IFM INVESTMENT ADVISORS PRIVATE LIMITED

Disclosure Document

Portfolio Management Services

DISCLOSURE DOCUMENT

(As required under Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020)

The Disclosure Document (hereinafter referred as **"This Document"** has been filed with Securities and Exchange Board of India along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.

This Document serves the purpose of providing essential information about the portfolio services in manner to assist and enable the investors in making informed decision for engaging IFM INVESTMENT ADVISORS PRIVATE LIMITED (as a **"Portfolio Manager"**).

This Document contains the necessary information about the Portfolio Manager required by an investor before investing. The investor is advised to retain this document for future reference.

The name, phone number, e-mail address of the Principal Officer as designated by the Portfolio Manager along with the address of the Portfolio Manager are as follows:

Mr. IQBAL SINGH
PRINCIPAL OFFICER
Phone: 9814602260
E-mail: isingh@ifmglobal.in

PORTFOLIO MANAGER
IFM INVESTMENT ADVISORS PRIVATE LIMITED
Registration No: INP000009436
B-98, Phase-8, Industrial Area, Sector 73, Mohali, Punjab 160062

IFM Investment Advisors

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1. DISCLAIMER CLAUSE

The particulars of this Document have been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020, as amended till date and filed with SEBI.

This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the Document.

2. ABBREVIATIONS & DEFINITIONS

In this Disclosure Document the following terms will have the meanings indicated there against, unless the context suggests otherwise:

a) "Act" means the Securities and Exchange Board of India Act, 1992 (15 of1992).
b) "Agreement" means agreement between Portfolio Manager and its Client and shall include all Schedules and Annexures attached thereto.
c) "Application" means the application made by the Client to the Portfolio Manager to place its funds and/or securities with the Portfolio Manager for Portfolio Management Services. Upon execution of the Agreement by the Portfolio Manager, the Application shall be deemed to form an integral part of the Agreement. Provided that in case of any conflict between the contents of the Application and the provisions of the Agreement, the provisions of the Agreement shall prevail.
d) "Assets" means (i) the Portfolio and/or (ii) the Funds.
e) "Body Corporate" shall have the meaning assigned to it in or under clause (11) of section 2 of the Companies Act,2013.
f) "Bank Account" means one or more accounts opened, maintained and operated by the Portfolio Manager with any of the Scheduled Commercial Banks in accordance with the agreement entered into with the Client.
g) "Board" means the Securities and Exchange Board of India established under sub-section (1) of Section 3 of the Securities and Exchange Board of India Act,1992.
h) "Client" means the person who enters into an Agreement with the Portfolio Manager for managing its portfolio and /or funds.
i) "Custodian" means custodian with whom the Portfolio Manager enters into an agreement for availing custodial Services such other custodian (s) as may be appointed by Portfolio Manager from time to time in compliance of the provisions of SEBI (Portfolio Managers) Regulations, 2020.
j) "Depository Account" means one or more account or accounts opened, maintained and operated by the Portfolio Manager with any depository or depository participant registered 4 under the SEBI (Depositories and Participants) Regulations, 1996 in accordance with the agreement entered into with the Client.
k) "Discretionary Portfolio Management Services" means the portfolio management services rendered to the Client by the Portfolio Manager on the terms and conditions contained in the

agreement, where under the Portfolio Manager exercises any degree of discretion in the investments or management of assets of the Client.

l) "Discretionary Portfolio Manager" means a Portfolio Manager who exercises or may, under a contract relating to portfolio management, exercise any degree of discretion as to the investments or management of the portfolio of securities or the funds of the Client, as the case may be.

m) "Document" means this Disclosure Document.

n) "Equity Related Instruments" includes convertible bonds and debentures, convertible preference shares, equity warrants, equity derivatives, FCCBs, equity mutual funds and any other like instrument.

o) "Equity Oriented Mutual Fund" means a mutual fund scheme which invests at least 65% of the assets in equities and equity related instruments.

p) "Financial Year" means the year starting from April 1 and ending on March 31 of the following year.

q) "Funds" means the monies managed by the Portfolio Manager on behalf of the Client pursuant to Portfolio Investment Management Agreement and includes the monies mentioned in the Application, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to Portfolio Investment Management Agreement, the proceeds of the sale or other realization of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the same is managed by the Portfolio Manager.

r) "Non-discretionary Portfolio Management Services" means a portfolio management services under which the Portfolio Manager, subject to express prior instructions issued by the Client from time to time in writing, for an agreed fee structure and for a definite described period, invests in respect of the Client's account in any type of security entirely at the Client's risk and ensure that all benefits accrue to the Client's Portfolio.

s) "Parties" means the Portfolio Manager and the Client; and "Party" shall be construed accordingly.

t) "Person" includes an individual, a Hindu Undivided Family, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.

u) "Portfolio" means the Securities managed by the Portfolio Manager on behalf of the Client pursuant to the Portfolio Investment Management Agreement and includes any Securities mentioned in the Application, any further Securities placed by the Client with the Portfolio Manager for being managed pursuant to the Portfolio Investment Management Agreement, Securities acquired by the Portfolio Manager through investment of Funds and bonus and rights shares or otherwise in respect of Securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.

