

**ALFACCURATE ADVISORS PRIVATE LIMITED**  
**DISCLOSURE DOCUMENT**  
**FOR**  
**PORTFOLIO MANAGEMENT SERVICES**

**PORTFOLIO MANAGEMENT SERVICES**  
**DISCLOSURE DOCUMENT**  
**Registration No: INP000003419**

***(As per the requirement of the Fifth Schedule under Regulation 22(3) of SEBI (Portfolio Managers) Regulations, 2020)***

- (i) The Document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended from time to time and filed with SEBI.
- (ii) The Document has been filed with the Board (SEBI) along with the certificate in the prescribed format in terms of regulation 22(3) of SEBI (Portfolio Managers) Regulation 2020.
- (iii) The purpose of the Document is to provide essential information about the Portfolio Management Services (PMS) in a manner to assist and enable the investors in making an informed decisions for engaging a Portfolio Manager.
- (iv) The document contains 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.
- (v) This Disclosure Document is dated 31<sup>ST</sup> January 2025 **(financial data considered up to 31<sup>ST</sup> March 2024).**

**Details of the Portfolio Manager**

Name of Portfolio Manager : AlfAccurate Advisors Private Limited  
SEBI Registration Number : INP000003419  
Registered Office Address : 503/504, B Wing, Naman Midtown, Off Senapati  
Bapat Marg, Elphinstone Road, Mumbai – 400 013  
Phone No(s) : +91 22 423 60301  
E-mail address : [compliance@alfaccurate.com](mailto:compliance@alfaccurate.com)

**Details of Principal Officer**

Name of Principal Officer : Mr. Rajesh B. Kothari  
Registered Office Address : 503/504, B Wing, Naman Midtown, Off Senapati  
Bapat Marg, Elphinstone Road, Mumbai – 400 013  
Phone No(s) : +91 22 423 60301  
E-mail address : [compliance@alfaccurate.com](mailto:compliance@alfaccurate.com)

**CERTIFICATE**

Disclosure Document and its content have been duly verified by an Independent Chartered Accountant, **B Y & Associates** Chartered Accountants, having firm registration number 123423W, and having its Office at 8A-2 Chandar Mukhi Building, 8<sup>th</sup> Floor, Nariman Point, opposite Nirmal Bldg., Mumbai – 400 021 to enable the investors to make well informed decisions.

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1. **Disclaimer:**

This Disclosure 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 the Document. The company does not undertake to notify the clients of any changes in the information stated herein, subsequent to the date of this document.

Notwithstanding anything contained in this Disclosure Document, the provisions of SEBI (Portfolio Managers) Regulations, 2020 and as amended from time to time and the circulars/guidelines issued by SEBI from time to time there under shall be applicable.

This Disclosure Document along with a certificate in Form C is required to be provided to the Client, prior to entering into an agreement with the Client.

2. **Definitions:**

Unless the context or meaning thereof otherwise requires, the following expressions shall have the meaning assigned to them hereunder respectively: -

- a) **“Act”** means the Securities and Exchange Board of India Act, 1992 (15 of 1992) as amended from time to time.
- b) **“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 the Board from time to time.
- c) **“Accredited Investor”** means any person who has been granted a certificate by the accreditation agency who:
  1. in the case of an individual, HUF, family trust, or sole proprietorship has:
    - a. the annual income of at least two crore rupees; or
    - b. the net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees are in the form of financial assets; or
    - c. the annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crores fifty lakh rupees are in the form of financial assets.
  2. in case of a body corporate, has a net worth of at least fifty crore rupees;
  3. in case of a trust other than family trust, has a net worth of at least fifty crore rupees;
  4. in the 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.

- d) **“Advisory”** services include the services provided by the portfolio manager but are not limited to advising clients on purchase or sale of securities and/or review, evaluating,

structure, monitor the portfolio of a client at an agreed fee so as to achieve Client's objectives;

- e) **"Activation Date"** is the date when the sum equivalent to the funds or the securities respectively are received in the Client's bank or Demat Account or the utilization of those funds/securities for portfolio management by the Portfolio Manager whichever is later.
- f) **"Agreement"** means the agreement between Portfolio Manager and its Clients in terms of Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020 issued by Securities and Exchange Board of India and shall include all recitals, schedules, exhibits and Annexure attached thereto, and any amendments made to this Agreement by the Parties in writing;
- g) **"APMI"** means Association of Portfolio Managers in India, which has been constituted as a Trade Body for Portfolio Managers registered with the Securities & Exchange Board of India (SEBI).
- h) **"Application"** means the application made by the Client to the Portfolio Manager to place the monies and/or securities mentioned therein with the Portfolio Manager for Portfolio Manager Service. Upon execution of the Agreement by the Portfolio Manager, the Application shall be deemed to form an integral part of the Agreement. Provided that in case of any conflict between the contents of the Application and the provisions of the Agreement, the provisions of the Agreement shall prevail.
- i) **"Assets"** means (i) the Portfolio and/or (ii) the Funds and includes all accruals benefits, allotments, calls refunds, returns, privileges, entitlements, substitutions and/or replacement or any other beneficial interest including dividend, interest, rights, bonus as well as residual cash balances, if any, (represented both by quantity and in monetary value), in relation to or arising out of Assets.
- j) **"Bank Account"** means one or more bank accounts opened, maintained and operated by the Portfolio Manager in the name of clients or a pool account in the name of the Portfolio Manager in which the funds handed over by the client shall be held by the Portfolio Manager on behalf of the Client.
- k) **"Board"** or **"SEBI"** means 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 as amended from time to time.
- l) **"Body corporate"** shall have the meaning assigned to it under clause (11) of section 2 of the Companies Act, 2013 (18 of 2013) as amended from time to time;
- m) **"Benchmark"** means the Benchmark selected by the Portfolio Manager pursuant to the SEBI circular dated 16<sup>th</sup> December 2022, to indicate performance of the portfolio vis a vis markets, which enables investors to evaluate relative performance of portfolio managers.
- n) **"BSE"** means Bombay Stock Exchange.
- o) **"Business Day"** means a day other than (i) a day on which the principal stock exchange(s) with reference to which the valuation of securities under the Approach is done is closed, or (ii) the Reserve Bank of India or banks in Mumbai, India are closed for business, or (iii) a day on which AAA office in Mumbai, India is closed for business;

- p) **“Cash Account”** means the account in which the funds handed over by the client shall be held by the Portfolio Manager on behalf of the client;
- q) **“Certificate”** means a certificate of registration issued by the Board;
- r) **“Change in control”**, in relation to a portfolio manager being a body corporate: –  
 (i) If its shares are listed on any recognized stock exchange, shall be construed with reference to the definition of control in terms of Regulation 2(e) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended from time to time;  
 (ii) In any other case, change in the controlling interest in the body corporate;  
 Explanation. – For the purpose of sub-clause (ii), the expression “controlling interest” means,  
 (A) An interest, whether direct or indirect, to the extent of at least fifty one percent of voting rights in the body corporate;  
 (B) Right to appoint the majority of the directors or to control the management directly or indirectly;
- s) **“Chartered Accountant”** means a Chartered Accountant as defined in clause (b) of sub-section (1) of section 2 of the Chartered Accountants Act, 1949 (38 to 1949) and who has obtained a certificate of practice under sub-section (1) of section 6 of that Act;
- t) **“Client” or “Investor”** means any person who registers with the portfolio manager for availing the services of portfolio management by the portfolio manager;
- u) **“Custodian”** means a person who has been granted a certificate of registration to carry on the business of custodian of securities under the SEBI (Custodian of Securities) Regulations, 1996.
- v) **“Depository”** as defined in the Depositories Act, 1996 (22 of 1996) and includes National Securities Depository Ltd. (NSDL) and Central Depository Services (India) Ltd. (CDSL).
- w) **“Direct on-boarding”** means an option provided to clients to be on-boarded directly with the Portfolio Manager without the intermediation of persons engaged in distribution services.
- x) **“Disclosure Document”** this disclosure document for Portfolio Management Services as prescribed under the Regulation and amended time to time.
- y) **“Discretionary Portfolio Management Services”** means the portfolio management services rendered to the Client, by the Portfolio Manager on the terms and conditions contained in this Agreement, where under the Portfolio Manager exercises any degree of discretion in investments or management of assets of the Client;
- z) **“Discretionary portfolio manager”** means a portfolio manager who exercises or may, under a contract relating to portfolio management, exercises any degree of discretion as to the investments or management of the portfolio of securities or the funds of the client, as the case may be;
- aa) **“Effective Date”** means the Depository participant who holds the shares, securities, and cash on behalf of the client;
- bb) **“Form”** means a form specified in Schedule I;

