is accrued on the ex-date of the Securities and the same is reflected in the Investor's books on the ex-date. Dividend income from temporary investments is recognised on an accrual basis.
- Corporate actions such as Bonus / Split / Rights entitlements are recognised as investments on the ex-bonus / ex-split / ex-rights date respectively.
- In case of fixed income instruments purchased / sold at cum-interest rates, the interest component up to the date of purchase / sale is taken to interest receivable / payable account.

12. Investor Services

The Portfolio Manager seeks to provide the Clients with a high standard of service. The Portfolio Manager is committed to put in place and upgrade on a continuous basis the systems and procedures that will enable effective servicing through the use of technology. Client servicing essentially involves:

- Reporting Portfolio actions and Client statement of accounts at pre-defined frequency;
- Attending to and addressing any Client query with minimum lead time;
- Ensuring Portfolio reviews at pre-defined frequency.

12.1 Investor Relations Officer

The following officer shall attend to Investor queries and complaints:

Name	Ms. Deepika Jain
Designation	Compliance Officer / Complaint Redressal Officer (CRO)

Address	Unit No. 155, Seat No. 1-3, Ground Floor, Pragya Accelerator II, Building-15B, Block 15, Road No. 1C, Zone-1, Gift SEZ, Gandhinagar – 382355
Email	deepika.jain@dt-fund.in
Telephone	+91 96622 24602

12.2 Grievance Redressal and Dispute Settlement Mechanism

DT Investment Management IFSC LLP is committed to addressing every Investor concern fairly, promptly, and transparently, in accordance with the IFSCA Circular on Complaint Handling and Grievance Redressal dated December 2, 2024.

Step 1	Lodge a complaint with the Complaint Redressal Officer (CRO) — Ms. Deepika Jain — at **deepika.jain@dt-fund.in.** All complaints will be examined and processed in a fair, transparent, professional, and impartial manner.
Step 2	If not satisfied with the CRO's resolution, escalate to the Complaint Redressal Appellate Officer (CRAO) — Mr. Jay Thakkar, Designated Partner — at **jay.thakkar@dt-fund.in.** All disputes will in the first place be attempted to be settled by mutual discussions.
Step 3	If still unresolved after exhausting the Firm's appellate mechanism, the Investor may escalate to IFSCA at **grievance-redressal@ifsca.gov.in** or through www.ifsca.gov.in.

In the event of failure of settlement through mutual discussions, disputes may also be resolved through arbitration or through an Ombudsman authorised or appointed for the purpose by any regulatory authority, as applicable. Where the dispute is presented for arbitration, the same shall be referred to a sole arbitrator to be appointed by the Parties mutually, as detailed in the Agreement. Such arbitration shall be in accordance with the Arbitration and Conciliation Act, 1996, or any statutory modification or re-enactment thereof.

13. General Provisions

13.1. Prevention of Money Laundering

The Prevention of Money Laundering Act, 2002 (PMLA Act) came into force with effect from July 1, 2005, forming the core of the legal framework to combat money laundering. As per the provisions of the PMLA Act, Intermediaries, including portfolio managers, have certain obligations regarding verification of the identity of their clients, maintaining records and furnishing information to the Financial Intelligence Unit – India (FIU-IND). IFSCA, through various circulars, has directed all Intermediaries, including portfolio managers, to formulate and implement policies and procedures for dealing with money laundering and adoption of a 'Know Your Customer' (KYC) Policy.

The Client should ensure that the amount invested in the Portfolio Management Service is through legitimate sources only and does not involve and is not designed for the purpose of any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of the PMLA Act, the Prevention of Money Laundering Rules, 2005, Income Tax Act, Anti-Money Laundering Guidelines, Prevention of Corruption Act, or any other applicable laws enacted by the Government of India from time to time.

13.2. KYC and Verification

The Portfolio Manager reserves the right to take all steps and actions, including recording clients' telephonic calls and/or obtaining and retaining all documentation for establishing the identity of the Client, proof of residence, source of funds, etc., in accordance with applicable law, as may be required to ensure appropriate identification, verification and re-verification of the Client, and the course of funds, under its KYC policy as may be amended and updated from time to time.

If at any time the Portfolio Manager believes that the transaction is suspicious in nature in accordance with applicable law, the Portfolio Manager shall have the absolute discretion to report the transaction to FIU-IND and/or any other statutory body that the Portfolio Manager is bound to report to from time to time. The Portfolio Manager can also reject any application, freeze the account, compulsorily close the Client account and pay out the proceeds to the Client, at its option. The Portfolio Manager shall have no obligation to inform the Client or its agent / power of attorney holder in the event of such reporting.

13.3. Limitation of Liability

The Portfolio Manager and its designated partners, employees, officers, agents and persons acting on its behalf shall not be responsible / liable for any loss suffered by the Client in any manner whatsoever due to any reporting to the FIU-IND by the Portfolio Manager, the rejection of any application or freezing or compulsory closure of any Client account or termination of the Agreement due to any non-compliance by the Client with the provisions of any applicable law, rule, regulation, KYC policy and/or where the Portfolio Manager has reported a suspicious transaction to FIU-IND.

13.4. Mutual Agreement

The Portfolio Manager and the Client can mutually agree to be bound by specific terms through a written two-way agreement between themselves in addition to the standard Agreement for Portfolio Management Services.

This Disclosure Document has been prepared and issued by DT Investment Management IFSC LLP, a Registered Fund Management Entity (Non-Retail) registered with IFSCA bearing registration number FDM2025FNR0790, in accordance with Regulation 74 of the IFSCA (Fund Management) Regulations, 2025.