v) "Portfolio Manager" shall have the same meaning as given in regulation 2(1)(o) of the SEBI (Portfolio Managers) Regulations, 2020 as amended from time to time.

w) "Principal Officer" means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager.

x) "Regulations" means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as may be amended from time to time.

y) "SEBI" means the Securities and Exchange Board of India established under sub-section (1) of Section 3 of the SEBI Act.

z) "Strategy" means broadly defined investment themes such as 'Equity', 'Debt', 'Hybrid' and 'Multi Asset'. Each Investment Approach shall be tagged to only one Strategy. A Portfolio Manager may tag more than one Investment Approach to a Strategy, but each Investment Approach must be tagged to only one Strategy.

aa) "Securities" includes: "Securities" as defined under the Securities Contracts (Regulation) Act, 1956 as amended from time-to-time and includes (Check the definition in SCR).

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. They have been included only for the purpose of clarity and shall in addition be interpreted according to their general meaning and usage and shall also carry meanings assigned to them in regulations governing Portfolio Management Services.

IFM Investment Advisors

3. DESCRIPTION

I. History, Present Business and Background of IFM INVESTMENT ADVISORS PRIVATE LIMITED.

IFM Investment Advisors PRIVATE Ltd is a private limited company incorporated on January 22, 2025, in Mohali, under the Companies Act, 2013 (18 of 2013), and is limited by shares. The company will primarily engage in the management of investment portfolios as a duly registered Portfolio Manager, adhering to the regulations set by the Securities and Exchange Board of India (SEBI), 2020.

II. DIRECTORS AND THEIR BACKGROUND

a) Iqbal Singh *(Managing Director and Principal Officer)*

Iqbal Singh is a seasoned entrepreneur and financial expert with over 25 years of experience. He holds a B.E., MBA, and is a CFA Level 2 Candidate. He is the Founder and Managing Director of Innovative Financial Management PRIVATE. Ltd. (IFM), providing comprehensive financial solutions such as mutual fund distribution, portfolio management, and investment advisory services. Iqbal was a key member of the founding team of HDFC Bank's private banking group and has also led investment and insurance businesses at CITI Bank. He serves on the Advisory Board of SBI AIF Fund (PIPE). He is Director and principal officer of Acepro Advisors PRIVATE. Ltd. SEBI Regulated PMS. He is a recognized leader in the financial industry, having earned multiple accolades, including Best Regional Financial Advisor by CNBC TV-18 and ICRA. Additionally, Iqbal is committed to financial literacy through IFM FinCoach Global PRIVATE. Ltd., which trains students for BFSI sector roles.

***b)* Ankit Himatsingka** *(Director)*

Ankit Himatsingka is a seasoned finance professional with over 15 years of experience across industries such as consumer goods, luxury retail, and high-growth technology startups. A Chartered Accountant (CA) by qualification, he has held leadership roles at renowned organizations like ITC Limited, Richemont, and several Sequoia-backed startups, where he played a pivotal role as CFO in driving financial strategy, raising capital, and supporting business scalability. In 2024, Ankit transitioned to a full-time equity investor, a passion he has pursued for over two decades, gaining a reputation for his sharp insights into global markets and macroeconomic trends. An alumnus of Harvard Business School, where he completed the Senior Executive Leadership Program (SELP), Ankit brings a global perspective to his investment decisions. He currently serves as the Director of IFM Investment Advisors PRIVATE. Ltd., where he continues to analyze financial markets with a focus on emerging opportunities and long-term value creation.

c) **Amanjot Kaur** *(Director, Compliance Officer)*

Dr. Amanjot Kaur is a certified Investment Advisor and Soft Skills Trainer with over 25 years of experience in Financial Services, Banking, and Customer Service. She holds a B.Sc., MBA, and a PhD in Financial Literacy & Financial Well-being. As the Director of Innovative Financial Management (IFM) since 2010, she has worked in Investment Advisory, Mutual Funds, and Stock Broking services, conducting over 260 financial literacy sessions that have impacted more than 6000 investors. Dr. Kaur also serves as Director at IFM Fincoach Global PRIVATE. Ltd., focusing on training and placement in the BFSI sector, partnering with top banks for hiring and training. Her career includes key roles at Citibank NA as Regional Operations & Service Head, where she managed a 300-seater Citi Phones Call Centre, and at HDFC Bank, where she helped launch depository services. She began her career at Ludhiana Stock Exchange, gaining early exposure to financial markets. Dr. Kaur's research in Behavioral Finance, Financial Literacy, Asset Management, and Financial Well-being is integrated into her workshops, investment advisory programs, and industry training. She has earned multiple certifications, including Investment Advisor, Mutual Fund Distributor and Soft Skills Trainer, and was selected for the Cherie Blair Foundation UK program under the Goldman Sachs 10,000 Women Program.

III. KEY PERSONNEL:

a) **Iqbal Singh** *(Fund Manager - Education- B.E, MBA, CFA level 2 Candidate)*

Investment strategies and portfolio management from Wharton Business school.