- cc) **"Financial year"** means the year starting from 1st April and ending on 31st March of the following year,
- dd) **"Funds"** means the monies placed by the Client with the Portfolio Manager and any accretions thereto;
- ee) **"Funds managed"** the individual/s appointed by the portfolio manager who manages, advise or directs, or undertakes on behalf of the client (whether as a Discretionary Portfolio Manager or otherwise) the management or administration of a portfolio of securities or the funds of the clients, as the case may be
- ff) **"Foreign Institutional Investor (FII)"** FII shall have the meaning defined under SEBI (Foreign Institutional Investor) Regulations, 1995, and as may be amended from time to time.
- gg) **"Foreign Portfolio Investor (FPI)"** FPI shall have the meaning defined under SEBI (Foreign Portfolio Investors) Regulations, 2014, and as may be amended from time to time.
- hh) **"Fund Manager"** (FM) means the individual/s appointed by the portfolio manager who manages, advise or directs, or undertakes on behalf of the client (whether as a Discretionary Portfolio Manager or otherwise) the management or administration of a portfolio of securities or the funds of the clients, as the case may be;
- ii) **"Goods"** means the goods notified by the Central Government under clause (bc) of section 2 of the Securities Contracts (Regulation) Act, 1956 and forming the underlying of any commodity derivative;
- jj) **"High Water Mark"** means the value of the highest Closing NAV (as at the end of each variable fees calculation period starting from the effective date) achieved by the Portfolio in any year during the subsistence of this Agreement (adjusted for any additional funds/withdrawals by the Client in that year) and net of (i) the Portfolio Management Fees, for that year;
- kk) **"Initial Corpus"** means the value of the Funds and the market value of Securities brought in by the Client and accepted by the Portfolio Manager at the time of entering into an agreement with the Portfolio Manager to avail its portfolio management services;
- ll) **"Inspecting authority"** means one or more persons appointed by the Board to exercise powers conferred under Chapter V;
- mm) **"Investment Advice"** means advice relating to investing in, purchasing, selling, or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral, or through any other means of communication for the benefit of the client and shall include financial planning;
- nn) **"Investment Approach"** shall mean a broad outlay of the type of securities and permissible instruments to be invested in by the portfolio manager for the customer, taking into account factors specific to clients and securities;

- oo) **“Investment Advisory Services”** the services, where the Portfolio Manager advises Clients on investments in general or gives specific advice required by the Clients and agreed upon in the Agreement.
- pp) **“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.
- qq) **“Net Asset Value”** (NAV) is the market value of assets in the portfolio consisting of securities and funds;
- rr) **“Non-Discretionary Portfolio Management Services”** means the services provided by the Portfolio Manager, who manages the funds in accordance with the discretion of the Client for an agreed fee and invests on behalf of the Client in their account in any type of securities entirely at the Client's risk and to ensure that all the benefits accrue to the Clients' Portfolio;
- ss) **“NRI”** Non-Resident Indian as defined in Section 2(30) of the Income Tax Act, 1961.
- tt) **“NSE”** means National Stock Exchange
- uu) **“Portfolio”** means the total holdings of Securities and Goods belonging to a client;
- vv) **“Portfolio Manager”** (PM) means **AlfAccurate Advisors Private Limited**, a body corporate, who has obtained a certificate from SEBI to act as a Portfolio Manager under Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, vide Registration No. **INP000003419**;
- ww) **“Principal Officer”** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for: -
  - i. the decisions made by the portfolio manager for the management or administration of a portfolio of securities or the funds of the client, as the case may be;
  - ii. all other operations of the portfolio managers;
- xx) **“Related party”** in relation to a portfolio manager, means –
  - (a) a director, partner or his relative;
  - (b) key managerial personnel or his relative;
  - (c) a firm, in which a director, partner, manager or his relative is a partner;
  - (d) a private company in which a director, partner or manager or his relative is a member or director;
  - (e) 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;
  - (f) 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;
  - (g) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:  
Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
  - (h) any body corporate which is—
    - 1. a holding, subsidiary or an associate company of the portfolio manager; or
    - 2. a subsidiary of a holding company to which the portfolio manager is also a subsidiary;



3. an investing company or the venturer of the portfolio manager;  
Explanation. —For the purpose of this clause, “investing company or the venturer of a 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.

- (i) a related party as defined under the applicable accounting standards;
- (j) 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

yy) **“Regulation”** means the Securities and Exchange Board of India (Portfolio Manager) Regulation, 2020 as amended by Securities and Exchange Board of India (Portfolio Managers) Amendment Regulations, 2002 and as may be amended by SEBI from time to time;

zz) **“Securities”** includes : “Securities” as defined under the Securities Contract (Regulations) Act, 1956; shares, scrips, stocks, bonds, warrants, convertible and non- convertible debentures, fixed return investments, equity linked instruments, negotiable instruments, deposits, money market instruments, commercial paper, certificate of deposit, units issued by Unit Trust of India and / or by any mutual funds, units or any other instrument issued by any collective investment scheme to the investors in such schemes, mortgage backed or other asset backed securities, derivative, derivatives instrument, options, futures, foreign currency commitments, hedged, swaps or netting of any other securities issued by any company or other body corporate, any trust, any entity, the Central Government, the State Government or the local or statutory authority and all money rights or property that may at any time be offered or accrue (whether by right, bonus, redemption, preference, option or otherwise) and whether in physical and in dematerialized form in respect of any of the foregoing or evidencing or representing rights or interest therein; any other instrument or investments as may be permitted by applicable law from time to time;

aaa) **“Securities lending”** means the securities lending as per the Securities Lending Scheme, 1997 specified by the Board;

bbb) **“Strategy”** means an additional layer of broadly defined investment themes adopted by the Portfolio Managers in addition to Investment Approach pursuant to SEBI Circular dated 16<sup>th</sup> December 2022.

ccc) **“Term”** means the agreement shall commence from the date of execution of the Agreement and shall continue on the same terms and conditions set out in the agreement unless terminated. Hence, there is no fixed term for the agreement and the agreement shall be in force till its termination.

**Words and expressions used in this disclosure document and not expressly defined shall be interpreted according to their general meaning and usage. The definitions are not exhaustive. They have been included only for the purpose of clarity and shall in addition be interpreted according to their general meaning and usage and shall also carry meanings**

assigned to them in regulations governing Portfolio Management Services. All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa. All references “Rs.” refer to Indian Rupees. A “crore” means “ten million” and a “lakh” means a “hundred thousand”.

**3. Description:**

**3.1 History, Present Business, and Background of the Portfolio Manager:**

**History**

AlfAccurate Advisors Private Limited (AAA) is promoted by Mr. Rajesh B. Kothari and Mrs. Prerana Kothari and is issued a certificate of incorporation on 1<sup>st</sup> June 2009 with a view to carrying out business as a portfolio manager and providing financial advisory to High Net-worth Clients.

AlfAccurate Advisors Private Limited received a PMS license on 21<sup>st</sup> September 2009. Post that, the company successfully launched its Equity Opportunity Plan, named “AAA India Opportunity Plan – Equity” to cater to High Net-worth Clients. Its PMS plan started on 23<sup>rd</sup> November 2009. Since then, the PMS has delivered superior returns compared to benchmark indices. This demonstrates the ability of generating wealth in difficult economic and market conditions globally.

