

CKREDENCE WEALTH MANAGEMENT PRIVATE LIMITED
(SEBI REGISTRATION NO.: INP000007164)

DISCLOSURE DOCUMENT FOR
PORTFOLIO MANAGEMENT SERVICES

DISCLOSURE DOCUMENT

(As per the requirement of the Fifth Schedule read with Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulation 2020, as amended from time to time).

1. This Disclosure Document pertains to the disclosures hereby made by Ckredence Wealth Management Private Limited.
2. This Disclosure Document is filed with the Securities Exchange Board of India ("SEBI") along with the certificate issued by the Chartered Accountant in Whole Time Practice as set out in this Disclosure Document, in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.
3. The purpose of this Disclosure Document is to provide essential information about the Portfolio Management Services to assist and enable investors in making informed decisions prior to engaging the Portfolio Manager.
4. The Disclosure Document sets forth necessary information about the Portfolio Manager required by an investor before investing, and the investor may also be advised to retain the Disclosure Document for future reference.
5. This Disclosure Document is prepared to update the details as per the SEBI Circular SEBI/HO/IMD/IMD-RAC-3/P/CIR/2025/125 dated September 09, 2025, to introduce new Investment Approach i.e. Akta Flexi Cap Investment Approach and Closure of Wealth Preserve Scheme and to update the financial figures as per the Audited Financial Statements for the Financial Year Ended 31st March, 2025.
6. The name, phone number, e-mail address of the Principal Officer so designated by the Portfolio Manager is:

Name of the Principal Officer	Mr. Kartik Bhaskerray Mehta
Phone	0261-6946645/651
Email ID	Kartik.mehta@ckredencewealth.com
Registered Office Address	901-903, International Wealth Center, VIP Road, Vesu, Surat, 395007

This Document is dated - **18th May 2026**

FORM C

**SECURITIES AND EXCHANGE BOARD OF INDIA (PORTFOLIO MANAGERS) REGULATIONS, 2020
(Regulation 22)**

Dear Investor,

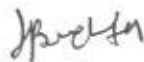
We confirm that:

The Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;

The disclosure made in the document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us / investment in the Portfolio Management Strategy;

The Disclosure Document has been duly certified by an Mr. Shardul Shah of M/s. Shah & Ramaiya (Membership No. 118394 and FRN: 126489W), Independent Chartered Accountant in Practice having his office at 36/227, RDP 10, Sector 6, Charkop, Near Ambe Mata Mandir, Kandivali (West), Mumbai: 400067; Phone no.:91-22-28085277 on **18th May 2026**

For and on behalf of Ckredence Wealth Management Private Limited



Mr. Kartik Bhaskerray Mehta
Director and Principal Officer
(DIN: 09501487)

Address: 901-903, International Wealth Center, VIP Road, Vesu, Surat, Gujarat, 395007.

Date: 18th May 2026

Place: Surat

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1. DISCLAIMER

This Disclosure Document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended from time to time 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.

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

1. DISCLAIMER

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2. DEFINITIONS

In this Disclosure Document, unless the context or meaning thereof otherwise requires, the following expressions shall have the meaning assigned to them hereunder respectively:

1. **"Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992)
2. **"Accreditation Agency"** means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by SEBI from time to time.
3. **"Accredited Investor"** means any person who is granted a certificate of accreditation by an accreditation agency who:
 - i. in case of an individual, HUF, family trust or sole proprietorship has:
 - a. annual income of at least two crore rupees; or
 - b. net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees is in the form of financial assets; or
 - c. annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crore fifty lakh rupees is in the form of financial assets.
 - ii. in case of a body corporate, has net worth of at least fifty crore rupees;
 - iii. in case of a trust other than family trust, has net worth of at least fifty crore rupees;
 - iv. in case of a partnership firm set up under the Indian Partnership Act, 1932, each partner independently meets the eligibility criteria for accreditation:

Provided that the Central Government and the State Governments, developmental agencies set up under the aegis of the Central Government or the State Governments, funds set up by the Central Government or the State Governments, qualified institutional buyers as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category I foreign portfolio investors, sovereign wealth funds and multilateral agencies and any other entity as may be specified by the Board from time to time, shall deemed to be an accredited investor and may not be required to obtain a certificate of accreditation.

4. **"Advisory Services"** means advising on the portfolio approach, investment and divestment of individual Securities in the Client's Portfolio, entirely at the Client's risk, in terms of the Regulations and the Agreement.
5. **"Agreement" or "Portfolio Management Services Agreement" or "PMS Agreement"** means agreement executed between the Portfolio Manager and its Client for providing portfolio management services and shall include all schedules and annexures attached thereto and any amendments made to this agreement by the parties in writing, in terms of Regulation 22 and Schedule IV of the Regulations.
6. **"Applicable Law/s"** means any applicable statute, law, ordinance, regulation, rule, order, bye-law, administrative interpretation, writ, injunction, directive, judgment or decree or other instrument including the Regulations which has a force of law, as is in force from time to time.
7. **"Assets Under Management" or "AUM"** means aggregate net asset value of the Portfolio managed by the Portfolio Manager on behalf of the Clients.
8. **"Associate"** means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager.
9. **"Benchmark"** means an index selected by the Portfolio Manager in accordance with the Regulations, in respect of each Investment Approach to enable the Clients to evaluate the relative performance of the Portfolio Manager.

10. **"Board" or "SEBI"** means the Securities and Exchange Board of India established under section 3 of the Securities and Exchange Board of India Act, 1992.
11. **"Business Day"** means any day, which is not a Saturday, Sunday, or a day on which the banks or stock exchanges in India are authorized or required by Applicable Laws to remain closed or such other events as the Portfolio Manager may specify from time to time.
12. **"Client(s)" / "Investor(s)"** means any person who enters into an Agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.
13. **"Custodian(s)"** means an entity registered with the SEBI as a custodian under the Applicable Laws and appointed by the Portfolio Manager, from time to time, primarily for custody of Securities of the Client.
14. **"Depository"** means the depository as defined in the Depositories Act, 1996 (22 of 1996).
15. **"Depository Account"** means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.
16. **"Direct on-boarding"** means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.
17. **"Disclosure Document" or "Document"** means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.
18. **"Distributor"** means a person/entity who may refer a Client to avail services of Portfolio Manager in lieu of commission/charges (whether known as channel partners, agents, referral interfaces or by any other name).
19. **"Eligible Investors"** means a Person who: (i) complies with the Applicable Laws, and (ii) is willing to execute necessary documentation as stipulated by the Portfolio Manager.
20. **"Fair Market Value"** means the price that the Security would ordinarily fetch on sale in the open market on the particular date.
21. **"Foreign Portfolio Investors" or "FPI"** means a person registered with SEBI as a foreign portfolio investor under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time.
22. **"Financial Year"** means the year starting from April 1 and ending on March 31 in the following year.
23. **"Funds" or "Capital Contribution"** means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies mentioned in the account opening form, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of 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.
24. **"Group Company"** shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary.
25. **"HUF"** means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.
26. **"Investment Approach"** is a broad outlay of the type of Securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and Securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.
27. **"IT Act"** means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.
28. **"Large Value Accredited Investor"** means an Accredited Investor who has entered into an Agreement with the Portfolio Manager for a minimum investment amount of ten crore rupees.
29. **"Non-resident Investors" or "NRI(s)"** shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.
30. **"NAV"** shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.

31. **"NISM"** means the National Institute of Securities Markets, established by the Board.
32. **"Person"** includes an individual, a HUF, 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.
33. **"Portfolio"** means the total holdings of all investments, Securities and Funds belonging to the Client.
34. **"Portfolio Manager"** means Ckredence Wealth Management Private Limited [a company] incorporated under [the Companies Act, [2013/1956], registered with SEBI as a portfolio manager bearing registration number INP000007164 and having its registered office at 901-903, International Wealth Center, VIP Road, Vesu, Surat, Gujarat, 395007.
35. **"Principal Officer"** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:
 - i. the decisions made by the Portfolio Manager for the management or administration of Portfolio of Securities or the Funds of the Client, as the case may be; and
 - ii. all other operations of the Portfolio Manager
36. **"Regulations" or "SEBI Regulations"** means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended/modified and reinstated from time to time and including the circulars/notifications issued pursuant thereto.
37. **"Related Party"** means –
 - i. a director, partner or his relative;
 - ii. key managerial personnel or his relative;
 - iii. a firm, in which a director, partner, manager or his relative is a partner;
 - iv. a private company in which a director, partner or manager or his relative is a member or director;
 - v. a public company in which a director, partner or manager is a director or holds along with his relatives, more than two per cent. of its paid-up share capital;
 - vi. anybody corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
 - vii. any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:
 Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
 - viii. anybody corporate which is— (A) a holding, subsidiary or an associate company of the Portfolio Manager; or (B) a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary; (C) an investing company or the venturer of the Portfolio Manager— The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the Portfolio Manager would result in the Portfolio Manager becoming an associate of the body corporate;
 - ix. a related party as defined under the applicable accounting standards;
 - x. such other person as may be specified by the Board: Provided that,
 - a. any person or entity forming a part of the promoter or promoter group of the listed entity; or
 - b. any person or any entity, holding equity shares:
 - o of twenty per cent or more; or
 - o of ten per cent or more, with effect from April 1, 2023; in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediately preceding Financial Year; shall be deemed to be a related party;
38. **"Securities"** means security as defined in Section 2(h) of the Securities Contract (Regulation) Act, 1956, provided that securities shall not include any securities which the Portfolio Manager is prohibited from investing in or advising on under the Regulations or any other law for the time being in force.

3. DESCRIPTION OF THE PORTFOLIO MANAGER

3.1 History, Present Business and Background of the Portfolio Manager

CKREDENCE WEALTH MANAGEMENT PRIVATE LIMITED was incorporated as a private limited company under the Companies Act, 1956 on 07th March, 2001.

Ckredence Wealth Management Private Limited was a Sub-broker registered through Sushil Financial Services Private Limited (Member NSE/BSE) from 2001 to 2014. One of its associates viz., Ckredence Financial Services (Formerly known as Chirag Financial Services), Partnership Firm is an approved Authorized Person of Sushil Financial Services Private Limited, Member of NSE, BSE since 2014. Another associate viz., Ckredence Investment Services Private Limited (Formerly known as Chirag Stockbroker Private Limited) is a Mutual Fund Distributor, having AMFI registration since 2004. The Company/its associates have been providing services to more than 7000 clients since last 23 years.

3.2 Promoters of the Portfolio Manager, Directors and their background

Sr. No.	Name	Role	Description
1	Chirag Arvindbhai Shah (B.Com.) (DIN:01260876)	Director and Shareholder	Mr. Chirag Shah, General Manager and a shareholder of Ckredence Wealth Management Private Limited has more than 28 years of experience in the Securities Market. He handled various businesses of the entity as well as its associates such as Equity Sub-broking, Mutual Fund Distribution and Authorized Person of Stock Broker.
2	Arvindbhai Keshavlal Shah (Director) (DIN: 00411559)	Director & Shareholder	Mr. Arvindbhai K Shah, the Director and a shareholder of the Ckredence Wealth Management Private Limited has more than 37 years of experience in the Securities Market. He is the founder of the entity and its associates which are in securities market and has experience as Sub-broker, Mutual Fund Distributor and Authorized Person of Stock Broker.
3	Urmilaben Arvindbhai Shah (DIN:00411300)	Director	Mrs. Urmilaben Arvindbhai Shah is a director and a shareholder of the Ckredence Wealth Management Private Limited for more than 26 years. She is also the Partner in Chirag Financial Services (Authorized Person of Sushil Financial Services Private Limited).
4	Hetal Chirag Shah (B.Com.) (DIN:01260891)	Director and Shareholder	Mrs. Hetal Chirag Shah, a shareholder of Ckredence Wealth Management Private Limited has more than 21 years of experience in the Securities Market.
5	Kartik Bhaskerray Mehta (B.Tech., MBA, Finance)	Principal Officer, Director and Shareholder	Kartik Bhaskerray Mehta is the Principal Officer of Ckredence Wealth Management Private Limited and has more than 18 years of experience in Fundamental Equity Research and Fund management with in-depth equity research across the sectors objective of generating

Sr. No.	Name	Role	Description
	(DIN:09501487)		outperformance against benchmark and within peer sets across time periods and marketing across length and depth of the country with NDs, Banks, Wealth Desks and IFAs.

3.3 Top 10 Group companies/ firms of the Portfolio Manager on turnover basis:

1. Ckredence Financial Services (Formerly known as Chirag Financial Services), Partnership Firm, Authorized Person of Stock Broker
2. Ckredence Investment Services Private Limited (Formerly known as Chirag Stockbroker Private Limited), Mutual Fund Distributor.

3.4 Details of the Services being Offered:

3.4.1 The Portfolio Manager offer Discretionary PMS, Non-Discretionary PMS and Investment Advisory services.

- **Discretionary Portfolio Management Services (DPMS):**

The Portfolio Manager shall be acting in a fiduciary capacity with regard to Clients' Portfolio and shall have sole and absolute discretion to invest Clients' Funds in any type of Securities and in any market as he deems fit for the benefit of the Client as per the Discretionary Portfolio Management Service Agreement. The Securities invested / disinvested by the Portfolio Manager may differ from Client to Client. The Securities traded or held by the Portfolio Manager for different Client's Portfolios, even if invested in the same Investment approach, may differ from Client to Client. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's Portfolio is absolute and final and cannot be called in question or be open to review at any time during the currency of the Agreement or any time thereafter except on the grounds of malafide, fraud, conflict of interest or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the relevant Acts, rules and regulations, guidelines, and notifications in force from time to time.

The Portfolio Manager shall invest funds of his clients in the securities listed or traded on a recognized stock exchange, money market instruments, units of Mutual Funds and other securities as specified by SEBI from time to time, on behalf of their clients. "Money market instruments" includes commercial paper, trade bill, treasury bills, certificate of deposit and usance bills.

The portfolio manager may provide advice for investment up to 100% of the assets under management of the large value accredited investors in unlisted securities, subject to the terms agreed between the client and the portfolio manager.

Portfolio Manager may invest in units of Mutual Funds (only through Direct Plan) and no distribution fees will be charged to the client.

However, the Portfolio Manager will not invest the clients' funds either in the portfolio managed or administered by another portfolio manager or based on the advice of any other entity.

- **Non-Discretionary Portfolio Management Services (NDPMS):**

Under these services, the assets of the Client are managed in consultation and in accordance with the instructions of the Client under the Non-Discretionary Portfolio Management Service Agreement between the Client and the Portfolio Manager. The Client has complete discretion and final decision-making authority on the investment (quantity and price or amount). The Portfolio Manager will provide Non-Discretionary Portfolio Management Services which shall be in the nature of investment management, and may include the responsibility of managing, renewing and reshuffling the portfolio, buying and selling the securities with the client's oral and/or written consent. Additionally, the Portfolio Manager will keep the safe custody of the securities and monitor book closures, dividend, bonus, rights etc. and any other benefits that accrue to the Client's Portfolio, for an agreed fee structure and for a definite period as described in the Products from time to time, entirely at the Client's risk.