Mr. Iqbal Singh is a distinguished entrepreneur and financial expert with over 25 years of experience and Founder and Managing Director of Innovative Financial Management PRIVATE. Ltd. (IFM), which provides comprehensive financial solutions, including mutual fund distribution broking services, financial planning, portfolio management services, investment advisory services. Mr. Iqbal Singh was part of founding team of HDFC Bank private banking group, where he played a pivotal role in the bank for wealth management and investment advisory services for north India. He was also heading investment and insurance business of CITI Bank Northern region in early phase of his career. His leadership extends to being a member of the Advisory Board for the first SBI AIF Fund (PIPE) from SBI Mutual fund. He is also currently serving as the Director of Acepro Advisors PRIVATE. Ltd. and Principal Officer for Acepro Large Cap PMS Strategy, SEBI Regulated discretionary portfolio management services.

Under his stewardship, IFM has achieved several accolades, including being named Best Regional Financial Advisor (North) by CNBC TV-18 and ICRA in 2009, 2010, 2012-13, and 2017-18. We have successfully created more than 100 financial plans, including for HNIs, IAS officers, doctors, and lawyers. Mr. Iqbal Singh is also committed to financial literacy, having founded IFM FinCoach Global Private Limited , which trains students for key roles in the BFSI sector and actively participates in CSR initiatives. With a proven track record in both financial advisory and corporate leadership, Mr. Iqbal Singh continues to offer actionable and insightful financial guidance, contributing significantly to the industry and community.

IFM Investment Advisors

4. SERVICES OFFERED

IFM INVESTMENT ADVISORS PRIVATE LIMITED offers Portfolio Management services across different asset classes to high-net-worth individuals and entities seeking wealth management services. We offer Discretionary, Non-Discretionary and Advisory Portfolio Management services to various clients.

Details of the services being offered

Discretionary	The portfolio manager independently manages the client's investments, making investment decisions aligned with the client's objectives.
Non-Discretionary	The portfolio manager manages the funds in accordance with the directions of the client.
Advisory	The portfolio manager offers investment advice without executing transactions or managing the portfolio.

I. DISCRETIONARY PORTFOLIO MANAGEMENT SERVICES

a) IFM LARGE CAP FUND

- **Investment Objective:** Our objective of the fund is to invest in a concentrated portfolio of stocks from NIFTY 100 universe emphasizing superior risk adjusted returns to achieve long term capital appreciation.
- **Investment Approach:** Our approach is to invest in high-quality large cap stocks with strong fundamentals, stable earnings and market leadership emphasizing capital preservation and wealth creation through active monitoring, sectoral diversification and a long-term outlook.
- **Investment Strategy:** Our strategy is to invest in upto 25 stocks mainly from constituents of NIFTY 100. The portfolio will be invested in market leaders across various sectors. These companies have long track records of good performance in peer groups. The portfolio may also be invested in IPOs (Initial Public Offerings) if deemed suitable and beneficial. In case of high market volatility, the portfolio may be strategically hedged through futures and options.
- **Benchmark:** NIFTY 50 TRI
- **Stock/ Sector exposure limit criteria**
  - Sector exposure limit - Nil
  - Stock exposure limit - 15%
- **Client Suitability:** Investors with an investment horizon of 3-4 years seeking steady moderate market returns with low to moderate risk appetite.
- **Minimum Investment Amount:** INR 50 lakhs or such other amount as decided by the Portfolio Manager at its sole discretion, subject to however in excess of the amount to comply with applicable SEBI Regulations.

b) IFM FLEXICAP GROWTH FUND

- **Investment Objective:** Our objective of the fund is to invest in a concentrated portfolio of stocks from NIFTY 500 universe/ETFs emphasizing superior risk adjusted returns to achieve long term capital appreciation.
- **Investment Approach:** Our approach is to invest across market capitalization (large, mid and small cap) adapting to market conditions. It will combine growth, value and opportunistic investing to maximize risk- adjusted returns with flexible allocation based on macro-economic factors, sectoral trends and stock specific fundamentals.
- **Investment Strategy:** Our strategy comprises upto 25 stocks mainly from Nifty 500 Stocks/ETFs. The portfolio will be invested in companies from various sectors. As mentioned, the exposure will be diversified across market capitalization depending upon the market conditions. The portfolio may also be invested in IPOs (Initial Public Offerings) if deemed suitable and beneficial. In case of high market volatility, the portfolio may be strategically hedged through futures and options.
- **Benchmark:** BSE 500 TRI
- **Stock/ Sector exposure limit criteria**
  - Sector exposure limit - Nil
  - Stock exposure limit - 15%
- **Client Suitability:** Investors with an investment horizon of 3-4 years seeking steady market returns with moderate to high-risk appetite.
- **Minimum Investment Amount:** INR 50 lakhs or such other amount as decided by the Portfolio Manager at its sole discretion, subject to however more than the amount to comply with applicable SEBI Regulations.