The company strongly believes that Indian households have very low exposure to Equity as an asset class. With its strong Investment management expertise and the best governance practices, AlfAccurate Advisors has created its niche positioning in the Indian Equity Capital Market.

Mr. Rajesh Kothari is an MBA in Finance from one of India’s reputed Institute K. J. Somaiya Institute of Management Studies & Research. He is a Graduate Cost & Works Accountant (Grad CWA) and Bachelor of Commerce (B. Com.) from Bombay University.

Mr. Rajesh has Rich experience of more than twenty-three years in Equity Fund Management – in both the structures – Asset Management Company and Hedge Fund. i.e., DSP Merrill Lynch Fund Managers Ltd & Voyager Investment Advisors Ltd.

He has experience of more than thirty-one years in equity research and related function on the broking and fund management side of the business

He played an instrumental role in business development (product innovation, product launch, marketing of schemes, communication with institutional investors/retail investors/distribution channels/branch level).

He has developed and built a strong Investment Process to match the Investment objectives of different kinds of schemes.

During his tenure, he has received many awards/appreciations for his outstanding performance.

AlfAccurate Advisors has adequate staff strength that carries along with them rich experiences from reputed organizations like ICICI Prudential Asset Management, Reliance Capital Asset Management, GIC Asset Management, DSP Merrill Lynch Asset Management, UBS, etc.

### **Present Activities**

The company has since its incorporation built its portfolio management services team and infrastructure. The company has one of the best practices in the PMS industry and has a setup of the systems & processes. Apart from our specialized services as a Portfolio Manager, we also provide/offer our expertise in Investment Advisory Services to domestic and offshore clients including Foreign Institutional Investors. Further, the company has obtained Registration from SEBI as an Investment Advisors having registration no. INA000015701 w.e.f. 12<sup>th</sup> January 2021. AlfAccurate Advisors Pvt. Ltd. also has a 51% partnership in the entity AlfAccurate Advisors LLP. AlfAccurate Advisors LLP is the sponsor of AAA India Equity Fund AIF. This is a Category-3 Alternative Investment Fund with the certificate granted by SEBI on 9<sup>th</sup> March 2023.

### **Background of the Portfolio Manager**

The Company is promoted by Rajesh Kothari in May 2009, who is also on the Board of the Company.

- Mr. Rajesh is ranked as Platinum Fund Manager on July 06 by ET Intelligence Study.
- He Received the Mutual Fund of the Year Award 2006 by CNBC TV 18 – CRISIL.
- He received Lipper India Fund Award 2006 for best equity fund group over three years.
- His DSP ML Technology.com scheme was declared the best fund over 5 years by Lipper India.
- Economic Times study rated him as Gold Fund Manager for Balanced schemes in Feb 2006.
- He also received the **CMA Young Achiever Award 2014** Certificate of Merit from Dr. Jitendra Singh, Union Minister of State (I/C), Prime Minister Office, MoS for DoNER, Department of Personnel and Training, Department of Space and Atomic Energy in CMA CFO Awards, and CMA Young Achiever Awards presentation ceremony held on Tuesday, 7th July 2015.

The schemes under his management maintained its 1st Quartile Ranking consistently during his tenure at DSP Merrill Lynch Fund Managers and received awards and recognition for delivering superior and consistent risk-adjusted returns from various institutions like CNBC, CRISIL, My Iris, Lipper-Reuters India.

### **3.2 Promoters and Directors of the Company:**

Name of the Director
Mr. Rajesh B. Kothari
Mrs. Prerana R. Kothari
Mr. Thomas Priju

### **3.3 Top 10 Group Companies / Firms of Portfolio Managers:**

The detail of the group company under the same management of the portfolio manager is as under:

Sr. No.	Name of company
1	AlfAccurate Advisors LLP

### **3.4 Details of Services offered:**

The Portfolio Manager offers Portfolio Management services under Discretionary, Non-Discretionary, and Advisory categories to its prospective clients.

a) **Discretionary Portfolio Management Services**

Under the Discretionary Portfolio Management Services, the Portfolio Manager will have the sole and absolute discretion with regard to the selection of the type of securities traded on behalf of the Client and held in the portfolio, based on the executed agreement. In the case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may invest up to 100% of the assets under management in unlisted securities. The Portfolio Manager has the discretion as regards the choice and timing of the investment decisions, to make changes in the investment, and to invest some or all of the funds of the Client in such manner and in such industries/sectors/securities as the Portfolio manager discretion. The Securities invested/disinvested by the Portfolio Manager for Clients may differ from Client to Client. The Portfolio Manager's decision (taken in good faith) in the deployment of the Clients' funds is absolute and final and cannot be called in question or be open for review at any time during the course of the Agreement or any time thereafter except on the ground of malafide intent, fraud, conflict of interest or gross negligence. This right of the Portfolio Manager will be exercised strictly in accordance with the relevant acts, rules, regulations, guidelines, and notifications in force from time to time.

b) **Non-Discretionary Portfolio Management Services**

Under these services, the client decides their own investment with the portfolio manager. The objective is to advise Clients on investing in equity, debt, and other investments depending on the Clients' needs and risk-return profile and to provide administrative services for execution of the transaction as per the mandate from the client. Under this, the Client will decide his own investments.

The Portfolio Manager, based on the Clients' mandate and consent, will deploy the Clients' funds available from time to time. All executions of transactions based on the Clients' mandate are final and at no point, Portfolio Manager's actions will be questioned during the currency of the Agreement or at any time thereafter. Each Client shall receive a portfolio statement relating to their portfolio.

However, for the client(s) other than those falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest only up to 25% of the assets under management in unlisted securities in addition to the securities for discretionary portfolio management services. In case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest up to 100% of the assets under management in unlisted securities.

c) **Advisory**

The Portfolio Manager may also engage in advisory services as is envisaged under the Securities and Exchange Board of India Portfolio Managers) Regulations, 2020 as amended from time to time. The portfolio Manager's responsibility includes advising on i.e. portfolio strategy and investment and divestment of individual securities on the clients' portfolio, for an agreed fee structure, entirely at the client's risk. However, for Client(s) other than those falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest only up to 25% of the assets under management in unlisted securities in addition to the securities for discretionary portfolio management services. In case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest up to 100% of the assets under management in unlisted securities.

**Direct Onboarding:**

The Portfolio Manager provides the facility to the Client for Direct on-boarding with us without any involvement of a broker/distributor/agent engaged in distributor services. The Client can onboard by directly contacting us or sign up for our services by writing to us at [investorservices@alfaccurate.com](mailto:investorservices@alfaccurate.com)

**4. Penalties, pending litigation or proceedings, etc.:**

Till date, no penalties have been imposed nor are there any pending litigation nor are findings of inspection or investigations for which action including warning letters have been taken or initiated by any regulatory whether against the company or its director or its employees.

**5. Services Offered:**

**5.1 Investment objectives:**

The general objective is to formulate the investment philosophy to achieve long-term capital appreciation by investing in assets, which generate reasonable returns and ensure liquidity. The actual portfolio management style may vary in line with each client profile with regard to his risk tolerance levels and specific preferences or concerns as well as the portfolio activities as selected by him.

Hedging: A portfolio manager may invest in derivatives including transactions for the purpose of hedging and portfolio rebalancing. The total exposure of a client shall be within the limitations as stipulated by SEBI from time to time.

**5.2 Types of Securities**

The Portfolio Manager / Fund Manager shall invest in all such Securities as defined (please refer to definitions) and in all such Securities as may be permissible from time to time, including equity, equity-related securities, derivatives, money market instruments, units of mutual funds, etc.

**Options to Invest in Derivative**

The introduction of derivative products in the Indian Market has paved the way for more efficient ways of managing and controlling risks and at the same time optimizing gains from a specific position. The portfolio manager shall wherever deemed appropriate and expedient, deploy client money in derivative products in the client portfolios, as permissible under the SEBI Regulations. However, such positions shall not be leveraged. Further, the use of derivatives requires an understanding not only of the underlying instrument but of the derivative itself.