The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the relevant acts, rules and regulations, guidelines and notifications in force from time to time. Periodical statements in respect to Client's Portfolio shall be sent to the respective Client.

Portfolio Manager may invest up to 25% of the assets under management of the client in unlisted securities, in addition to the securities permitted for discretionary portfolio management.

The portfolio manager may invest up to 100% of the assets under management of the large value accredited investors in unlisted securities, subject to the terms agreed between the client and the portfolio manager.

Portfolio Manager may invest in units of Mutual Funds (only through Direct Plan) and no distribution fees will be charged to the client.

However, Portfolio Manager will not invest the clients' funds either in the portfolio managed or administered by another portfolio manager or based on the advice of any other entity.

- **Advisory Services:**

The Portfolio Manager provides Advisory Services, in terms of the Regulations, which shall be in the nature of non-binding investment advisory and shall include the responsibility of advising on the Portfolio Investment approach, investment and divestment of individual Securities on the Clients Portfolio, for an agreed fee structure and for a period agreed in the Investment Advisory Agreement, entirely at the Client's risk, to all eligible categories of investors who can invest in Indian market. The Portfolio Manager shall be acting solely as an advisor to the Client Portfolio and shall not be responsible for the investment/divestment of securities and/or any administrative activities on the Client Portfolio.

The Portfolio Manager shall provide advisory services in accordance with such guidelines and/ or directives issued by the regulatory authorities and /or the Client, from time to time, in this regard.

Portfolio Manager may provide advice for investment up to 25% of the assets under management of the client in unlisted securities, in addition to the securities permitted for discretionary portfolio management.

The portfolio manager may provide advice for investment up to 100% of the assets under management of the large value accredited investors in unlisted securities, subject to the terms agreed between the client and the portfolio manager.

3.4.2 Direct Onboarding Option

Client should note that pursuant to SEBI Master circular no. SEBI/HO/IMD/IMD-POD 1/P/CIR/2024/80 dated June 07, 2024, an option to invest directly i.e. without intermediation of persons engaged in distribution services, is available to the investors". At the time of onboarding no charges, except statutory charges, shall be levied.

Client has an option to invest with us directly without availing the services of Distributors. For more details the client can write to us on info@ckredencewealth.com Alternatively, the client can also reach out for this option via our website link <https://ckredencewealth.com/>

4. Penalties, pending litigation or proceedings, findings of inspection or investigation for which action may have been taken or initiated by any regulatory authority.

All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made there under.	None
The nature of the penalty/direction	None
Penalties/Fines imposed for any economic offense and/or for violation of any securities law	None
Any pending material litigation / legal proceedings against the portfolio manager / key personnel with separate disclosure regarding pending criminal cases, if any	None
Any deficiency in the systems and operations of the portfolio manager observed by the Board or any regulatory agency	Refer Note 1
Any enquiry/adjudication proceedings initiated by the Board 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 there under	None

Note 1: SEBI had conducted inspection of books of accounts and records of Ckredence Wealth Management Private Limited for the first time for the period April 01, 2021 to December 31, 2022 and noted certain deficiencies which was later rectified by the Company by taking appropriate steps. There is no further inspection conducted after that by the SEBI.

5. SERVICES OFFERED

5.1 The present investment objectives and policies including the types of securities in which it generally invests shall be clearly and concisely stated in the document for easy understanding of the potential investor.

The Portfolio's Managers investment objective and policies shall be transparently outlined in compliance with SEBI (Portfolio Manager) Regulation, 2020, ensuring clarity for potential investors.

Under its Portfolio Management Service (PMS), the portfolio manager aims to generate long term capital appreciation and/ or regular income. Investment shall be made in equity, debt, fixed income instruments, mutual funds, exchange traded funds (ETF), structured products, derivatives and other permissible securities in accordance with applicable laws.

5.2 INVESTMENT APPROACHES OF PORTFOLIO MANAGER

i. Diversified Multi-Cap Investment Approach

Strategy: Equity

Investment Objective

Diversification Investment Approach intends to invest in baskets of stocks with no undue concentration in any stock or sector. The process of diversification may help control risk in the portfolio. The Portfolio manager aims to generate long term capital appreciation and superior returns by investing across market capitalizations. The proposed portfolio would normally invest in 45-50 Stocks.

Types of securities

Predominantly invests in listed equity and equity related securities. The Investment Approach may also take exposure to exchange traded derivative instruments and Gold ETF for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

The Portfolio Manager selects equity and equity related securities of companies from the listed universe space across market capitalization. The Investment Approach may not be restricted by any particular investment style such as top-down or bottom –up approach and may opt for flexibility to make selection among the stocks across sectors depending upon available opportunities. The top-down approach is used to analyze various macro indicators and from that identify key macroeconomic trend & industry wise themes and subsequently helps identify stocks that will benefit from the same. In bottom-up approach, as there are always good companies to invest in irrespective of the market conditions. The Portfolio Manager looks to identify and invest in such companies. The prominence given to the top-down vs. bottom-up approach would vary from time to time depending on macroeconomic, sectorial and company specific fundamentals.

Allocation of the Portfolio:

Particulars	Allocatio
Equity and Equity related securities	50-100%

Cash, debt oriented mutual funds, liquid funds and arbitrage funds	0-50%
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In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days.

Investment Approach

The Portfolio manager aims to generate long term capital appreciation and superior returns by investing in companies across the businesses where there is strong sustainable competitive advantage, pricing power and scalability. That should be further supported by corporate governance, low leverage, high return ratios and free cash flows and optimal capital allocation track-record.

The Portfolio Manager aims to maintain a diversified portfolio by investing in a basket of stocks across market capitalization, without any undue concentration in any stock or sector.

The Investment Approach follows a mix of a top-down and a bottom-up approach. Generally large-cap stocks are picked up using top-down approach whereas bottom-up style is useful for small and midcap identification. The prominence given to the top-down vs. bottom-up approach would vary from time to time depending on macroeconomic, sectoral and company specific fundamentals.

Fund will have dynamic multi-cap investment approach as there is always varied degree of opportunities in the market across the market capitalizations. India being growing country and dynamic valuations cycles, investing across the length and depth of market capitalization is very important.

The Investment Approach aims to follow a buy and hold Investment Approach with an aim to fully capitalize on the true underlying value of the business potential, which is expected to get unlocked over a period of time. However, Investment Approach may be actively managed to take advantage of market cycles of hills and valleys with an endeavor to enhance returns without taking undue risk. Portfolio would normally invest in 45-50 Stocks.

Benchmark

The Investment Approach of Portfolio shall be benchmarked to S&P BSE 500 TRI. The S&P BSE 500 TRI index captures various sectors and industries with varied market capitalizations. The Portfolio Manager under the Investment Approach invests across sectors with different market capitalizations, so this benchmark fits perfect for comparison with Investment Approach's philosophy.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 5 years and above.

Risks associated with investment approach:

There could be time periods when securities selected may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at maintaining a diversified portfolio without any undue concentration in any sector or stock and the portfolio may underperform relative to concentrated portfolios during certain periods of time.

Since, the Investment Approach invests across market capitalizations, there is relatively higher risk compared to pure large cap Investment Approach. That said it should be also known to the investors that while small

and mid-cap stocks can be riskier and more volatile on a relative basis, they also give more choice to go beyond the usual large stocks and offer possible higher capital appreciation.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

ii. Focused Multi-cap Investment Approach

Strategy: Equity

Investment Objective

Unlike diversified fund, here Portfolio manager would take concentrated style approach to generate long term wealth. Focused Investment Approach intends to invest in key themes and sectors in concentrated manner with 30-35 Stocks in the portfolio. The Portfolio manager aims to generate long term capital appreciation and superior returns by investing across market capitalizations.

Types of securities

Predominantly invests in listed equity and equity related securities. The Investment Approach may also take exposure to exchange traded derivative instruments and Gold ETF for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

The Portfolio Manager selects equity and equity related securities of companies from the listed universe space across market capitalization. The stocks would be selected using growth at reasonable price (GARP) approach where lot of priority will be laid towards scalability and sustainability of growth without compromising balance sheet standards. The focus is on identifying stocks with attractive growth prospects that are available at reasonable valuations.

Allocation of the Portfolio:

Particulars	Allocati
Equity and Equity related securities	50-
Cash, debt oriented mutual funds, liquid funds and arbitrage funds	0-50%

In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days

Investment Approach

The Portfolio manager aims to generate long term capital appreciation and superior returns by investing in 30-35 companies across the businesses where there is strong sustainable competitive advantage, leadership and huge scope of scalability. That should be further supported by top notched corporate governance, low leverage, high return ratios and free cash flows and optimal capital allocation track-record.

The Investment Approach follows principle of Growth at reasonable price (GARP) approach. Using that portfolio manager focuses on creating concentrated portfolio on certain themes and ideas which is backed by thorough research.

Fund will have dynamic multi-cap investment approach as there is always varied degree of opportunities in the market across the market capitalizations. India being growing country and dynamic valuations cycles, investing across the length and depth of market capitalization is very important.

While Investment Approach aims to follow a buy and hold approach with an aim to fully capitalize on the true underlying value of the business potential, which is expected to get unlocked over a period of time, there would be equal focus on active management to take advantage of certain market trends with an endeavor to enhance returns.

Benchmark

The Investment Approach Portfolio shall be benchmarked to Nifty 50 TRI index. The Nifty 50 TRI index is designed to capture leadership businesses across various industries and sectors where scalability and sustainability of growth is high.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 5 years and above.

Risks associated with investment approach:

There could be time periods when securities selected may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at maintaining a concentrated focused portfolio in any sector or stock and the portfolio may underperform relative to diversified portfolios during certain periods of time. Thus, Focused portfolio would have high volatility of returns compared to diversified funds given higher concentration to stocks and sectors.

Since, the Investment Approach invests across market capitalizations, there is relatively higher risk compared to pure large cap Investment Approach. That said it should be also known to the investors that while small and mid-cap stocks can be riskier and more volatile on a relative basis, they also give more choice to go beyond the usual large stocks and offer possible higher capital appreciation.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

iii. All Weather Investment Approach

Strategy: Equity

Investment Objective

The primary objective of portfolio manager of All-weather Investment Approach is to generate long term capital appreciation and superior returns by investing across asset classes such as Indian equity, offshore mutual fund schemes/ETFs and gold ETFs with an objective of giving investors an enhanced diversification. The proposed portfolio normally invests in 30-35 Stocks.

Types of securities

Predominantly invests in listed Indian equity and equity related securities, offshore mutual fund schemes/ETFs and gold ETFs. The Investment Approach may also take exposure to exchange traded derivative

instruments for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

For Indian equity segment, the Portfolio Manager selects equity and equity related securities of companies from the listed universe space across market capitalization. The Investment Approach may not be restricted by any particular investment style such as top-down or bottom –up approach and may opt for flexibility to make selection among the stocks across sectors depending upon available opportunities. The prominence given to the top-down vs. bottom-up approach would vary from time to time depending on macroeconomic, sectorial and company specific fundamentals. While for overseas equity and Gold, the Portfolio Manager shall select schemes of offshore mutual fund schemes/ETFs and gold ETFs based on domestic equity valuations and forward outlook.

Allocation of the Portfolio:

Particulars	Allocatio
Equity and Equity related securities	60-100%
Cash, debt oriented mutual funds, liquid funds and arbitrage funds	0-40%

In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days

Investment Approach

Here, portfolio will be designed to capture benefits of all asset classes be it domestic equity, overseas equity and gold. Portfolio would be having following weights

Domestic Equity – 60% to 100%

Offshore Equity through ETF – 0% to 20%

Gold through ETF – 0% to 20%

Globally, there are many superior businesses which are either not available in India or are in very nascent stage. Overseas ETF would capture it.

Gold would act as hedging tool against global economic uncertainty and inflation. Gold ETF would capture it.

Domestic equity part would be made of businesses across the market capitalizations having strong competitive advantage, leadership and scalability. That should be further supported by top notched corporate governance, low leverage, high return ratios and free cash flows and optimal capital allocation track-record. The Investment Approach aims to invest across market capitalization.

In case of any sudden market movement the Portfolio Manager reserves the right to switch the existing funds partially/fully to money market /liquid mutual fund schemes. This is a risk mitigation feature which the Portfolio Manager can exercise considering the market movements. The Portfolio Manager reserves the right to invest the portion of the portfolio, which is pending for deployment, in money market /liquid mutual fund schemes. Portfolio would normally invest in 30-35 Stocks.

Benchmark

The Investment Approach of Portfolio shall be benchmarked to S&P BSE 500 TRI. Our portfolio will be investing into scalable and sustainable business which gets perfectly captured in S&P BSE 500 TRI index which

is designed to capture leadership businesses across various industries and sectors where scalability and sustainability of growth is high.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 5 years and above.

Risks associated with investment approach:

There could be time periods when securities selected for Indian equities segment may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at giving enhanced diversification beyond Indian equities, in that case sometimes the portfolio may underperform relative to pure Indian equity portfolios.

While it would be the Endeavour of the Portfolio Manager of the All-Weather Investment Approach to invest in the target offshore schemes/ETF in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of the All-Weather Investment Approach being adversely impacted.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

iv. Ice Growth Investment Approach

Strategy: Equity

Investment Objective

Ice Growth Investment Approach (Formerly known by the name Three Pillar Investment Approach) intends to invest in baskets of stocks covering consumption, exports and investment aspects of the economy with no undue concentration in any stock or sector. The process of diversification may help control risk in the portfolio. The Portfolio manager aims to generate long term capital appreciation and superior returns by investing across market capitalizations.

Types of securities

Predominantly invests in listed equity and equity related securities. The Investment Approach may also take exposure to exchange traded derivative instruments and Gold ETF for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

The Portfolio Manager selects equity and equity related securities of companies from the listed universe space across market capitalization. The Investment Approach may not be restricted by any particular investment style such as top-down or bottom –up approach and may opt for flexibility to make selection among the stocks across sectors depending upon available opportunities

Allocation of the Portfolio:

Particulars	Allocation
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Equity and Equity related securities	50-100%
Cash, debt oriented mutual funds, liquid funds and arbitrage funds	0-50%

In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days.

Investment Approach

Portfolio would be designed keeping three important pillars of an economy in mind. Objective of the scheme is to ensure that investor does not miss out any specific pillar centric opportunity. These three pillars are (A) Consumption (both necessary & discretionary), (B) Exports (Goods & Services) and (C) Investment (Public & Private).

Consumption – Both necessary and discretionary consumption drives economic activities. These includes automobile (two wheelers and Passenger vehicles), FMCG, Consumer finance, retail (footwear, apparel, jewelry, grocery), white goods, brown goods etc.

Exports – Both goods and services are exported world over. In the era of globalization, this pillar has become very important for any economy to grow especially when own domestic economy may be struggling. This includes Pharmaceuticals, Technology, Chemical, Textile etc.

Investment - Investment is all about asset heavy businesses. For long sustainable growth any country needs investment towards competitive plants and machinery, roads, airports, ports, water infrastructure, defense etc. This pillar includes host of industries such as Cement, Metal, Infrastructure, Capital Goods, wholesale banking, commercial vehicle etc.

Globally all economies stand and grows on these three pillars. These pillars are complementary to each other. For example, Domestic consumption may help more while exports are down, exports help more while investment might be struggling and so on and so forth.

