

ANGEL ONE INVESTMENT MANAGERS & ADVISORS PRIVATE LIMITED

DISCLOSURE DOCUMENT

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

I. Declaration:

- a) The Disclosure Document (hereinafter referred as the “**Document**”) has been filed with Securities and Exchange Board of India (“**SEBI**”) along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020 (“**Regulations**”).
- b) The purpose of the Document is to provide essential information about the portfolio management services in a manner to assist and enable the investors in making informed decisions for engaging “**Angel One Investment Managers & Advisors Private Limited**” (hereinafter referred as the “**Portfolio Manager**”) as the portfolio manager.
- c) The Document contains the necessary information about the Portfolio Manager required by an investor before investing, and the investor may also be advised to retain the Document for future reference.
- d) The name, phone number, e-mail address of the principal officer as designated by the Portfolio Manager along with the address of the Portfolio Manager is as follows:

PRINCIPAL OFFICER	PORTFOLIO MANAGER
Name : Mr. Gaurav Aggarwal Phone : 9729686829 E-Mail : po@ionic.in	<u>Angel One Investment Managers & Advisors Private Limited</u> Registered Address: Office No. 601, 6th Floor, Ackruti Star, Chakala MIDC, Central Road, Mumbai - 400093, Maharashtra, India. Principal Place of Business: 14 th Floor, Awfis, INS Tower, G Block, opposite to trident hotel, Bandra Kurla Complex, Bandra East, Mumbai, Mumbai 400051.. Correspondence Address: 3 rd Floor, Empressa 14 Western Express Highway, Sahar Road, Andheri East, Mumbai, Maharashtra – 400099.

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PART-I- Static Section

1. Disclaimer

This Document has been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 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 this 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.

2. Definitions

In this Disclosure Document, unless the context otherwise requires, the following words and expressions shall have the meaning assigned to them:

1. **Act** means the Securities and Exchange Board of India Act, 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 be 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. **Capital Contribution:** means the sum of money or Securities or combination thereof, contributed by the Client for investments in accordance with the terms of the Agreement from time to time during the Term.
15. **Depository** means the depository as defined in the Depositories Act, 1996 (22 of 1996).
16. **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.
17. **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.
18. **Disclosure Document or Document** means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.
19. **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).
20. **Exit Load:** means the withdrawal charge/s payable to the Portfolio Manager in accordance with the terms of the Agreement and this Document.

21. **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.
22. **Fair Market Value** means the price that the Security would ordinarily fetch on sale in the open market on the particular date.
23. **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.
24. **Financial Year** means the year starting from April 1 and ending on March 31 in the following year.
25. **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.
26. **Group Company** shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary.
27. **HUF** means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.
28. **“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.
29. **IT Act** means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.
30. **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.
31. **Management Fee:** means the management fee payable to the Portfolio Manager in accordance with the terms of the Agreement and this Document.
32. **Non-resident Investors** or **NRI(s)** shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.
33. **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.
34. **NISM** means the National Institute of Securities Markets, established by the Board.

35. **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.
36. **Performance Fee:** means the performance-linked fee payable to the Portfolio Manager in accordance with the terms of the Agreement and this Document.
37. **Portfolio or Client Portfolio:** means the total holdings of Securities and goods belonging to the Client.
38. **Portfolio Entity:** means companies, enterprises, bodies corporate, or any other entities in the Securities of which the monies from the Client Portfolio are invested subject to Applicable Laws.
39. **Portfolio Investments:** means investments in Securities of one or more Portfolio Entity/ies made by the Portfolio Manager on behalf of the Client under the PMS from time to time.
40. **Portfolio Manager:** means Angel One Investment Managers & Advisors Private Limited, a company incorporated under the provisions of the Companies Act, 2013, registered with SEBI as a portfolio manager bearing registration number INP000009117 and having its registered office 601, 6th Floor, Ackruti Star, Chakala MIDC, Central Road, Mumbai – 400093 and principal place of business at 14th Floor, Awfis, INS Tower, G Block, opposite to trident hotel, Bandra Kurla Complex, Bandra East, Mumbai, Mumbai 400051..
41. **Principal Officer:** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for: 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 all other operations of the Portfolio Manager.
42. **PMS:** means the portfolio management services provided by the Portfolio Manager in accordance with the terms and conditions set out in the Agreement, this Document and subject to Applicable Laws.
43. **“Related Party”** means –
- (i) a director, partner or his relative;
 - (ii) a 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) any body 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;
- (viii) Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
- (ix) any body 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;
- (x) a related party as defined under the applicable accounting standards;
- (xi) 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:
 - (i) of twenty per cent or more; or
 - (ii) 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 immediate preceding Financial Year; shall be deemed to be a related party;

44. **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.

45. **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.

46. **SEBI:** shall mean the Securities and Exchange Board of India established under sub-section (1) of Section 3 of the Securities and Exchange Board of India Act, 1992.

47. **Term:** means the term of the Agreement as reflected in the respective Agreement entered with the Client by the Portfolio Manager.

Any term used in this Document but not defined herein (but defined in the Regulations) shall have the same meaning as assigned to them in the Regulations.

3. Description

(i) History, Present Business and Background of the Portfolio Manager

Angel One Investment Managers & Advisors Private Limited (“AOIMAPL”) is a company incorporated under the provisions of the Companies Act, 2013 on May 31st, 2024 at Mumbai. It has a portfolio manager license (registration number INP000009117) (obtained on 27.11.2024) to offer discretionary portfolio management services, non-discretionary portfolio management services, advisory services and co-investment portfolio management services to various clients *inter alia* including ultra-high net-worth individuals (UHNI), high net-worth individuals (HNIs), affluents, institutional clients, corporates, Accredited Investors, Large Value Accredited Investors and other permissible class of investors. In addition, AOIMAPL is also registered with SEBI as an investment advisor (Reg. No. INA000019804) (effective from 7.1.2025) and is also involved in managing alternative investment funds for its clients. AOIMAPL has also obtained a registered fund management entity (non-retail) license on 25.03.2025 (bearing no. FDM2025FNR0810) and serves as a fund manager for funds based in the Gujarat International Finance Tec-City (GIFT).

(ii) Promoters of the Portfolio Manager, directors and their background

(a) Angel One Wealth Limited, *Promoter*

Angel One Investment Managers & Advisors Private Limited is promoted by Angel One Wealth Limited. Angel One Wealth Limited (“AOWL”) carries on the business of providing all kind of distribution services, wealth management, insurance products including life, general and health and financial planning products in accordance with the applicable laws and to carry on the business of advising on investments in stocks, shares, securities, debentures, bonds, warrants, depository receipts, commodities, currency, real estate, options, derivatives and all kinds of financial instruments including portfolio management services, mutual funds, market linked debentures, fixed income products, structured products, alternate products, corporate fixed deposits, gold related products, primary & secondary market corporate bonds, small savings investment plans, retirement plans, IPOs, REITs, INVITs, unit linked policies, insurance policies, and any other wealth management products either onshore or offshore and providing financial and investment advisory services, management and facilitation services, conducting analysis, assessment and research, related to any industry, funds, national and international stock market and providing investment recommendations, and consultancy or broking services to any person whether in India or abroad including but not limited to Individuals, government, semi-government, venture capital funds, private investors, angel investors, trusts, institutional investors, banks, companies, bodies corporate (whether incorporated or not), in India or abroad and to act as managers, advisors, brokers, executors, trustees, administrators, attorneys, representative, or nominee and to manage the investments, assets and funds of such persons Angel One Wealth Limited holds an ARN certification. AOWL also has technological capabilities to develop tech platforms like internal business management software, customer facing websites and mobile applications; and automation of processes. Further, AOWL also acts as the

sponsor to the funds/schemes launched as alternative investment funds managed by AOIMAPL.

(b) Mr. Shobhit Mathur, *Executive Director*

Shobhit Mathur, appointed as the Executive Director of Angel One Investment Managers & Advisors Private Limited, embarked on his entrepreneurial journey with Angel One Wealth Limited and its subsidiaries in February 2024.

Prior to his entrepreneurial journey, Shobhit spent 16 years with the Kotak group. At Kotak Cherry, a digital investment platform, he played a pivotal role in shaping business strategy, enhancing investment solutions and refining user experience for retail investors. His experience in building businesses from the ground up, coupled with his expertise in investment advisory and leveraging internal tech resources, uniquely positions him at the forefront of digital wealth Management.

Previously, Shobhit spearheaded Kotak's inaugural multi-manager, multi-asset AIF strategy from 2019 to 2022, overseeing assets exceeding INR 3000 crores. Recognized As the "Innovation of the Year" at Kotak Group in 2020, this achievement underscored his leadership and innovation in the finance industry. He has served on the Investment Committee of several prominent family offices at Kotak Private Bank and provided strategic portfolio guidance to 200 UHNI families.

Earlier in his career, he led the structured products division of Kotak Private Bank where he pioneered bespoke investment solutions by leveraging derivative strategies on equity indices and stock baskets. Prior to joining Kotak, Shobhit honed his skills as a product expert at ICICI Bank, specializing in interest rates and foreign exchange-linked structured products for NRIs and corporate clients.

He has an MBA in Finance from XLRI, Jamshedpur and a Bachelor's degree in Engineering, from IIT- BHU.

(c) Mr. Amit Majumdar, *Director*

Amit Majumdar is the Director of Angel One Investment Managers & Advisors Private Limited and is also a Whole-time Director of Angel One Limited, the ultimate holding company and a Director of Angel One Wealth Limited (formerly known as Angel One Wealth Management Limited), holding company. With almost 3 decades of experience in the financial services industry, he brings deep expertise across business strategy and growth, mergers and acquisitions, operations, risk management, and compliance.. Amit has a proven track record of driving profitable retail scale operations in dynamic market environments, leading large teams, and executing business process reengineering initiatives. His leadership is defined by a relentless focus on sustainable growth, operational efficiency, and long-term value creation. Before rejoining Angel One, Amit held senior leadership roles at Wellspring Healthcare Pvt. Ltd. and AGS Transact Technologies Ltd. In his prior assignments, he had contributed to strategic and financial

advisory mandates at leading firms including EY, Chohung Bank, Rabo India Finance Pvt. Ltd. (a wholly owned subsidiary of Rabobank International), and Ambit Corporate Finance Pte Ltd.. From 2004 to 2015, during his earlier stint at Angel One as Executive Director and Chief Strategy Officer, Amit played a pivotal role in driving sustained, profitable growth and building scalable, efficient operations that contributed to the company's market leadership.