**5.3 Minimum Investment Amount**

The portfolio manager shall not accept from the client, funds or Securities worth less than Rs.50 lacs or other sum (above Rs. 50 Lacs) as may be specified in the agreement with the portfolio manager. However, the said minimum investment amount shall not be applicable to Accredited Investors.

**5.4 Investment Approaches:**

**i. AAA India Opportunity Plan**

a. **Strategy:** Equity

b. **Investment objective:** The primary investment objective of this investment plan (approach) is to seek to generate long-term capital appreciation from a portfolio that is substantially constituted of securities, with the combination of high growth

stocks as well as value stocks. From time to time, the Investment Manager will identify investment opportunities in different sectors & will seek maximum value from the same.

- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** NIL

ii. **AAA Budding Beasts Plan**

- a. Strategy: Equity
- b. **Investment objective:** In this portfolio plan (approach), it aims to provide long-term capital appreciation by predominantly investing into mid and small-cap companies which have the potential to grow faster than economic growth, high return ratios, and strong management. The (approach) also provides flexibility to Portfolio Manager to invest in large-cap, if the valuation/earnings prospects of large-cap companies get attractive compared to small-cap companies. The portfolio management process would also focus on the use of derivatives for hedging and portfolio re-balancing.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.

- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** With effect from April 01, 2023, the Benchmark has been changed to BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

iii. **AAA Focus Plan**

- a. **Strategy:** Equity
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return by investing into fundamentally sound companies. The portfolio will generally comprise of equity & equity-related instruments of around 30 companies.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

iv. **AAA Couture Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over the benchmark indices by predominantly investing in a set of high conviction companies across large-cap, mid-cap, small-cap, and micro-cap stocks. The portfolio will generally comprise of equity & equity-related instruments of around 20 companies. The portfolio will target companies with

strong management, high return ratios, scalable business model, and strong earnings growth. The portfolio management process will also focus on using cash as an investment tool and derivatives as a hedging tool.

- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
  - d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
  - e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
  - f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
  - g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
  - h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
  - i. **Other salient features, if any:** Nil
- v. **AAA Absolute Return Plan**
- a. **Strategy:** Equity
  - b. **Investment objective:** Highly flexible investment option, which offers a diversified investment portfolio across large-cap, mid-cap, small-cap, and micro-cap stocks. The portfolio would endeavor to generate absolute positive return irrespective of the market conditions, by investing in an optimum mix of asset classes including equity & equity-related instruments, fixed income securities/Funds, and cash and cash equivalents, and derivatives as a hedging tool.
  - c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
  - d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
  - e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.



- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**vi. AAA Shariah Plan**

- a. Strategy – Equity
- b. **Investment objective:** In this portfolio plan/ (approach), it aims to provide medium to long term capital gains by investing in Shariah-compliant equity and equity-related instruments of well-researched value and growth-oriented companies
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** With effect from April 01, 2023, the Benchmark has been changed to BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**vii. AAA Digital India Plan**

- a. Strategy – Equity
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over a three-five timeframe over the benchmark indices by investing into companies that will benefit significantly due to the rising digitalization of the economy. The portfolio seeks to invest in companies that have great management, strong business moat, and significant growth potential. The portfolio management process will also focus on using cash as an investment tool and derivatives as a hedging tool.

- c. **Description of Type of securities:** Please refer to Point 5.2 for the detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **Risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

viii. **AAA ESG Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior risk-adjusted return over a three-five timeframe over the benchmark indices by investing into companies that practice sound Environmental Social and Governance (ESG) policies.
- c. **Description of Type of securities:** Please refer to Point 5.2 for the detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above



- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
  - d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
  - e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
  - f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
  - g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
  - h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
  - i. **Other salient features, if any:** Nil
- xi. **AAA India Midcap opportunity**
- a. **Strategy – Equity**
  - b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over the benchmark indices by predominantly investing into mid-cap companies having fairly scalable operations and the potential of strong earnings growth. The (approach) also provides flexibility to Portfolio Manager to invest in a large cap, if the valuation/earnings prospects of large-cap companies get attractive compared to midcap companies. The portfolio management process will also focus on using cash as an investment tool and derivatives as a hedging tool.
  - c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
  - d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
  - e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
  - f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.

- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xii. AAA Contra Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), it aims to provide long-term capital appreciation by predominantly investing in equity & equity-related securities using a contrarian strategy. A contrarian strategy would buy into equity shares that have been overlooked by the market or beaten down due to the adverse business environment and/or market conditions. The portfolio management process would also focus on the use of derivatives for hedging and portfolio re-balancing.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 Index TR.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xiii. AAA Small cap Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), it aims to provide long-term capital appreciation by predominantly investing into small-cap companies which have the potential to grow faster than economic growth, high return ratios, and strong management. The (approach) also provides flexibility to Portfolio Manager to invest in large-cap/mid-cap, if the valuation/earnings prospects of large-cap companies get attractive compared to small-cap companies. The portfolio

management process would also focus on the use of derivatives for hedging and portfolio re-balancing.

- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** With effect from April 01, 2023, the Benchmark has been changed to BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil
- j. **Other salient features, if any:** Nil

**xiv. AAA India Advantage**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over a three-to-five-year timeframe over the benchmark indices by investing into companies that will benefit significantly due to a strong business model, strong management, and strong earnings growth. The portfolio management process will also focus on using cash as an investment tool and derivatives as a hedging tool.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.

- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

xv. **AAA India Flexi Cap**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), it aims to provide long-term capital appreciation by predominantly investing into large and/or mid and small-cap companies which have the potential to grow faster than economic growth, high return ratios, and strong management. The portfolio management process would also focus on the use of derivatives for hedging and portfolio re-balancing.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE 500 TR INDEX
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

xvi. **AAA Special Situations**

- a. **Strategy – Equity**
- b. **Investment objective:** To generate long-term capital appreciation by investing in mis-priced stocks facing special situations. The mispricing of stocks can occur due to companies facing special situations like regulatory/policy changes, management restructuring, technology-led disruption, innovation, or any temporary challenges in

the operating environment. The portfolio management process would also focus on the use of derivatives for hedging and portfolio re-balancing.

- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across the type of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

xvii. **AAA Business Cycles**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), it aims to provide long-term capital appreciation by predominantly investing into equity and equity-related securities in the Indian market with a focus on riding business cycles through asset allocation between various sectors and stocks at different stages of business cycles in the economy. The portfolio management process would also focus on the use of derivatives for hedging and portfolio re-balancing.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis for the choice of Benchmark:** BSE500 Index.



- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xviii. AAA Hybrid Plan**

- a. **Strategy – Hybrid**
- b. **Investment objective:** In this portfolio plan (approach), it seeks to generate capital appreciation and current income through a mix of investments in Equities and Fixed Income Securities (debt and money market instruments).
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:**

Under normal circumstances, the asset allocation of the fund shall be as follows:

Asset Allocation	Minimum	Maximum	Risk Profile
Equity and Equity related instruments	65%	100%	Medium to High
Fixed Income Instruments* (Debt and Money market instruments)	0%	35%	Medium to High

\* Including securitized Debt

However, under exceptional circumstances and/or regulatory changes, the fund managers may deviate from the indicated asset allocation with the sole objective/intention of safeguarding the interest of the investor’s assets and providing optimal returns to them. Pending deployment of funds in terms of investment objectives of this (approach), the funds may be invested in short-term deposits with Scheduled Commercial Banks and money market instruments.

Safety, transparency, capital appreciation, and value-added services will be the guiding factor.

- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE S&P HYBRID.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xix. AAA Liquid Plan**

- a. **Strategy – Debt**

- b. **Investment objective:** The primary investment objective of the Plan is to seek to generate a reasonable return commensurate with low risk and a high degree of liquidity, from a portfolio constituted of money market securities and high-quality debt securities.
- c. **Description of Type of securities:** Liquid Mutual Funds including liquid bees listed on exchanges, short-term debt funds, money market mutual funds, and other debt funds
- d. **Basis of selection of the above type of securities:** To generate optimal returns consistent with moderate levels of risk and liquidity by investing in debt securities and money market securities.
- e. **Portfolio allocation across the type of securities:** The Plan seeks to invest in Debt Instruments including Government Securities, Corporate Debt, Other debt instruments, Term Deposits, and Money Market Instruments with portfolio maturity of 0-180 days.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** CRISIL Composite Bond Fund Index
- g. **Indicative Investment Horizon (tenure):** Short Term (3-6 months)
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **h. Other salient features, if any:** Not Applicable

**xx. AAA India Growth Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over the benchmark indices by investing into companies that are likely to grow faster than the economy.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.

- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxi. AAA India Century Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over the benchmark indices by investing into companies that enjoys sustainable competitive advantage and the companies that are likely to grow faster than the economy.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxii. AAA Value Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** The investment objective of the Plan is to provide capital appreciation by investing in a well-diversified portfolio of stocks through fundamental analysis.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.

- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxiii. AAA Quant Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** The investment objective of the Plan is to provide capital appreciation by investing in companies using AAA Quant Model.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxiv. AAA Funda Quant Plan**

- a. **Strategy – Equity**

- b. **Investment objective:** The investment objective of the Plan is to provide capital appreciation by investing in companies using AAA FundaQuant Model. It plans to invest in only those companies that meets AAA Fundamental Investment framework.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxv. AAA Valuations Cycles Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** The investment objective of the Plan is to provide capital appreciation by investing in companies using valuations as a key matrix.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above

- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxvi. AAA Gladiators Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan (approach), the investment will target a long-term superior return over the benchmark indices by predominantly investing in a set of high conviction companies across mid-cap, small-cap, and micro-cap stocks. The portfolio will generally comprise of equity & equity-related instruments of about 10-25 companies. The portfolio will target companies with strong management, high return ratios, scalable business model, and strong earnings growth. The portfolio management process will also focus on using cash as an investment tool and derivatives as a hedging tool.
- c. **Description of Type of securities:** Please refer Disclosure Document for detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** The risk associated with the Investment Approach: Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxvii. AAA Shariah Mid and Small cap Plan**

- a. **Strategy – Equity**
- b. **Investment objective:** In this portfolio plan/ (approach), it aims to provide medium to long term capital gains by investing in Shariah-compliant equity and equity-related instruments of well-researched value and growth-oriented companies mainly in Mid and smallcap segment.

- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.

**Other salient features, if any:** Nil

**xxviii. AAA Debt Plan**

- a. **Strategy - Debt**
- b. **Investment objective:** The investment objective of the Plan is to provide capital appreciation by investing into Fixed Income Instruments.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** CRISIL Composite Bond Fund Index
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxix. AAA Active-Passive Plan**

- a. **Strategy** - Equity
- b. **Investment objective:** The investment objective of the Plan is to provide capital appreciation by investing in companies and/or equity mutual funds
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the fundamentals of the companies besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into equity shares of listed companies and unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TRI INDEX
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** Nil

**xxx. AAA Equity Fund of Funds**

- a. **Strategy** - Equity
- b. **Investment objective:** The primary investment objective of this investment plan (approach) is to seek to generate long-term capital appreciation from a portfolio that is substantially constituted of securities, mainly units of equity oriented mutual funds. It invests in units of mutual funds instead of directly investing in securities, stocks, or bonds. The fund management team decides where to invest the funds based on where they expect to get superior returns. It follows a systematic and process driven equity allocation approach based on the research.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the strategy of the funds besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into units of equity mutual funds. Unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change



(higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.

- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** BSE500 TR INDEX.
- g. **Indicative Investment Horizon (tenure):** Long term 5 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** NIL

**xxxi. AAA Asset Allocator Fund of Funds**

- a. **Strategy - Equity**
- b. **Investment objective:** The primary investment objective of this investment plan (approach) is to seek to generate long-term capital appreciation from a portfolio that is substantially constituted of securities, mainly units of mutual funds in equity oriented, debt oriented and Gold ETF schemes.  
  
It invests in units of mutual funds instead of directly investing in securities, stocks, or bonds. It follows a systematic and process driven asset allocation approach based on the research.
- c. **Description of Type of securities:** Please refer to Point 5.2 for a detailed description of the type of securities.
- d. **Basis of selection of the above type of securities:** Based on the strategy of the funds besides other factors that we would consider appropriate and efficient to satisfy our objectives/criteria of the investment approaches.
- e. **Portfolio allocation across types of securities:** Investments mainly into units of mutual funds. Unused cash can be invested in liquid funds/Cash or Cash Equivalents. The allocation to each of these categories or asset classes may change (higher or below) for certain time periods for reasons including market factors, portfolio views on the attractiveness of the equity investment opportunities at the time, etc.
- f. **Appropriate Benchmark to compare performance and basis / justification for the choice of Benchmark:** Benchmark: 90% NIFTY 50 Hybrid Composite Debt 65:35 Index (Total Returns Index) and 10% Domestic Prices of Gold derived as per regulatory norms.
- g. **Indicative Investment Horizon (tenure):** 3 years and above
- h. **The risk associated with the Investment Approach:** Please refer to Point 6 for the detailed risks associated with this investment approach.
- i. **Other salient features, if any:** NIL

**Note:**

The above Plans / Investment Approaches both existing and proposed are / will be available either with the Fixed Fees approach or with the Variable (Profit Sharing) Fees approach. In case of any clarification/query, the client can approach the Investors Services Cell of the Portfolio Manager.

**5.5 Systematic Transfer Plan (STP) & Systematic Investment Plan (SIP) Facility (common for all portfolios)****Features of the STP facility for existing clients & new clients as given below:****A. Initial investment made in a liquid Mutual fund/Liquid Bees**

Thereafter, periodically as per the terms of the client agreement, the Funds will be systematically redeemed from the liquid mutual fund(s)/Liquid Bees and deployed in listed equity securities

**Features of the SIP facility for existing clients & new clients as given below:**

A systematic investment plan (SIP) is offered to investors, allowing them to invest small amounts periodically instead of lump sums. In PMS, an existing client (having a minimum AUM of 50 Lakhs in the existing account) can top up his existing portfolio as per the pre-defined schedule at regular intervals.

**5.6 Investment in Associates/Group Companies of the Portfolio Manager:**

The Portfolio Manager has not made any investments on behalf of Clients in any of its associates or related parties as of today.

Sr. No.	Investment Approach, if any	Name of the associate/related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores)	percentage of total AUM as on last day of the previous calendar quarter
na	na	na	na	na	na

## 6. Risk Factors

The Portfolio Manager is not responsible for the loss if any, incurred or suffered by the Client. The following are the inherent risks associated with the management of the Portfolio:

- i. Securities investments are subject to market risks including price, volatility and liquidity risks and there is no assurance, insurance or guarantee that the objectives of the Investment Approaches will be achieved. The investment in the above approaches may not be suitable for all the categories of investors.
- ii. Past performance is not an indication that returns in the future with regard to either the same investment approaches or any other future approaches that may be launched by the Portfolio Manager, will be achieved. Investors are not being offered any assurance, insurance, or guarantee either that the objective of the approaches will be achieved or of any indicative returns or of protection of initial corpus or of appreciation of the Portfolio through these investment approaches and the names of the investment approaches do not, in any manner, indicate their prospects or returns.
- iii. Alfaccurate Advisors Private limited is also a SEBI registered Investment Advisors (INA000015701) and appropriate controls are in place to manage conflicts and potential conflicts between PMS and IA activities to ensure clients' interests are protected at all times.
- iv. The investments in equity-related instruments of mutual funds are subject to interest rate risks, credit risks, political and geopolitical risks, currency risks, country risks, and risks arising from changing business dynamics. This may adversely affect returns.
- v. At times the performance of the Portfolio would depend on the performance of such companies/industries/sectors of the economy/class of assets. Technology, pharmaceutical stocks, and some of the investments in niche sectors run the risk of high volatility, high valuation, obsolescence, and low liquidity.
- vi. The value of the Portfolios may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, the 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.
- vii. The Portfolio Manager may invest in the shares, mutual funds, debt instruments, deposits, and other financial instruments of affiliates/ companies, subject to the relevant regulatory requirements. Such decisions will be on an arm's length basis.
- viii. The decision is on investments by the Portfolio Manager may not always result in profits.
- ix. Plans/Investment Approaches using derivatives/futures and options products are affected by risks different from those associated with stocks and bonds Such products are highly leveraged instruments and their use requires a high degree of skill, diligence, and expertise. Small price movements in the underlying securities may have a large impact on the value of derivatives, futures, and options. Some of the risks relate to missing pricing or the improper valuation of derivatives/futures and options and the inability to correlate the positions with underlying assets, rates, and indices.
- x. The Debt Instruments, Fixed Deposits, and other fixed-income securities are subject to:

- a) **Market Risk:** The plan's / (approach) NAV will react to the interest rate movements. The Investor may lose money over a short or long period due to fluctuation in the Scheme's NAV in response to factors such as economic and political developments, changes in interest rates, inflation, and other monetary factors, and also movement in prices of underlying investments.
- b) **Interest Rate Risk:** Changes in interest rates will affect the Scheme's Net Asset Value. The prices of securities usually increase as interest rates decline and usually decrease as interest rates rise. The extent of fall or rise in the prices is guided by modified duration, which is a function of the existing coupon, days to maturity, and increase or decrease in the level of interest rate. The new level of interest rate is determined by the rate at which the government raises new money and/or the price levels at which the market is already dealing in existing securities. Prices of long-term securities generally fluctuate more in response to interest rate changes than short-term securities. The price risk is low in the case of the floating rate or inflation-linked bonds. The price risk does not exist if the investment is made under a repo agreement. Debt markets, especially in developing markets like India, can be volatile leading to the possibility of price movements up or down in fixed income securities and thereby to possible movements in the NAV. Modified Duration is a measure of price sensitivity, the change in the value of investment to a 1% change in the yield of the investment.
- c) **Reinvestment Risk:** Investments in fixed income securities may carry reinvestment risk as interest rates prevailing on the interest or maturity due dates may differ from the original coupon of the bond. Consequently, the proceeds may get invested at a lower rate.
- d) **Pre-payment Risk:** Certain fixed income securities give an issuer the right to call back its securities before their maturity date, in periods of declining interest rates. The possibility of such prepayment may force the fund to reinvest the proceeds of such investments in securities offering lower yields, resulting in lower interest income for the fund.
- e) **Spread Risk:** In floating-rate security, the coupon is expressed in terms of a spread or mark up over the benchmark rate. In the life of the security, this spread may move adversely leading to a loss in value of the portfolio. The yield of the underlying benchmark might not change, but the spread of the security over the underlying benchmark might increase leading to a loss in the value of the security.
- f) **Credit Risk:** Credit Risk means that the issuer of a security may default on interest payments or even paying back the principal amount on maturity. (i.e. the issuer may be unable to make timely principal and interest payments on the security). Even where no default occurs, the prices of security may go down because the credit rating of an issuer goes down. It must be, however, noted that where the Scheme has invested in Government securities, there is no risk to that extent.
- g) **Liquidity or Marketability Risk:** This refers to the ease at which a security can be sold at or near its true value. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. Liquidity risk is characteristic of the Indian fixed income market. Trading Volumes, settlement periods, and transfer procedures may restrict the liquidity of the investments made by the Scheme. Different segments of the Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances leading to delays in receipt of proceeds from the sale of securities. As liquidity of the

investments made by the Scheme could, at times, be restricted by trading volumes and settlement periods, the time taken by the Fund for the redemption of units may be significant in the event of an inordinately large number of redemption requests or restructuring of the Scheme.

- xi. The liquidity of the investments is guided and inherently restricted by trading volumes in the securities in which the Portfolio Manager may invest. This may /limit the Portfolio Manager's ability to freely deal with securities in the Portfolio.
- xii. The Portfolio Manager may, considering the overall level of risk of the portfolio, invest in lower-rated/unrated securities that offer a higher yield, which may increase the risk to the portfolio. Such investments shall be subject to the scope of investments laid down in the executed Agreement.
- xiii. The Portfolio Manager may, subject to authorization by the Client in writing, participate in securities lending. The Portfolio Manager may not be able to sell/lend out securities, which will result into the creation of a situation of illiquidity of the securities. There are inherent risks in securities lending, including the risk of failure of the other party, in this case, the approved intermediary to comply with the terms of the agreement. Such failure can result in a possible loss of the right to the collateral, the inability of the approved intermediary to return the securities deposited by the lender, and the possible loss of corporate benefits accruing thereon. The Portfolio Manages shall not be responsible or liable for any loss resulting from the operations of the portfolio.
- xiv. Trading volumes, settlement periods, and transfer procedures may restrict the liquidity of the investments made by the Portfolio Manager. Different segments of the Indian financial markets have different settlement periods, and such periods may be extended significantly due to unforeseen circumstances. The inability of the Portfolio Manager to make intended security purchases due to settlement problems could result in missing out on certain investment opportunities. By the same rationale, the inability to sell securities held in Portfolio due to the absence of a well-developed and liquid secondary market for debt securities would result, at times, in potential losses in the Portfolio.
- xv. While securities that are listed on the stock exchange carry lower liquidity risk, the ability to sell these investments is limited by the overall trading volume on the stock exchanges. Money market/debt securities while fairly liquid, lack a well-developed secondary market, which may restrict the selling ability of the Portfolio Manager and may lead to investments incurring losses till the security is finally sold.
- xvi. In any Investment Approaches which may invest predominantly in schemes of Mutual Funds – Debt and/or equity and other instruments, its performance may depend on that of the underlying schemes of Mutual Funds. Any change in investment policies or fundamental attributes of underlying schemes could adversely affect the performance of the portfolio. Also, for a sharp increase in the stock market during the period of investment, the return of the portfolio might be less than that given by direct investment of similar amounts in equities.
- xvii. There are inherent risks arising out of investment objectives, investment strategy, asset allocation, and non-diversification of the portfolio.
- xviii. The Clients may not be able to avail of securities transaction tax credit benefit and/or tax deduction at source (TDS) credit and this may result in an increased incidence of tax on the Clients. The Client may incur a higher rate of TDS/ Dividend Distribution Tax in case

the investments are aggregated in the name of the Portfolio Management investment Approaches.

- xix. The investments of the fund and resultant investments are subject to a very wide range of risks which include amongst others inter alia:
  - a) Overall economic slowdown, unanticipated poor corporate performance, environmental or political (including changes in tax laws and rates), changes in government policies and regulations with regards to industry and exports.
  - b) Act of state, sovereign action, Acts of God, Acts of war, Civil disturbance.
  - c) Delisting or market closure, relatively small number of scrips accounting for a large proportion of trading volume.
  - d) Misjudgment of Portfolio Manager, unsystematic settlement procedures, refusal or delay in registration of securities, non-receipt of interest or dividend, etc.
- xx. The portfolio manager shall take all reasonable steps to invest the funds in a prudent manner such a decision shall not always prove to be profitable or correct. Consequently, any loss arising from such a decision shall be a risk assumed by the client.
- xxi. Limited liquidity in the market, settlement risk, impeding readjustment of portfolio composition, highly volatile stocks money markets in India. There is also the risk of the total loss of value of an Asset, possibilities of recovery of the loss in investments only through the expensive legal process. Such loss could arise due to factors which by way of illustration, include, default or non-performance of a third party, company's refusal to register security due to legal stay, or otherwise, disputes raised by third parties. Thus, the investment in the Indian Capital Money Market involves above-average risk for investors compared with other types of investment opportunities. Investments will be of longer duration compared to trading in securities. There is a possibility of the value of the investment and the income there from falling as well as rising depending upon the market situation.
- xxii. The Portfolio Manager is not guaranteeing or assuring any return on investment.
- xxiii. Prospective investors should review/study this Disclosure Document carefully and in its entirety and shall not construe the contents hereof or regard the summaries contained herein as advice relating to legal, taxation, or financial / investment matters and are advised to consult their own professional advisor(s) as to the legal, tax, financial or any other requirements or restrictions relating to the subscription, gifting, acquisition, holding, disposal (sale or conversion into money) of Portfolio and to the treatment of income (if any), capitalization, capital gains, any distribution, and other tax consequences relevant to their portfolio, acquisition, holding, capitalization, disposal (sale, transfer or conversion into money) of portfolio within their jurisdiction of nationality, residence, incorporation, domicile etc. or under the laws of any jurisdiction to which they or any managed funds to be used to purchase/gift portfolio of securities are subject, and also to determine possible legal, tax, financial or other consequences of subscribing / gifting, purchasing or holding portfolio of securities before making an investment.