PMS IN MUTUAL FUNDS

c) IFM ALPHAEDGE GROWTH FUND

- **Investment Objective**: Our objective is long-term capital appreciation by investing in diversified equity oriented mutual funds/ETFs across market capitalizations.
- **Investment Approach:** Our approach is to invest in equity oriented mutual funds/ETFs from all categories. The selection is based on consistent performance, superior risk-adjusted returns, right valuation and various other parameters of selecting mutual funds.
- **Investment Strategy:** Our strategy is a blend of growth and value investing in equity oriented mutual funds/ETFs. It focuses on capturing opportunities across sectors and market cycles while managing risk and liquidity. In case of high market volatility, the portfolio may be strategically hedged through futures and options.
- **Benchmark:** BSE 500 TRI
- **Client Suitability**: Suitable for investors with a medium to long-term investment horizon (3–5 years), aiming for higher capital appreciation and willing to tolerate moderate market volatility.

- **Minimum Investment Amount**
  Portfolio Manager will invest in equity oriented mutual funds. Currently the minimum investment amount is INR 50 Lakhs

d) IFM CAPITAL SAFETY YIELD FUND

- **Investment Objective**: Our objective is to generate stable and predictable returns over the medium to long term by investing in high-quality debt oriented mutual funds/ ETFs with minimal credit and interest rate risk.
- **Investment Approach:** Our approach focuses on investing in best-performing debt mutual funds across all categories delivering superior risk adjusted returns.
- **Investment Strategy:** Our strategy is to invest in high-quality debt oriented mutual funds/ETFs, which are actively managed to take advantage of interest rate movements and yield curve shifts.
- **Benchmark:** 10-Year Government Security (G-Sec)
- **Client Suitability**: Ideal for conservative investors looking for stable returns with low to moderate risk, especially those aiming to preserve capital with a 3–5-year investment horizon.
- **Minimum Investment Amount:** Portfolio Manager will invest in debt mutual Funds. Currently the minimum investment amount is INR 50 Lakhs.

II. NON-DISCRETIONARY PORTFOLIO MANAGEMENT SERVICES:

In terms of the SEBI (Portfolio Manager) Regulations, 2020, the non-discretionary portfolio management services shall involve providing investment advice without the discretion to make investment decisions on behalf of the client. The portfolio manager will advise on the portfolio strategy, recommend the investment and divestment of individual securities, and provide guidance on the allocation of assets, based on the client's preferences. All investment decisions will be made by the client, and the services will be provided for an agreed fee structure, entirely at the client's risk. These services are available to all eligible categories of investors, including NRIs, FPIs, and others who can invest in the Indian market.

III. ADVISORY SERVICES

In terms of the SEBI (Portfolio Manager) Regulations, 2020, shall be in the nature of investment advisory and shall include the responsibility of advising on the portfolio strategy, investment and divestment of individual securities of the clients portfolio, for an agreed fee structure, entirely at the Client's risk; to all eligible category of investors who can invest in Indian market including NRIs, FPIs, etc. Clients make final decisions on execution.

INVESTMENTS IN ASSOCIATES/ GROUP COMPANIES OF THE PORTFOLIO MANAGER AND THE MAXIMUM PERCENTAGE OF SUCH INVESTMENTS THEREIN SUBJECT TO THE APPLICABLE LAWS / REGULATIONS/ GUIDELINES

The portfolio manager may invest in listed securities of the associate/group companies (if any). These investments will be carried out to achieve the investment objectives and strategies and in the normal course of investment activity subject to the applicable laws/regulations.

CUSTODY AND SAFE-KEEPING

The Portfolio Manager shall arrange for the custody of the Investments by appointing a Custodian, details are as follows:

- **Name of the Custodian:** Orbis Financial Corporation Limited
- **Address:** 4A, Ocus Technopolis, Sector 54, Golf Club Road, Gurgaon, Haryana-122002
- **Registration No.:** IN/CUS/020

Custodian shall be holding investments in dematerialized form in the Client Depository Account and/or Client Mutual Fund Investment Account and/or Pooled Depository Account. The Portfolio Manager shall use all reasonable care and due diligence for the safe custody of the Investments and extend the same degree of care and due diligence as a Portfolio Manager would extend in case of his own portfolio.

