

Report on implementation of principles of Stewardship Code for FY 21-22

In accordance with the requirements of SEBI circular No. CIR/CFD/CMD1/168/2019 dated December 24, 2019 read with circular dated March 30, 2020, a report on implementation of every Principle may be sent as a part of annual intimation to the unitholders. The Stewardship Code (Code) is disclosed on our website, www.itiamc/statutory disclosures.

The Code is a principles-based framework that assists institutional investors in fulfilling their responsibilities to help them protect and enhance the value of their clients and beneficiaries. It includes key principles regarding monitoring of investee companies by having engagement with the company management, voting on shareholder resolutions pertaining to the companies and disclosures relating thereto

Accordingly, the report on the status of compliance with the principles for the period April 1, 2021 to March 31, 2022 is given below:

Sr. no	Particulars of Principles of Stewardship Code	Status (Complied, Deviation, Partly Complied, Not Complied)	Status of Compliance (Complied / Not complied) and implementation
1	Formulation of Policy, its Disclosure and Review	Complied	ITI Mutual Fund (ITI MF) has formulated Stewardship Code (the Code) in accordance with the provision of the SEBI Circular. This has been approved by the Board of Directors of ITI Asset Management Limited and the ITI Mutual Fund Trustee Private Limited and was effective from July 1, 2020. The Code has been disclosed on the Company's website.
2	Managing Conflict of Interest	Complied	The Stewardship Code also covers conflict of interests in fulfilling stewardship responsibilities. Voting decisions are also guided by voting policy and conflict of interest policy. Also, in all cases the voting decisions of ITI Mutual Fund have been based on the overall best interests of the Unit holders. The voting policy has also been disclosed on the website of ITI Mutual Fund.
3	Monitoring of Investee Companies	Complied	In accordance with the Stewardship Code, the investee companies were monitored through various activities like financial performance analysis, management evaluation, business outlook, corporate governance, capital structure, industry level changes, and other key risk areas. Monitoring of areas like remuneration,

			risk related to social and environmental issues, shareholder rights and grievances was done on a best effort basis.
4	Policy on Intervention in the Investee Company and collaboration with other Institutional Investors	Complied	The Stewardship Code includes guiding principle for intervention in investee companies and on collaboration with other institutional investors. All the interventions were done with the objective to play a constructive role in enhancing the value of the investment in the equity of the investee companies to benefit the unitholders of schemes.
5	Voting Policy and disclosure of voting activity	Complied	ITI Mutual Fund has formulated the Voting policy approved by the Board of directors of ITI AMC and Trustee Company. The Policy lays down the rules related to voting on the issues related to the investee companies. The Policy has been disclosed on ITI Mutual Fund's website. The Company has also uploaded it's voting activities on the website on quarterly basis as per the guidelines issued by SEBI and Board approved Stewardship Code and Voting policy. The summary of votes cast during the financial year 2021-22 is annexed in this Annual Report.
6	Reporting of Stewardship Activities	Complied	ITI Mutual Fund has reported its stewardship activities as per the guidelines issued by SEBI and as per the Stewardship Code and Voting Policy.