## 7. Client Representation

- i) The Portfolio Management Services performance for the previous three years ended on 31<sup>st</sup> March 2022 ,31<sup>st</sup> March 2023, 31<sup>st</sup> March 2024 and 31<sup>st</sup> December 2024 are as follows:

Category of Clients	No. of clients	Funds Managed (Rs. Crores)	Discretionary / Non – Discretionary / Advisory
<b>Associates/Group Companies:</b>			
March 31 <sup>st</sup> 2022	NIL	NIL	NIL
March 31 <sup>st</sup> 2023	NIL	NIL	NIL
March 31 <sup>st</sup> 2024	NIL	NIL	NIL
December 31 <sup>st</sup> 2024	NIL	NIL	NIL
<b>Others (Only Active Clients)</b>			
March 31 <sup>st</sup> 2022	748	1055.61	Discretionary
	5	141.58	Advisory
<b>Total</b>	<b>753</b>	<b>1197.19</b>	
March 31 <sup>st</sup> 2023	850	1221.34	Discretionary
	5	140.85	Advisory
<b>Total</b>	<b>855</b>	<b>1362.19</b>	
March 31 <sup>st</sup> 2024	1118	1987.6	Discretionary
	7	188.66	Advisory
<b>Total</b>	<b>1125</b>	<b>2176.26</b>	
December 31 <sup>st</sup> 2024	1340	2715.49	Discretionary
	6	223.12	Advisory
<b>Total</b>	<b>1346</b>	<b>2938.61</b>	

- ii) **Companies' disclosure in respect of transactions with related parties as per the accounting standards specified by the Institute of Chartered Accountants of India.**

### Related Parties & Key Management Personnel

Sr. No.	Name of the Related Party	Description of the relationship
1.	Mr. Rajesh Kothari	Director
2.	Mrs. Prerana Kothari	Director
3.	Mr. Amar Maurya	Director (Retired on 24.01.2024)
4.	Mr. Vatsal Kothari	Relative of Director's
5.	Logus Advisory Services Pvt. Ltd	Director's related company
6.	DNB Advisory Services Pvt. Ltd	Director's related company
7.	AlfAccurate Advisors LLP	Subsidiary
8.	Thomas Joseph Priju (Key management Personnel)	Director

### b) Transactions during the year from 01/04/2023 to 31/03/2024 (Rs)

Sr. No	Nature of Transactions	PMS Fees	Payment to Director/ Relative	Debtors	Share of Profit /(Loss)
1	Mr. Rajesh Kothari – Remuneration	0	12,00,000	0	0
2	Mr. Rajesh Kothari – Rental charges	0	6,60,000	0	0
3	Mrs. Prerana Kothari Remuneration	0	12,00,000	0	0

4	Mr. Amar Mourya Remuneration	0	57,72,680	0	0
5	Logus Advisory Services Pvt. Ltd	5,76,000	0	0	0
6	Logus Advisory Services Pvt. Ltd	0	0	20,00,000	0
7	DNB Advisory Services Pvt. Ltd	61,000	0	0	0
8	AlfAccurate Advisors LLP	0	0	0	9,88,000
9	Mr. Vatsal Kothari Remuneration	0	5,91,070	0	0
10	Thomas Joseph Priju – Remuneration	0	15,46,000	0	0
	<b>Total</b>	<b>6.37,000</b>	<b>1,09,69,750</b>	<b>20,00,000</b>	<b>9,88,000</b>

**8. Financial Performance (Rs. in lacs)**

Year	Turnover / Gross Income	Profit / Loss before Provision of tax	Profit / Loss after tax
<b>2021-22 (Audited)</b> (from 01/04/2021 to 31/03/2022)	2716.02	877.69	654.76
<b>2022-23 (Audited)</b> (from 01/04/2022 to 31/03/2023)	2502.91	625.55	461.67
<b>2023-24 (Audited)</b> (from 01/04/2023 to 31/03/2024)	3640.72	1057.93	788.31

**9. Portfolio Management Performance (%)**

Name of the Plan / (approach) (Discretionary Clients)	FY 24-25 (Up to Dec24)	FY 23-24	FY 22-23	FY 21-22
<b>AAA India Opportunity Plan</b>	<b>21.07%</b>	<b>35.77%</b>	<b>1.08%</b>	<b>22.25%</b>
Benchmark BSE500 TR Index	10.83%	40.16%	-0.91%	22.26%
<b>AAA Budding Beasts Plan</b>	<b>32.15%</b>	<b>44.8%</b>	<b>8.06%</b>	<b>37.06%</b>
Benchmark BSE500 TR Index	10.83%	40.16%	-0.91%	22.26%
<b>AAA Focus Plan</b>	<b>20.46%</b>	<b>26.28%</b>	<b>0.1%</b>	<b>20.53%</b>
Benchmark BSE500 TR Index	10.83%	40.16%	-0.91%	22.26%
<b>AAA India Shariah Plan</b>	<b>18.23%</b>	<b>32.65%</b>	<b>-7.54%</b>	<b>29.22%</b>
Benchmark BSE500 TR Index	10.83%	40.16%	-0.91%	22.26%
<b>AAA Liquid Plan</b>	<b>3.44%</b>	<b>4.46%</b>	<b>3.48%</b>	<b>1.62%</b>
Benchmark Crisil Composite Bond Fund Index	6.13%	8.26%	3.80%	4.48%
<b>AAA Couture Plan*</b>	<b>24.58%</b>	<b>9.62%</b>		
Benchmark BSE500 TR Index*	10.83%	15.84%		

**Notes:**

- Portfolio Management Performance (%) is Net of all fixed management fees and charges levied
- Returns have been calculated using the Time-weighted rate of return method.
- All the clients under the respective investment approaches have been taken into account to arrive at overall performance.
- \* AAA Couture Plan was started on 13<sup>th</sup> September 2023.



- Performance/returns are calculated using the “Time Weighted Rate of Return” method in terms of Regulation 22 of SEBI (Portfolio Managers) Regulations 2020.
- Returns are net of all fees and expenses.
- Performance-related information is not verified by SEBI.
- Past performance may or may not be sustained in the future.
- Past performance is not a guarantee of future return.
- Please note that actual performance for a client portfolio may vary due to factors such as expenses charged, timing of additional flows and redemption, individual client mandate, specific portfolio construction characteristics or other structural parameters. These factors may have an impact on client portfolio performance and hence may vary significantly from the performance data depicted above.

**10. Audit Observations**

There are no observations made by the statutory auditor of the Portfolio Manager for the preceding three financial years, FY2021-22, FY2022-23, and FY2023-24.

**11. Nature of Fees and Service Charges**

The following are indicative types of charges. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Services Agreement and the agreements in respect of each of the services availed at the time of execution of such agreements.

**11.1. Portfolio Management Fees:**

- i) The Portfolio Management Fees relate to the portfolio management services offered to the Clients. The fee may be a fixed charge or a percentage of the quantum of the funds being managed or linked to portfolio returns achieved or a combination of any of these with a high watermark.

**High Water Mark Principle:** High Water Mark shall be the highest value that the portfolio/account has reached. The value of the portfolio for computation of high watermark shall be taken to be the value on the date when performance fees are charged. For the purpose of charging a performance fee, the frequency shall not be less than quarterly.

The portfolio manager shall charge a performance-based fee only on the increase in portfolio value in excess of the previously achieved high watermark.

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

Mutual Funds shall be recovering expenses or management fees, entry/exit loads, and other incidental expenses along with GST, if any, on such recoveries and such fees, entry /exit loads and charges including GST on such recoveries shall be paid to the Asset Management Company of these Mutual Funds on the Clients' account. Such fees and charges are in addition to the Portfolio Management fees described above.

- 11.3 Certification charges or professional charges:** The charges payable for outsourced professional services like accounting, taxation, and any legal services, notarizations, etc. shall be borne by the Clients.

- 11.4 Securities lending and borrowing charges:** The charges pertaining to the lending of securities, costs associated with the transfer of securities connected with the lending, and borrowing transfer operations as permitted by SEBI from time to time.

- 11.5 Any other incidental or ancillary expenses:** All incidental and ancillary expenses not covered above but incurred by the Portfolio Manager on behalf of the Client shall be charged to the Client.

- 11.6 Registrars and Transfer Agents' fees:** Fees payable to the Registrars and Transfer Agents in connection with effecting transfer of any or all of the securities and bonds including stamp duty cost of affidavits, notary charges, postage stamps, and courier charges.

**11.7 Fees for Technical Services:**

- a) **Investment management fee** i.e. a fixed fee is charged as agreed with the client vide terms and conditions mentioned in the agreement.

b) **Performance management fee** i.e. A performance fee based on profit slabs provided in the portfolio agreement is charged as agreed with the client vide terms and conditions mentioned in the agreement.

c) The fees charged to the client for PMS come under the ambit of “fees for technical services” under Section 194J of the Income Tax Act, 1961 (“the Act”). As the section calls for withholding tax, the client is required to withhold tax @ 10 % excluding Goods & Service Tax, on the fees that the client pays to the Portfolio Manager if he/she falls under the following two categories:

a) An Individual / HUF whose total sales / gross receipt or turnover from business or profession carried on by him exceeds the monetary limit specified under clause (a) or clause (b) of Sec. 44AB during the previous year immediately preceding the financial year. In respect to the above TDS provision please note that in Act No 23 of Finance Act, 2019 a new section i.e., 194M has been inserted with effect from 01.09.2019 which specifies that:

Any Person being individual or a Hindu undivided family other than those required to deduct income tax as per the provision of section 194J mentioned in (a) above shall at the time of credit of such sum or at the time of payment of such sum in cash or by the issue of cheque or draft or by any other mode whichever is earlier, deduct an amount equal to five percent (two percent w.e.f. 01st October 2024) of such sum as income-tax thereon if the aggregate of sum, credited or paid to a resident during the financial year exceeds fifty lakh rupees.

b) Corporate

This implies the Client (as mentioned in points ‘a’ and ‘b’ above) while making payment of the fees would deduct tax at Source. The taxes payable on any transactions entered into or undertaken by the Portfolio Manager on behalf of the client, whether by way of deduction withholding, payment, or other, shall be fully borne by the client. Payment of the tax shall be the personal responsibility and liability of the client. In case the client deducts and pays the withholding tax, the client shall provide a Tax Deduction Certificate in Form No. 16A as prescribed under the Income Tax Rules, 1962 to the Portfolio Manager within 30 days from the date of filing return or due date of filing TDS Return for the quarter whichever is earlier. The Portfolio Manager is not by law, contract, or otherwise required to discharge any obligation on behalf of the client to pay any taxes payable by the client.

11.8 **Depository / Custodian Charges & Fund Accounting Charges:** The actual fees levied by the DP / Custodian for Custody and Fund Accounting shall be charged to the client as mentioned in the agreement with the client.

11.9 **Brokerage and Transaction cost:** Brokerage / or Transaction Cost on the transaction would be levied at the prevailing rates charged by the brokers and/or any such other intermediary (+) applicable GST (+) any other levies thereon, as may be applicable from time to time.

11.10 **Exit Load:**

Exit Load will be charged to the Client as per the below-mentioned slabs:

- a. In the first year of investment, a maximum of 3% of the amount redeemed;
- b. In the second year of investment, a maximum of 2% of the amount redeemed;
- c. In the third year of investment, a maximum of 1% of the amount redeemed;

After a period of three years from the date of the investment, no exit load will be charged to the Clients.

- 11.11 **Other Charges:** Over and above the Portfolio Management fees and the transaction cost as mentioned above, the portfolio manager would recover charges levied by the custodian for acquiring, holding, sale & transfer of investments in dematerialized form, audit fees for auditing and reporting of individual client's accounts; and other charges that the portfolio manager may have to incur while running Portfolio Management Services.  
Charges pertaining to partial withdrawal/closure would be levied as per the terms provided in the Agreement entered into between Portfolio Manager and the Client.
- 11.12 The portfolio manager shall deduct/withdraw directly from the cash account of the client all the fees/costs specified above. Other expenses, which could be attributable to the Portfolio Management, would also be directly deducted and the client would be sent a statement about the same.
- 11.13 All the Operating Expenses excluding brokerage, over and above the fees charged for the Portfolio Management Service, shall not exceed 0.50% per annum of the clients' average daily Asset under Management (AUM). It shall include charges payable for outsourced professional services like accounting, auditing, taxation, and legal services, etc. for documentation, notarizations, certifications, attestations required by Bankers or regulatory authorities including legal fees and day-to-day operations charges, etc. Further, the portfolio manager shall ensure that any charges to self/associate shall not be at rates more than that paid to the non-associates providing the same service and a capped at 20% by value per associate (including self) per service shall be maintained by the portfolio manager in a financial year.
- 11.14 Portfolio Manager shall not charge any fees to Clients at the time of onboarding except the specific charges applicable for the execution of the agreement and related documents for account opening.

## 12. **Taxation implication on client**

### 12.1 **General:**

In view of the individual nature of tax consequences, each client is advised to consult his / her / its tax advisor with respect to the specific tax consequences to him / her / it of participation as a client. The Portfolio Manager shall not be responsible for assisting in or completing the fulfillment of the client's tax obligations.

### 12.2 **Tax deduction at Source**

If any tax is required to be withheld on account of any legislation, the Portfolio Manager shall be obliged to act in accordance with the regulatory requirements in this regard.

### 12.3 **Advance tax installment obligations**

It shall be the client's responsibility to meet the advance tax obligation installments payable on the due dates under the Income Tax Act.

Provisions of the Income Tax Act 1961 undergo change frequently and are also based on the status of the client, thus the client is advised to consult his/her tax consultant for appropriate advice on the tax treatment of income indicated herein.

The fees charged to the client for PMS come under the ambit of “fees for technical services” under Section 194J of the Income Tax Act, 1961 (“the Act”). As the section calls for withholding tax, the client is required to withhold tax @ 10 % excluding Goods & Service Tax, on the fees that the client pays to the Portfolio Manager if he/she falls under the following two categories:

a) An Individual / HUF whose total sales / gross receipt or turnover from business or profession carried on by him exceeds the monetary limit specified under clause (a) or clause (b) of Sec. 44AB during the previous year immediately preceding the financial year.

In respect to the above TDS provision please note that in Act No 23 of Finance Act, 2019 a new section i.e., 194M has been inserted with effect from 01.09.2019 which specifies that:

Any Person being individual or a Hindu undivided family other than those required to deduct income tax as per the provision of section 194J mentioned in (a) above shall at the time of credit of such sum or at the time of payment of such sum in cash or by the issue of cheque or draft or by any other mode whichever is earlier, deduct an amount equal to five percent (two percent w.e.f. 01<sup>st</sup> October 2024) of such sum as income-tax thereon if the aggregate of sum, credited or paid to a resident during the financial year exceeds fifty lakh rupees.

b) Corporate

This implies the Client (as mentioned in point ‘a’ and ‘b’ above) while making payment of the fees would deduct tax at Source. The taxes payable on any transactions entered into or undertaken by the Portfolio Manager on behalf of the client, whether by way of deduction withholding, payment, or other, shall be fully borne by the client. