



IIT Tirupati
Navavishkār
I-Hub Foundation

IIT TIRUPATI NAVAVISHKAR I-HUB FOUNDATION

Technology Innovation Hub in
Positioning and Precision Technology

SARATHI

Startup Acceleration and Research in Advanced Technologies for Holistic Innovation

Policy Document For Fast-Tracking Startup Research and Innovation Projects

Supported by DST & NM-ICPS



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Policy Document For Fast-Tracking Startup Research and Innovation Projects

Startup Acceleration and Research in Advanced Technologies for Holistic Innovation (SARATHI)

An IIT Tirupati Navavishkar I-Hub Foundation (IITTNiF)

Initiative for

Fast-Tracking Startup Research and Innovation Projects

IIT Tirupati Navavishkar I-Hub Foundation (IITTNiF)

SARATHI

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Date: March 08, 2024

1. About US

IIT Tirupati Navavishkar Foundation is a Section 8 company founded to support the initiatives of the established Technology Innovation Hub at the Indian Institute of Technology Tirupati in the framework of National Mission on Interdisciplinary Cyber-Physical Systems (NM-ICPS) by the Department of Science and Technology, Government of India. The Foundation supports R&D in Positioning and Precision Technologies including GIS, Remote Sensing, GPS and other non-invasive technologies. It provides incubation support to technology-based startups towards developing innovative solutions and sustainable development in these domains.

1.1 Background

Positioning and precision technologies such as Geographic Information Systems (GIS), Remote Sensing (RS), Global Positioning System (GPS) and non-invasive surveying methods have become indispensable for national development and good governance. India has a history of using GIS for resource planning and management since the 1980s. Government programs like NRIS and NNRMS have utilized GIS for land, water and forest resource mapping and planning. RS data from Indian and foreign satellites is used for applications in agriculture, urban planning, weather forecasting and disaster management.

The Indian Regional Navigation Satellite System (IRNSS) developed by ISRO provides position accuracy better than 20 meters throughout India and regions up to 1500 km. IRNSS will be a key enabler in sectors like transport, banking and emergency services. Advanced surveying technologies like LiDAR, digital photogrammetry and GPR that allow non-destructive 3D mapping and visualization have become essential for smart city development, infrastructure planning, heritage documentation and other applications requiring high precision and accuracy.

A robust policy framework and implementation strategy is required to promote wider adoption of these technologies across sectors, enable capacity building, incentivize private sector participation, and create a conducive innovation ecosystem and manufacturing base in line with Make in India, Digital India and other national missions. The potential of positioning and precision technologies must be fully harnessed for inclusive, resilient and sustainable development.

To address the challenges in efficient mapping, monitoring and management of resources, the Government of India established the Technology Innovation Hub (IITTNiF) in Positioning and Precision Technologies Indian Institute of Technology Tirupati with a fund of 100 Cr. At IITTNiF, we are developing collaborative Cyber-Physical Systems (CPS) integrating GIS, remote sensing, GPS and other non-invasive technologies to enable precise real-time monitoring and data-driven decision making. The core R&D domains in which the hub is functioning are: remote sensing for advanced Earth observation, GIS and spatial analytics for resource mapping and planning, global navigation satellite systems for precise positioning, and non-invasive surveying for 3D modeling and visualization. By bringing together scientists, professors, innovators and startup founders, we aim to build an ecosystem to develop innovative solutions towards the sustainable and efficient management of land and water resources, smart agriculture, resilient infrastructure, and inclusive development. Here are the core domains in positioning and precision technologies:

Geographic Information Systems (GIS)

- GIS software tools, applications and solutions
- Spatial data acquisition, management and analysis
- GIS-based decision support systems
- GIS for resource planning and management
- Web GIS and spatial data infrastructures

Applications: Urban planning, disaster management, location-based services, logistics

Remote Sensing (RS)

- Satellite and aerial remote sensing
- Hyperspectral, multispectral and microwave remote sensing
- Image processing and analysis
- Applications in agriculture, forestry, geology, meteorology etc.