Portfolio would be having exposure to all the three pillars with dynamic approach in terms of their respective weights. The portfolio would normally invest in 40-45 Stocks.

The Investment Approach aims to invest across market capitalization. The Investment Approach may not be restricted by any particular investment style such as top-down or bottom –up approach and may opt for flexibility to make selection among the stocks across sectors. The Investment Approach may use cash as hedge against sharp declines inequity in an endeavor to protect the portfolio. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

The Investment Approach aims to follow a buy and hold Investment Approach with and aim to fully capitalize on the true underlying value of the business potential, which is expected to get unlocked over a period of time. However, Investment Approach may be actively managed to take advantage of market cycles of hills and valleys with an endeavor to enhance returns without taking undue risk.

Benchmark

The Investment Approach of Portfolio shall be benchmarked to S&P BSE 500 TRI. Our portfolio will be investing into scalable and sustainable business which gets perfectly captured in S&P BSE 500 TRI index which is designed to capture leadership businesses across various industries and sectors where scalability and sustainability of growth is high.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 5 years and above.

Risks associated with investment approach:

There could be time periods when securities selected may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at maintaining a diversified portfolio without any undue concentration in any sector or stock and the portfolio may underperform relative to concentrated portfolios during certain periods of time.

Since, the Investment Approach invests across market capitalizations, there is relatively higher risk compared to pure large cap Investment Approach. That said it should be also known to the investors that while small and mid-cap stock can be riskier and more volatile on a relative basis, they also give more choice to go beyond the usual large stocks and offer possible higher capital appreciation.

Investment Approach may take higher exposure to any particular pillar at any given point of time at the cost of other pillars, which may not go well for some time thus may impact the scheme's performance against the benchmark.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

Product offered to the Investors

The Portfolio Management Product proposes to offer Portfolio Management services to HNI Investors, Corporates, NRI/PIO for investment into Equity market as per rules and regulation laid down by SEBI and RBI.

Ice Growth Investment Approach is absolute and complete replica of the Three Pillar Investment Approach. Therefore, in this regard we would like to state that only the name of the Three Pillar Investment Approach is changed to Ice Growth Investment Approach. There are no changes in Benchmark or Strategy, or any other factor to which Three Pillar Investment Approach was previously governed before the change in its name and hence there is no need to give any exit opportunity to any of the existing clients. We further would like to state that this change in name shall be communicated to all the clients in due course of time.

V. Business Cycle Fund

Strategy: Equity

Investment Objective

The objective of the fund is to generate long-term wealth by identifying and investing in sectors & companies which are at the cusp of the growth cycle. It intends to invest in concentrated manner in few sectors across market capitalizations with 30-35 stocks in the portfolio with aim to reap benefit from business cycle revival.

Types of securities

Predominantly invests in listed equity and equity related securities. The Investment Approach may also take exposure to exchange traded derivative instruments and Gold ETF for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

In case of Indian equity segment, the Portfolio Manager selects equity and equity related securities of companies from the listed universe space across market capitalization. The focus is on identifying stocks in sectors which after facing temporary headwinds, have started witnessing turnaround and has good growth potential and scalability with favoring industry dynamics. Further, the priority will be laid towards high standards of corporate governance, balance-sheet along with reasonable valuations.

Allocation of the Portfolio:

Particulars	Allocati
Equity and Equity related securities	50-
Cash, debt oriented mutual funds, liquid funds and arbitrage funds	0-50%

In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days.

Investment Approach

The aim is to generate long term wealth by focusing on sectors that had been facing temporary headwinds and has now begin to show the signs of business revival. This may entail investment approach such as top-down or bottom-up approach but may not be restricted to the same while selecting the stocks depending upon available opportunities. Sectoral tailwinds can emerge as a result of economic recovery, exports opportunities, industry consolidation etc. Considering the nature of investment and in order to reap benefit from the business cycle revival, the tenure of holdings can be relatively longer.

The focus would be to identify and invest in companies in those sectors which are fundamentally strong & have good growth potential, scalability with competent management. That should be further supported by top notch corporate governance, low leverage, optimal capital allocation track-record and reasonable valuations. Investment will be done in concentrated manner in 30-35 stocks in few sectors and companies which is backed by thorough research.

Fund will have dynamic multi-cap investment approach as there is always varied degree of opportunities in the market across the market capitalizations. India being growing country and dynamic valuations cycles, investing across the length and depth of market capitalization is very important.

While Investment Approach aims to follow a buy and hold approach with an aim to fully capitalize on the true underlying value of the business potential, which is expected to get unlocked over a period of time, there would be equal focus on active management to take advantage of certain market trends with an endeavor to enhance returns.

Benchmark

The Investment Approach Portfolio shall be benchmarked to Nifty 50 TRI index. The Nifty 50 TRI index is designed to capture leadership businesses across various industries and sectors where scalability and sustainability of growth is high.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 5 years and above.

Risks associated with investment approach:

There could be time periods when securities selected may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at maintaining a concentrated focused portfolio in any sector or stock and the portfolio may underperform relative to diversified portfolios during certain periods of time. Thus, Focused portfolio would have high volatility of returns compared to diversified funds given higher concentration to stocks and sectors.

Since, the Investment Approach invests across market capitalizations, there is relatively higher risk compared to pure large cap Investment Approach. That said it should be also known to the investors that while small and mid-cap stocks can be riskier and more volatile on a relative basis, they also give more choice to go beyond the usual large stocks and offer possible higher capital appreciation.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

vi. Elite Blue-Chip Fund

Strategy: Equity

Investment Objective

The primary objective of this investment approach is to create long-term wealth by investing in large-cap companies which are industry leaders or aspiring to be a leader having dominant market positions across various sectors. The portfolio manager intends to invest in few sectors in concentrated manner which are expected to outperform the markets with 15-20 stocks in the portfolio.

Types of securities

Predominantly invests in listed equity and equity related securities. The Investment Approach may also take exposure to exchange traded derivative instruments and Gold ETF for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

In case of Indian equity segment, the Portfolio Manager selects equity and equity related securities of companies from the listed universe space in large-cap category. The investment approach may not be restricted to any particular investment style such as top-down or bottom-up approach and may opt flexibility to make selection among the stock across sectors depending upon available opportunities. The prominence given to the top-down vs. bottom-up approach would vary from time to time depending on macroeconomic, sectoral and company specific fundamentals. Further, the priority will be laid towards high standards of corporate governance, balance-sheet along with reasonable valuations.

Allocation of the Portfolio:

Particulars	Allocation
Equity and Equity related securities, mutual fund schemes	50-100%
Cash, debt oriented mutual funds, liquid funds, ETFs and arbitrage funds	0-50%

In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days

Investment Approach

The aim is to generate long term capital appreciation and superior returns by investing in companies across the businesses which are industry leaders or aspiring to be having strong fundamentals, sustainable competitive advantage, good growth potential, scalability and competent management. Investment will be done in concentrated manner in 15-20 large-cap companies in few sectors which is backed by thorough research.

The Investment Approach would follow a mix of top-down and a bottom-up approach wherein the prominence given to either of the approach would vary from time to time depending on macroeconomic, sectoral and company specific fundamentals.

While Investment Approach aims to follow a buy and hold approach with an aim to fully capitalize on the true underlying value of the business potential, which is expected to get unlocked over a period of time, there would be equal focus on active management to take advantage of certain market trends with an endeavor to enhance returns.

Benchmark

The Investment Approach Portfolio shall be benchmarked to Nifty 50 index. The Nifty 50 index is designed to capture leadership businesses across various industries and sectors where scalability and sustainability of growth is high.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 5 years and above.

Risks associated with investment approach:

There could be time periods when securities selected may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at maintaining a concentrated focused portfolio in any sector or stock and the portfolio may underperform relative to diversified portfolios during certain periods of time. Thus Focused portfolio would have high volatility of returns compared to diversified funds given higher concentration to stocks and sectors.

Since, the Investment Approach invests only in large market capitalizations companies, there is relatively higher risk of underperformance of portfolio returns vs. broader market returns in case market moves highly skewed in favor of mid and small companies compared to pure large cap Investment Approach.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

vii. Akta Flexi Cap Investment Approach

Strategy: Equity

Investment Objective

The aim is to generate long-term capital appreciation by investing predominantly in a diversified yet concentrated portfolio of 25–35 stocks across large-cap, mid-cap, and small-cap companies. The scheme seeks to identify and invest in high-conviction businesses with sustainable growth potential, irrespective of market capitalization. In order to optimize diversification and capture opportunities, the fund also intends to invests in ETFs including offshore ETFs and commodity ETFs like Gold ETF, Silver ETF etc.

Types of securities

Predominantly invests in listed Indian equity and equity related securities, offshore mutual fund schemes/ETFs and gold ETFs. The Investment Approach may also take exposure to exchange traded derivative instruments for hedging purpose. For liquidity or defensive considerations or pending deployment, the Portfolio Manager may invest in debt, money market instruments, mutual fund schemes or debt ETFs.

Basis for selection of securities

For Indian equity segment, the Portfolio Manager selects equity and equity related securities of companies from the listed universe space across market capitalization. India seems to be at an inflection point with strong growth outlook envisaged over next couple of years backed by Political stability, Focused Government approach towards manufacturing & exports, Rejig in supply-chain globally i.e., China + 1 strategy etc. This would entail huge investments in manufacturing and greater emphasis on exports. Moreover, increasing per capita income and higher aspirations is likely to drive the domestic consumption to the next level. This would open up new avenues in multiple sectors which is likely to be structural in nature enabling many companies to deliver much better growth. In order to capture this huge upcoming opportunity, stock selection would play a pivotal role requiring in-depth research and knowledge across sectors. Selection of securities would be based on thorough research on macro-economic parameters followed by top-down or bottom-up approach. The prominence given to the top-down vs. bottom-up approach would vary from time to time depending on macroeconomic, sectorial and company specific fundamentals.

Clear determination of Investment thesis, financial modelling along with regular periodic review of investments would be the part of key process. It would involve Strategic as well as Tactical asset allocation wherein Strategic would be more long-term in nature while tactical would be more opportunity based. While for overseas equity and Gold, the Portfolio Manager shall select schemes of offshore mutual fund schemes/ETFs and gold ETFs based on domestic equity valuations and forward outlook.

Allocation of the Portfolio:

Particulars	Allocation
Equity and Equity related securities	40-100%
Cash, debt oriented mutual funds, liquid funds, ETFs and arbitrage funds	0-60%

In case of deviation in the above provided asset allocation, same shall be rebalanced within 30 days.

Investment Approach

The objective is to generate long term capital appreciation by judiciously investing in quality and growing companies across sectors & market-capitalization. The focus would be to invest in companies having strong fundamentals, sustainable competitive advantage, good growth potential, scalability and competent management. Investment would be done in diversified yet concentrated portfolio of 25–35 stocks with exposure to overseas equity and gold which would help in both to capture opportunities globally as well as hedge against inflation and global uncertainty.

Globally, there are many superior businesses which are either not available in India or are in very nascent stage offering good investment opportunities which can be captured through Overseas ETF. Gold on the other hand would act as hedging tool against global economic uncertainty and inflation. Gold ETF would capture it.

The Investment Approach would follow a mix of top-down and a bottom-up approach wherein the prominence given to either of the approach would vary from time to time depending on macroeconomic, sectoral and company specific fundamentals. While Investment Approach aims to follow a buy and hold approach with an aim to fully capitalize on the true underlying value of the business potential, which is expected to get unlocked over a period of time, there would be equal focus on active management to take advantage of certain market trends with an endeavor to enhance returns.

In case of any sudden market movement the Portfolio Manager reserves the right to switch the existing funds partially/fully to money market /liquid mutual fund schemes. This is a risk mitigation feature which the Portfolio Manager can exercise considering the market movements. The Portfolio Manager reserves the right to invest the portion of the portfolio, which is pending for deployment, in money market /liquid mutual fund schemes.

Benchmark

The Investment Approach of Portfolio shall be benchmarked to S&P BSE 500 TRI. Our portfolio will be investing into scalable and sustainable business which gets perfectly captured in S&P BSE 500 TRI index which is designed to capture leadership businesses across various industries and sectors where scalability and sustainability of growth is high.

Indicative tenure for investment horizon

Since Investment Approach wants to capture true long-term potential of the invested business, the ideal investment horizon shall be 3 years and above.

Risks associated with investment approach:

There could be time periods when securities selected for Indian equities segment may underperform relative to other stocks in the market which could impact the performance.

The Investment Approach aims at giving enhanced diversification beyond Indian equities, in that case sometimes the portfolio may underperform relative to pure Indian equity portfolios.

While it would be the Endeavour of the Portfolio Manager of the All-Weather Investment Approach to invest in the target offshore schemes/ETF in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of the All-Weather Investment Approach being adversely impacted.

General Risks related to equity and equity linked investments, derivative investments, debt and debt related instruments and GOLD ETF are elaborated in the 'Risk Factors' section of this Disclosure Document.

5.3 The policies for investments in associates/group companies of the portfolio manager and the maximum percentage of such investments therein subject to the applicable laws/regulations/ guidelines.

Investment Limits:

- i. For investments in securities of Associates/ Related Parties, the Portfolio Manager shall comply with the following:
 - The Portfolio Manager shall invest maximum upto 30% of the Client's AUM in the securities of its Associates/Related parties.

Security Type	Limit for investment in individual associate/ related party (as % of client's AUM)	Limit for investment across multiple associates/related parties (as % of client's AUM)
Equity	up to 15%	up to 25%
Debt and hybrid securities	up to 15%	up to 25%
Equity + Debt + Hybrid securities	up to 30%	

Proposed norms for minimum credit rating of all investments by PMS

	DPMS	NDPMS
Credit rating of debt and hybrid securities for investment	Minimum Investment Grade for all investments	Minimum Investment Grade for investments/advice in listed securities
Unrated debt and hybrid securities	May not be allowed	10% of AUM in unlisted unrated securities within the limit of 25 percent allowed for unlisted

- ii. *Hybrid securities include units of Real Estate Investment Trusts (REITs), units of Infrastructure Investment Trusts (InvITs), convertible debt securities and other securities of like nature.
- iii. The aforementioned limits shall be applicable only to direct investments by Portfolio Manager in equity and debt/hybrid securities of its Associates/Related parties and not to any investments in the Mutual Funds.
- iv. With respect to investments in debt and hybrid securities, the Portfolio Manager shall ensure compliance with the following:
 - v. Under discretionary portfolio management services, the Portfolio Manager shall not make any investment in unrated and below investment grade securities.
 - vi. Under non-discretionary portfolio management services, the Portfolio Manager shall not make any investment in unrated below investment grade listed securities.