(d) Mr. Subhash Menon, Director

Subhash Menon is a Director of Angel One Investment Managers & Advisors Private Limited and is also the Chief Human Resources Officer of Angel One Limited, the ultimate holding company and a Director of Angel One Wealth Limited (formerly known as Angel One Wealth Management Limited), holding company. He has been associated with Angel One Group since November 17, 2015. With over 20 years of expertise, steers Angel One's HR strategy. Under his leadership, Angel One has been recognized as one of the Best Workplaces in India for 3 consecutive years (Ranked 25 out of 100 Best Companies to work for in 2024) along with several other recognitions like Best Workplace in FinTech, for Women & for Millennials and India. Since joining in November 2015, he's transformed HR policies, processes, boosting productivity with best in class learning and development initiatives, shaping up not only the very core of HR at Angel One, but also fostering diversity, inclusivity and equal opportunities for all. He holds a Bachelor's degree of Science from University of Mumbai and Master of Human Resources Development Management from Narsee Monjee Institute of Management Studies. Prior to joining this, Subhash worked with IndiaFirst Life Insurance Co. Ltd. in leadership roles helping the company achieve industry recognition for its workplace environment. He also served in significant HR roles at SBI Life Insurance Co. Ltd., and USV Limited.

(iii) Top 10 Group companies/firms of the Portfolio Manager on turnover basis (as per the financial statements for the financial year ended March 31, 2025)

Sr. No.	Name of the Company
1	Angel One Limited
2	Angel Financial Advisors Private Limited
3	Angel Fincap Private Limited
4	Angel One Investment Services Private Limited
5	Angel Securities Limited
6	Angel One Asset Management Company Limited
7	Angel Digitech Services Private Limited
8	Angel Crest Limited
9	Mimansa Software Systems Private Limited
10	Angel One Wealth Limited <i>(Formerly known as Angel One Wealth Management Limited)</i>

(iv) Details of the services being offered: Discretionary, Non-Discretionary, Advisory and Co-Investment Portfolio Management Services

The Portfolio Manager proposes to carry on discretionary portfolio management services, non-discretionary portfolio management services, advisory services and co-investment portfolio management services.

The key features of all the said services are provided as follows:

(a) Discretionary Services:

Under the discretionary PMS, the choice as well as the timings of the investment decisions rest solely with the Portfolio Manager and the Portfolio Manager can exercise any degree of discretion in the investments or management of assets of the Client. The Portfolio Manager shall have the sole and absolute discretion to invest in respect of the Client's Portfolio in any type of security as per the Agreement and make such changes in the Portfolio and invest some or all of the Client's Portfolio in such manner as it deems fit in accordance with the Agreement. The Securities invested/divested by the Portfolio Manager for Clients may differ from Client to Client. In case of Large Value Accredited Investors, the Portfolio Manager may invest up to 100% of the assets under management of such Investors in unlisted securities, subject to the terms of the Agreement executed. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's account 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 except on the ground of fraud, malafide intent, conflict of interest (other than those already disclosed in the Agreement) or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the Applicable Laws. Periodical statements in respect of the Client's assets under management shall be sent to the respective Clients in accordance with the Agreement and the Regulations. In case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may invest funds of his clients in the securities listed or traded on a recognized stock exchange, money market instruments, units of Mutual Funds, units of Alternate Investment Fund and any other unlisted securities or instruments as may be permitted by the Regulations.

(b) Non - Discretionary Services:

Under the non-discretionary PMS, the assets of the Client are managed in consultation with the Client. Under this service, the assets are managed as per the requirements of the Client after due consultation with the Client. The investments made on behalf of the Client by the Portfolio Manager shall be subject to express prior instructions/ directions or consent issued by the Client from time to time in writing. The Portfolio Manager shall provide recommendation to the Client based on the research it has carried out, the transaction will be executed based on instruction or consent received from the Client as per the agreed fee structure. The deployment (investment / disinvestment) of the Client's Funds by the Portfolio Manager on the instructions

of the Client is absolute and final and can never be called in question or shall not be open to review at any time during the currency of the Client agreement or at any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence. The Portfolio Manager shall execute the investment instructions and follow up with payments, settlements, custody and other back-office functions. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the Applicable Laws. In case of Large Value Accredited Investors, the Portfolio Manager may invest up to 100% of the assets under management of such Investors in unlisted securities.

(c) Advisory Services:

The Portfolio Manager shall provide investment advisory services, in terms of the Regulations, which shall include the responsibility of advising on the investment and divestment of individual Securities on the Client Portfolio, for an agreed fee structure, entirely at the Client's risk; to all eligible category of Investors. The Portfolio Manager shall be solely acting 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. It will be the discretion/responsibility of the Client to decide whether to execute trades based on the advice of Portfolio Manager. In case of Large Value Accredited Investors, the Portfolio Manager may advice to invest up to 100% of the assets under management of such Investors in unlisted securities.

(d) Co-Investment Portfolio Management Services:

The Co-Investment Portfolio Manager is an Investment Manager to various categories of Alternative Investment Fund(s) and will offer Co-investment opportunities to existing investors of the schemes managed by Angel One Investment Managers & Advisors Private Limited and sponsored by the Angel One Wealth Limited (formerly known as Angel One Investment Managers & Advisors Private Limited). The Co-Investment Portfolio Manager shall make investments only in unlisted securities of investee companies where the Alternative Investment Funds makes investments.

(e) Services offered to Accredited Investors and Large Value Accredited Investors:

The below regulatory concessions are available to Accredited Investor and Large Value Accredited Investor under SEBI (Portfolio Managers) Regulations, 2020:

Particulars	Applicability
Contents of agreement specified under Schedule IV of SEBI (Portfolio Managers) Regulations, 2020 shall not apply to the agreement between the Portfolio Manager and Large Value Accredited Investor.	Large Value Accredited Investor

The Portfolio Manager may offer discretionary or non-discretionary for investment up to hundred percent of the assets under management in unlisted securities subject to the terms agreed between the client and the Portfolio Manager.	Large Value Accredited Investor
The quantum and manner of exit load applicable to the client of the Portfolio Manager shall be governed through bilaterally negotiated contractual terms.	Large Value Accredited Investor
The requirement of minimum investment amount per client shall not apply.	Accredited Investor

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

- i. All cases of penalties imposed by SEBI or the directions issued by SEBI under the SEBI Act or rules or regulations made thereunder.

None.

- ii. The nature of the penalty/direction.

None.

- iii. Penalties/fines imposed for any economic offence and/ or for violation of any securities laws.

None.

- iv. Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.

None.

- v. Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory agency.

None.

- vi. Any enquiry/ adjudication proceedings initiated by 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 thereunder as of March 31, 2025.

1. Angel One Limited (“**AOL**”) has filed an Application for Settlement in accordance with SEBI (Settlement Proceedings) Regulations, 2018 for settlement of all proceedings arising out of the same cause of action, in the matter of:

(i) Show Cause Notice (SCN) dated March 12, 2024 bearing reference number SEBI/EAD-3/BM/GN/10172/1/2024 (“Enquiry SCN”) issued by SEBI under Regulation 25(1) of SEBI Intermediaries Regulations, 2008 upon Angel One Limited, calling upon the Noticee to show cause as to why appropriate recommendation should not be made against the Noticee as prescribed under Regulations 23 and 26 of the said Intermediaries Regulations.

(ii) Show Cause Notice (SCN) dated March 12, 2024 bearing reference number SEBI/EAD-3/BM/GN/10169/1/2024 (“AO SCN”) issued by SEBI under Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995, Rule 4(1)

of the Securities Contracts (Regulations) (Procedure for Holding Inquiry and Imposing Penalties) Rules 2005 upon Angel One Limited, calling upon the Noticee to show cause as to why an inquiry should not be held against it and why penalty, if any, should not be imposed on it under the provisions of Section 23H and Section 23D of the Securities Contracts (Regulation) Act, 1956 and Section 15HB of the SEBI Act for the alleged violations.

SEBI issued Settlement Order No. SO/BM/GN/2024-25/7734-35 dated October 25, 2024, in relation to the above whereby SEBI imposed a penalty of Rs. 5,74,56,000/- (Rupees Five Crore Seventy-Four Lakh Fifty-Six Thousand Only) upon Angel One Limited. The same was paid by AOL on October 23, 2024.

2. AOL had filed an Application for Settlement in accordance with SEBI (Settlement Proceedings) Regulations, 2018 for settlement of proceedings arising out of Show Cause Notice dated April 24, 2024, bearing reference number SEBI/IV/D/ID11/SJ/15115/1/2024 issued by SEBI under Sections 11(1) and 11B(2) read with Section 15HB of the SEBI Act, 1992 read with Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 calling upon the Noticee to show cause as to why an inquiry should not be held against it in terms of Rule 4 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 and why suitable monetary penalties under Section 11B(2) read with Section 15HB of the SEBI Act, 1992 and Regulations 26(iii), (xv) and (xvi) of SEBI (Stock Brokers) Regulations, 1992 should not be imposed for the alleged violations. SEBI issued settlement order no. SO/EFD2/2024-25/7823 dated September 27, 2024, in relation to said show cause notice whereby SEBI imposed a penalty of Rs. 21,64,500/- (Rupees Twenty One Lakhs Sixty Four Thousand Five Hundred only) upon Angel One Limited. The same was paid by AOL on September 21, 2024.
3. Adjudication Order No. Order/AK/VV/2023-24/26065 dated April 28, 2023, whereby SEBI, imposed a penalty of Rs. 10,00,000/- (Rupees ten lakhs only) upon Angel Broking Limited under Section 15HB of the SEBI Act, Section 23D of the Securities Contracts Regulation Act and Section 19G of the Depositories Act for the alleged violations of various circulars and provisions as noted during the course of joint inspection for the period of April 2019 to December 2020. The same was paid by AOL on May 31, 2023 and the matter stands closed.
4. Order no. QJA/AB/MIRSD/MIRSD3/28840/2023-24 dated August 22, 2023, whereby SEBI under Section 12(3) and Section 19 of the SEBI Act read with Regulation 27(5) of the Intermediaries Regulations issued a warning to Angel One Limited to be careful and diligent in the conduct of its businesses.
5. SEBI vide Adjudication Order No. BM/GN/2024-25/31011 dated November 28, 2024, imposed a penalty of Rs. 6,00,000/- on AOL, arising out of Show Cause Notice dated July 31, 2024 bearing Reference No. SEBI/EAD-3/BM/GN/24728/2/2024 under Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules 1995 calling upon Angel One Limited to show cause as to why inquiry should not be held and monetary penalty not be imposed for the alleged violations. The same was paid by AOL on December 06, 2024.
6. SEBI had issued a Show Cause Notice dated October 9, 2024 bearing Reference No. SEBI/HO/EAD-8/AS/RM/31790/1-2/2024 under Rule 4(1) of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules 1995 read with Section 15-I of the Securities

and Exchange Board of India Act, 1992 calling upon Angel One Limited to show cause as to why inquiry should not be held against it in terms of Rule 4 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 r/w Section 15I of the SEBI Act and why penalty \ should not be imposed upon AOL under the provisions of Section 15HB of the SEBI Act for the alleged violations. Inspection of documents conducted, and further documents sought from SEBI, awaiting the same. Thereafter, Reply shall be filed, and hearing will be scheduled accordingly. As of now, proceedings are pending.

7. Mr. Shobhit Mathur and Mr. Gaurav Aggarwal were among the designated fund managers/ Key Managerial Personnel of Kotak Optimus Moderate Scheme (“Scheme”) of Kotak Alternate Assets Fund III, a Category III Alternative Investment Fund (“Fund”). SEBI observed that the Scheme was in breach of the concentration limit (being 10% of investible funds) in a single investee company, being Indian Railway Financial Corporation Limited, from May 13, 2022 to July 11, 2022. This was in non-compliance with Regulation 15(1)(d) of the SEBI (Alternate Investment Funds) Regulations, 2012 (“AIF Regulations”). The Scheme clarified to SEBI that the limit monitoring process was being done manually by a dedicated resource in the operations team of the investment manager of the Fund, being Kotak Alternate Asset Managers Limited, and thereafter the same was sent to the investment team of the Scheme. However, there was an operational lapse/error in the aforementioned instance. On identification of the error, the investment manager took corrective action, including selling the Scheme's excess position in the aforesaid investee company to comply with the extant regulatory limit (being 10% of investible funds) and introduction of checks/controls to ensure such operational error does not re-occur in the future. SEBI took note of the corrective action by the investment manager of the Scheme and disposed off the case through settlement order issued by SEBI vide no - SO/AS/EFD2/2023-24/2-6.

5. Services Offered

(i) The present investment objectives and policies including the types of securities in which it generally invests:

(a) Investment Objective

The investment objective of the Portfolio Manager is to offer portfolio management services, advisory services and co-investment portfolio management services to ultra high net-worth individuals (UHNI), high net-worth individuals (HNIs), affluents, institutional clients, corporates, Accredited Investors, Large Value Accredited Investors and any other permissible class of investors in respect of investment in Indian securities and capital markets. The Portfolio Manager proposes to employ data driven investment strategies to make investments with the objective of delivering superior risk-adjusted returns to the Clients. The Client understands and agrees that the Portfolio Manager may use derivative instruments like stock index futures, futures on individual stocks, options on stock indices and options on individual stocks, interest rate swaps, forward rate agreements or such other derivative instruments as may be introduced from time to time, as permitted by the SEBI Regulations and Applicable Laws.

(b) Type of securities in which Portfolio Manager will invest

The Portfolio Manager may invest Capital Contributions in Securities and any other permissible securities/instruments/products as per the Applicable Laws, in such manner and through such markets as it may deem fit in the interest of the Client. The investment in Securities shall primarily comprise of:

- listed equity and preference shares of Indian companies,
- listed debentures, bonds and secured premium notes, including tax exempt bonds of Indian companies and corporations;
- units and other instruments of mutual funds or ETFs;
- listed InVITs and REITs;
- money market instruments such as government securities, commercial papers, trade bill, treasury bills, certificate of deposit and usance bill;
- listed options, futures, swaps and such other derivatives as may be permitted from time to time;
- units of alternative investment funds
- unlisted securities;
- such other securities/instruments as specified by SEBI from time to time.

Under the non-discretionary PMS and advisory services, the Capital Contribution shall be invested in listed and/or unlisted securities (provided that investment in unlisted securities shall not exceed 25% (twenty-five percent) of the assets under management of such Client and/or such other limits

as prescribed under the Regulations) and managed in consultation with the Client. In case of Large Value Accredited Investors, the Portfolio Manager may advise to invest up to 100% of the assets under management of such Investors in unlisted securities.

Following limits shall be followed with respect to investment in debt and hybrid securities:

- i) Portfolio Managers shall not invest Clients' funds in unrated securities of associate companies / related parties.
- ii) Under Discretionary Portfolio Management Services, no investment shall be made in below investment grade securities
- iii) Under Non-Discretionary Portfolio Management Services, investment shall not be made in below investment grade listed securities. However, Portfolio Manager may invest upto 10% (ten per cent) of Client's asset under management in unlisted unrated debt and hybrid securities of issuers other than associate companies / related parties.
Such investment in unlisted, unrated debt and hybrid securities shall be within maximum limit of 25% (twenty-five per cent) for investment in unlisted securities as stated under reg.24 (4) of the Regulations.
- iv) Investments of Clients' funds shall be based on credit rating as may be specified by SEBI from time to time.

All investments in debt & hybrid securities under all the strategies mentioned herein shall be in compliance with the aforementioned provisions and SEBI circulars issued in this regard from time to time.

Asset classes for investment will always be subject to the scope of investments as may be agreed upon between the Portfolio Manager and the Client by way of any agreement, explicit or implied including this Disclosure Document, addenda thereof, other documents and communications in writing and emails duly authenticated and exchanged between the Client and Portfolio Manager.

(ii) Investment Approach of the Portfolio Manager

Please refer to **Annexure I** for more details.

(iii) 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.

The Portfolio Manager will, before investing in the Securities of associate/group companies, evaluate such investments on the basis of the same criteria applied for evaluating other similar investments. Investments under the Portfolio in the Securities of the associates/group companies will be subject to the limits prescribed under the Agreement and in accordance with the Applicable Laws.

6. Risk factors

A. General Risk:

- 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.
- 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.
- The names of the Investment Approach do not in any manner indicate their prospects or returns.
- 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.
- 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.
- 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.
- 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.
- 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. Risks associated with in equity and equity related instruments

- 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.

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.

- 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

- **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.

- **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.

- **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.

- **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

- 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.
- 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

- 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.
- 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.
- Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.
- 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.
- The Portfolio Manager shall not be 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.
- The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.

- 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.
- 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

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

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.

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.

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 the general costs and expenses to be borne by the Clients availing the services of the Portfolio Manager. However, the exact nature of expenses relating to each of the following services is annexed to the Agreement in respect of each of the services provided.

i. Investment Management Fee:

The Investment Management Fee relates to the portfolio management services offered to the Clients. The Investment Management Fee shall be upto 2.5% p.a. of the quantum of the funds being managed as agreed in the Agreement. The Management Fee excludes all indirect taxes as applicable.

ii. Advisory Fees:

The advisory fees relates to the advisory services offered by the Portfolio Manager to the client. The advisory fee shall be upto 2% p.a. of the quantum of the funds being advised as agreed in the Agreement. The advisory fees shall be exclusive of indirect taxes, if any.

iii. Custodian Fees:

The Custody Fees and all other Operating cost shall not be more than 0.50% of the client's AUM

iv. Registrar and Transfer agent Fees:

At actual, however all the Operating cost shall not be more than 0.50% of the client's AUM.

v. Performance Fee:

The Performance Fee relates to the share of profits charged by the Portfolio Manager, subject to hurdle rate and high water mark principle as per the details provided in the Agreement. The Performance Fee shall be upto 40% of the return over and above a hurdle rate as prescribed for each Investment Approach which shall be charged annually and/or upon withdrawal of funds by the Client whichever is higher, on high water mark basis.

vi. Exit Load:

The Portfolio Manager may charge early withdrawal fee up to 3% p.a. for the 1st year, up to 2% p.a. for the 2nd year and up to 1% p.a. for the 3rd year on the value of the Portfolio redeemed, as per the terms and conditions of a particular Investment Approach as agreed in the Agreement, and subject to and in accordance with the Regulations.

In case of Large Value Accredited Investors, the quantum and manner of Exit Load applicable to such Large Value Accredited Investor shall be as per the Agreement.

vii. Certification and professional charges:

Charges payable for outsourced professional services like accounting, taxation and legal services, notarizations etc. for certifications, attestations required by bankers or regulatory authorities, at actuals.

viii. Other fees and expenses:

The Portfolio Manager may incur the following expenses which shall be charged on actuals to by the Client:

- (a) Transaction expenses including, but not limited to, statutory fees, documentation charges, statutory levies, stamp duty, registration charges, commissions, charges for transactions in Securities, custodial fees, fees for fund accounting, valuation charges, audit and verification fees, depository charges, and other similar or associated fees, charges and levies, legal fees, incidental expenses etc.;
- (b) Brokerage shall be charged at actuals;
- (c) Legal and statutory expenses including litigation expenses, if any, in relation to the Portfolio;
- (d) Statutory taxes and levies, if any, payable in connection with the Portfolio;
- (e) Valuation expenses, valuer fees, audit fees, levies and charges;
- (f) All other costs, expenses, charges, levies, duties, administrative, statutory, revenue levies and other incidental costs, fees, expenses not specifically covered above, whether agreed upon in the Agreement or not, arising out of or in the course of managing or operating the Portfolio.

Above operating fees and expenses excluding brokerage, over and above the fees charged for Portfolio Management Service, can be vary from client to client and will be decided based on the PMS Agreement executed with client while onboarding and shall not exceed 0.50% per annum of the client's average daily AUM.

Provided the Portfolio Manager shall not charge any up-front fees to the Client whether directly or indirectly. Notwithstanding the above, the Portfolio Manager may charge up-front costs and expenses so attributable to the Client in terms of the Agreement.

8. Taxation

A. General

The following information is based on the tax laws in force in India as of the date of this Disclosure Document and reflects the Portfolio Manager's understanding of applicable provisions. The tax implications for each Client may vary significantly based on residential status and individual circumstances. As the information provided is generic in nature, Clients are advised to seek guidance from their own tax advisors or consultants regarding the tax treatment of their income, losses, and expenses related to investments in the portfolio management services. The Client is responsible for meeting advance tax obligations as per applicable laws.

B. Tax deducted at source

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 tax deduction at source (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.

C. Long term capital gains

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) or less	Twenty-four (24) 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	Thirty-six (36) 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) 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

(b) 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 upto 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 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 rebated 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)**

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 reconversion 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% as mentioned in para 12.10.2 above. This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

- **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.

D. Short term capital gains

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.

E. Profits and gains of business or 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. 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.

F. Losses under the head capital gains/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.

G. 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
- Recharacterising equity into debt, capital into revenue, etc.

The GAAR provisions would override the provisions of a treaty in cases where GAAR is invoked. 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.

H.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).