Applications: Land use mapping, weather forecasting, vegetation monitoring, geology and mineral exploration

Global Navigation Satellite Systems (GNSS)

- IRNSS/NavIC, GPS, GLONASS, Galileo
- GNSS receivers, augmentation systems
- Positioning, navigation and timing applications
- Location-based services and solutions

Applications: Navigation and mapping, precision agriculture, fleet tracking, disaster management

Non-Invasive Surveying

- LiDAR and digital photogrammetry for 3D mapping
- GPR, resistivity tomography and other geophysical methods
- Laser scanning, digital surveying systems
- Applications in infrastructure, heritage, mining etc.

Applications: Smart city modeling, infrastructure planning, heritage documentation, mineral exploration

Positioning, Navigation, Timing

- Precise positioning systems and services
- PNT for intelligent transportation, 5G networks
- Timing via cesium, rubidium, hydrogen maser atomic clocks
- Chip-scale atomic clocks, quantum sensors
- Resilient PNT technologies

Applications: Satellite navigation, telecom synchronization, autonomous vehicles, smart power grids, financial transactions

2. Startup Acceleration and Research in Advanced Technologies for Holistic Innovation (SARATHI)

2.1. Overview:

The Technology Innovation Hub on Positioning and Precision Technologies (TIH-PPT) was established by the Department of Science and Technology, Ministry of Science and Technology, as a pivotal initiative to advance the forefront of Interdisciplinary Cyber-Physical Systems (ICPS). This establishment is a key component of a broader strategy aimed at embracing the global surge in CPS technologies. The TIH-PPT's mandate is to cultivate a vibrant ecosystem conducive to innovation and excellence in research, skill development, incubation, acceleration, and training and international collaboration, with a specialized focus on positioning and precision technologies. These include but are not limited to, advancements in geospatial mapping, satellite navigation systems, precision farming, autonomous vehicles, and timing technologies enabled by atomic clocks.

The hub endeavors to facilitate the integration of positioning and precision technologies across various sectors, emphasizing their application in services and manufacturing industries, disaster management, defense, agriculture, water resources management, energy, traffic control, healthcare, environmental monitoring, infrastructure development, Geo-Information Systems, security, financial sectors, and in efforts to combat crime. To this end, 25 hubs have been strategically established in premier institutes across India. At IIT Tirupati, the hub aims explicitly to empower researchers, innovators, entrepreneurs, and startups to harness PPT technologies for innovative solutions in GIS, Remote Sensing, GPS, and other non-invasive sectors.

In alignment with the Department of Science and Technology's National Mission on Interdisciplinary Cyber-Physical Systems (DST NM-ICPS), the IIT Tirupati Navavishkar I-Hub Foundation (IITTNiF) is proud to announce the launch of two groundbreaking initiatives, DISCOVER and SARATHI, aimed at catalyzing entrepreneurship and fostering innovation in the incubation and acceleration of cutting-edge technologies. These initiatives are set to be directly implemented by IITTNiF, ensuring a focused and efficient execution of their objectives. Moreover, to enhance the scope and impact of these programs, IITTNiF will strategically collaborate with both national and international partners, integrating their expertise and resources as necessary to meet the evolving demands of the projects.

The SARATHI Accelerator Initiative represents a cornerstone of IITTNiF's strategy to support the burgeoning ecosystem of ICPS startups engaged in DeepTech, hardware, and software research and development. This initiative is dedicated to strengthening the national ICPS network, aligning with the country's strategic priorities, and promoting the indigenization of technology. By providing targeted support to startups with promising potential, the SARATHI initiative aims to bolster the development and commercialization of innovative solutions across the ICPS landscape.

Furthermore, IITTNiF is committed to fostering a collaborative environment, inviting participation from a diverse array of international and national partners. This approach is designed to facilitate the exchange of knowledge and resources, thereby enriching the programs offered under the DISCOVER and SARATHI initiatives and ensuring they are

well-equipped to address the complex challenges facing today's innovators and entrepreneurs.

The SARATHI initiative, in particular, is conceived as a facilitation mechanism aimed at accelerating the journey from prototype to market-ready product for startups and innovators. It seeks to provide essential support to those who have already introduced their products to the market and are looking to scale their operations and enhance their product offerings. Through this initiative, IITTNiF aspires to create a nurturing ecosystem that empowers startups to achieve sustained growth and make significant contributions to the technological advancement and economic development of the nation.

2.2. Objective

The objectives of Startup Acceleration and Research in Advanced Technologies for Holistic Innovation (SARATHI)' initiative are as follows:

The SARATHI Accelerator scheme is dedicated to fostering the growth and success of ICPS Startups focused on Positioning and Precision Technologies. This initiative is designed to expedite the progress of these startups by offering a comprehensive array of support services:

1. **Technology Validation and Due Diligence:** We provide thorough validation and due diligence processes for the technology and products developed by ICPS startups, ensuring their viability and market readiness.
2. **Progressive Support:** From early-stage to mid-stage and large-stage development, we offer continuous support to startups as they progress from prototype to product launch, facilitating their evolution within the market.
3. **Partnership Facilitation:** We facilitate strategic partnerships, collaborations, and engagements with national and international innovation actors, fostering a conducive environment for tech-business development.
4. **International Market Exploration:** For well-established ICPS startups, we assist in exploring and accessing international markets, enhancing their global reach and opportunities.
5. **Customized Training and Mentoring:** Tailored training, outreach, and mentoring sessions are provided to each cohort based on their specific needs and requirements, ensuring personalized guidance and support.
6. **Financial Assistance:** We offer financial support for scaling up technology/products and launching them to industry-grade standards, collaborating with partners or directly supporting startups with up to INR 50 Lakh in initial funding.
7. **Commercialization Support:** Our program provides facilitative support for the commercialization of developed technology/products, assisting startups in navigating the complexities of bringing their innovations to market.
8. **Test Bed Access:** Startups gain access to test beds worldwide, enabling them to explore opportunities in the Indian market and develop collaborations and linkages for joint technology/product development, thereby fostering innovation and growth.

The SARATHI initiative is structured to support the Venture Capital (VC) ecosystem through the creation of a Fund of Funds, with objectives outlined as follows:

- **Market Launch Support:** To facilitate the deployment of technologies or products developed by startups that are ready for market introduction.

- **Technology Enhancement:** To provide support for the technological advancement of existing startup technologies or products, tailored to meet evolving market needs.

This strategic approach is aimed at fostering innovation and facilitating the growth of impactful solutions within the startup ecosystem.

2.3. Scope and Opportunity

The startup initiative SARATHI by the Technology Innovation Hub (TIH) at IIT Tirupati, focusing on Positioning and Precision Technologies, underscores the critical importance of these technologies in advancing India's strategic, economic, and societal goals. This initiative represents a strategic endeavor to harness the potential of advanced geospatial technologies across various sectors, integrating the initiative's objectives with the broader aspirations of the National Geospatial Policy of India.

- **Enhancing Economic Growth and Global Competitiveness:** SARATHI fosters innovation in precision agriculture, logistics optimization, and smart manufacturing, driving economic efficiency and positioning India as a formidable competitor on the global stage.
- **Strengthening National Security:** By supporting startups that develop cutting-edge positioning technologies, the initiative contributes to national security efforts, enhancing surveillance, border management, and defense capabilities.
- **Innovating for Disaster Management:** SARATHI plays a pivotal role in developing technologies for accurate disaster prediction, management, and response, minimizing the impact of natural calamities on lives and infrastructure.
- **Supporting Sustainable Urban and Infrastructure Development:** The initiative promotes the use of geospatial technologies in planning sustainable urban spaces and resilient infrastructure, aligning with the vision of building smart cities.
- **Advancing Environmental Conservation:** Startups under SARATHI are instrumental in deploying technologies for environmental monitoring and conservation, aiding in climate change mitigation and protecting biodiversity.
- **Improving Healthcare and Emergency Services:** The initiative supports the development of technologies that enhance healthcare delivery, emergency services, and patient care through innovative use of positioning and precision technologies.
- **Transforming Transportation and Mobility:** SARATHI encourages the creation of solutions that improve transportation safety, reduce congestion, and pave the way for autonomous vehicles and smart mobility systems.

Incorporating the startup initiative SARATHI into the landscape of Positioning and Precision Technologies at IIT Tirupati amplifies the impact of these technologies on India's development narrative. By catalyzing innovation, entrepreneurship, and the commercialization of advanced geospatial solutions, SARATHI not only propels the sectors it touches towards greater efficiency and sustainability but also significantly contributes to India's technological sovereignty and societal well-being. This initiative exemplifies a comprehensive approach to leveraging cutting-edge technologies to address pressing challenges and unlock new opportunities, steering India towards a future marked by innovation, resilience, and global leadership in geospatial technologies.

2.4. Implementation

The IITTNiF initiative is structured to foster innovation and growth within the ecosystem of deep-tech startups, through a comprehensive acceleration program outlined as follows:

- Target Applicants: Welcoming applications from:
 - Existing startups in the acceleration phase.
 - Innovators and researchers either launching a prototype or with a market-ready product aiming for expansion.
- Program Duration: The accelerator program spans 4 to 9 months on a rolling basis, facilitating continuous entry and support.
- Cohort Structure:
 - Aim to support 10-15 deep-tech startups annually through 2 to 3 cohorts.
 - Each cohort will consist of 3 to 5 startups, contingent on the Detailed Project Report (DPR).
- Flexibility in Implementation:
 - The initiative's scope and the number of supported startups are adaptable, based on available funding, resources, and other pertinent factors.
 - Encourages participation in subsequent cohorts for additional support through newly launched programs by IITTNiF.
- Funding and Support (3P Model):
 - Stage 1 (Prototype): Entrepreneurs in Residence (EIR) Fellowship offering INR 30k/month for up to 1 year.
 - Stage 2 (Pilot): One-time grant of up to INR 7 lakh per year or loans up to INR 25 lakh.
 - Stage 3 (Product Launch and Scale-up): Acceleration Fund up to INR 50 lakh through mutually agreed financial instruments (Equity, Debentures, etc.).
- Broad Support Spectrum:
 - SARATHI aims to cover the entire product development journey, from prototype to market entry and expansion.
 - Encourages mid-stage startups with market-ready products and those looking to expand.
 - Open to early-stage startups with demonstrable prototypes and late-stage startups seeking scale-up funds.
- Equity and Sustainability:
 - IITTNiF may take equity in startups in exchange for government contributions, through instruments like Promissory/SAFE Notes, as advised by Startup India, DST, AIM, etc., to ensure program and Technology Innovation Facility (TIF) sustainability.
- Oversight and Management:
 - A Project Management Committee (PMC) or IITTNiF Startup Management Committee (ISMC) will oversee and manage the SARATHI initiative and related programs.

This strategic approach aims to catalyze the growth of deep-tech startups, offering a structured pathway from conceptualization to market expansion, ensuring dynamic support aligned with the evolving needs of the startup ecosystem.

2.5 Investment Model

The IIT Tirupati Navavishkar I-Hub Foundation (IITTNiF) adopts a strategic investment model to bolster startups at various stages of their growth journey, outlined as follows:

- Initial Investment Commitment: IITTNiF commits to investing up to INR 50 lakh in selected startups, contingent on their growth stage and developmental needs.
- Matching Investment Scheme: A matching investment up to INR 50 lakh, averaging INR 20 lakh per startup per cohort, will be facilitated by the accelerator/investor, based on the startup's current valuation and growth phase.
- Equity Dilution upon Fundraising: Startups achieving successful fundraising are required to dilute equity in favor of investments received, utilizing mechanisms such as SAFE / Promissory Notes, aligned with Startup India and other Government of India initiatives.
- Legal and Regulatory Compliance: Investments in the form of SAFE notes will adhere to the legal structure of Compulsorily Convertible Preference Shares (CCPS), in compliance with relevant sections of the Companies Act, 2013, and associated rules.
- Flexible Investment Vehicles: Startups have the flexibility to select the most suitable investment vehicle, including equity, debt, or a blend of financing options, in agreement with the investor and accelerator.
- Government Funding Alignment: For government funding contributions, IITTNiF will utilize the same investment vehicle as the accelerator/investor, ensuring the program's self-sustainability.
- Investment Discretion: The IITTNiF team reserves the discretion to invest in startups, either as a sole investor or in collaboration with other partners for matching investments.
- Alternative Support for Non-qualifying Startups: Startups not qualifying for investment at the program's conclusion may be recommended for other supportive programs by the IITTNiF team.
- Program Fee: A nominal fee may be charged as a Program Fee, in addition to equity/SAFE note considerations.

Comprehensive Startup Support

IITTNiF provides extensive support beyond financial investments, emphasizing research and development (R&D), prototyping, and technology validation. We prioritize utilizing our advanced in-house lab facilities for R&D activities. In instances of resource limitations, IITTNiF is committed to facilitating the necessary resources or forging partnerships with other hubs/institutes to ensure startups have access to essential resources. Additionally, financial investment in startups is tailored to their specific needs, reinforcing our dedication to supporting startups throughout their development. The terms of investment are governed by the established Investment Policy of IITTNiF, ensuring a structured and supportive framework for startup growth and success.

2.6 Disbursement Model

Our disbursement model is meticulously structured to provide a highly customized acceleration program, tailored to meet the distinct needs of each startup within our cohort. This model emphasizes a holistic approach to startup development, offering a broad spectrum of support services designed to catalyze growth and innovation:

- Customized Support: The acceleration program is personalized for each startup, ensuring that the provided support aligns with their unique development stage and business requirements.
- Comprehensive Service Range:
 - Customer Engagement: Assistance in establishing vital connections with potential customers to enhance market reach.
 - Investor Networking: Facilitation of introductions to potential investors to secure funding and financial backing.
 - Capacity Enhancement: Strategies and resources to bolster business operations and increase scalability.
 - Product Improvement: Guidance on refining and advancing product offerings to meet market demands.
 - Technology Development: Support in the development of cutting-edge technologies integral to the startup's growth.
 - Technology Validation: Validation services to ensure the reliability and market readiness of technological solutions.
- Financial Support Allocation: Startups are provided with a budget that ranges from INR 3.6 lakhs, delivered through the Entrepreneur in Residence (EIR) Fellowship at INR 30,000 per month, extending up to a maximum support of INR 50 lakhs. This financial framework is designed to:
 - Facilitate access to essential services and resources.
 - Support the operational and developmental needs of the startups.
 - Accelerate the journey from concept to market readiness.

This disbursement model is integral to our commitment to fostering innovation and success among the startups in our cohort, providing them with the necessary tools, connections, and resources to thrive in a competitive marketplace.

3. Eligibility & Selection Procedure

Eligibility Criteria:

- Early Stage (Prototype Development):
 - Innovators or entrepreneurs should have a concrete plan for their prototype development.
 - Applications from startups holding patents or intellectual property are particularly encouraged.
 - An EIR Fellowship offering INR 30,000 per month is available, with durations ranging from 3 to 12 months.
- Mid-Level (Pilot Project):
 - Applicants should be at the stage of having developed a prototype or nearing its completion.
 - Financial support in the form of grants or loans between INR 5 lakh to INR 7 lakh will be provided based on the startup's specific needs.
 - Direct progression to the next phase may be recommended for startups that are already registered and have secured previous funding.
 - Clear objectives for the next 3 to 6 months, with a roadmap to achieving these goals, are required.

- Scale-Up (Product Scale):
 - Startups must have a Minimum Viable Product (MVP) with early traction and revenue evidence.
 - A history of funding or grants is necessary.
 - A granted patent with a market-ready product is essential.
 - Financial assistance ranging from INR 7 lakh to INR 50 lakh will be provided as decided by the ISMC.
 - In cases of matching funds, decisions on investment will follow the guidelines established by the committee.
 - Defined and achievable goals for the upcoming 3 to 6 months are mandatory.

Selection Procedure:

- The IITTNiF team invites applications from startups and innovators that meet the eligibility criteria, through either rolling admissions or open innovation challenges.
- A selection committee comprising representatives from the government, industry, and the investment community will oversee the selection process.
- A strong emphasis is placed on startups that are technology-driven, with innovations, IP, and patents being core to their business proposition.
- Candidates may be required to participate in virtual interviews or complete specific online forms to help tailor the acceleration program to their unique requirements.
- Up to 8 startups per cohort will be supported, with a focus on the sectors of Positioning and Precision Technologies. This includes specializations in Geographic Information Systems (GIS), satellite navigation, location-based services, and related data/IP-driven domains.
- The frequency of ISMC meetings to review applications will be determined based on the volume of applications and may be held monthly, bimonthly, or quarterly.

Accelerator Services & Activities:

Selected startups will receive a variety of support services, including:

- Expert diagnostics for market research and product positioning.
- Dedicated mentorship from experts in relevant technical fields.
- Comprehensive legal support for IP, incorporation, and other legal matters.
- Opportunities for connected learning, networking, and co-learning.
- Regular meetings among startup founders for knowledge sharing.
- A Demo Day for presenting to venture capitalists and angel investors.
- Assistance in negotiating and finalizing investment deals.
- Full spectrum technology development, incubation, and acceleration support.

General Terms:

- Funding arrangements exceeding INR 5 lakh may utilize SAFE/Promissory Notes, with the ISMC deciding the specifics of these instruments.
- For matching fund investments, IITTNiF and the funding partner will collaboratively determine the investment terms and valuation criteria.
- Definitions of startups will align with the Startup India Guidelines.
- IITTNiF reserves the right to adjust IP, consulting, incubation, and acceleration policies as per individual case requirements.

- All selected startups will be required to complete an Incubation and Acceleration onboarding form.

4. Program Management

It is proposed to constitute a IITTNiF Startup Management Committee (ISMC) for SARATHI in order to oversee all aspects related to the effective implementation of the Initiative, review the progress of the program in terms of its objectives from time to time, provide strategic guidance and recommend changes/amendments for the improvement of the program.

The composition of the committee would be as under:

S.No	Representative	Role
a)	Director / Project Director / CxO	Chairperson
b)	CEO or Representative of Incubator / Accelerator	Member
c)	Representative, State Cell / Org	Member
d)	Representative, IIT Tirupati	Member
e)	Industry Experts / Mentor / Expert / Startup Founder	Member
f)	Representative, VC Ecosystem	Member
g)	Nominated Member from Funding Partner	Member
h)	Nominated Member from Chairperson	Member-Convener

Meeting for ISMC: IITTNiF team shall have right to take applications on a rolling basis or on cohort basis through an online form. Based on the number of applications IITTNiF team may plan for ISMC meetings on a monthly, bimonthly or quarterly basis.

5. Financial outlay (as per DPR)

The IITTNiF initiative outlines a structured financial outlay, designed to support startups through various stages of their development. This framework is delineated in accordance with the Detailed Project Report (DPR), specifying the funding categories and their respective durations:

- Entrepreneur in Residence (EIR) Program: A monthly stipend of INR 30,000.
- Grants: Provision of financial assistance up to INR 5 lakhs.
- Loans: Availability of loan facilities up to INR 25 lakhs.
- Equity Investments / SAFE Notes: Investment options extending up to INR 50 lakhs.

Investment through these channels will be conducted across a variety of initiatives and programs, contingent upon the availability of funds, the merit of ideas and innovations, and requisite approvals. To effectively deploy the allocated funds, a series of programs, events, and conclaves will be organized, aimed at fostering the growth and development of startups. Moreover, the IITTNiF team is committed to augmenting its financial resources by actively seeking additional funding from external sources. This includes engaging with stakeholders, corporates, and leveraging Corporate Social Responsibility (CSR) funds, aimed at investing in promising ideas, researchers, innovators, and startups.

It is important to note that the specified financial limits may be subject to adjustments, based on the evolving needs of the startups and the strategic decisions of the ISMC. This flexible

approach ensures that the financial support is dynamically aligned with the requirements of the startups, fostering an environment conducive to innovation and growth.

6. Exit Management

I. The exit strategy for investments made in startups by IITTNiF, or its authorized entity holding equity stakes, is articulated with a structured and professional approach, governed by the following procedures:

- **Exit Approval:** The decision to exit from a startup's equity position will be undertaken by IITTNiF or its designated organization, subject to the approval of the Startup Management Committee (SMC).
- **Performance Review:** Biannual evaluations of startups within the investment portfolio will be systematically conducted. The insights garnered from these reviews will inform the decision-making process regarding potential exits from the startup investments.
- **Reinvestment of Profits/Returns:** Profits or returns accrued from the investments in startups will be strategically reinvested into the accelerator's corpus. This reinvestment policy is designed to sustain and enhance the funding capacity for future cohorts and iterations of the accelerator program.
- **Tech Commercialization Returns:** Similarly, profits or returns generated through the commercialization of technologies, or other investment avenues, will be channelled back into the corpus. This reinvestment serves to bolster the financial resources available for SARATHI and its various other programs, ensuring a continuous cycle of investment and innovation support.

This exit management strategy is crafted to ensure a sustainable and responsible approach to investment and reinvestment, fostering a nurturing environment for the growth and development of startups and technological innovations.

Disclaimer:

This document is intended for informational and policy guidance purposes only, aimed at supporting the research community and the startup ecosystem. It should not be utilized for any legal proceedings or formal legal advice.

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