However, Portfolio Manager may invest up to 10% of the assets under management of such clients in unlisted unrated securities of issuers other than associates/related parties of Portfolio Manager. The said investment in unlisted unrated debt and hybrid securities shall be within the maximum specified limit of 25% for investment in unlisted securities as per the PMS Regulations

6. RISK FACTORS

A. General Risks Factors

1. Investment in Securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc.
2. The Portfolio Manager does not assure that the objectives of any of the Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
3. Past performance of the Portfolio Manager does not indicate the future performance of the same or any other Investment Approach in future or any other future Investment Approach of the Portfolio Manager. [OR] The Portfolio Manager has no previous experience/track record in the field of portfolio management services. However, the Principal Officer, directors and other key management personnel of the Portfolio Manager have rich individual experience.
4. The names of the Investment Approach do not in any manner indicate their prospects or returns.
5. Appreciation in any of the Investment Approach can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any Investment Approach may also be affected due to any other asset allocation factors.
6. When investments are restricted to a particular or few sector(s) under any Investment Approach; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the Portfolio value will be adversely affected.
7. Each Portfolio will be exposed to various risks depending on the investment objective, Investment Approach and the asset allocation. The investment objective, Investment Approach and the asset allocation may differ from Client to Client. However, generally, highly concentrated Portfolios with lesser number of stocks will be more volatile than a Portfolio with a larger number of stocks.
8. The values of the Portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.
9. The Portfolio Manager shall act in fiduciary capacity in relation to the Client's Funds and shall endeavour to mitigate any potential conflict of interest that could arise while dealing in a manner which is not detrimental to the Client.

B. Risk associated with equity and equity related instruments

10. Equity and equity related instruments by nature are volatile and prone to price fluctuations on a daily basis due to macro and micro economic factors. The value of equity and equity related instruments may fluctuate due to factors affecting the securities markets such as volume and volatility in the capital markets, interest rates, currency exchange rates, changes in law/policies of the government, taxation laws, political, economic or other developments, which may have an adverse impact on individual Securities, a specific sector or all sectors. Consequently, the value of the Client's Portfolio may be adversely affected.

11. Equity and equity related instruments listed on the stock exchange carry lower liquidity risk, however the Portfolio Manager's ability to sell these investments is limited by the overall trading volume on the stock exchanges. In certain cases, settlement periods may be extended significantly by unforeseen circumstances. The inability of the Portfolio Manager to make intended Securities purchases due to settlement problems could cause the Client to miss certain investment opportunities. Similarly, the inability to sell Securities held in the Portfolio may result, at times, in potential losses to the Portfolio, should there be a subsequent decline in the value of Securities held in the Client's Portfolio.
12. Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small number of scrip's accounting for a large proportion of trading volume among others.

C. Risk associated with debt and money market securities.

13. Interest Rate Risk

Fixed income and money market Securities run interest-rate risk. Generally, when interest rates rise, prices of existing fixed income Securities fall and when interest rate falls, the prices increase. In case of floating rate Securities, an additional risk could arise because of the changes in the spreads of floating rate Securities. With the increase in the spread of floating rate Securities, the price can fall and with decrease in spread of floating rate Securities, the prices can rise.

14. Liquidity or Marketability Risk

The ability of the Portfolio Manager to execute sale/purchase order is dependent on the liquidity or marketability. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. The Securities that are listed on the stock exchange carry lower liquidity risk, but the ability to sell these Securities is limited by the overall trading volumes. Further, different segments of Indian financial markets have different settlement cycles and may be extended significantly by unforeseen circumstances.

15. Credit Risk

Credit risk or default risk refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). Because of this risk corporate debentures are sold at a higher yield above those offered on government Securities which are sovereign obligations and free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the changes in the perceived level of credit risk as well as any actual event of default. The greater the credit risk, the greater the yield required for someone to be compensated for the increased risk.

16. Reinvestment Risk

This refers to the interest rate risk at which the intermediate cash flows received from the Securities in the Portfolio including maturity proceeds are reinvested. Investments in fixed income Securities may carry re-investment risk as interest rates prevailing on the interest or maturity due dates may differ from the original coupon of the debt security. Consequently, the proceeds may get invested at a lower rate.

D. Risk associated with derivatives instruments

17. The use of derivative requires an understanding not only of the underlying instrument but of the derivative itself. Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the Portfolio Manager to identify such opportunities. Identification and execution of the strategies to be pursued by the Portfolio Manager involve uncertainty and decision of Portfolio Manager may not always be profitable. No assurance can be given that the Portfolio Manager will be able to identify or execute such strategies.

18. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price of interest rate movements correctly. The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments. Other risks include settlement risk, risk of mispricing or improper valuation and the inability of the derivative to correlate perfectly with underlying assets, rates and indices, illiquidity risk whereby the Portfolio Manager may not be able to sell or purchase derivative quickly enough at a fair price.

E. Risk associated with investments in mutual fund schemes

19. Mutual funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the schemes will be achieved. The various factors which impact the value of the scheme's investments include, but are not limited to, fluctuations in markets, interest rates, prevailing political and economic environment, changes in government policy, tax laws in various countries, liquidity of the underlying instruments, settlement periods, trading volumes, etc.
20. As with any securities investment, the NAV of the units issued under the schemes can go up or down, depending on the factors and forces affecting the capital markets.
21. Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.
22. The Portfolio Manager shall not be responsible for liquidity of the scheme's investments which at times, be restricted by trading volumes and settlement periods. The time taken by the scheme for redemption of units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the schemes.
23. The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes in the offer document(s)/scheme information document(s) of the scheme(s), which may vary substantially depending on the market risks, general economic and political conditions in India and other countries globally, the monetary and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.
24. The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.
25. While it would be the endeavor of the Portfolio Manager to invest in the schemes in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of this portfolio being adversely impacted.
26. The scheme specific risk factors of each of the underlying schemes become applicable where the Portfolio Manager invests in any underlying scheme. Investors who intend to invest in this portfolio are required to and are deemed to have read and understood the risk factors of the underlying schemes.

F. Risk arising out of non-diversification

27. 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. Similarly, the portfolios with investment objective to have larger exposure to certain market capitalization buckets, would be exposed to risk associated with underperformance of those relevant market capitalization buckets. Moreover, from the style orientation perspective, concentrated exposure to value or growth stocks based on the requirement of the mandate/strategy may also result in risk associated with this factor.

G. Risk arising out of investment in Associate and Related Party transactions

28. All transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations shall be disclosed if found having conflict of interest with the transactions in any of the client's portfolio.
29. The Portfolio Manager may utilize the services of its group companies or associates for managing the portfolios of the client. In such scenarios, the Portfolio Manager shall endeavor to mitigate any potential conflict of interest that could arise while dealing with such group companies/associates by ensuring that such dealings are at arm's length basis.
30. The Portfolios may invest in its Associates/ Related Parties relating to portfolio management services and thus conflict of interest may arise while investing in securities of the Associates/Related Parties of the Portfolio Manager. Portfolio Manager shall ensure that such transactions shall be purely on arms' length basis and to the extent and limits permitted under the Regulations. Accordingly, all market risk and investment risk as applicable to securities may also be applicable while investing in securities of the Associates/Related Parties of the Portfolio Manager.

7. Nature of Expenses

The following are indicative types of charges. The exact basis of charge relating to each of the following services shall be annexed to the PMS Agreement and the agreements in respect of each of the services availed at the time of execution of such agreements and shall be in accordance with SEBI (Portfolio Managers) Regulations, 2020, as amended from time to time read with any circular(s) or notification(s) issued by SEBI in this regard from time to time and in force at the time of levying and/or charging and/or deducting any fees, charges and/or expenses in this regard.

i. Investment Management and Advisory Fees:

- Management Fees:**

Professional charges relate to the Portfolio Management Services offered to clients. The fee may be a fixed charge or a fixed percentage of the quantum of funds managed and may be return/performance based or a combination of any of these, as agreed by the clients in the PMS Agreement.

Option	Particulars	Basis Of Charge	Interval
A	Fixed Fees	Upto 3.5% of AUM p.a	Quarterly, calculated on daily weighted average NAV basis (a) In the first instance, upon the end of the calendar Quarter in which the PMS Agreement becomes effective and (b) thereafter, at the end of every quarter thereon. Upon the termination of the agreement by the client, the client shall be liable to pay the fixed fees mentioned above on proportionate basis for the quarter in which the agreement is terminated.
B	Fixed + Performance Fees	Upto 2.5% p.a. Fixed Management Fees + 25% Performance Fees (Hurdle rate 0%)	Quarterly, calculated on daily weighted average NAV basis (a) In the first instance, upon the end of the calendar Quarter in which the PMS Agreement becomes effective and (b) thereafter, at the end of every quarter thereon. Performance Fees will be charged annually or agreed with the client in the agreement with high water marking basis. Upon the termination of the agreement by the client, the client shall be liable to pay the fixed fees + Performance Fees mentioned above on proportionate basis for the quarter in which the agreement is terminated.

Swap Fees: The client shall be charged/levied 0.5% swap fees in case client changes the model from Discretionary to Non-Discretionary or from one type of Investment Approach or to another type.

- Fees, entry/exit loads and charges in respect of investment in mutual funds:**

Mutual Funds shall be deducting expenses or management fees, entry/exit loads and other incidental expenses along with applicable taxes, if any, on such deductions and such fees, entry /exit loads and charges including applicable taxes on such deductions shall be paid to the Asset Management Company of these Mutual Funds on the Clients' account. Such fees and charges are in addition to the Portfolio Management fees prescribed at Clause 12.1 above.

- Exit loads and charges in PMS:**

Charge of 3%, 2% and 1% as exit fees shall be levied by the Portfolio Manager for redemption before 1 year, 2 years and 3 years respectively of the amount redeemed by the Client in the PMS.

Exit Load	Exit Fees	1. Up to 1 Year- Exit Fees 3% of the amount redeemed, 2. Exit between 1 to 2 year- Exit Fees of 2% of the amount redeemed, 3. Exit between 2 to 3 years - Exit Fees 1% of the amount redeemed	Charges on the value of Portfolio Redemption Value.
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- **Certification charges or professional charges:**

The charges payable for outsourced professional services like accounting, taxation and any legal services, notarizations, etc. shall be borne by the Clients.

- **Any other incidental or ancillary expenses:**

All incidental and ancillary expenses not covered above but incurred by the Portfolio Manager on behalf of the Client shall be charged to the Client on actual basis.

- **Audit Fees:**

Every client account may apply audit fees charges as defined and mentioned in fees tariff with applicable goods & services tax.

- **Other Charges:**

Over and above the Portfolio Management fees and the transaction cost as mentioned above, the portfolio manager would recover audit fees for auditing and reporting of individual client's accounts; and other charges that the portfolio manager may have to incur while running Portfolio Management Services.

Charges pertaining to partial withdrawal/closure would be levied as per the terms provided in the Agreement entered into between the Portfolio Manager and Client.

The portfolio manager shall deduct/withdraw directly from the cash account of the client all the fees/costs specified above. Other expenses, which could be attributable to the Portfolio Management, would also be directly deducted and the client would be sent a statement about the same.

ii. Custodian / Depository Charges:

The charges relating to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization and other charges in connection with the operation and management of the depository accounts would be at actual on clients.

iii. Registrar and Transfer Agents' fees (RTA Fees):

Fees payable to the Registrar and Transfer Agents in connection with effecting transfer of any or all of the securities and bonds including stamp duty, cost of affidavits, notary charges, postage stamps and courier charges would be at actual on clients.

iv. Brokerage and Transaction cost:

Brokerage / or Transaction Cost on transactions would be levied at the prevailing rates charged by the brokers and / or any such other intermediary between 0.01% to 0.30% on transaction value (+) applicable GST (+) Transaction Charges (+) Stamp Duty (+) Securities Transaction Tax (+) Turnover Tax (+) any other levies thereon, as may be applicable from time to time.

8. Taxation

8.1 General

This summary on Indian tax matters contained herein is based on existing law as on the date of this memorandum. No assurance can be given that future legislation, administrative rulings or court decisions will not significantly modify the conclusions set forth in this summary, possibly with retroactive effect.

The following is a summary of certain relevant provisions of the Income-tax Act, 1961 ('ITA') as amended by the Finance Act, 2025 ('Finance Act') read along with Income-tax Rules, 1962, ('IT Rules') and various circulars and notifications issued thereunder from time to time.

The summary is based on laws, regulations, rulings and judicial decisions now in effect, and current administrative rules, practices and interpretations, all of which are subject to change, with possible retrospective effect.

Further, the statements with regard to benefits mentioned herein are expressions of views and not representations of Portfolio Manager to induce any client, prospective or existing, to invest in the portfolio management schemes of the Portfolio Manager. Implications of any judicial decisions/ double tax avoidance agreements etc. are not explained herein.

In view of the nature of tax consequences, each client is advised to consult their own tax advisor with respect to the specific tax consequences arising to them from participation in any of the investments.

It is the responsibility of all prospective clients to inform themselves as to any income tax or other tax consequences arising in the jurisdictions in which they are resident or domiciled or have any other presence for tax purposes, which are relevant to their particular circumstances in connection with the acquisition, holding or disposal of the securities.

The Portfolio Manager accepts no responsibility for any loss suffered by any Investor as a result of current taxation law and practice or any changes thereto.

8.2 Tax Deducted at Source ('TDS')

In the case of resident clients, the income arising by way of dividend, interest on securities, income from units of mutual fund, etc. from investments made in India are subject to the provisions of TDS. Residents without Permanent Account Number (PAN) are subjected to a higher rate of TDS.

In the case of non-residents, any income received or accrues or arises; or deemed to be received or accrue or arise to him in India is subject to the provisions of tax deduction at source under the IT Act. The authorized dealer is obliged and responsible to make sure that all such relevant compliances are made while making any payment or remittances from India to such non-residents. Also, 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. Non-residents without PAN or tax residency certificate (TRC) of the country of his residence are currently subjected to a higher rate of TDS.

The Finance Act, 2021 introduced a special provision to levy higher rate for TDS for the residents who are not filing income-tax return in time for previous two years and aggregate of TDS is INR 50,000 or more in each of these two previous years. This provision of higher TDS is not applicable to a non-resident who does not have a permanent establishment in India and to a resident who is not required to furnish the return of income.

With effect from July 1, 2021, a buyer whose sales, turnover or gross receipts from business exceeds INR 10 Crores during the immediately preceding financial year, shall be liable to deduct TDS at the rate of 0.1% on consideration paid to a resident seller in excess of INR 50 lakhs for sale of goods. TDS would need to be deposited with the Indian Government to the credit of the seller, basis which seller would get credit of such taxes deducted by buyer. It has been clarified that this provision would not be applicable where a buyer is liable to deduct TDS under any other provisions of the IT Act or if TCS provisions are applicable. Further, it is also clarified that in case TCS on goods applies (as discussed above) and there is conflict with this proposed TDS provision, then TDS provisions will apply instead of TCS provisions.

Similar to TCS provisions and consequent to the ambiguity caused by the TCS provisions, there is no clarity as to whether securities are intended to be covered as 'goods' and whether TDS shall apply in case of transaction in securities. Clarity is awaited from the Government on this aspect.

8.3 Long Term Capital Gain

Where investment under portfolio management services is treated as investment, the gain or loss from transfer of Securities shall be taxed as capital gains under section 45 of the IT Act.