5. RISK FACTORS

I. Produced below are the standard risk factors:

a) The name of any of the Products does not, in any manner, indicate either the quality of the Product or its future prospects or returns. The present products are not guaranteed or assured return products.
b) At times, due to the forces and factors affecting the capital market or as per the view of the fund manager, the Product may not be able to invest in securities falling within its investment objective resulting in holding the monies collected by it in cash or cash equivalent or invest the same in other permissible securities amounting to substantial reduction in the earning capability of the Product.
c) Securities investments are subject to market risk and there is no assurance or guarantee that the objectives of the product will be achieved. Past performance of the portfolio manager does not indicate the future performance of the same investment option in future or any other future investment options of the portfolio manager and may not necessarily provide a basis of comparison with other investments. There is no assurance that past performances in earlier products will be repeated. Risk arising from the investment objective, investment strategy, asset allocation and quant model risk: Market risk, political and geopolitical risk and risk arising from changing business dynamics, which may affect portfolio returns. At times, portfolios of individual clients may concentrate in certain companies/industries. The performance of the portfolios would depend on the performance of such companies / industries / sectors of the economy.
d) Investors may note that Portfolio Manager's investment decisions may not always be profitable, as actual market movements may be at variance with anticipated trends.
e) The returns of investments in securities would depend on the happening / non-happening of specified events and the returns may or may not accrue to an investor accordingly.
f) The Portfolio Manager has included statements / opinions / recommendations in this document, which contain words, or phrases such as "will", "expect", "should", "believe" and similar expressions or variations of such expressions that are "forward looking statements". Actual results may differ materially from those suggested by the forward looking statements due to risk or uncertainties associated with our expectations with respect to, but not limited to, exposure to market risks, general economic and political conditions in India and other countries globally, which have an impact on our services and / or investments, the monetary and interest policies of India, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices etc.
g) While utmost care has been exercised, ., its sponsors or any of its officers, employees, personnel, and directors make no representation as to the accuracy, completeness or reliability of the content and hereby disclaim any liability with regard to the same. Recipients of this material should exercise due care and read the disclosure document (including if necessary,

obtaining the advice of tax / legal / accounting / financial/ other professionals) prior to taking of any decision, acting or omitting to act. The document is solely for the information and understanding of intended recipients only. Further, the recipient shall not copy / circulate contents of this document, in part or whole, or in any other manner whatsoever without prior and explicit approval.

h) The tax implications provided in this document are for general purposes only and is based on advice that the Portfolio Manager has received regarding the law and the practice that is currently in force in India and the client should be aware that the relevant fiscal rules and their interpretation may change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of investment in the Portfolio will endure indefinitely. In view of the individual nature of tax consequences, each client is advised to consult his/her own professional tax advisor.

i) The Portfolio Manager is not responsible for risk profiling of prospective and existing investors. The investor should read the disclosure document and terms and conditions of the product properly before making any investment decision

j) The Portfolio Manager would be acting on the advice of experts in the relative fields but would not be responsible for any loss occasioned by any act or omission on the part of such persons.

k) To implement a decision of the client regarding investments, the Portfolio Manager would have to employ the services of persons and bodies who are not the Portfolio Manager's employees and rely on them. While the Portfolio Manager, would exercise all care and take all precautions while employing such persons, it should be understood that the Portfolio Manager would not be liable for any act or omission on the part of such persons engaged by the Portfolio Manager for the purpose of making an investment or disposing of an investment and that the Portfolio Manager would not be liable for any loss caused by any act or omission on the part of such person.

l) The Portfolio Manager will not be liable for any financial loss arising from the Portfolio Manager not being able to sell the shares on behalf of the client before they are replaced, in case the original shares are lost or stolen whilst shares were in transit.

m) The Portfolio Manager will also not be liable for any bona fide act of omission or commission or delay in carrying out the instructions of the client.

n) The Portfolio Manager may not be able to lend out securities which can lead to temporary illiquidity. There are risks inherent in securities lending, including the risk of failure of the other party, in this case the approved intermediary to comply with the terms of the agreement. Such failure can result in a possible loss of rights to the collateral, the inability of the approved intermediary to return the securities deposited by the lender and the possible loss of corporate benefits accruing thereon.

o) In case the Portfolio Manager invests in mutual funds registered with SEBI, specific risk factors of each such underlying investment will be applicable to the portfolio. All risks associated with such underlying investment, including the performance of their underlying stocks, derivative instruments, offshore investments etc. will therefore be applicable to the Portfolio. Returns from the types of securities in which mutual funds invest may underperform from various general securities markets or different assets classes. Different types of securities tend to go through cycles of out-performance and under-performance in comparison with general securities markets.

p) Each Portfolio will be exposed to various risks depending on the investment objective, investment strategy and the asset allocation. The investment objective, investment strategy and the asset allocation may differ from client to client.
q) As the price/value/interest rates of the securities in which mutual funds invest fluctuate, the value of the portfolio managed by the Portfolio Manager may go up or down depending on various factors and forces affecting the capital markets and money markets.
r) Investment in mutual fund schemes investing in equity and equity related instruments will have all the risks associated with the equity schemes including liquidity risk.
s) Investments in mutual fund schemes investing in debt, money market and other fixed income instruments will have all the risks associated with the income scheme including interest risk, reinvestment risk, credit risk, market risk, liquidity risk, etc.
t) Investment in Gold/ Silver Exchange Traded Funds (ETF) Fund of Fund (FOF) Scheme will have all the risks associated with investment in Gold/ Silver ETF. Secondly, the investors of the FOF Scheme will bear dual recurring expenses and possibly dual loads viz. the recurring expenses of the FOF Scheme in addition to recurring expenses ETF in which the FOF Scheme invests predominantly. Hence, the returns to the investors may be lower to the extent if they had invested directly in the underlying ETF Scheme. Secondly, as Gold/ Silver ETF will invest primarily in physical gold/ silver, the ETF as well as FOF Scheme will react to the price of gold/ silver. The prices of gold/ silver may be affected by several factors such as demand and supply of gold/ silver in India and in the global market, change in political, economic environment and government policy, inflation trends, currency exchange rates, interest rates, perceived trends in bullion prices, restrictions on the movement/trade of gold by RBI, GOI or countries that supply/purchase gold/ silver to/from India etc.
u) Investment in Arbitrage mutual funds schemes will have all the risks associated with arbitrage schemes. The primary objective of the Scheme is to identify investment opportunities and to exploit price discrepancies in various markets. Identification and exploitation of the strategies to be pursued by the fund manager involve uncertainty. No assurance can be given that fund managers will be able to locate investment opportunities or to correctly exploit price discrepancies in the capital markets. Reduction in mis-pricing opportunities between the cash market and future and the options market may lead to a lower level of activity affecting the returns. As the Scheme proposes to execute arbitrage transactions in various markets simultaneously, this may result in high portfolio turnover and consequently high transaction costs.
v) Any change in the investment policies or fundamental attributes of the schemes of mutual funds will affect the performance of the Client’s Portfolio managed by the Portfolio Manager.