I. Goods and Services Tax on services provided by the portfolio manager

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

THERE CAN BE NO GUARANTEE THAT THE ABOVE POSITION REGARDING TAXATION WOULD BE NECESSARILY ACCEPTED BY THE INDIAN TAX AUTHORITIES UNDER THE ITA. NO REPRESENTATION IS MADE EITHER BY THE PORTFOLIO MANAGER OR ANY EMPLOYEE, DIRECTOR, SHAREHOLDER OR AGENT OF THE MANAGER IN REGARD TO THE ACCEPTABILITY OR OTHERWISE OF THE ABOVE POSITION REGARDING TAXATION BY THE INDIAN TAX AUTHORITIES UNDER THE ITA. INVESTORS ARE URGED TO CONSULT THEIR OWN TAX ADVISERS IN THIS REGARD.

9. Accounting policies

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

A. Client Accounting

- 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.
- The books of account of the Client shall be maintained on an historical cost basis.
- 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.
- All expenses will be accounted on due or payment basis, whichever is earlier.
- 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.
- Tax deducted at source (TDS) shall be considered as withdrawal of portfolio and debited accordingly.

B. Recognition of portfolio investments and accrual of income

- 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.
- 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.
- 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.
- 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.
- 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.

- In respect of all interest-bearing Securities, income shall be accrued on a day-to-day basis as it is earned.
- 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

- 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.
- 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.
- 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.
- 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.
- 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

The Portfolio Manager seeks to provide the Clients a high standard of service. The Portfolio Manager is committed to put in place and upgrade on a continuous basis the systems and procedures that will enable effective servicing through the use of technology. The Client servicing essentially involves:

- (a) Reporting portfolio actions and client statement of accounts at pre-defined frequency;
- (b) Attending to and addressing any client query with least lead time;
- (c) Ensuring portfolio reviews at predefined frequency.

(i) Name, address and telephone number of the investor relation officer who shall attend to the investor queries and complaints:

Name	Mr. Gaurav Aggarwal
Designation	Principal Officer
Registered Address	Office No. 601, 6th Floor, Ackruti Star, Chakala MIDC, Central Road, Mumbai - 400093, Maharashtra, India.
Principal Place of Business	14 th Floor, Awfis, INS Tower, G Block, opposite to trident hotel, Bandra Kurla Complex, Bandra East, Mumbai, Mumbai 400051. .
Telephone No.	022 4000 3600
Email id	po@ionic.in

(ii) Grievance redressal and dispute settlement mechanism:

The aforesaid personnel of the Portfolio Manager shall attend to and address any Client query/concern/grievance at the earliest. The Portfolio Manager will ensure that this official is vested with the necessary authority and independence to handle Client complaints. The aforesaid official will immediately identify the grievance and take appropriate steps to eliminate the causes of such grievances to the satisfaction of the Client. Effective grievance management would be an essential element of the Portfolio Manager's portfolio management services and the aforesaid official may adopt the following approach to manage grievance effectively and expeditiously:

1. **Acknowledging grievance** – The aforesaid officer shall acknowledge the grievance put forward by the Client and look into the complaint impartially and without any bias.
2. **Gathering facts** – The aforesaid official shall gather appropriate and sufficient facts explaining the grievance's nature. A record of such facts shall be maintained so that these can be used in later stage of grievance redressal.
3. **Examining the causes of grievance** – The actual cause of grievance would be identified. Accordingly, remedial actions would be taken to prevent repetition of the grievance.
4. **Decision making** – After identifying the causes of grievance, alternative course of actions would be thought of to manage the grievance. The effect of each course of action on the existing and future management policies and procedure would be analysed and accordingly decision should be taken by the aforesaid official. The aforesaid official would execute the decision quickly.

5. **Review** – After implementing the decision, a follow-up would be there to ensure that the grievance has been resolved completely and adequately.

Grievances/concerns, if any, which may not be resolved/satisfactorily addressed in aforesaid manner shall be redressed through the administrative mechanism by the designated Compliance Officer, namely Mr. Nipun Doshi subject to the Regulations. The Compliance Officer will endeavor to address such grievances in a reasonable manner and time. The coordinates of the Compliance Officer are provided as under:

Name	Mr. Nipun Doshi
Registered Address	Office No. 601, 6th Floor, Ackruti Star, Chakala MIDC, Central Road, Mumbai - 400093, Maharashtra, India.
Principal Place of Business	14 th Floor, Awfis, INS Tower, G Block, opposite to trident hotel, Bandra Kurla Complex, Bandra East, Mumbai, Mumbai 400051..
Correspondence Address	3 rd Floor, Empressa 14 Western Express Highway, Sahar Road, Andheri East, Mumbai, Maharashtra – 400099.
Telephone No.	022 4000 3600
Email id	compliance.assets@ionic.in

If the Client still remains dissatisfied with the remedies offered or the stand taken by the Compliance Officer, the Client and the Portfolio Manager shall abide by the following mechanisms:

Any dispute unresolved by the above internal grievance redressal mechanism of the Portfolio Manager, can be submitted to mediation/ conciliation/ arbitration under online dispute resolution as specified by SEBI vide its circular no. SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 updated as on December 20, 2023 and further amendments thereto.

If the client is still not satisfied with the outcome of the abovementioned mechanism, the client can initiate dispute resolution in accordance with the framework notified by SEBI vide its master circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023 titled ‘Online Resolution of Disputes in the Indian Securities Market’ which was further amended vide circular no. SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/191 dated December 20, 2023 titled ‘Amendment to Circular dated July 31, 2023 on Online Resolution of Disputes in the Indian Securities Market’ (including any amendments or clarificatory circulars that may be issued by SEBI from time to time).

Without prejudice to anything stated above, the Client can also register its grievance/complaint through SCORES (SEBI Complaints Redress System), post which the complaint will be either routed to the Portfolio Manager or to SEBI (as applicable), which may then forward the complaint to the Portfolio Manager and the Portfolio Manager will suitably address the same. SCORES is available at <http://scores.sebi.gov.in>.

Online Dispute Resolution: If the client is still not satisfied with the outcome of the abovementioned mechanism, the client initiate dispute resolution in accordance with the framework notified by SEBI vide its master circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023 titled 'Online Resolution of Disputes in the Indian Securities Market' which was further amended vide circular no. SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/191 dated December 20, 2023 titled 'Amendment to Circular dated July 31, 2023 on Online Resolution of Disputes in the Indian Securities Market' (including any amendments or clarificatory circulars that may be issued by SEBI from time to time). The Smart ODR link: <https://smartodr.in/login>.

11. Details of diversification policy for portfolio manager:

This policy has been laid down to ensure the risk is spread across different asset classes, issuers and time horizon within the framework laid down in the specific Investment Approach. The Portfolio Manager follows a rule-based approach to investments. In this approach, Securities are eliminated by analyzing past data and selected based on rules / bottom-up or top-down research approach. This results in a well diversified portfolio with broad based caps for weightages on individual stocks as well as sector. The Portfolio Manager shall periodically review the portfolios to maintain appropriate portfolio mix depending upon investment goals, market conditions, risk tolerance and liquidity requirement to ensure diversification and meet long term goals. However, the Clients need to understand that too much diversification require large capital investment and may also lead to losses. Further, portfolio churning for achieving diversification may not be effective on a long term basis in achievement of investment goals. Accordingly, diversification shall be undertaken while balancing risk and return to achieve desired results in achieving investment goals.

Part-II- Dynamic Section

12. Client Representation:

- (i) Details of clientele and funds managed –
a. Discretionary Portfolio Management Services

As on October 31, 2025

Category of clients	No. of Accounts	Funds managed (Rupees in Crores)
Associates/group companies(Last 3 years) As on October 31st, 2025	1	0.53
As on March 31st, 2025	NA	NA
As on March 31st, 2024	NA	NA
As on March 31st, 2023	NA	NA
Others (Last 3 years)		
As on October 31st, 2025	133	226.98
As on March 31st, 2025	20	60.58
As on March 31st, 2024	NA	NA
As on March 31st, 2023	NA	NA

- b. Non-Discretionary Portfolio Management Services

As on October 31, 2025

Category of clients	No. of Accounts	Funds managed (Rupees in Crores)
Associates/group companies(Last 3 years)	NIL	NIL
Others (Last 3 years)		
As on October 31 , 2025	66	208.38
As on March 31 st , 2025	17	18.34
As on March 31 st , 2024	NA	NA
As on March 31 st , 2023	NA	NA

Note:

- i. PMS License received on November 27, 2024
- (ii) Complete disclosure in respect of transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India.

Names of related parties and nature of relationship

		Ownership Interest
		For the period 31 May 2024 to 31 March 2025
a) Ultimate Holding Company		
Angel One Limited	India	100%

a) Holding Company		
Angel One Wealth Limited (formerly known as Angel One Wealth Management Ltd)	India	100%
b) Fellow Subsidiary Company		
Angel Fincap Private Limited	India	
Angel Financial Advisors Private Limited	India	
Mimansa Software Systems Private Limited	India	
Angel Digatech Services Private Limited	India	
Angel Securities Limited	India	
Angel Crest Limited (from 26th April 2023)	India	
Angel One Asset management Company Limited (from 04th May 2023)	India	
Angel One Trustee Limited (from 26th May 2023)	India	
Angel One Investment Services Private Limited (from 30th May 2024)	India	
Angel One Foundation (from 22nd October 2024)	India	
c) Individuals owning directly or indirectly interest and voting power that gives them control or significant influence		
Mr. Dinesh Thakkar		
(d) Key Management Personnel		
Mr. Amit Majumdar	Director	
Mr. Subhash Menon	Director	
Mr. Shobhit Mathur	Additional Director	
(e) Close Members of Key Management Personnel as above		
Subhash Menon HUF	HUF of Subhash Menon	

Details of transactions with related party in the ordinary course of business

	For the period 31 May 2024 to 31 March 2025 (Rs. In million)
<u>Ultimate Holding company</u>	
<u>Angel One Limited</u>	
Rent Expense	1.35
Business support services (includes employee benefits expense and electricity)	0.95

<u>Holding company</u>	
<u>Angel One Wealth Limited (formerly known as Angel One Wealth Management Ltd)</u>	
Capital Infusion from Holding Company	310.00
Expense on employee stock option scheme	16.93
Cross charges of employee benefit expenses	3.07
Purchase of Property, Plant and equipment	1.24
Expenses of the Company incurred by fellow subsidiary	0.19
<u>Fellow subsidiaries</u>	
<u>Angel One Investment Services Private Limited</u>	
Business support services (includes employee benefits expense)	0.01
<u>Management fees received</u>	
Shobhit Mathur	0.00
Subhash Menon HUF	0.01
<u>Remuneration paid</u>	
Short term incentive	11.57
Mr. Shobhit Mathur	11.57
Share based payment - Employee stock option scheme	10.07
Mr. Shobhit Mathur	10.07

Amount due to/from related party as on:

	For the period 31 May 2024 to 31 March 2025 (Rs. In million)
<u>Holding company</u>	
<u>Other Financial liabilities</u>	
Angel One Limited	0.16
Angel One Wealth Limited (formerly known as Angel One Wealth Management Ltd)	4.85
<u>Trade receivable</u>	
<u>Key Management Personnel and Close Members of Key Management Personnel</u>	
Shobhit Mathur	0.00
Subhash Menon HUF	0.01
<u>Other Receivables</u>	
<u>Fellow subsidiaries</u>	
Angel One Investment Services Private Limited	0.01

*Close members of only those related parties are added with whom transactions are done during the period

13. The Financial Performance of Portfolio Manager (based on audited financial statements)

Particulars	FY 2024-25 (Rs. in Millions)
Revenue from Operations	8.21
Profit/(Loss) before tax	(163.30)
Less: Tax Expense	-
Profit/(Loss) after tax	(163.30)

14. Performance of the Portfolio Manager

DPMS:

Portfolio	Benchmark	Performance			
		From April 1 st 2025 to October 31 st 2025	FY 24-25*	FY 23-24*	FY 22-23*
Ionic PIPE Strategy	Portfolio	10.04	-5.17	NA	NA
	BSE 500 TRI	11.77	-4.24	NA	NA
Ionic Liquid Approach	Portfolio	3.61	1.67	NA	NA
	CRISIL Composite Bond Index	3.57	2.36	NA	NA
Ionic Yield Enhancer Strategy	Portfolio	7.28	1.27	NA	NA
	CRISIL Composite Bond Index	3.57	1.51	NA	NA
Ionic Allocate Portfolio - Equity	Portfolio	10.26	-0.09	NA	NA
	NIFTY 50 TRI	10.40	1.42	NA	NA
Ionic Allocate Portfolio - Aggressive	Portfolio	15.44	-0.34	NA	NA
	NSE MULTI ASSET INDEX 1	9.98	0.37	NA	NA
Ionic Allocate Portfolio - Moderate	Portfolio	14.97	NA	NA	NA
	NIFTY 50 Hybrid Composite Debt 50:50 Index	6.33	NA	NA	NA
Ionic Navigator Portfolio	Portfolio	-7.13	NA	NA	NA
	NIFTY 50 TRI	5.15	NA	NA	NA
Ionic Navigator Portfolio Midcap	Portfolio	-8.29	NA	NA	NA
	NIFTY 50 TRI	5.15	NA	NA	NA

NDPMS:

Portfolio	Benchmark	Performance			
		From April 1 st 2025 to October 31 st 2025	FY 24-25*	FY 23-24*	FY 22-23*
Ionic Sharpe One Strategy	Portfolio	16.75	-5.68	NA	NA
	BSE 500 TRI	11.77	-1.44	NA	NA

Ionic Liquid Approach-NDPMS	Portfolio	3.44	0.37	NA	NA
	CRISIL Composite Bond Index	3.57	1.04	NA	NA
Ionic Allocate Select Portfolio	Portfolio	10.60	NA	NA	NA
	NIFTY 50 Hybrid Composite Debt 50:50 Index	4.60	NA	NA	NA

Note:

- The PMS license was received on November 27, 2024*.
- The performance of a portfolio manager shall be calculated using 'Time Weighted Rate of Return' for the immediately preceding three years and in such cases performance indicators shall also be disclosed.
- The performance returns of these investment approaches are calculated from their respective inception date upto October 31st, 2025 as provided below:

Name of the Investment Approach	Inception Date
Ionic PIPE Strategy	8.01.2025
Ionic Liquid Approach	8.01.2025
Ionic Yield Enhancer Strategy	25.02.2025
Ionic Allocate Portfolio - Equity	21.03.2025
Ionic Allocate Portfolio - Aggressive	24.03.2025
Ionic Allocate Portfolio – Moderate	17.04.2025
Ionic Sharpe One Strategy (NDPMS)	17.01.2025
Ionic Liquid Approach (NDPMS)	18.03.2025
Ionic Allocate – Select (NDPMS)	22.04.2025
Ionic Navigator Portfolio	05.06.2025
Ionic Navigator Portfolio Midcap	05.06.2025

- The performance of the Co-investment Portfolio Manager shall be calculated in the manner as agreed between the Co-investment Portfolio Manager and the client.
- Given the Investment Approach inception date for Ionic Allocate – Select is 22.04.25, the returns depicted above is for the 1 month pe

15. Audit Observations for preceding three years

There have been no adverse observations reported by the statutory auditor in Financial Year 2024-25.

16. Details of Investments in the securities of related parties of the Portfolio Manager

As on date, Portfolio manager have not made investment in the related parties.

17. General

Prevention of Money Laundering




The Portfolio Manager shall presume that the identity of the Client and the information disclosed by the Client 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 only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, 1961, PML Laws, Prevention of Corruption Act, 1988 and/or any other Applicable Law in force and the investor is duly entitled to invest the said funds.

To ensure appropriate identification of the Client(s) under its Know Your Client (“KYC”) policy and with a view to monitor transactions in order to prevent money laundering, the Portfolio Manager (itself or through its nominated agency as permissible under Applicable Laws) reserves the right to seek information, record investor’s telephonic calls and/or obtain and retain documentation for establishing the identity of the investor, proof of residence, source of funds, etc.

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, holding the funds/securities in his name, is legally authorised/entitled to invest the said funds/securities through the services of the Portfolio Manager, for the benefit of the beneficiaries.

The Portfolio Manager, and its partners, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Client’s account/rejection of any application or mandatory repayment/returning of funds due to non-compliance with the provisions of the PML Laws and KYC policy. If the Portfolio Manager believes that transaction is suspicious in nature within the purview of the PML Laws, then it will report the same to FIU-IND. Notwithstanding anything contained in this Document, the provisions of the Regulations, PML Laws and the guidelines there under shall be applicable. Clients/Investors are advised to read the Document carefully before entering into an Agreement with the Portfolio Manager.

For and on behalf of Angel One Investment Managers & Advisors Private Limited

Subhash Menon DIN: 08276123 Director	:	
Amit Majumdar DIN: 01633369 Director	:	 

Place: Mumbai

Date : November 14, 2025

Annexure I

Investment Approaches

Discretionary PMS

1. Investment Approach: Ionic Allocate Portfolio-Moderate

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to generate a balance of capital appreciation along with income such as interest, dividend etc. as may be applicable to each investment. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Hybrid

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks /Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds/ commodity ETF and other permissible securities as per the Regulations	35-70%
Fixed Income and other instruments: Bonds/ debentures / Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other permissible securities as per the Regulations	30-65%

Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 Hybrid Composite Debt 50:50 Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetite.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.

- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would range between 30-65%. Hence in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.
- In a downward trending market, low allocation to debt may impact performance versus benchmark.

2. Investment Approach: Ionic Allocate Portfolio-Conservative

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital preservation while keeping return efficiency in consideration. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Debt

Description of types of securities

Under this approach, the portfolio manager would primarily invest in fixed income as an asset class. This shall include mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, government securities, derivative instruments, listed units of alternate investment funds, , and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Related Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global	0-35%

Equity Funds / commodity ETF and other permissible securities as per the Regulations	
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other permissible securities as per the Regulations	65-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with low-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations in which the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

- Allocation to cash/fixed income mutual funds would range between 65-100%. Hence in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.
- In a downward trending market, low allocation to debt may impact performance versus benchmark.

3. Investment Approach: Ionic Allocate Portfolio-Aggressive

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating majorly to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Multi Asset

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity as an asset class. This shall include mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, government securities, derivative instruments, listed units of alternate investment funds, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities –

Particulars	Allocation
Equity other Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	70-100%

Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity /Debt and other permissible securities as per the Regulations	0-30%
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Appropriate benchmark to compare performance and basis for choice of benchmark:

NSE Multi Asset Index 1 Composition: 50%: Nifty 500 40%: Nifty 50 Arbitrage Index 10%: REIT & INVIT

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

4. Investment Approach: Ionic Navigator Portfolio

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes. The portfolio manager shall use internal frameworks and market conditions to decide allocation to different asset classes in the portfolio.

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager shall decide the allocation to different asset classes and different securities thereon basis the market conditions and internal quantitative frameworks.
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like Bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	0-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations in which the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds can lead to lag in returns in scenarios of market run ups.
- In a downward trending market, low allocation to debt may impact performance versus benchmark.
- The portfolio shall also face the risk of concentration in the portfolio as the portfolio manager shall tilt the portfolio to a specific asset class basis market conditions.

5. Investment Approach: Ionic Navigator Portfolio-Midcap

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes. The portfolio manager shall use internal frameworks and market conditions to decide allocation to different asset classes in the portfolio. Equity allocation shall be done through instruments which have allocation to mid-cap securities

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager shall decide the allocation to different asset classes and different securities thereon basis the market conditions and internal quantitative frameworks.
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like Bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and Equity Related Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global	0-100%

Equity Funds/ commodity ETF and other permissible securities as per the Regulations	
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other permissible securities as per the Regulations	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the a forementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- The portfolio shall have allocation to mid-cap securities and instruments due to which the portfolio performance may be volatile
- There could be situations in which the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds can lead to lag in returns in scenarios of market run ups.

- In a downward trending market, low allocation to debt may impact performance versus benchmark.
- The portfolio shall also face the risk of concentration in the portfolio as the portfolio manager shall tilt the portfolio to a specific asset class basis market conditions.

6. Investment Approach: Ionic PIPE Strategy

Type: Discretionary PMS

Fund Manager: Mr. Harsh Gupta

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating majorly to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income, and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity as an asset class. This shall include listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, equity mutual funds including ETFs, debt mutual funds, REITs, INVITs, , and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager will build a focused portfolio of 30 listed stocks or less basis the following characteristics:
 - a. Governance: Which is measured by capital allocation & capital return to shareholders on a through-cycle basis; alignment of promoter incentives and professionalism of management.
 - b. S-Curve of Profits: Which is measured by operating profits growing faster than the sector, faster than the broader economy and at a key-take off level basis global comparables.
 - c. Predictability: Which is measured by the longevity and moat of the business model. Key determinants will be the risk of technological obsolescence, regulatory and geo-political risks.
 - d. Valuation: The portfolio manager will follow a growth-at-a-reasonable price approach to valuation which considers the company's total addressable market, scenario analysis and quality of earnings.
- Fixed income instruments, debt mutual funds, INVITs and REITs will be included as investment options for surplus cash. The selection criteria for these will be basis interest rate risk, credit risk and liquidity risk.
- For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/ Open Ended equity oriented mutual funds including ETFs/ commodity ETF and other permissible securities as per the Regulations	65-100%

Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/ InvITs and other permissible securities as per the Regulations	0-35%
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Appropriate benchmark to compare performance and basis for choice of benchmark:

BSE 500 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 5 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risk is majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would mean that in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.

7. Investment Approach: Ionic Yield Enhancer Strategy

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital preservation and liquidity while keeping return efficiency in consideration. Further, the investment objective would be to achieve this through investments in fixed income and alternate asset classes.

Strategy: Debt

Description of types of securities

Under this approach, the portfolio manager would primarily invest in fixed income as an asset class. This shall include mutual fund schemes, listed securities including but not limited to convertible and non-convertible debentures, preference shares, perpetual bonds, fixed deposits, certificates of deposit, commercial paper, debt mutual funds, equity arbitrage mutual funds, INVITs, REITs, loans, and bonds. The portfolio manager may also invest in unlisted papers to the extent permissible under SEBI Portfolio Manager regulations, listed equity instruments and derivatives on a hedged basis and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager will manage a portfolio of high yield fixed income securities that strike an appropriate balance of yield, duration, credit risk, liquidity risk and regular income.
- The criteria used:
 - a. Duration to be managed basis a macroeconomic forecast of interest rates.
 - b. Credit risk to be managed basis underwriting of issuer and security level characteristics. The important criteria will be the issuer's ability to generate cash flow to service their debt; collateral provided and security cover.
 - c. Liquidity risk will be managed basis our understanding of market supply-demand.
 - d. The strategy will endeavor to pay regular income to investors on at least a quarterly basis keeping in mind tax efficiency.
- For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Fixed Income and fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/InvITs	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 2 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with low-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations in which the scheme may not match the underlying benchmark.
- The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

8. Investment Approach: Ionic Allocate Portfolio-Equity

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of instruments like mutual funds, ETFs, direct stocks, warrants etc.

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would invest in equity as an asset class. This shall include mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, and equity linked instruments, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs,
- For equity stocks, the manager shall select security basis the price performance in past, governance structure and quality, visibility of profitability, position in the industry etc.
- For mutual funds and ETFs, factors like quality of the manager, vintage of the fund, historical performance along with quantitative factors like capture ratios, consistency ratios shall be considered.

Allocation of portfolio across types of securities –

Particulars	Allocation
Equity and Equity Related Instruments: Listed Stocks/Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	80-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage	0-20%

/ Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other cash instruments and other permissible securities as per the Regulations	
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Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

9. Investment Approach: Ionic Liquid Approach

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to generate a regular income and yield on surplus monies pending deployment.

Strategy: Debt

Description of types of securities

Fixed income investments shall include non-equity oriented mutual fund schemes, convertible and non-convertible debentures, gold bonds, tax free bonds, bonds, commercial papers, certificates of deposit, fixed deposits, arbitrage positions in equity and debt, debentures, preference shares, INVITs, REITs and loans.

Basis of selection of such types of securities as part of the investment approach

- Selection of instruments will be based on an assessment and an appropriate balance of safety, liquidity and credit risk, interest rate risk.

Allocation of portfolio across types of securities

Particulars	Allocation
Fixed Income and Fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage.	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager. is minimum 1 month.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.

- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.

10. Investment Approach: Ionic All Weather Portfolio

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to generate a balance of capital appreciation along with income such as interest, dividend etc. as may be applicable to each investment. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Hybrid

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	0-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other permissible securities as per the Regulations	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 Hybrid Composite Debt 50:50 Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 1 year.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetite.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would range between 30-65%. Hence in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.
- In a downward trending market, low allocation to debt may impact performance versus benchmark.

11. Investment Approach: Ionic Edge Strategy

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating majorly to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income, and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity as an asset class. This shall include listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, equity mutual funds including ETFs, debt mutual funds, REITs, INVITs and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager will build a focused portfolio of 30 listed stocks or less basis the following characteristics:
 - (i) P&L Catalysts: Companies experiencing a breakout in sales growth and/or margins while maintaining stability or improvement on other fundamental parameters.
 - (ii) Balance Sheet Catalysts: Companies completing their capital expenditure and/or reducing debt/ borrowings and/or improving capital efficiency as measured by return on equity and return on invested capital. While maintaining stability or improvement on other fundamental parameters.
 - (iii) Cash Flow Catalysts: Companies experiencing an improvement in cash-flow conversion typically via an improvement in working capital while maintaining stability or improvement on other fundamental parameters.
 - (iv) Shareholding Catalysts: Companies experiencing promoter buying or promoter holding increases via open market purchases, preferential issues, rights issues, buybacks and open offers.
 - (v) Macro Catalysts: Companies benefiting from policy and macroeconomic changes.

All stocks will be screened for corporate governance and liquidity. And a final portfolio will be built from a subset of stocks from the above five filters that are demonstrating technical strength as measured by price, volume and open interest indicators.

- Fixed income instruments, debt mutual funds, INVITs and REITs will be included as investment options for surplus cash. The selection criteria for these will be basis interest rate risk, credit risk and liquidity risk.

- For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/ Open Ended equity oriented mutual funds including ETFs, / commodity ETF and other permissible securities as per the Regulations	65-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/InvITs and other permissible securities as per the Regulations	0-35%

Appropriate benchmark to compare performance and basis for choice of benchmark:
BSE 500 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 2 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risk is majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.

- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would mean that in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.

12. Investment Approach: Ionic High Grade Debt Strategy

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital preservation and liquidity while keeping return efficiency in consideration. Further, the investment objective would be to achieve this through investments in fixed income and alternate asset classes.

Strategy: Debt

Description of types of securities

Under this approach, the portfolio manager would primarily invest in fixed income as an asset class. This shall include mutual fund schemes, listed securities including but not limited to convertible and non-convertible debentures, preference shares, perpetual bonds, fixed deposits, certificates of deposit, commercial paper, debt mutual funds, equity arbitrage mutual funds, INVITs, REITs, loans, and bonds. The portfolio manager may also invest in unlisted papers to the extent permissible under SEBI Portfolio Manager regulations, listed equity instruments and derivatives on a hedged basis and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager will manage a portfolio of high grade fixed income securities that strike an appropriate balance of yield, duration, credit risk, liquidity risk and regular income.
- The criteria used:
 - e. Duration to be managed basis a macroeconomic forecast of interest rates.
 - f. Credit risk to be managed basis underwriting of issuer and security level characteristics. The important criteria will be the issuer's ability to generate cash flow to service their debt; collateral provided and security cover.
 - g. Liquidity risk will be managed basis our understanding of market supply-demand.
 - h. The strategy will endeavor to pay regular income to investors on at least a quarterly basis keeping in mind tax efficiency.
- For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Fixed Income and fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/InvITs	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 2 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with low-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations in which the scheme may not match the underlying benchmark.
- The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

13. Investment Approach: Ionic Vantage Bespoke Portfolio

Type: Discretionary PMS

Fund Manager: Mr. Yajash Mehta

Investment objective

Ionic Vantage Bespoke Portfolio is a long only, multi-cap, sector agnostic portfolio developed based on a customized need and goals of the clients, with an overarching objective to generate superior risk adjusted returns over a long period of time using our detailed fundamental research. Each client portfolio under the strategy may vary depending on each client's objective, timing of the fund investments or for any other reason warranted by the circumstances. Though reasonable endeavour will be made to understand clients' objectives and achieve the objectives of the portfolio, there is no guarantee or assurance that the investment objective will be achieved. No guaranteed returns are being offered under these services.

Strategy: Equity

Description of types of securities

Under Ionic Vantage Bespoke Portfolio, clients' monies would be primarily invested in equity shares and equity linked instruments issued by companies which are listed in India. Some part of clients' monies might be invested in mutual funds, units of money market and any other asset classes and securities as permissible under the Regulations. The Portfolio Manager shall make investments in the securities of associates/related parties under this approach only after obtaining the prior consent of the client and not beyond the Investment limit specified by the Client as well as mandated in the Regulations as amended from time to time. The Portfolio Manager, however, shall not invest clients' funds in unrated securities of their associates/related parties. In respect of any investment in debt and hybrid securities, Portfolio Manager shall not make any investment in below investment grade securities.

Basis of selection of such types of securities as part of the investment approach

The Portfolio Manager will build a focused portfolio of listed stocks or less basis the PERFECT framework: a. Promoter & Management (P): Quality of management & corporate governance b. Earnings ©: Quality of financial reports and consistency of earnings. C. Risks ©: Business model and market-related risks. D. Fair Value (F): Buying stocks with a margin-of-safety. E. Events ©: Macro & micro events that can move a stock. Also being nimble about capitalizing on new opportunities. F. Capital Allocation ©: Prudent capital allocation. G. Trends & Timing (T): Capturing market and business trends.

Fixed income instruments, debt mutual funds, INVITs and REITs will be included as investment options for surplus cash. The selection criteria for these will be basis interest rate risk, credit risk and liquidity risk.

For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/ Open Ended equity oriented mutual funds including ETFs / commodity ETF and other permissible securities as per the Regulations	0-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/InvITs and other permissible securities as per the Regulations	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:
BSE 500 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 5 years.

Portfolio Construction and Recommendation

Not all investors are alike. Different investors have different investment goals and objectives, risk appetite, investment experience, age factor, family factors, business dynamics etc, key determinants in establishing their Risk Profile with reference to investing their money. The process of identifying an investor's investment profile involves detailed conversation with the investor and guiding them through a risk assessment against equity investment to help them establish their Investment Policy Statement (IPS).

We broadly classify investors in 3 risk profiles into Aggressive / Balanced / Conservative. Also, for clients looking for customization, for investing across various asset classes, based on their risk profile and investment objective, we will provide them Be-Spoke Investment approaches to meet their investment objective.

Allocation Across Risk Profiles

Asset / Sub-Asset Class	Aggressive	Balanced	Conservative
Large Cap	0 – 30%	35 – 65%	70 – 100%
Mid & Small Cap	70 – 100%	35 – 65%	0 – 30%
Total	100%	100%	100%

Aggressive Strategy

This approach is designed for investors who are comfortable with higher levels of risk and volatility in pursuit of long-term growth. The portfolio is tilted towards mid and small cap companies, which provide strong growth potential but may face sharper fluctuations. Large caps are included to provide some stability. This strategy is suitable for investors with a long-term horizon and a high-risk appetite.

Balanced Strategy

This approach aims to strike a balance between growth and stability. The portfolio is spread across both large caps and mid & small caps, ensuring participation in growth opportunities while

maintaining resilience through stable companies. It is suited for investors with moderate risk tolerance, seeking a balance of wealth creation and protection.

Conservative Strategy

This approach prioritizes safety and capital preservation. The portfolio is anchored in large cap companies, which tend to be more stable and resilient. A smaller portion is allocated to mid and small caps to provide some participation in growth. This strategy is suitable for investors with lower risk appetite, who value stability and steady returns over aggressive growth.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this Document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risk is majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by interest rate movements, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would mean that in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.

14. Investment Approach: Ionic Summit Portfolio-Moderate

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to generate a balance of capital appreciation along with income such as interest, dividend etc. as may be applicable to each investment. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Hybrid

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds, SIFs, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/SIFs/Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds/ commodity ETF and other permissible securities as per the Regulations	35-70%
Fixed Income and other instruments: Bonds/ debentures/ SIFs/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/	30-65%

Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other permissible securities as per the Regulations	
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Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 Hybrid Composite Debt 50:50 Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetite.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would range between 30-65%. Hence in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.
- In a downward trending market, low allocation to debt may impact performance versus benchmark.

15. Investment Approach: Ionic Summit Portfolio-Conservative

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital preservation while keeping return efficiency in consideration. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Debt

Description of types of securities

Under this approach, the portfolio manager would primarily invest in fixed income as an asset class. This shall include mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, government securities, derivative instruments, listed units of alternate investment funds, SIFs, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Related Instruments: Listed Stocks/ SIFs/Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	0-35%

Fixed Income and other instruments: Bonds/ debentures/ SIFs/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other permissible securities as per the Regulations	65-100%
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Appropriate benchmark to compare performance and basis for choice of benchmark:
CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with low-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations in which the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would range between 65-100%. Hence in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.
- In a downward trending market, low allocation to debt may impact performance versus benchmark.

16. Investment Approach: Ionic Summit Portfolio-Aggressive

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating majorly to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Multi Asset

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity as an asset class. This shall include mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, government securities, derivative instruments, listed units of alternate investment funds, SIFs and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.

Allocation of portfolio across types of securities –

Particulars	Allocation
Equity other Instruments: Listed Stocks/ SIFs/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	70-100%

Fixed Income and other instruments: Bonds/ debentures/ SIFs/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity /Debt and other permissible securities as per the Regulations	0-30%
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Appropriate benchmark to compare performance and basis for choice of benchmark:

NSE Multi Asset Index 1
Composition: 50%: Nifty 500
40%: Nifty 50 Arbitrage Index
10%: REIT & INVIT

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

17. Investment Approach: Ionic Summit Portfolio-Equity

Type: Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of instruments like mutual funds, ETFs, direct stocks, warrants etc.

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would invest in equity as an asset class. This shall include mutual fund schemes, SIFs, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, and equity linked instruments, and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. Fixed income instruments like bonds, debentures, SIFs, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs,
- For equity stocks, the manager shall select security basis the price performance in past, governance structure and quality, visibility of profitability, position in the industry etc.
- For mutual funds and ETFs, factors like quality of the manager, vintage of the fund, historical performance along with quantitative factors like capture ratios, consistency ratios shall be considered.

Allocation of portfolio across types of securities –

Particulars	Allocation
Equity and Equity Related Instruments: Listed Stocks/Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ SIFs/ Global Equity Funds / commodity ETF and other permissible securities as per the Regulations	80-100%

Fixed Income and other instruments: Bonds/ debentures/ SIFs/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity/ Debt and other cash instruments and other permissible securities as per the Regulations	0-20%
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Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the aforementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

Non-Discretionary PMS

1. Investment Approach: Ionic Sharpe One Strategy

Type: Non-Discretionary PMS

Fund Manager: Mr. Yajash Mehta

Investment objective

The investment objective of this approach is to focus on capital appreciation by allocating majorly to equity as an asset class. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income, and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Equity

Description of types of securities

Under this approach, the portfolio manager would primarily invest in equity as an asset class. This shall include listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, equity mutual funds including ETFs, debt mutual funds, REITs, INVITs and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager will build a focused portfolio of listed stocks or less basis the PERFECT framework:
 - a. Promoter & Management (P): Quality of management & corporate governance
 - b. Earnings (E): Quality of financial reports and consistency of earnings.
 - c. Risks (R): Business model and market-related risks.
 - d. Fair Value (F): Buying stocks with a margin-of-safety.
 - e. Events (E): Macro & micro events that can move a stock. Also being nimble about capitalizing on new opportunities.
 - f. Capital Allocation (C): Prudent capital allocation.
 - g. Trends & Timing (T): Capturing market and business trends.
- Fixed income instruments, debt mutual funds, INVITs and REITs will be included as investment options for surplus cash. The selection criteria for these will be basis interest rate risk, credit risk and liquidity risk.
- For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.
- The portfolio manager shall shortlist the securities basis the objectives and profile of the investor and share options for his/her confirmation. However, the execution of trades shall happen only post the confirmation received from the client.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and other Instruments: Listed Stocks/ Open Ended equity oriented mutual funds including ETFs / commodity ETF and other permissible securities as per the Regulations	0-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/InvITs and other permissible securities as per the Regulations	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:
BSE 500 TRI

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 5 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this Document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risk is majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with high-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by interest rate movements, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.
- Allocation to cash/fixed income mutual funds would mean that in periods of runaway equity returns and high equity valuations, this investment approach may lag equity returns.

2. Investment Approach: Ionic Yield Enhancer Strategy

Type: Non-Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to focus on capital preservation and liquidity while keeping return efficiency in consideration. Further, the investment objective would be to achieve this through investments in fixed income and alternate asset classes.

Strategy: Debt

Description of types of securities

Under this approach, the portfolio manager would primarily invest in fixed income as an asset class. This shall include mutual fund schemes, listed securities including but not limited to convertible and non-convertible debentures, preference shares, perpetual bonds, fixed deposits, certificates of deposit, commercial paper, debt mutual funds, equity arbitrage mutual funds, INVITs, REITs, loans, and bonds. The portfolio manager may also invest in unlisted papers to the extent permissible under SEBI Portfolio Manager regulations, listed equity instruments and derivatives on a hedged basis and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- The portfolio manager will manage a portfolio of high yield fixed income securities that strike an appropriate balance of yield, duration, credit risk, liquidity risk and regular income.
- The criteria used:
 - a. Duration to be managed basis a macroeconomic forecast of interest rates.
 - b. Credit risk to be managed basis underwriting of issuer and security level characteristics. The important criteria will be the issuer's ability to generate cash flow to service their debt; collateral provided and security cover.
 - c. Liquidity risk will be managed basis our understanding of market supply-demand.
 - d. The strategy will endeavor to pay regular income to investors on at least a quarterly basis keeping in mind tax efficiency.
- For any other asset class or instrument type: instrument specific characteristics may be considered. For example, the correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.
- The portfolio manager shall shortlist the securities basis the objectives and profile of the investor and share options for his/her confirmation. However, the execution of trades shall happen only post the confirmation received from the client.

Allocation of portfolio across types of securities

Particulars	Allocation
Fixed Income and fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / REITs/InvITs	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:
CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 2 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with low-risk appetites.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations in which the scheme may not match the underlying benchmark.
- The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

3. Investment Approach: Ionic Allocate Select Portfolio

Type: Non-Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to meet the risk and return expectations of the investor by creating a personalized multi asset portfolio basis his/her needs and objectives behind the investments. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Hybrid

Description of types of securities

Under this approach, the portfolio manager would invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.
- The portfolio shall be personalized to each investor's requirement in terms of risk, return, time horizon etc. The asset allocation, type of securities, allocation to various securities shall be basis the requirements specified by the investor
- The shortlisting of securities shall be done by the manager for it to be approved by the investor. The final execution of trades shall only be done post confirmation from the investor.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and Equity Related Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds, / commodity ETF and other permissible securities as per the Regulations	0-100%
Fixed Income and other instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity /Debt and other permissible securities as per the Regulations	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 Hybrid Composite Debt 50:50 Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetite.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the a forementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration

all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.

- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

4. Investment Approach: Ionic Liquid Approach

Type: Non-Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to generate a regular income and yield on surplus monies pending deployment.

Strategy: Debt

Description of types of securities

Fixed income investments shall include non-equity oriented mutual fund schemes, convertible and non-convertible debentures, gold bonds, tax free bonds, bonds, commercial papers, certificates of deposit, fixed deposits, arbitrage positions in equity and debt, debentures, preference shares, INVITs, REITs and loans.

Basis of selection of such types of securities as part of the investment approach

- Selection of instruments will be based on an assessment and an appropriate balance of safety, liquidity and credit risk, interest rate risk.

Allocation of portfolio across types of securities

Particulars	Allocation
Fixed Income and Fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage.	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

CRISIL Composite Bond Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager. is minimum 1 month.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.

- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.

Investors must keep in mind that the above statements and presentation cannot disclose all the risks and characteristics. Investors should take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.

5. Investment Approach: Ionic Co-Pilot Portfolio

Type: Non-Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to meet the risk and return expectations of the investor by creating a personalized multi asset portfolio basis his/her needs and objectives behind the investments. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio.

Strategy: Hybrid

Description of types of securities

Under this approach, the portfolio manager would invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds and/or other permissible securities/products in accordance with the applicable laws.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc., fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the Portfolio Manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.
- The portfolio shall be personalized to each investor's requirement in terms of risk, return, time horizon etc. The asset allocation, type of securities, allocation to various securities shall be basis the requirements specified by the investor.
- The shortlisting of securities shall be done by the Portfolio Manager for it to be approved by the investor. The final execution of trades shall only be done post confirmation from the investor.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and Equity Related Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds/ AIFs etc.	0-100%
Fixed Income and Fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds	0-100%

including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity and Debt etc.	
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Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 Hybrid Composite Debt 50:50 Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetite.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the a forementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

6. Investment Approach: Ionic Large Value Portfolio

Type: Non-Discretionary PMS

Fund Manager: Mr. Gaurav Aggarwal

Investment objective

The investment objective of this approach is to meet the risk and return expectations of the investor by creating a personalized multi asset portfolio basis his/her needs and objectives behind the investments. Further, the investment objective would be to achieve this in the long term through investments in investment opportunities that are a combination of equity, fixed income and alternate asset classes to achieve desired asset allocation for the portfolio. This investment approach shall only be available to investors with valid and active Accredited Investor Certificate in India.

Strategy: Hybrid

Description of types of securities

Under this approach, the Portfolio Manager would invest in equity oriented mutual fund schemes, listed securities including but not limited to equity, preference, participating, non-participating, voting and/or non-voting shares, in warrants, options, equity linked instruments, bonds, , debentures, debt oriented mutual funds, government securities, derivative instruments, listed units of alternate investment funds and/or other permissible securities/products in accordance with the applicable laws. The portfolio manager shall invest in securities in proportion applicable to investors with Accreditation.

Basis of selection of such types of securities as part of the investment approach

- Disciplined approach to asset allocation per the investment approach
- Investment in equity and equity-oriented instruments like listed stocks, mutual funds, ETFs, options etc. fixed income instruments like bonds, debentures, mutual funds, ETFs also form a part of the universe of investment for the portfolio manager. Both open ended and closed ended funds will be considered which include equity, fixed income, hybrid, thematic, index, ETF, arbitrage, offshore scheme/ETF and gold schemes and any other categories that may emerge over time. The portfolio may also consider investments in InvITs/REITs, Bonds/Debentures based on the prevailing market conditions and keeping the investor's interests in mind to enhance relative risk adjusted performances.
- For any other asset class: instrument specific characteristics may be considered. For example: for parameters like correlation with different asset classes, sensitivity to macroeconomic fluctuations, return trajectory etc. may be considered.
- The portfolio shall be personalized to each investor's requirement in terms of risk, return, time horizon etc. The asset allocation, type of securities, allocation to various securities shall be basis the requirements specified by the investor
- The shortlisting of securities shall be done by the manager for it to be approved by the investor. The final execution of trades shall only be done post confirmation from the investor.
- Investment Limits shall be applicable as per the regulations for Accredited Investors.

Allocation of portfolio across types of securities

Particulars	Allocation
Equity and Equity Related Instruments: Listed Stocks/ Open Ended Equity oriented mutual funds including ETF / Index / Equity Hybrid funds/ Global Equity Funds/ AIFs etc.	0-100%
Fixed Income and Fixed Income related instruments: Bonds/ debentures/ Open Ended Fixed Income oriented mutual funds including ETFs/ Index/ Debt Hybrid/ Arbitrage / Gold funds/ Listed AIFs/ REITs/InvITs/ Equity and Debt etc.	0-100%

Appropriate benchmark to compare performance and basis for choice of benchmark:

Nifty 50 Hybrid Composite Debt 50:50 Index

Indicative tenure or investment horizon

Recommended time horizon for effective portfolio returns as envisaged by the portfolio manager is minimum 3 years.

Risks associated with the investment approach

Below are select risks associated with the investment approach apart from those disclosed in Clause 6 titled 'Risk Factors' of this document. The risks may affect portfolio performance even though the portfolio manager may take measures to mitigate the same.

Capital risks are majorly related to equity and equity related Securities, interest rate risks and credit risks associated with fixed income securities. This investment approach will be suitable for investors with moderate risk appetite.

- The portfolio performance is subject to market risks and may lead to loss of capital during the tenure of the portfolio. Investors with an ability to take such risk shall be suitable for the portfolio investment approach.
- The portfolio may also be impacted by the interest rate movement, credit risks and liquidity risks, however, to the extent of the debt fund exposure in the portfolio.
- Investments in mutual funds are subject to market risk and there is no assurance or guarantee of the objectives of the portfolio investment approach being achieved.
- The investment returns from the portfolio investment approach may be a function of mutual fund scheme selection and portfolio actions as well as market conditions during the investment tenor of the portfolio investment approach.
- Past performance does not indicate the future performance of the investment approach.
- Investors must keep in mind that the a forementioned statements and presentation cannot disclose all the risks and characteristics. The investors are requested to take into consideration all the risk factors including their financial condition, suitability to risk return profile and the likes and take professional advice before investing.
- There could be situations where the scheme may not match the underlying benchmark. The investors should note that the risk factors of the underlying mutual fund schemes and other instruments in which the portfolio manager will invest shall be applicable.

Co-Investment Portfolio Management Services

i. Investment Objective

The main objective of the Co-Investment Portfolio Manager is to act and render co-investment portfolio management services to existing investor of alternative investment funds being managed by the Co-Investment Portfolio Manager and sponsored by same Sponsor.

ii. Description of types of securities in which Portfolio Manager will invest

The Co-Investment Portfolio Manager shall invest in Unlisted equity, equity linked instruments, debt or such other form as it deemed appropriate where Category I Alternative Investment Funds and Category II Alternative Investment Funds make investment.

iii. Investment Approach of the Portfolio Manager

There shall be no specific investment approach as existing investors of alternative investment fund which are managed by the Co-Investment Portfolio Manager who are desirous to invest in specific unlisted security shall be permitted to invest.

iv. Terms of Co-Investment

- The terms of co-investment in an investee company by a co-investor, shall not be more favourable than the terms of investment of the Alternative Investment Fund.
- The terms of exit from the Co-investment in an investee company including the timing of exit shall be identical to the terms applicable to that of exit of the Alternative Investment Fund.
- Early withdrawal of funds by the co-investors with respect to Co-investment in investee companies shall be allowed to the extent that the Alternative Investment Fund has also made an exit from respective investment in such investee companies.

v. Risks associated with Co-Investments

- a. Investments in Unlisted securities depends upon the ability of the Co-investment Portfolio Manager to source, select, review/evaluate, complete and realize appropriate investments. Securities investments are prone to volatility and subject to market risks;
- b. The Client Portfolio may comprise of investment in unlisted securities and in case of such securities the Co-investment Portfolio Manager's ability, upon instructions of the Client, to protect the investment or seek returns or create liquidity when required may be limited.
- c. The Co-investment Portfolio Manager may also invest in Portfolio Entity/ies which are new or recently established which may provide limited liquidity.
- d. In case of in-specie distribution of the Securities by the Co-investment Portfolio Manager upon termination or liquidation of the Client Portfolio, the same could consist of such Securities for which there may not be a readily available public market.
- e. Co-investment Portfolio Manager's investment suggestions may not always be profitable, as actual market movements may be at variance with anticipated trends.
- f. The Client may be restricted / prohibited from transferring any of the interests, rights or obligations with regard to the Portfolio except as may be provided in the Agreement and in the Regulations.
- g. The Co-Investment Portfolio Manager has no previous experience/track record in the field of co-investment portfolio management services and has obtained a license to function as a Co-Investment Portfolio Manager. However, the Principal Officer, Directors and other key management personnel of the Co-Investment Portfolio Manager have extensive individual experience.

FORM C

Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020
[Regulation 22]

Name	Angel One Investment Managers & Advisors Private Limited
Registered Address	Office No. 601, 6th Floor, Ackruti Star, Chakala MIDC, Central Road, Mumbai - 400093, Maharashtra, India.
Principal Place of Business	14 th Floor, Awfis INS Tower, G Block, Opposite to Trident Hotel, Bandra Kurla Complex, Bandra East, Mumbai, 400051.
Correspondence Address	3 rd Empressa 14 Western Express Highway, Sahar Road, Andheri East, Mumbai, Maharashtra – 400099.
Phone Number	+91 022 4000 3600
Fax Number	022 4000 3600
Mobile Number	+91 022 4000 3600
Email	compliance.assets@ionic.in

We confirm that:

- (i) the Disclosure Document forwarded to SEBI is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by SEBI from time to time;
- (ii) the disclosures 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 through the Portfolio Manager;
- (iii) the Disclosure Document has been duly certified by an independent Chartered Accountant, as on November 14, 2025. The details of the Chartered Accountants are as follows:

Name of the Firm : Aneel Lasod and Associates
Registration Number : 124609W
Partner Name : Mr. Aneel Lasod
Membership Number : 040117
Address : 1101-1103, 11th Floor, Corporate Annexe, Sonawala Lane,
Near Udyog Bhawan, Goregaon (E), Mumbai-400063.
Telephone Number : 022-68287038

For and on behalf of Angel One Investment Managers & Advisors Limited

Date: November 14, 2025

Place: Mumbai

Signature of the Principal Officer: _____

Mr. Gaunav Aggarwal





CERTIFICATE

The Board of Directors,
Angel One Investment Managers & Advisors Private Limited
Office No-610, 6th Floor,
Ackruti Star, Chakala MIDC,
Central Road,
Mumbai – 400093, Maharashtra.

You have requested to us to provide a certificate on the Disclosure document for Portfolio Management services ("the Disclosure Document") of **Angel One Investment Managers & Advisors Private Limited**. ("the Company"). We understand that the disclosure document is required to be submitted to the Securities and Exchange Board of India ("the SEBI").

1. The Disclosure Document and compliance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 ("the SEBI Regulation") and the Master Circular issued by SEBI dated July 16, 2025 and SEBI circular dated September 9, 2025 is the responsibility of the management of the company. Our responsibility is to report in accordance with the Guidance note on Audit Reports and Certificates for special purposes issued by the Institute of Chartered Accountants of India. Further, our scope of work did not involve us performing audit tests for the purpose of expressing an opinion on the fairness or accuracy of any of the financial information or the financial statement taken as a whole. We have not performed an audit, the objective of which would be the expression of an opinion on the financial statement, specified elements, accounts or items thereof, for the purpose of this certificate. Accordingly, we do not express such opinion.
2. In respect of the information given in the Disclosure document, we state that:
 - i. The list of persons classified as Associates or group companies and list of related parties are relied upon as provided by the company.
 - ii. The Promoters and director's qualification, experience, ownership details are as declared by them and have been accepted without further verification.
 - iii. We have relied on the representations given by the management of the company about the penalties or litigations against the Portfolio Manager mentioned in the Disclosure document.
 - iv. We have relied on the representation made by the management regarding the Assets under management of Rs. 435.89 Crore as on October 31, 2025.

Read with above and on the basis of our examination of the books of accounts, records, statements produced before us and to the best of our knowledge and according to the information, explanations and representations given to us, we certify that the disclosure made in the Disclosure Document dated November 14, 2025 are true and fair in accordance with the disclosure requirements laid down in Regulation 22 read with Schedule V to the SEBI Regulations. A management certified copy of the disclosure document is enclosed herewith.

This certificate is intended solely for the use of the management of the company for the purpose as specified in paragraph 1 above.

For Aneel Lasod and Associates

Chartered Accountants

Firm Regn.No.124609W

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Lasod

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by Aneel
manoharlal
Lasod
Date:
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18:15:06 +05'30'

Aneel Lasod

(Partner)

Mhip No.040117

Place: Mumbai

Date: 14-11-2025

UDIN:25040117BMIBIP7545