Period of Holding

The details of period of holding for different capital assets for the purpose of determining long term or short-term capital gains are explained hereunder:

Securities	Position upto 22 July 2024 Period of Holding	Position on or after 23 July 2024 Period of Holding	Characterization
Listed Securities (other than unit) and unit of equity oriented mutual funds, unit of UTI, zero coupon bonds	More than twelve (12) months	More than twelve (12) months	Long-term capital asset
	Twelve (12) months or less	Twelve (12) months or less	Short-term capital asset
Unlisted shares of a company	More than twenty-four (24) months	More than twenty-four (24) months	Long-term capital asset
	Twenty-four (24) months or less	Twenty-four (24) months or less	Short-term capital asset
Other Securities (other than Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023; or unlisted bond or unlisted debenture)	More than Thirty-six (36) months	More than twenty-four (24) months	Long-term capital asset
	Thirty-six (36) months or less	Twenty-four (24) months or less	Short-term capital asset
Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023	Any period	Any period	Short-term capital asset

Unlisted bond or unlisted debenture	More than 36 months		Long-term capital asset
	36 months or less	Any period	Short-term capital asset

- **Definition of Specified Mutual Fund:**

Before 1st April 2025:

“Specified Mutual Fund” means a Mutual Fund by whatever name called, where not more than thirty-five per cent of its total proceeds is invested in the equity shares of domestic companies.

On and after 1st April 2025:

“Specified Mutual Fund” means, —

- a Mutual Fund by whatever name called, which invests more than sixty-five per cent. of its total proceeds in debt and money market instruments; or*
- a fund which invests sixty-five per cent. or more of its total proceeds in units of a fund referred to in sub-clause (a).*

- **Definition of debt and money market instruments:**

“debt and money market instruments” shall include any securities, by whatever name called, classified or regulated as debt and money market instruments by the Securities and Exchange Board of India.

- **Definition of Market Linked Debenture:**

“Market Linked Debenture” means a security by whatever name called, which has an underlying principal component in the form of a debt security and where the returns are linked to the market returns on other underlying securities or indices, and includes any security classified or regulated as a market linked debenture by SEBI.

- **For listed equity shares in a domestic company or units of equity-oriented fund or business trust:**

The Finance Act 2018 changed the method of taxation of long-term capital gains from transfer of listed equity shares and units of equity-oriented fund or business trust.

As per section 112A of the IT Act, long term capital gains exceeding INR 1 lakh arising on transfer of listed equity shares in a company or units of equity-oriented fund or units of a business trust is taxable at 10%, provided such transfer is chargeable to STT. This exemption limit has been increased from INR 1 lakh to INR 1.25 lakh and tax rate has been increased from 10% to 12.5% with effect from 23 July 2024. Further, to avail such concessional rate of tax, STT should also have been paid on acquisition of listed equity shares, unless the listed equity shares have been acquired through any of the notified modes not requiring to fulfil the pre-condition of chargeability to STT.

Long term capital gains arising on transaction undertaken on a recognized stock exchange located in any International Financial Services Centre and consideration is paid or payable in foreign currency, where STT is not chargeable, is also taxed at a rate of 10%. This benefit is available to all assesseees. This tax rate is increased from 10% to 12.5%.

The long-term capital gains arising from the transfer of such Securities shall be calculated without indexation. In computing long term capital gains, the cost of acquisition (COA) is an item of deduction from the sale consideration of the shares. To provide relief on gains already accrued upto 31 January 2018, a mechanism has been provided to "step up" the COA of Securities. Under this mechanism, COA is substituted with FMV, where sale consideration is higher than the FMV. Where sale value is higher than the COA but not higher than the FMV, the sale value is deemed as the COA.

Specifically in case of long term capital gains arising on sale of shares or units acquired originally as unlisted shares/units up to 31 January 2018, COA is substituted with the "indexed COA" (instead of FMV) where sale consideration is higher than the indexed COA. Where sale value is higher than the COA but not higher than the indexed COA, the sale value is deemed as the COA. This benefit is available only in the case where the shares or units, not listed on a recognised stock exchange as on the 31 January 2018, or which became the property of the assessee in consideration of share which is not listed on such exchange as on the 31 January 2018 by way of transaction not regarded as transfer under section 47 (e.g. amalgamation, demerger), but listed on such exchange subsequent to the date of 17 transfer, where such transfer is in respect of sale of unlisted equity shares under an offer for sale to the public included in an initial public offer.

The CBDT has clarified that 10% withholding tax will be applicable only on dividend income distributed by mutual funds and not on gain arising out of redemption of units.

No deduction under Chapter VI-A or rebate under Section 87A will be allowed from the above long term capital gains.

- **For other capital assets (securities and units) in the hands of resident of India**

Long-term capital gains in respect of capital asset (all securities and units other than listed shares and units of equity oriented mutual funds and business trust) is chargeable to tax at the rate of 20% plus applicable surcharge and education cess, as applicable. The capital gains are computed after taking into account cost of acquisition as adjusted by cost inflation index notified by the Central Government and expenditure incurred wholly and exclusively in connection with such transfer. This tax rate is reduced from 20% to 12.5%; but no indexation benefit will be available with effect from 23 July 2024.

As per Finance Act, 2017, the base year for indexation purpose has been shifted from 1981 to 2001 to calculate the cost of acquisition or to take Fair Market Value of the asset as on that date. Further, it provides that cost of acquisition of an asset acquired before 1 April 2001 shall be allowed to be taken as Fair Market Value as on 1 April 2001.

- **For capital assets in the hands of Foreign Portfolio Investors (FPIs)**

As per section 2(14) of the IT Act, any investment in securities made by FPIs in accordance with the regulations made under the Securities and Exchange Board of India is treated as a capital asset. Consequently, any income arising from transfer of securities by FPIs are to be treated as capital gains.

Long term capital gains, arising on sale of debt Securities, debt-oriented units (other than units purchased in foreign currency and capital gains arising from transfer of such units by offshore funds referred to in section 115AB) are taxable at the rate of 10% under Section 115AD of the IT Act. This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024. Such gains would be calculated without considering benefit of (i) indexation for the COA and (ii) determination for capital gain/loss in foreign currency and reversion of such gain/loss into the Indian currency.

Long term capital gains, arising on sale of listed shares in the company or units of equity-oriented funds or units of business trust and subject to conditions relating to payment of STT, are taxable at 10%. This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

Under section 115AD of the IT Act, interest and dividend income earned by FPIs should be taxable at 20%. However, interest referred to in section 194LD of the IT Act should be taxable at 5% subject to fulfillment of conditions.

As per section 196D of the IT Act, no deduction of tax shall be made from any income by way of capital gains arising from the transfer of securities referred to in section 115AD which is payable to an FPI. However, tax shall be deducted under section 196D of the IT Act with respect to interest income (other than referred to in section 115AD of the IT Act) and dividend at the rate of 20%.

- **For other capital asset in the hands of non-resident Indians**

Under section 115E of the IT Act, any income from investment or income from long-term capital gains of an asset other than specified asset as defined in Section 115C (specified assets include shares of Indian company, debentures and deposits in an Indian company which is not a private company and Securities issued by Central Government or such other Securities as notified by Central Government) is chargeable at the rate of 20%. Income by way long-term capital gains of the specified asset is, however, chargeable at the rate of 10% plus applicable surcharge and cess (without benefit of indexation and foreign currency fluctuation). This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

8.4 Short Term Capital Gain

Section 111A of the IT Act provides that short-term capital gains arising on sale of listed equity shares of a company or units of equity-oriented fund or units of a business trust are chargeable to income tax at a concessional rate of 15% plus applicable surcharge and cess, provided such transactions are entered on a recognized stock exchange and are chargeable to Securities Transaction Tax (STT). This tax rate has been increased from 15% to 20% with effect from 23 July 2024. However, the above shall not be applicable to transaction undertaken on a recognized stock exchange located in any International Financial Services Centre and where the consideration for such transaction is paid or payable in foreign currency. Further, Section 48 provides that no deduction shall be allowed in respect of STT paid for the purpose of computing Capital Gains.

Short term capital gains in respect of other capital assets (other than listed equity shares of a company or units of equity-oriented fund or units of a business trust) are chargeable to tax as per the relevant slab rates or fixed rate, as the case may be.

The Specified Mutual Funds or Market Linked Debentures acquired on or after 1 April 2023 will be treated as short term capital asset irrespective of period of holding as per Section 50AA of the IT Act. The unlisted bonds and unlisted debentures have been brought within the ambit of Section 50AA of the IT Act with effect from 23 July 2024.

Key tax rates are summarised as under:

Taxability of capital gains under the IT Act (without considering the benefits under the tax treaties for non-resident investors) should be as follows:

	Particulars	Resident investors	Non-resident investors	FPI
		Tax rate (%) excluding applicable surcharge and health and education cess		
	Short-term capital gains on transfer of listed equity shares and units of an equity oriented mutual fund on which securities transaction tax (STT) has been Paid	Upto 22 Jul 2024 - 15%/ 20% w.e.f. 23 July 2024	Upto 22 Jul 2024- 15%/ 20% w.e.f. 23 Jul 2024	Upto 22 Jul 2024 - 15%/ 20% w.e.f. 23 July 2024
	Any other short-term capital gains	30% [Note 1]	30% (in case of firms/ LLP/ foreign non-corporates)/ 35% (in case of foreign company)	30%
	Long-term capital gains on transfer of: (i) listed equity shares on which STT has been paid both at the time of acquisition and sale of such shares; and (ii) units of equity oriented mutual fund on which STT has been paid on transfer [Note 2]	Upto 22 Jul 2024 - 10% [on income in excess of INR1 lakh] w.e.f. 23 Jul 2024 – 12.5% [on income in excess of INR 1.25 lakh] [Note 3]	Upto 22 Jul 2024 - 10% [on income in excess of INR 1 lakh] w.e.f. 23 Jul 2024 – 12.5% [on income in excess of INR1.25 lakh] [Note 3]	Upto 22 Jul 2024 - 10% [on income in excess of INR 1lakh] w.e.f. 23 Jul 2024 – 12.5% [on income in excess of INR1.25 lakh] [Note 3]
	Long term capital gains on sale of listed bonds or listed debentures	Upto 22 Jul 2024 - 10% (without indexation) [Note 4] W.E.F. 23 Jul 2024 – 12.5% (Indexation not allowed)	Upto 22 Jul 2024 - 10% (without indexation) [Note 4] W.E.F. 23 Jul 2024 – 12.5% (Indexation not allowed)	Upto 22 Jul 2024 - 10% (without indexation) [Note 3] W.E.F. 23 Jul 2024 – 12.5% (Indexation notallowed)
	Long-term capital gains on transfer of unlisted bonds or unlisted debentures	Upto 22 Jul 2024 - 20% (without indexation)	Upto 22 Jul 2024 - 10% [Note 3 and 4]	Upto 22 Jul 2024 - 10% [Note 3]

		W.E.F. 23 Jul 2024 – Considered as short-term capital asset	W.E.F. 23 Jul 2024 – Considered as short-term capital asset	W.E.F. 23 Jul 2024 – Considered as short-term capital asset)
	Long-term capital gains on transfer of unlisted securities (other than unlisted bonds and unlisted debentures) [Note 5]	Upto 22 Jul 2024 - 20% (with indexation) W.E.F. 23 Jul 2024 – 12.5% (Indexation not allowed)	Upto 22 Jul 2024 - 10% [Note 3 and 4] W.E.F. 23 Jul 2024 – 12.5% (Indexation not allowed)	Upto 22 Jul 2024 - 10% [Note 3] W.E.F. 23 Jul 2024 – 12.5% (Indexation not allowed)

Note 1: Assuming the highest slab rates for individual investors.

In the case of domestic companies having total turnover or gross receipts not exceeding INR 400 crores in the FY 2021-22 (AY 2022-23), the tax rate would be 25% (plus surcharge and health and education cess).

Also, as per the Taxation Laws (Amendment) Act, 2019, domestic companies have the option to pay tax on total income at the rate of 15% or 22% (plus applicable surcharge and health and Education cess).

The Finance Act 2020 has inserted a new section 115BAC in the IT Act. As per the said section, resident Individual and HUF will have an option to pay tax on its total income at the reduced tax rates (New Tax Regime). The income would, however, have to be computed without claiming prescribed deductions or exemptions.

Note 2: The cost of acquisition of equity shares or units of an equity oriented mutual funds acquired before 1 February 2018, shall be higher of:

- the actual cost of acquisition; and
- Lower of:
 - i. Fair market value as on 31 January 2018, determined in the prescribed manner; and
 - ii. Value of consideration received or accruing upon transfer.

The CBDT issued a notification dated 1 October 2018, wherein the list of transactions has been specified in respect of which the provision of sub-clause (a) of clause (iii) of sub-section (1) of section 112A of the IT Act shall not apply i.e. payment of STT on acquisition of equity shares.

Note 3: Without considering indexation and foreign exchange fluctuation benefit.

Note 4: IT Authorities may disregard the said position and apply a tax rate of 20%.

Note 5: As per section 50CA of the IT Act, where the consideration received or accruing on account of transfer of unlisted shares is less than the fair market value of such share, determined in the prescribed manner, the fair value as determined should be deemed to be the full value of consideration for the purpose of computing capital gains.

8.5 Tax Collected at Source

Under the provisions of the IT Act, with effect from October 1, 2020, a seller whose sales, turnover or gross receipts from business exceeds INR 10 Crores during the immediately preceding financial year, shall be liable to collect TCS at the rate of 0.1% on consideration received from a buyer in excess of INR 50 lakhs for sale of goods. TCS would need to be collected by the seller from buyer (over and above the sale consideration) and be deposited with the Indian Government to the credit of the buyer, basis which buyer would get credit of such taxes collected by the seller. It has been clarified that TCS provisions would not be applicable where a buyer is liable to deduct tax at source on the transaction and has deducted such tax at source on transaction.

Indian Revenue authorities have clarified vide Circular no. 17 dated September 29, 2020 that TCS would not be applicable on transactions in securities undertaken on a recognized stock exchange. This has led to an ambiguity on whether securities are intended to be covered within the meaning of the term “goods” and hence, whether TCS provisions could apply to transactions in securities other than those sold on a recognized stock exchange. Clarity is awaited from the Government on this aspect. Also, exemption has been provided from applicability of TCS provisions in case of export of goods out of India or import of goods into India; however, it is unclear how such exemptions will be applied for transactions in securities.

8.6 Deemed income on investment in shares / securities

In terms of section 56(2)(x) of the IT Act, if shares / securities are received for less than the fair market value of the shares / securities (computed as per prescribed rules), the difference between the price paid and fair value thereof shall be deemed as ordinary income of the recipient.

Separately, if shares other than “quoted shares” are transferred for less than the fair value of the shares (computed as per prescribed rules), the fair value of such unquoted shares shall be deemed to be the sale consideration for the seller, for computing its capital gains for Indian tax purposes. “Quoted share” is defined as “the share quoted on any recognised stock exchange with regularity from time to time, where the quotation of such share is based on current transaction made in the ordinary course of business.”

8.7 Profit and gains of Business and Profession

If the Securities under the portfolio management services are regarded as business/trading asset, then any gain/loss arising from sale of such Securities would be taxed under the head “Profits and Gains of Business or Profession” under section 28 of the IT Act. The gain/ loss is to be computed under the head “Profits and Gains of Business or Profession” after allowing normal business expenses (inclusive of the expenses incurred on transfer) according to the provisions of the IT Act.

Gains arising from the transfer of securities held in the investee company or portfolio company may be treated either as ‘Capital Gains’ or as ‘Business Income’ for tax purposes, depending upon whether such securities were held as a capital asset or a trading asset (i.e., stock-in-trade). Traditionally, the issue of characterization of gains (whether taxable as Business Income or Capital Gains) has been a subject matter of litigation with the tax authorities. There have been judicial pronouncements on whether gains on transfer of securities should be taxed as ‘Business Income’ or as ‘Capital Gains’. However, these pronouncements, while laying down certain guiding principles have largely been driven by the facts and circumstances of each case. Also, the Central Board of Direct Taxes (‘CBDT’) has provided guidance, vide its Instruction: No. 1827, dated 31 August 1989 (‘CBDT Instructions’) and Circular No. 4/2007, dated 15 June 2007 (‘CBDT Circular 2007’), in respect of characterization of gains as either Capital Gains or Business Income.

Following are the key illustrative factors indicative of Capital Gains characterization (not Business Income): -

- i. Intention at the time of acquisition - capital appreciation;
- ii. Low transaction frequency;

- iii. Long period of holding;
- iv. Shown as investments in books of accounts (not stock in trade);
- v. Use of owned funds (as opposed to loan) for acquisition; and
- vi. Main object in constitution document is to make investments.

Further, the CBDT had issued a circular no. 6/2016 dated 29 February 2016 ('CBDT Circular 2016'), clarifying the issue of taxability of gains arising on sale of listed shares and securities. The CBDT Circular 2016, laid down guiding principles to characterise the gains from sale of listed shares and securities, either as Business Income or Capital Gains. It had clarified that the Income-tax officer would not dispute any income arising from transfer of listed shares and securities held for more than 12 (twelve) months, if the same was treated as, and offered to tax under, the head 'Capital Gains', subject to genuineness of the transaction being established. However, the CBDT Circular 2016 did not deal with the treatment of Capital Gains arising on transfer of unlisted shares.

To avoid disputes/ litigation and to have a consistent view in assessments, the CBDT had issued an instruction on 2 May 2016, to the tax department, on determining the tax treatment of income arising from transfer of unlisted shares, providing that the income from transfer of unlisted shares would be treated as 'Capital Gains' irrespective of period of holding. However, the CBDT has carved out the following 3 (three) exceptions for the tax department to take an appropriate view, if:

- i. The genuineness of transactions in unlisted shares itself is questionable;
- ii. The transfer of unlisted shares is related to an issue pertaining to lifting of corporate veil; or
- iii. The transfer of unlisted shares is made along with the control and management of underlying business.

If the gains are characterised as business income, then the same should be taxable on net income basis at the rate of 30% for resident investors. The Finance Act has reduced the tax rate to 25% in case of domestic companies having a total turnover or gross receipts not exceeding 400 crores in the FY 2021-22 (AY 2022-23). Kindly note, we have assumed highest rate for resident individual investors Also, as per the Taxations Laws (Amendment) Act, 2019, domestic companies have the option to pay tax on total income at the rate of 15% or 22%.

If the gains are characterised as business income, then the same should be taxable on net income basis at 35% for foreign company if it has a business connection/ permanent establishment in India, and such income is attributable to the business connection/ permanent establishment of the non- resident in India. Further, for non-resident investors (other than a foreign company) a tax rate of 30% should be levied.

Interest income arising on Securities could be characterized as 'Income from other sources' or 'business income' depending on facts of the case. Any expenses incurred to earn such interest income should be available as deduction, subject to the provisions of the IT Act

8.8 Losses Under the head capital gain/ business income

In terms of section 70 read with section 74 of the IT Act, short term capital loss arising during a year can be set-off against short term as well as long term capital gains. Balance loss, if any, shall be carried forward and set-off against any capital gains arising during the subsequent 8 assessment years. A long-term capital loss arising during a year is allowed to be set-off only against long term capital gains. Balance loss, if any, shall be carried forward and set-off against long term capital gains arising during the subsequent 8 assessment years.

Business loss is allowed to be carried forward for 8 assessment years and the same can be set off against any business income.

8.9 General Anti Avoidance Rules (GAAR)

GAAR may be invoked by the Indian income-tax authorities in case arrangements are found to be impermissible avoidance arrangements. A transaction can be declared as an impermissible avoidance arrangement, if the main purpose of the arrangement is to obtain a tax benefit and which satisfies one of the 4 (four) below mentioned tainted elements:

- The arrangement creates rights or obligations which are ordinarily not created between parties dealing at arm's length;
- It results in directly / indirectly misuse or abuse of the IT Act;
- It lacks commercial substance or is deemed to lack commercial substance in whole or in part; or
- It is entered into, or carried out, by means, or in a manner, which is not normally employed for bona fide purposes.

In such cases, the tax authorities are empowered to reallocate the income from such arrangement, or recharacterize or disregard the arrangement. Some of the illustrative powers are:

- Disregarding or combining or recharacterising any step in, or a part or whole of the arrangement;
- Ignoring the arrangement for the purpose of taxation law;
- Relocating place of residence of a party, or location of a transaction or situation of an asset to a place other than provided in the arrangement;
- Looking through the arrangement by disregarding any corporate structure; or
- Re characterizing equity into debt, capital into revenue, etc.

The GAAR provisions would override the provisions of a treaty in cases where GAAR is invoked. In other words, Where GAAR is invoked, the taxpayer may also be denied the benefits otherwise available under the relevant tax treaty.

The necessary procedures for application of GAAR and conditions under which it should not apply, have been enumerated in Rules 10U to 10UC of the Income-tax Rules, 1962. The Income-tax Rules, 1962 provide that GAAR should not be invoked unless the tax benefit in the relevant year does not exceed INR 3 crores.

On 27 January 2017, the CBDT has issued clarifications on implementation of GAAR provisions in response to various queries received from the stakeholders and industry associations. Some of the important clarifications issued are as under:

- Where tax avoidance is sufficiently addressed by the Limitation of Benefit Clause (LOB) in a tax treaty, GAAR should not be invoked.
- GAAR should not be invoked merely on the ground that the entity is located in a tax efficient jurisdiction.
- GAAR is with respect to an arrangement or part of the arrangement and limit of INR 3 crores cannot be read in respect of a single taxpayer only.

8.10 FATCA Guidelines

According to the Inter-Governmental Agreement read with the Foreign Account Tax Compliance Act (FATCA) provisions and the Common Reporting Standards (CRS), foreign financial institutions in India are required to report tax information about US account holders and other account holders to the Indian Government. The Indian Government has enacted rules relating to FATCA and CRS reporting in India. A statement is required to be provided

online in Form 61B for every calendar year by 31 May. The reporting financial institution is expected to maintain and report the following information with respect to each reportable account:

- (a) the name, address, taxpayer identification number and date and place of birth;
- (b) where an entity has one or more controlling persons that are reportable persons:
 - (i) the name and address of the entity, TIN assigned to the entity by the country of its residence; and
 - (ii) the name, address, date of birth, place of birth of each such controlling person and TIN assigned to such controlling person by the country of his residence.
- (c) account number (or functional equivalent in the absence of an account number);
- (d) account balance or value (including, in the case of a cash value insurance contract or annuity contract, the cash value or surrender value) at the end of the relevant calendar year; and
- (e) the total gross amount paid or credited to the account holder with respect to the account during the relevant calendar year.

Further, it also provides for specific guidelines for conducting due diligence of reportable accounts, viz. US reportable accounts and other reportable accounts (i.e. under CRS).

8.11 Other Key Provisions

8.11.1 Tax Rules

The tax rates stated in this tax chapter are exclusive of surcharge and health and education cess (unless stated otherwise). The tax rates are applicable for the financial year 2025-26 (Assessment year 2026-27).

Health and Education Cess are applicable at the rate of 4% on the amount of income-tax plus surcharge payable, irrespective of the amount of income earned.

Note that IT Act provides for two tax regimes viz. old tax regime and new tax regime. The rate of surcharge and health and education cess under Old Tax Regime are mentioned as under:

i. Surcharge rates are provided below:

Type of Investor	Surcharge rate as a % of income-tax (refer notes below)				
	If income is up to INR 50 lakhs	If income exceeds INR 50 lakhs but up to INR 1 Crore	If income exceeds INR 1 Crore but up to INR 2 Crores	If income exceeds INR 2 Crores but up to INR 5 Crores	If income exceeds INR 5 Crores
Individual, HUF, AOP, BOI (Resident and non-resident)	Nil	10%	15%	25%	37%

Note 1: In case where the total income includes any income referred to in Section 111A, Section 112, Section 112A, Section 115AD of the IT Act, and dividend income, surcharge on such incomes shall not exceed 15%.

Note 2: As per changes in Finance (No.2) Bill 2024, in case of AOP having only corporate members, the rate of surcharge is restricted to 15% of such Income-tax, where the total income exceeds one crore rupees.

Note 3: In case where the total income of foreign portfolio investor ('FPI') includes any short- term capital gains, long-term capital gains and dividend, surcharge on such income shall not exceed 15%.

Type of Investor	Surcharge rate as a % of income-tax (refer notes below)		
	If income does not exceed 1 crore	If income exceeds INR 1 crore but up to INR 10 crores	If income exceeds INR 10 crores
Partnership firm	Nil	12%	12%
Domestic Company	Nil	7%	12%
Foreign Company, including FPIs	Nil	2%	5%

Note 1: As per the Taxation Laws (Amendment) Act, 2019, the applicable surcharge rate on income chargeable to tax under sections 115BAA or 115BAB of the IT Act shall be 10% irrespective of the income threshold.

In this tax chapter, slab rates under Old Tax Regime which are applicable for individuals / HUF / AOP / BOI are as follows:

Alternate 1:

Total Income	Tax rates (refer notes below)
Up to INR 2,50,000	Nil
From INR 2,50,001 to INR 5,00,000	5%
From INR 5,00,001 to INR 10,00,000	20%
INR 10,00,001 and above	30%

Note 1: The Central Government vide the Finance (No. 2) Act, 2019, has provided for a rebate on tax on total income of up to INR 5,00,000 for individual assessee.

Note 2: In the case of a resident individual of the age of 60 years or more but less than 80 years, the basic exemption limit is INR 3,00,000.

Note 3: In the case of a resident individual of the age of 80 years or more, the basic exemption limit is INR 5,00,000.

Alternate 2:

The Finance Act, 2023 has made the New Tax Regime u/s 115BAC as "Default Regime". The slab rate under new tax regime for individual, HUF, AOP are as under:

Total Income	Tax Rates
Upto Rs. 4,00,000/-	Nil

Rs. 4,00,001/- to Rs. 8,00,000/-	5%
Rs. 8,00,001/- to Rs. 12,00,000/-	10%
Rs. 12,00,001/- to Rs. 16,00,000/-	15%
Rs. 16,00,001/- to Rs. 20,00,000/-	20%
Rs. 20,00,001/- to Rs. 24,00,000/-	25%
Above Rs. 24,00,000/-	30%

Note 1: The Central Government vide the Finance Act, 2023, has provided for a rebate on tax on total income of up to INR 12,00,000 and allow marginal relief if the total income marginally exceeds INR 12,00,000 - for individual assesseees. The rebate is not applicable on incomes taxed at specific rates.

Note 2: The option to pay tax at lower rates shall be available only if total income of assessee is computed without claiming specified exemptions / deductions specified under the IT Act.

Surcharges in applicable at the rate for A.Y 2025-26 (For Taxation under New Tax Regime)

Income Slab	Surcharge Rates	
	Individual	
Total Income	Income Taxable u/s 111A, 112, 112A & Dividend	Other Income
Upto Rs. 50 Lakhs	Nil	Nil
Total Income > 50 Lakhs <= 1 Crore	10%	10%
Total Income > 1 Crore <= 2 Crore	15%	15%
Total Income > 2 Crores	15%	25%

8.11.2 Advance Tax Payment

It will be the responsibility of the investors to meet the advance tax obligation payable on a quarterly basis as prescribed under the IT Act

8.11.3 It is envisaged that the investor, including FPIs, could also earn the following streams of income from investments made in the portfolio investments:

- Dividend income;
- Interest income; and
- Gains on buy-back of shares.

The tax implications of each stream of income are provided below:

8.11.3.1 Dividend Income on shares

The Indian Company declaring dividend on or after 1 April 2020, would not be required to pay any Dividend Distribution Tax (DDT) on dividend distributed/ paid/ declared to its shareholders. The dividend income shall be taxable in the hands of the shareholders at the applicable rates. Further, the taxpayer can claim a deduction of interest expenditure under section 57 of the IT Act against such dividend income up to 20% of the dividend income.

Section 80M is introduced by the Finance Act. As per Section 80M, in case any Indian company receives dividend from another Indian company or foreign company or business trust and the dividend is distributed by the first mentioned Indian company before the specific due date (i.e. one month prior to the date of filing tax return under section 139 of the IT Act), then deduction can be claimed by such Indian company of so much of dividend received from such another Indian company or foreign company or business trust.

The Indian Company declaring dividend of Rs. 5,000 or above would be required to deduct tax at 10% in case of payment to resident investors and at rates in force i.e. 20% (no threshold) in case of payment to non-resident investors. In case, the dividend income is paid to FPIs, the rate of tax deduction at source as per section 196D of the IT Act is 20%.

As per the amended provisions, the dividend income (net of deductions, if any) shall be taxable at the following rates:

Resident investors

Dividend income earned by	Tax rate for domestic investors
Resident companies (Refer Note 1 and 2)	30%
Firms / Limited Liability Partnerships (LLPs)	30%
Others (Refer Note 3)	As per applicable slab rates, maximum being 30%

Note 1: In the case of domestic companies having total turnover or gross receipts not exceeding INR 400 crores in the Financial Year 2021-22 (Assessment Year 2022-23) the tax rate is 25%.

Note 2: As per the Taxation Laws (Amendment) Act, 2019, the tax rates for resident companies exercising the option under section 115BAA and section 115BAB of the IT Act shall be 22% and 15% respectively (plus applicable surcharge and health and education cess), subject to the fulfilment of conditions prescribed in the said sections.

Note 3: The Finance Act 2020 has inserted a new section 115BAC in the IT Act. As per the said section, resident Individual and HUF will have an option to pay tax on their total income at the reduced tax rates (New Tax Regime). The income would, however, have to be computed without claiming prescribed deductions or exemptions.

Non-resident investors

Dividend income (net of deductions, if any) shall be taxable in the hands of the non-resident investors at the rate of 20% under the IT Act. As per the provisions of the IT Act, in case of taxability of a non-resident who is a tax resident of a country with which India has a Double Taxation Avoidance Agreement ('Tax Treaty') for granting relief of tax, the provisions of the IT Act, shall apply to the extent they are more beneficial.

Taxation of dividend income in the hands of FPI has been discussed separately.

8.11.1.2 Interest Income on Debt Securities

Resident investors

Interest income earned by	Tax rate for domestic investors
Resident companies (Refer Note 1 and 2)	30%
Firms / LLPs	30%

Others (Refer Note 3)	As per applicable slab rates, maximum being 30%
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Note 1: In case of domestic companies having total turnover or gross receipts not exceeding INR 400 crores in the Financial Year 2021-22 (Assessment Year 2022-23) the tax rate is 25%.

Note 2: As per the Taxation Laws (Amendment) Act, 2019, the tax rates for resident companies exercising the option under section 115BAA and section 115BAB of the IT Act shall be 22% and 15% respectively, subject to the fulfillment of conditions prescribed in the said sections.

Note 3: The Finance Act has inserted a new section 115BAC in the IT Act. As per the said section, resident Individual and HUF will have an option to pay tax on their total income at the reduced tax rates (New Tax Regime). The income would, however, have to be computed without claiming prescribed deductions or exemptions.

Non-resident investors

As per the provisions of the IT Act, in case of taxability of non-resident who is a tax resident of a country with which India has a Tax Treaty for granting relief of tax, the provisions of the IT Act shall apply to the extent they are more beneficial.

The interest income earned by the non-resident investors (being corporate entity / non- corporate entity) shall be generally (unless certain conditions are satisfied) taxable at the rate of 30%/ 35% under the provisions of the IT Act.

Taxation of interest income in the hands of FPI has been discussed separately.

8.11.1.3 Proceeds on Buy Back of Shares by Domestic Company

Upto 30 September 2024, gains arising on buy back of shares (listed and unlisted) shall be exempt in the hands of investors. However, a distribution tax at the rate of 20% (plus applicable surcharge of 12% and health and education cess of 4%) shall be payable by the Indian company on distribution of income by way of buyback of its shares if the buy- back is in accordance with the provisions of any law for the time being in force relating to companies. Such distribution tax shall be payable on the difference between consideration paid by such Indian company for purchase of its own shares and the amount that was received by the Indian company at the time of issue of such shares. With effect from 1 October 2024, any distributions received by the Fund pursuant to buyback of shares will be taxable as dividend under section 2(22)(f) and the value of consideration received by fund shall be deemed to be NIL for the purpose of capital gain working.

8.11.1.4 Other Tax Consideration

a. Non-resident investors (including FPI):

A non-resident investor would be subject to taxation in India only if;

- it is regarded a tax resident of India; or
- being a non-resident in India, it derives (a) Indian-sourced income; or (b) if any income is received/ deemed to be received in India; or (c) if any income has accrued / deemed to have accrued in India in terms of the provisions of the IT Act.

As per Section 6 of the IT Act, a foreign company will be treated as a tax resident in India if its place of effective management ('POEM') is in India in that year. POEM has been defined to mean a place where key

management and commercial decisions that are necessary for the conduct of the business of an entity are, in substance made. In case, the foreign company has a POEM in India, it would qualify as resident of India for tax purposes and consequently, its worldwide income would be taxable in India.

b. Tax Treaty Benefits for Non-Resident investors

As per Section 90(2) of the IT Act, the provisions of the IT Act, would apply to the extent they are more beneficial than the provisions of the Tax Treaty between India and the country of residence of the non-resident investor (subject to General Anti Avoidance Rules provisions discussed below and to the extent of availability of Tax Treaty benefits to the non-resident investors).

Section 90(1) provides that the Central Government may enter into a Tax Treaty for granting relief in respect of income tax, without creating opportunities for non- taxation or reduced taxation through tax evasion or avoidance (including through treaty shopping arrangements aimed at obtaining reliefs provided in the said agreement for the indirect benefit of residents of any other country or territory).

Having said the above, it may be noted that no assurance can be provided that the Tax Treaty benefits will be available to the non-resident investors or the terms of the Tax Treaty will not be subject to amendment or reinterpretation in the future.

In order to claim Tax Treaty benefits, the non-resident investor has to furnish the Tax Residency Certificate ('TRC') issued by the foreign tax authorities. Further, the non- resident investor shall be required to furnish such other information or document as may be prescribed. In this connection, the CBDT vide its notification dated 1 August 2013 has prescribed certain information in Form No. 10F to be produced alongwith the TRC, if the same does not form part of the TRC.

The tax authorities may grant Tax Treaty benefit (after verifying the TRC) based on the facts of each case. This chapter does not discuss the tax implications applicable to the non-residents under a beneficial Tax Treaty, which would need to be analysed separately on the specific facts.

The taxability of such income of the non-resident investors, in the absence of Tax Treaty benefits or from a country with which India has no Tax Treaty, would be as per the provisions of the IT Act.

c. STT: STT is applicable on various transactions as follows:

Sr. No.	Taxable Securities Transaction	STT Rates w.e.f. 01-10-2024	STT Rates upto 30-09-2024	Payable by
1	Purchase of an equity share in a company or a unit of a business trust, where transaction is entered into in a recognized stock exchange and such contract is settled by the actual delivery or transfer of such share or unit.	0.10 %	0.10 %	Purchaser- on the value of taxable securities transaction based on the volume weighted average price.

	Purchase of a unit of an equity-oriented fund, where such contract is settled by the actual delivery or transfer of such share or unit.	NIL	NIL	NA
2	Sale of an equity share in a company or a unit of a business trust, where transaction is entered into in a recognized stock exchange and such contract is settled by the actual delivery or transfer of such share or unit	0.10 %	0.10 %	Seller - on the value of taxable securities transaction based on the volume weighted average price.
	Sale of a unit of an equity-oriented fund, where transaction is entered into in a recognized stock exchange and such contract is settled by the actual delivery or transfer of such share or unit	0.001 %	0.001 %	Seller - on the value of taxable securities transaction based on the volume weighted average price.
3	Sale of an equity share in a company or a unit of an equity-oriented fund or a unit of a business trust, where transaction is entered into in a recognized stock exchange and such contract is settled otherwise than by the actual delivery or transfer of such share or unit.	0.025 %	0.025 %	Seller - on the value of taxable securities transaction based on the volume weighted average price.
4a	Sale of an option in securities	0.1 %	0.0625 %	Seller - on the option premium.
4b	Sale of an option in securities, where option is exercised	0.125 %	0.125 %	Purchaser - On Intrinsic value w.e.f. 01.09.2019
4c	Sale of a futures in securities	0.02 %	0.0125 %	Seller - on the price at which such futures is traded.

Further, as per SEBI guidelines, FII's are required to settle the transactions by delivery only and therefore Sr. No. 3 of the above table is not applicable in case of FIIs.

d. Transfer of unquoted shares at less than fair market value

As per Section 50CA of IT Act, if there is a transfer of unquoted shares of a company at a value lesser than the fair market value, then the fair market value should be deemed to be the full value of sale consideration for computing the capital gains for such unquoted shares. The CBDT has notified rules for computation of FMV for the purpose of section 50CA of the IT Act.

As per the Finance (No. 2) Act, 2019, the provision of section 50CA shall not apply to any consideration received/ accruing on transfer by certain class of persons and subject to fulfillment of conditions, as may be prescribed.

e. Minimum Alternate Tax

The Taxation Laws (Amendment) Act, 2019 has reduced the base rate of MAT from 18.5% to 15% (plus applicable surcharge and cess), which shall be applicable w.e.f. 1 April 2020 i.e. financial year 2019- 2020.

As per the IT Act, if the income-tax payable on total income by any company is less than 15% (excluding applicable surcharge and health and education cess) of its book profits, the company will be required to pay MAT which will be deemed to be 15% of such book profits (excluding applicable surcharge and health and education cess). Further, MAT provisions shall not be applicable to a foreign company if such company is a resident of a country or a specified territory with which India has a Tax Treaty and the company does not have a permanent establishment in India. Also, MAT provisions are not applicable if the company is a resident of a country or a specified territory with which India does not have a Tax Treaty, but the company is not required to seek registration under any law in relation to companies.

Further, the MAT credit is allowed to be carried forward up to 15 assessment years. The Finance Act, 2017, has introduced the framework for computation of book profit for Ind AS compliant companies in the year of adoption and thereafter. In case where the domestic company opts to be taxed as per the rates and manner prescribed under Section 115BAA and 115BAB of the IT Act, then MAT provisions shall not be applicable to such domestic companies. Also, MAT credit (if any) shall not be allowed to be carried forward once the company exercises the option to avail reduced tax rates as mentioned above.

f. Alternate Minimum Tax

As per the IT Act, if the income-tax payable on total income by any person other than a company is less than the alternate minimum tax, the adjusted total income shall be deemed to be the total income of that person and he shall be liable to pay income- tax on such total income at the rate of 18.5% (excluding applicable surcharge and health and education cess). Such provisions are not applicable if the adjusted total income does not exceed INR 20 lakhs.

Further, as per Finance Act, the above provisions are not applicable in case of a person who exercises the option referred to in section 115BAC or section 115BAD of the IT Act.

g. Bonus stripping

Where any person buys or acquires any securities; or units of a mutual fund or the Unit Trust of India or business trust or Alternate Investment Fund within a period of three months prior to the record date (i.e., the date that may be fixed by a company or a Mutual Fund or the Administrator of the specified undertaking or the business trust or Alternate Investment Fund or the specified company, for the purposes of entitlement of the holder of the securities or units to receive additional security or unit, as the case may be, without any consideration) and such person is allotted additional securities or units (without any payment) on the basis of holding of the aforesaid securities or units on the record date, and if such person sells or transfers all or any of the original securities or units within a period of nine months after the record date while continuing to hold all or any of the additional securities or units, then any loss arising to him on account of such purchase and sale of all or any of the securities or units would be ignored for the purpose of computing his income chargeable to tax. Further, the loss so ignored would be deemed to be the cost of acquisition of such additional securities or units as are held by him on the date of sale or transfer of original securities or units.

h. Carry-forward of losses and other provisions (applicable irrespective of the residential status)

In terms of section 70 read with section 74 of the IT Act, short term capital loss arising during a year can be set-off against short term as well as long term capital gains. A long-term capital loss arising during a year is allowed to be set-off only against long term capital gains. Balance loss, if any, shall be carried forward for set-off against capital gains during the subsequent 8 assessment years.

i. Goods and Services Tax

Goods and Services Tax (GST) will be applicable on services provided by the Portfolio Manager to its Clients. The current GST rate of 18% would be levied on fees if any, payable towards portfolio management fee.

There can be no guarantee that the above position or our interpretation thereof regarding taxation or other laws or regulations would be necessarily true, correct and accepted by the Indian tax or other regulatory authorities under the income tax act or other acts as applicable. No representation is made either by the portfolio manager, its group company or any employee, director or agent of the portfolio manager in regard to the acceptability or applicability or otherwise of the above stated position regarding taxation or other laws by the Indian tax or other authorities under the said acts. Investors are urged to consult their own other tax advisers in this regard for confirming their position. The portfolio manager or any other related person shall not be held liable for any errors/omissions in the above regulatory section.

9 Accounting policies

Following accounting policies are followed for the portfolio investments of the Client:

A. Client Accounting

1. The Portfolio Manager shall maintain a separate Portfolio record in the name of the Client in its book for accounting the assets of the Client and any receipt, income in connection therewith as provided under Regulations. Proper books of accounts, records, and documents shall be maintained to explain transactions and disclose the financial position of the Client's Portfolio at any time.
2. The books of account of the Client shall be maintained on an historical cost basis.
3. Transactions for purchase or sale of investments shall be recognised 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 financial statements for that year.
4. All expenses will be accounted on due or payment basis, whichever is earlier.
5. The cost of investments acquired or purchased shall include brokerage, stamp charges and any charges customarily included in the broker's contract note. In respect of privately placed debt instruments any front-end discount offered shall be reduced from the cost of the investment. Sales are accounted based on proceeds net of brokerage, stamp duty, transaction charges and exit loads in case of units of mutual fund. Securities transaction tax, demat charges and Custodian fees on purchase/ sale transaction would be accounted as expense on receipt of bills. Transaction fees on unsettled trades are accounted for as and when debited by the Custodian.
6. Tax deducted at source (TDS) shall be considered as withdrawal of portfolio and debited accordingly.

B. Recognition of portfolio investments and accrual of income

7. In determining the holding cost of investments and the gains or loss on sale of investments, the "first in first out" (FIFO) method will be followed.
8. Unrealized gains/losses are the differences, between the current market value/NAV and the historical cost of the Securities. For derivatives and futures and options, unrealized gains and losses will be calculated by marking to market the open positions.
9. Dividend on equity shares and interest on debt instruments shall be accounted on accrual basis. Further, mutual fund dividend shall be accounted on receipt basis.
10. Bonus shares/units to which the security/scrip in the portfolio becomes entitled will be recognized only when the original share/scrip on which bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.
11. Similarly, right entitlements will be recognized only when the original shares/security on which the right entitlement accrues is traded on the stock exchange on the ex-right basis.
12. In respect of all interest-bearing Securities, income shall be accrued on a day-to-day basis as it is earned.
13. Where investment transactions take place outside the stock exchange, for example, acquisitions through private placement or purchases or sales through private treaty, the transactions shall be recorded, in the event of a purchase, as of the date on which the scheme obtains an enforceable obligation

to pay the price or, in the event of a sale, when the scheme obtains an enforceable right to collect the proceeds of sale or an enforceable obligation to deliver the instruments sold.

C. Valuation of portfolio investments

14. Investments in listed equity shall be valued at the last quoted closing price on the stock exchange. When the Securities are traded on more than one recognised stock exchange, the Securities shall be valued at the last quoted closing price on the stock exchange where the security is principally traded. It would be left to the portfolio manager to select the appropriate stock exchange, but the reasons for the selection should be recorded in writing. There should, however, be no objection for all scrips being valued at the prices quoted on the stock exchange where a majority in value of the investments are principally traded. When on a particular valuation day, a security has not been traded on the selected stock exchange, the value at which it is traded on another stock exchange may be used. When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than thirty days prior to the valuation date.
15. Investments in units of a mutual fund are valued at NAV of the relevant scheme. Provided investments in mutual funds shall be through direct plans only.
16. Debt Securities and money market Securities shall be valued as per the prices given by third party valuation agencies or in accordance with guidelines prescribed by Association of Portfolio Managers in India (APMI) from time to time.
17. Unlisted equities are valued at prices provided by independent valuer appointed by the Portfolio Manager basis the International Private Equity and Venture Capital Valuation (IPEV) Guidelines on a semi-annual basis.
18. In case of any other Securities, the same are valued as per the standard valuation norms applicable to the mutual funds.

The Investor may contact the customer services official of the Portfolio Manager for the purpose of clarifying or elaborating on any of the above policy issues.

The Portfolio Manager may change the valuation policy for any particular type of security consequent to any regulatory changes or change in the market practice followed for valuation of similar Securities. However, such changes would be in conformity with the Regulations.

10 Investors services

1. Name, address and telephone number of the investor relation officer who shall attend to the investor queries and complaints.

Name	Krupali Kanchanwala
Address	901-903, International Wealth Center, VIP Road, Vesu, Surat, Gujarat, 395007.
Telephone No	0261-6946661
Email address	grievances@ckredencewealth.com

2. Grievance redressal and dispute settlement mechanism.

Pursuant to Regulation 22A and 34A of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 as amended from time to time read with any circular(s) and/or notification(s) issued by SEBI from time to time and in force the portfolio manager shall endeavor to redress all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable, amicable manner and within 21 days from the date of receipt of such grievance. If the client remains dissatisfied with the remedies offered, the client and the portfolio manager shall abide by the following mechanisms:

All disputes, differences, claims and questions whatsoever arising between the client and the portfolio manager and/or their respective representatives shall be submitted to a dispute resolution mechanism that includes mediation and/or conciliation and/or arbitration in accordance with the procedure specified by the Board and in force at the time of the event and shall also be governed by the Agreement entered by the Client with the Portfolio Manager and as per the applicable laws.

