

Investor Charter in Respect of Portfolio Management Services

A. Vision and Mission Statements for investors.

Vision:

To implement diligently researched customised investment strategies which help investors meet their long-term financial goals in a risk appropriate manner.

Mission:

To ensure that the PMS industry provides a viable investment avenue for wealth creation by adopting high levels of skill, integrity, transparency and accountability.

B. Details of business transacted by the organization with respect to the investors.

- a. appropriate risk profiling of investors
- b. to provide Disclosure Document to investors
- c. executing the PMS agreement
- d. Making investment decisions on behalf of investors (discretionary) or investment decisions taken at the discretion of the Investor (non-discretionary) or advising investors regarding their investment decisions (advisory), as the case may be.

C. Details of services provided to investors-

i. Discretionary & Non-Discretionary Portfolio Management Services (PMS):-

Under these services, all an investor has to do, is to give his portfolio in any form i.e. in stocks or cash or a combination of both. The minimum size of the portfolio under the Discretionary and/ or Non-Discretionary Funds Management Service should be Rs.50 lakhs as per the current SEBI Regulations. However, the PMS provider reserves the right to prescribe a higher threshold product-wise or in any other manner at its sole discretion. The PMS provider will ascertain the investor's investment objectives to achieve optimal returns based on his risk profile. Under the Discretionary Portfolio Management service, investment decisions are at the sole discretion of the PMS provider if they are in sync with the investor's investment objectives. Under the Non-Discretionary Portfolio Management service, investment decisions taken at the discretion of the Investor.

ii. Investment Advisory Services: -

Under these services, the Client is advised on buy/sell decision within the overall profile without any back-office responsibility for trade execution, custody of securities or accounting functions. The PMS provider shall be solely acting as an Advisor to the Client and shall not be responsible for the

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investment/divestment of securities and/or administrative activities on the client's portfolio. The PMS provider shall act in a fiduciary capacity towards its Client and shall maintain arm's length relationship with its other activities. The PMS provider shall provide advisory services in accordance with guidelines and/or directives issued by the regulatory authorities and/or the Client from time to time in this regard.

iii. Client On-boarding

- a. Ensuring compliance with KYC and AML guidelines
- b. franking & signing the Power of Attorney to make investment decisions on behalf of the investor
- c. opening demat account and funding of the same from the investor's verified bank account and/or transfer of securities from verified demat account of the investor, and
- d. mapping the said demat account with Custodian.

iv. Ongoing activities

- a. To provide periodic statements to investors as provided under the PMS Regulations 2020 and other SEBI notifications and circulars ("PMS Regulations"), and
- b. Providing each client an audited account statement on an annual basis which includes all the details as required under the PMS Regulations.

v. Fees and Expenses

Charging and disclosure of appropriate fees & expenses in accordance with the PMS Regulations

vi. Closure and Termination

Upon termination of PMS Agreement by either party, the securities and the funds lying in the account of the investor shall be transferred to the verified bank account/ demat account of the investor.

vii. Grievance Redressal

Addressing in a timebound manner investor's queries, service requests and grievances, if any, on an ongoing basis.

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Detailed timelines of the services provided to investors are as follows:

Sr. No.	Service / Activity	Timeline for completion
1	Opening of PMS account (including demat account) for residents	7 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers.
2	Opening of PMS account (including demat account) for non-individual clients	14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers.
3	Opening of PMS account (including demat account, bank account and trading account) for non-resident clients	14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers.
4	Registration of nominee in PMS account and demat account	Registration of nominee happens along with account opening, therefore turnaround time will be same as account opening turnaround time
5	Modification of nominee in PMS account and demat account	10 days from receipt of requisite nominee modification form, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers.
6	Uploading of PMS account in KRA and CKYC database	10 days from date of account opening (Portfolio Manager may rely on the custody for updating the same)
7	Whether PMS registered with SEBI then SEBI registration number	At the time of client signing the agreement; this information is a part of the account opening form and disclosure document
8	Disclosure about latest networth of PMS and total AUM	Disclosure of Portfolio Managers' total AUM is done monthly to SEBI and disclosure of latest networth is done in the disclosure document whenever there are any material changes
9	Intimation of type of PMS account - discretionary	At the time of client signing the agreement; this information is a part of the account opening form
10	Intimation of type of PMS account - non discretionary	At the time of client signing the agreement; this information is a part of the account opening form
11	Intimation to client what discretionary account entails and powers that can be exercised by PM	At the time of client signing the agreement; this information is a part of the account opening form
12	Intimation to client what non-discretionary account entails and powers that can be exercised by PM	At the time of client signing the agreement; this information is a part of the account opening form
13	Copy of executed PMS agreement sent to client	Within 3 days of client request
14	Frequency of disclosures of available eligible funds	All details regarding client portfolios are shared quarterly (point 26)

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Sr. No.	Service / Activity	Timeline for completion
15	Issuance of funds and securities balance statements held by client	This data is shared on a quarterly basis or upon client request
16	Intimation of name and demat account number of custodian for PMS account	Within 3 days of PMS and demat account opening
17	Conditions of termination of contract	At the time of client signing the agreement; this information is a part of the account opening form
18	Intimation regarding PMS fees and modes of payment or frequency of deduction	At the time of client signing the agreement; this information is a part of the account opening form
19	POA taken copy providing to client	Within 3 days of client request
20	Intimation to client about what all transactions can PM do using PoA	At the time of client signing the agreement; this information is a part of the account opening form
21	Frequency of providing audited reports to clients	Annual
22	Explanation of risks involved in investment	At the time of client signing the agreement; this information is a part of the account opening form
23	Intimation of tenure of portfolio investments	Indicative tenure is disclosed at the time of client signing the agreement; this information is a part of the account opening form
24	Intimation clearly providing restrictions imposed by the investor on PM	Negative list of securities is taken from the client at the time of client signing the agreement; this information is a part of the account opening form
25	Intimation regarding settling of client funds and securities	Settlement of funds and securities is done by the Custodian. The details of client funds and securities are sent to the client in the format prescribed by SEBI, not later than on a quarterly basis
26	Frequency of intimation of transactions undertaken in portfolio account	This data is shared on a quarterly basis or upon clients' request
27	Intimation regarding conflict of interest in any transaction	The Portfolio Manager provides details on related party transactions and conflict of interest in the Disclosure Document which is made available on PMs website at all times
28	Timeline for providing disclosure document to investor	The latest disclosure document is provided to investors prior to account opening and the latest disclosure documents is uploaded on the Portfolio Managers' website
29	Intimation to investor about details of bank accounts where client funds are kept	Within 3 days of PMS and demat account opening
30	Redressal of investor grievances	30 days, subject to all the information required to redress the complaint is provided by the complainant to the portfolio manager

Notes:

- The number of days in the above timelines indicate clear working days

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D. Details of grievance redressal mechanism and how to access it.

1. It is mandatory for every PMS provider to register itself on SEBI SCORES (SEBI Complaint Redress System). SCORES is a centralised online complaint resolution system through which the complainant can take up his grievance against the PMS provider and subsequently view its status. (<https://scores.gov.in/scores/Welcome.html>)
2. The details such as the name, address and telephone number of the investor relations officer of the PMS provider who attends to the investor queries and complaint is provided in the PMS Disclosure document.
3. The grievance redressal and dispute mechanism is also mentioned in the Disclosure Document.
4. Investors can approach SEBI for redressal of their complaints. On receipt of complaints, SEBI takes up the matter with the concerned PMS provider and follows up with them.
5. Investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051

E. Expectations from the investors (Responsibilities of investors)

1. Check registration status of the intermediary from SEBI website before availing services.
2. Submission of KYC documents and application form in a timely manner with signatures in appropriate places and with requisite supporting documents
3. Read carefully terms and conditions of the agreement before signing the same.
4. Thorough study of the Disclosure Documents of the PMS to accurately understand the risks entailed by the said investment in PMS
5. Accurate and sincere answers given to the questions asked in the 'Risk Questionnaire' shall help the PMS provider properly assess the risk profile of the investor.
6. Thorough study of the quarterly statements sent by the PMS provider to the investor intimating him about the portfolio's absolute and relative performance, its constituents and its risk profile.
7. Ensure providing complete details of negative list of securities as part of freeze instructions at the time of entering into PMS agreement and every time thereafter for changes, if any, in a timely manner.
8. To update the PMS provider in case of any change in the KYC documents and personal details and to provide the updated KYC along with the required proof.