w) When the underlying Securities of the mutual fund scheme are industry specific such as technology stocks; such investments may be subject to volatility, high valuations, obsolescence and low liquidity leading to non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the performance of the mutual fund scheme will be adversely affected.

x) The Client acknowledges and confirms that the purchases and sale of mutual fund units have inherent risks and accordingly, any loss, damage, cost, expenses, direct/indirect or consequential on account of purchases and sale of such units by the Portfolio Manager with the Funds of the Client shall be that of the Client. The Portfolio Manager shall not in any way, directly, or indirectly be responsible or liable for the loss damage, cost, expenses, direct/indirect or consequential, which arises to the Client for any reason whatsoever.

y) In the case of investments in mutual fund units, the Client will bear the recurring expenses of the underlying mutual fund schemes also, apart from exit load if any.

II. <u>Risk arising out of non-diversification</u>

The investment according to investment objective of a Portfolio may result in concentration of investments in a specific security / sector/ issuer, which may expose the Portfolio to risk arising out of non-diversification. Further, the portfolio with investment objective to invest in a specific sector / industry would be exposed to risk associated with such sector / industry and its performance will be dependent on performance of such sector / industry.

III. <u>Risk Associated with Premature Withdrawal.</u>

In case the Client requests for premature withdrawal / closure of his account, then the securities can be liquidated at loss, for facilitating to generate cash for the closure / partial withdrawal of his account. The portfolio manager shall not be liable for this loss as he would have constructed the portfolio on the time horizon given by the client.

IV. The Portfolio Manager has received registration as a Portfolio Manager, under the SEBI (Portfolio Managers) Regulations, 2020 in December 2020. The Portfolio Manager has no previous experience/track record in the field of portfolio management services.

V. The Portfolio Manager has received registration as a Portfolio Manager, under the SEBI (Portfolio Managers) Regulations, 2020 in December 2020. Therefore, there are no transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations having conflict of interest with the transactions in any of the client's portfolio.

VI. There are no transactions giving rise to conflict of interest related to services offered by group companies or associates of the portfolio manager.

6. PENALTIES, PENDING LITIGATION OR PROCEEDINGS, FINDINGS OF INSPECTION OR INVESTIGATIONS FOR WHICH ACTION MAY HAVE BEEN TAKEN OR INITIATED BY ANY REGULATORY AUTHORITY

Penalties imposed by the SEBI or the directions issued by the SEBI under the SEBI Act or Rules or Regulations made thereunder:

I. No penalties/fines have been imposed by SEBI against IFM INVESTMENT ADVISORS PRIVATE LIMITED for any economic offence and/ or for violation of any securities laws;
II. There are no pending material litigations/legal proceedings against the portfolio manager / key personnel engaged in the portfolio management business activities of IFM INVESTMENT ADVISORS PRIVATE LIMITED.
III. No deficiency in the systems and operations of the portfolio manager has been observed by the SEBI or any regulatory agency.
IV. No enquiry/adjudication proceedings have ever been initiated by the SEBI against the portfolio manager or its directors, principal officer or employee or any person directly or indirectly connected with the portfolio manager or its directors, principal officer or employee, under the Act or Rules or Regulations made thereunder.
V. There are no cases pertaining to PMS activities of IFM INVESTMENT ADVISORS PRIVATE LIMITED, pending before the Consumer Redressal Forums, Civil Courts and High Courts.

7. NATURE OF EXPENSES

The following fees are related to portfolio management services offered to clients. The fee would be in the form of a percentage of the average asset under management. The indicative table of all the fees that may be levied by the portfolio manager is given hereunder:

I. IFM LARGE CAP FUND

Sr. No.	Nature of Fee	
1	Setup Fees	Nil
2	Exit load	Nil
3	Management Fees (as a % of AUM)	Upto 1.25% per annum
4	Performance based fees (Profit sharing % above the hard hurdle rate)	20%*
5	Hard Hurdle Rate	10%
6	Custody charges, DP charges, brokerage & transaction costs, registrar fee, certification & professional charges, incidental expenses, etc.	On actual basis as percentage of AUM
7	GST and other statutory levies as per the law	As applicable

*Performance shall be computed on the basis of high-water mark principle over the life of the investment for charging of performance / profit sharing fee. High Water Mark shall be the highest value that the portfolio/account has reached. The value of the portfolio for computation of high watermark shall be taken to be the value on the date when performance fees are charged. The performance fees will be charged on the crossing of Hurdle Rate of the NAV of Portfolio. For the purpose of charging the performance fee, the frequency shall not be less than quarterly. The portfolio manager shall charge a performance-based fee only on increase in portfolio value in excess of the previously achieved high water mark (**maximum 20% of Profit-sharing above hurdle rate** plus GST & all applicable taxes.)