In case the Client is not satisfied with the redressal by the Portfolio Manager or otherwise, the Client may lodge a complaint on SEBI's web-based complaints redress system (SCORES) at <https://scores.gov.in/scores/Welcome.html>.

After exhausting the aforementioned options for the resolution of the grievance, if the Client is still not satisfied with the outcome, they can initiate dispute resolution mechanism that includes mediation and / or conciliation and / or arbitration, through the Online Dispute Resolution Portal (ODR Portal) at <https://smartodr.in/login> in accordance with the procedure specified by SEBI vide SEBI circular no.

SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/145 dated July 31, 2023 (updated as on August 4, 2023), on "Online Resolution of Disputes in the Indian Securities Market." The ODR Portal named "SMART ODR" can be accessed through the URL: <https://smartodr.in/login>.

SCORES and Smart ODR Platform facilitate investors to lodge their complaint online with SEBI and subsequently view its status and to raise any further concern if the investor is not satisfied with the redressal

11 Details of the diversification policy of the portfolio manager

The details of the diversification policy of the portfolio manager for the portfolio of the clients.

1. Portfolio diversification is a strategy of risk management used in investing, which allows to reduce risks by allocating the funds in multiple asset types. It helps to mitigate the associated risks on the overall investment portfolio.
2. The Portfolio Manager shall focus through a collection of core holdings and may or may not seek diversification across the various sectors of the equity market. Securities shall be chosen amongst a wide spectrum of market capitalizations, from SME to large capitalization equities. However, from time to time on opportunistically basis, may also choose to invest in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws. The Portfolio Manager may also, from time to time, engage in hedging strategies by investing in derivatives and permissible securities/instruments as per the Applicable Laws.

Part-II- Dynamic Section**12 CLIENT REPRESENTATION, RELATED PARTY TRANSACTIONS AND PORTFOLIO DIVERSIFICATION POLICY****12.1 Client Representation:**

Category of clients	No. of clients	Funds managed (Rs. Cr.)	Discretionary / non-discretionary (if available)
Associates / group companies (Last 3 years)			
as at 30-04-2023	Nil	Nil	Nil
as at 30-04-2024	Nil	Nil	Nil
as at 30-04-2025	Nil	Nil	Nil
as at 30-04-2026	Nil	Nil	Nil
Others			
as at 30-04-2023	161	634.75	Discretionary
as at 30-04-2024	295	749.56	Discretionary
as at 30-04-2025	419	551.77	Discretionary
as at 30-04-2026	491	729.41	Discretionary
as at 30-04-2023	Nil	Nil	Non - Discretionary
as at 30-04-2024	Nil	Nil	Non - Discretionary
as at 30-04-2025	Nil	Nil	Non - Discretionary
as at 30-04-2026	Nil	Nil	Non - Discretionary
as at 30-04-2023	1	52.17	Advisory
as at 30-04-2024	2	139.11	Advisory
as at 30-04-2025	1	5.17	Advisory
as at 30-04-2026	1	6.14	Advisory

12.2 Related Party transactions

(Transaction with director and their relatives are also considered as related party)

Sr. No.	Description of Relationship	Name of Related Party
1	Key Management Personnel	Arvind K. Shah (Director)
		Chirag A. Shah (Director)
		Hetal C. Shah (Director)
		Kartik B. Mehta (Director w.e.f. 14.02.22)
		Urmila A. Shah (Director)
		Kartik B. Mehta (Major shareholder w.e.f. 25.01.22)
2	Relative Key Management Personnel	Arvind K. Shah HUF (HUF of Director)
		Chirag A. Shah HUF (HUF of Director)

		Yashvi C. Shah (Daughter of Director)
		Khevna K. Mehta (Wife of Director)
		Mamta H. Shah (Sister of Director)
		Mita P. Shah (Sister of Director)
3	Associates	Ckredence Financial Services (Formerly known as Chirag Financial Services), Partnership Firm
		Ckredence Investment Services Private Limited (Formerly known as Chirag Stockbroker Private Limited)

Transactions with Related Party

Sr. No.	Name	Nature Of Payment	Amount (24-25)	Amount (23-24)
1	Arvind K. Shah	Remuneration as a Director	72,00,000	2,77,00,000
2	Chirag A. Shah	Remuneration as a Director	90,50,000	4,83,64,240
3	Hetal C. Shah	Remuneration as a Director	61,50,000	3,37,63,120
4	Kartik B. Mehta	Remuneration as a Director	1,88,00,000	7,80,09,656
5	Urmila A. Shah	Rent	3,15,000	3,00,000
6	Arvind K. Shah HUF	Rent	3,15,000	3,00,000
7	Khevna K. Mehta	Salary	75,10,000	5,12,75,576
8	Yashvi C. Shah	Salary	47,72,250	1,51,48,900

Investments in the securities of associates/related parties of Portfolio Manager:

Sr. No.	investment Approach, if any	Name of the associate/ related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores)	percentage of total AUM as on last day of the previous calendar quarter
Not Applicable					

13 Financial Performance:

The financial performance of the company for the year 2022-23 and 2023-24 and 2024-25 (Audited) is as follows.
(Amt in Rupees)

Particulars	2022-23	2023-24	2024-25
Total Income	15,24,73,867	35,95,26,656	14,08,50,228
Profit/ (Loss) before Tax	4,93,41,250	7,92,46,436	4,65,36,214
Profit/ (Loss) After Tax	3,69,70,464	6,24,04,884	3,92,20,460
Equity Capital (31 st March)	9,20,010	9,20,010	9,20,010
Reserves / (loss c/f) (31 st March)	13,72,33,443	19,96,38,328	23,88,58,788
Net Worth (31 st March)	13,81,53,453	20,05,58,338	23,97,78,798

14 Performance of Portfolio Manager

SCHEME	01-05-23 to 30-04-24 (Returns in %)	01-05-24 to 30-04-2025 (Returns in %)	01-05-25 to 30-04-2026 (Returns in %)
All Weather	48.94	-3.16	18.12
BSE 500 TRI	38.63	5.70	3.64

SCHEME	01-05-23 to 30-04-24 (Returns in %)	01-05-24 to 30-04-2025 (Returns in %)	01-05-25 to 30-04-2026 (Returns in %)
Diversified	56.42	-2.31	14.06
BSE 500 TRI	38.63	5.70	3.64

SCHEME	01-05-23 to 30-04-24 (Returns in %)	01-05-24 to 30-04-2025 (Returns in %)	01-05-25 to 30-04-2026 (Returns in %)
Focus Multicap	48.15	-0.67	13.77
Nifty 50 TRI	26.51	9.01	-0.28

SCHEME	01-11-23 to 30-04-24 (Returns in %)	01-05-24 to 30-04-2025 (Returns in %)	01-05-25 to 30-04-2026 (Returns in %)
Business Cycle Fund	17.82	5.27	12.63
Nifty 50 TRI	16.49	9.01	-0.28

SCHEME	01-10-24 to 30-04-25 (Returns in %)	01-05-25 to 30-04-2026 (Returns in %)
Ice Growth	-6.34	12.86
BSE 500 TRI	-9.04	3.64

Notes:

- Performance figures are net of all fees and expenses.
- Returns have been calculated using Time Weighted Rate of Return ("TWRR") method as specified by SEBI.
- The actual returns of the client may differ from the investment approach returns.
- Past performance may or may not be sustained in future and should not be used as basis for Comparison with other investments.

15 Audit Observations

Ckredence Wealth Management Private Limited commenced its Portfolio Management activities ("PMS activities") from June, 2021 onwards on grant of Certificate of Registration from SEBI on February 26, 2021.

In connection with the audit of the Financial Statements of the Company which is examined by the statutory auditor, proper books of accounts are maintained as required by law and complied with the Accounting Standards specified under the act. Based on the audit report given by the statutory auditor it is concluded that the true and fair view is reflected on the standalone financial statements of the Company during last 3 financial years.

16 _ Details of investments in the securities of related parties of the portfolio manager

The Company (Ckredence Wealth Management Private Limited) does not invest any money in the securities of Associates/Related Parties of the Portfolio Manager.

17 **GENERAL PROVISIONS:**

The Prevention of Money Laundering Act, 2002 (PMLA Act) came into force with effect from July 1, 2005, forming the core of the legal framework to combat money laundering. As per the provisions of the PMLA Act, Intermediaries, including portfolio managers, have certain obligations regarding verification of the identity of their clients, maintaining records and furnishing information to the Financial Intelligence Unit-India (FIUIND). SEBI vide its various circulars issued in this regard has mandated all Intermediaries, including portfolio managers to formulate and implement policy framework and procedures for dealing with money laundering and adoption of 'Know Your Customer' (KYC) Policy as per the applicable laws. Accordingly, the client should ensure that the amount invested in the Portfolio Management Service is through legitimate sources only and does not involve and is not designed for the purpose of any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of the PMLA Act, the Prevention of Money Laundering Rules, 2005, Income Tax Act, Anti Money Laundering Guidelines, Prevention of Corruption Act or any other applicable laws enacted by the Government of India from time to time.

The Portfolio Manager is committed to complying with all applicable anti-money laundering laws and regulations in all of its operations. The Portfolio Manager reserves the right to take all steps and actions, including obtaining and retaining all documentation for establishing the identity of the Client, proof of residence, source of funds etc. in accordance applicable law from the client and/or the custodian as may be required to ensure appropriate identification/verification and re-verification of the Client, the source of fund etc. under its KYC policy as may be amended and updated from time to time. If at any time the Portfolio Manager believes that the transaction is suspicious in nature in accordance with applicable law, the Portfolio Manager shall have the absolute discretion to report the transaction to FIU-IND and/or any other statutory body that the Portfolio Manager is bound to report to from time to time. The Portfolio Manager reserves the right to reject or refund or freeze the account of the client if the client does not comply with the internal policies of the Portfolio Manager or any of the Applicable Laws including the KYC requirements.

Further, the Portfolio Manager has put in place Client due diligence measures. the Portfolio Manager shall take necessary action including rejection of application / refund of application money / freezing of investor account for future transactions/ submitting suspicious transactions report ("STR") to law enforcement authorities if the Portfolio Manager has reasonable grounds to believe/ suspect that the transactions involve money laundering or Terrorist financing or proceeds of crime.

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

KYC is mandatory for all investors and registered intermediaries are required to upload the KYC data with Central KYC Records Registry ("CKYCR"). Each investor has to undergo a uniform KYC process only once in the securities market and the details would be shared with other intermediaries by the KYC registration agencies("KRA") and the CKYCR. Applications shall be liable to be rejected if the investors do not comply with the aforesaid KYC requirements.

The portfolio manager and the client can mutually agree to be bound by specific terms through a written two-way agreement between themselves in addition to the standard agreement.

18 GENERAL DISCLAIMER ON INFORMATION PERTAINING TO THE CLIENT:

The Portfolio Manager shall presume that the identity of the Client and the information disclosed by him is true and correct. It will also be presumed that the funds invested by the Client through the services of the Portfolio Manager come from legitimate sources / manner and the investor is duly entitled to invest the said funds.

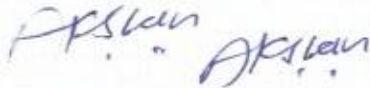
Where the funds invested are for the benefit of a person (beneficiary) other than the person in whose name the investments are made and/or registered, the Client shall provide an undertaking that the Client is holding the funds/Securities in his name is legally authorized/entitled to invest the said funds through the services of the Portfolio Manager, for the benefit of the beneficiaries.

Notwithstanding anything contained in this Document, the provisions of the Regulations and the guidelines there under shall be applicable.

Investors are advised to read this Disclosure Document and other investment materials carefully before entering into an agreement with the Portfolio Manager.

The contents of this disclosure document had been certified by Chartered Accountant.

For and on behalf of CKREDENCE WEALTH MANAGEMENT PRIVATE LIMITED

Sr No.	Name of the Director	Signature
1	Mr. Arvind K. Shah (DIN: 00411559)	
2	Mr. Chirag A. Shah (DIN: 01260876)	

Place: Surat

Dated: 18th May, 2026

Material Change in Disclosure Document

1. Name of the Portfolio Manager: Ckredence Wealth Management Private Limited
2. Registration No.: INP000007164
3. Material Change:

Sl. No.	Material Change	Existing	Proposed Change
1.	Change in control of the Portfolio	NA	NA
2.	Principal Officer	NA	NA
3.	Fees charged	NA	NA
4.	Charges associated with the services	NA	NA
5.	Investment approaches offered (along with the impact of such change)	Investment Approaches Offered to Client: 1. Diversified Multicap Investment Approach 2. Focused Multicap Investment Approach 3. All Weather Investment Approach 4. Ice Growth Investment Approach 5. Business Cycle Fund Investment Approach 6. Elite Blue-Chip Fund 7. Wealth Preserve Investment Approach	Investment Approaches Offered to Client: 1. Diversified Multicap Investment Approach 2. Focused Multicap Investment Approach 3. All Weather Investment Approach 4. Ice Growth Investment Approach 5. Business Cycle Fund Investment Approach 6. Elite Blue-Chip Fund 7. Akta Flexi Cap Investment Approach Impact of New Investment Approach: The change provides an additional investment option to clients. There will be no impact on existing clients unless they voluntarily choose to invest under the newly added approach. Impact of Discontinuance of Old Investment Approach: The said Investment Approach has been removed from the list of Investment Approaches offered by the Portfolio Manager. Accordingly, the Portfolio Manager shall not onboard any new client under the discontinued Investment Approach.
6.	Other changes as specified by SEBI from time to time	NA	NA



CERTIFICATE

We have verified the Disclosure Document ("the Document") for Portfolio Management Services prepared by **M/s. Ckredence Wealth Management Private Limited**, a Portfolio Manager registered with SEBI under the SEBI (Portfolio Managers) Regulations, 2020 (**SEBI Reg. No. INP000007164**), dated **May 18, 2026** having its Registered Office at 901-903, International Wealth Center, VIP Road, Vesu, Surat, 395007.

The disclosure made in the document is made on the model disclosure document as per circular SEBI/HO/IMD/IMD-RAC-3/P/CIR/2025/125 dated September 09, 2025.

With regard to TWRR calculation method, we have been informed by the management that the TWRR has been calculated by their software as per the logic specified by SEBI.

Our certification is based on the audited Balance sheet of the Company as on 31st March, 2025 audited by Statutory Auditors, V R C & Co. Chartered Accountants and examination of other records, data made available and information & explanations provided to us.

Based on such examination we certify that:

- The disclosure made in the document is true, fair and correct and
- The information provided in the Disclosure Document is adequate to enable the investors to make well-informed decisions.

The enclosed document is initialled / signed by us for the purpose of identification.

For Shah & Ramaiya
Chartered Accountants

FRN : 126489W

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by SHARDUL
JASHWANTLAL
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Date: 2026.05.18
16:13:12 +05'30'

CA Shardul Shah

Partner

M No.: 118394

UDIN No: 26118394EUDFJV7598

Place: Mumbai

Date: May 18, 2026