Frequency of charges

- **Setup Fee**: Charged on contribution amount at the time of investment and additional investment into the product.
- **Exit Load:** Charged at the time of redemption.
- **Portfolio Management Advisory Fees:** As given in the Expense structure
- **Performance Based Fees:** The frequency shall be annual
- **Custody, Transaction, Fund Accounting, Registrar Fee and Other Incidental Charges**: Charged on a daily basis on the daily assets under management paid monthly.
- **Security Transaction Tax & Brokerage & Transaction Cost**: Charged as and when transaction takes place in the portfolio. This is built into the price of the stock/security and is part of portfolio valuation. On the redemption amount, STT, Brokerage and GST are as applicable.
- **GST& other taxes/levies:** As applicable
- **Any other charges:** As per actual

II. IFM FLEXICAP GROWTH FUND

Sr. No.	Nature of Fee	
1	Setup Fees	Nil
2	Exit load	Nil
3.Management Fees (as a % of AUM)*		
3(i)	Fixed management fee (as a % of AUM)	Upto 2.5% per annum
3(ii)	Variable management fee (as a % of AUM)	Fixed Fees – Nil, Performance Fees - 25% above NIFTY 50 returns
3(iii)	Hybrid management fee (as a % of AUM)	Upto 1.25% Fixed annual + Performance fee (Profit sharing 20% above the hard hurdle rate)
4.	Hard Hurdle Rate	NIFTY 50 Return
5	Custody charges, DP charges, brokerage & transaction costs, registrar fee, certification & professional charges, incidental expenses, etc.	On actual basis as percentage of AUM
6	GST and other statutory levies as per the law	As applicable

* The client can choose any one option from the following three options for management fees.

Performance shall be computed on the basis of high-water mark principle over the life of the investment for charging of performance / profit sharing fee. High Water Mark shall be the highest value that the portfolio/account has reached. The value of the portfolio for computation of high watermark shall be taken to be the value on the date when performance fees are charged. The performance fees will be charged on the crossing of Hurdle Rate of the NAV of Portfolio. For the purpose of charging the performance fee, the frequency shall not be less than quarterly. The portfolio manager shall charge a performance-based fee only for an increase in portfolio value in excess of the previously achieved high water mark (maximum 20% of Profit-sharing above hurdle rate** plus GST & all applicable taxes.)

Frequency of charges

- **Setup Fee**: Charged on contribution amount at the time of investment and additional investment into the product.
- **Exit Load:** Charged at the time of redemption.
- **Portfolio Management Advisory Fees:** As given in the Expense structure
- **Performance Based Fees:** The frequency shall be quarterly
- **Custody, Transaction, Fund Accounting, Registrar Fee and Other Incidental Charges**: Charged on a daily basis on the daily assets under management paid monthly.
- **Security Transaction Tax & Brokerage & Transaction Cost**: Charged as and when transaction takes place in the portfolio. This is built into the price of the stock/security and is part of portfolio valuation. On the redemption amount, STT, Brokerage and GST are as applicable.
- **GST& other taxes/levies:** As applicable
- **Any other charges:** As per actual

III.IFM AlphaEdge Growth Fund

Sr. No.	Nature of Fee	
1	Setup Fees	Nil
2	Exit load	Nil
3. Management Fees (as a % of AUM)*		
3(i)	Fixed Management Fees (as a % of AUM)	Upto 0.75% per Annum or
3(ii)	Variable Management Fees	10-20% of the annual profit based on the capital contribution
4	Performance based fees (Profit sharing % above the hard hurdle rate)	Nil
5	Hard Hurdle Rate	Nil
6	Custody charges, DP charges, brokerage & transaction costs, registrar fee, certification & professional charges, incidental expenses, etc.	On actual basis as percentage of AUM
7	GST and other statutory levies as per the law	As applicable

*The client can choose any one option from the following two options for management fees.

Frequency of charges.

- **Portfolio Management Advisory Fees:** As given in the Expense structure
- **Custody, Transaction, Fund Accounting, Registrar Fee and Other Incidental Charges**: Charged on a daily basis on the daily assets under management paid monthly.
- **Security Transaction Tax & Brokerage & Transaction Cost**: As applicable
- **GST& other taxes/levies:** As applicable
- **Any other charges:** As per actual

IV.IFM CAPITAL SAFETY YIELD FUND

Sr. No.	Nature of Fee	
1	Setup Fees	Nil
2	Exit load	Nil
3	Management Fees (as a % of AUM)	Upto 0.25% per Annum
4	Performance based fees (Profit sharing % above the hard hurdle rate)	Nil
5	Hard Hurdle Rate	Nil
6	Custody charges, DP charges, brokerage & transaction costs, registrar fee, certification & professional charges, incidental expenses, etc.	On actual basis as percentage of AUM
7	GST and other statutory levies as per the law	As applicable

Frequency of charges.

- **Portfolio Management Advisory Fees:** As given in the Expense structure
- **Custody, Transaction, Fund Accounting, Registrar Fee and Other Incidental Charges**: Charged on a daily basis on the daily assets under management paid monthly.
- **Security Transaction Tax & Brokerage & Transaction Cost**: As applicable
- **GST& other taxes/levies:** As applicable
- **Any other charges:** As per actual

8. TAXATION

The information set out below outlines the tax implications based on relevant provisions of the Indian Income-tax Act, 1961 (‘the Act’) as amended by the Finance (No. 2) Act, 2024 and Chapter VII of the Finance (No. 2) Act, 2004 (‘Securities Transactions Tax Act’/‘STT’).

The tax information provided below is generic in nature and the actual tax implications for each client could vary substantially from what is mentioned below, depending on residential status, the facts and circumstances of each case. The client would therefore be best advised to consult his or her tax advisor/consultant for appropriate advice on the tax treatment of his income or loss and the expenses incurred by him as a result of his investment in the PMS offered by the Portfolio Manager. It shall be the Client’s responsibility to meet the obligation on account of advance tax instalments payable on the due dates under the Act. Tax is required to be deducted at source for non-residents by the authorized dealer. If required, tax will be withheld for non-residents. If any tax is required to be withheld on account of any future legislation, the Portfolio Manager shall be obliged to act in accordance with the regulatory requirements in this regard.

9. ACCOUNTING POLICIES

I. All investments are marked to market for portfolio reporting. However, in client financials, investments are valued at cost.

II. In determining the holding cost of investments and the gains or loss on sale of investments, the ‘first in first out’ method shall be followed.

III. Transactions for purchase or sale of investments would be recognized as of the trade date and not as of the settlement date, so that the effect of all investments traded during a financial year are recorded and reflected in the individual client account for that year.

IV. The cost of investments acquired or purchased would include brokerage, stamp charges and any charge customarily included in the broker’s contract note.

V. For equity shares, corporate actions are accounted on respective Ex dates.

VI. The Portfolio Manager shall maintain separate Client -wise accounts. The accounts should contain details regarding investment, disinvestments, income, receipts interest, dividend, bonus and disbursements as per provisions under SEBI (Portfolio Managers) Regulations, 2020. The tax deducted at source shall also be recorded in the books of accounts.

VII. Investments in units of Mutual Funds shall be valued at the NAV of the previous day declared for the relevant Scheme on the date of the report. The NAVs are available on AMFI web site.

VIII. Debt Instruments will be valued at the market value of the debt instrument.

Name, address and telephone number of the Investor Relation Officer who shall attend to the investor queries and complaints:

Ms. Amanjot Kaur Compliance Officer
Correspondence Address: IFM INVESTMENT ADVISORS PRIVATE LIMITED. B-98, Phase-8, Industrial Area, Sector 73, Mohali, Punjab 160062
M.no.: 0172-4243301
Email: amanjot@ifmglobal.in

IFM Investment Advisors

10. GRIEVANCE REDRESSAL AND DISPUTE SETTLEMENT MECHANISM

We follow the standard practice of resolving all customer queries and grievances with a robust process.

I. We have systems in place to address, monitor and suggest improvements based on feedback received from clients. Clients can record their issues/ grievances by sending email to either isingh@ifmglobal.in or even by calling 0172-4243300. Clients can also contact the relationship managers, or any employee concerned in the team.
II. We ensure that all queries raised by clients are resolved with satisfaction and also get feedback from clients after the closure of the grievance.
III. All disputes, differences, claims and questions arise between the Client and the Portfolio Manager and/or their respective representatives, including any dispute regarding fees & charges, shall be settled in accordance with the provision of The Arbitration and Conciliation Act 1996 or any statutory requirement, modification or re- enactment thereof for the time being in force. Such arbitration proceedings shall be held at Mohali or such other places as the portfolio manager thinks fit.
IV. In addition to the above, the clients can also login to the SEBI Complaints Redressal System (SCORES) website www.scores.gov.in to register their grievances / complaints.
V. If the client is still not satisfied with the outcome of the abovementioned mechanism, the client initiate dispute resolution in accordance with the framework notified by SEBI vide its master circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023 titled 'Online Resolution of Disputes in the Indian Securities Market' which was further amended vide circular no. SEBI/HO/OIAE/OIAE_IAD 3/P/CIR/2023/191 dated December 20, 2023 titled 'Amendment to Circular dated July 31, 2023 on Online Resolution of Disputes in the Indian Securities Market' (including any amendments or clarificatory circulars that may be issued by SEBI from time to time).

The Smart ODR link has been provided on our website: https://smartodr.in/login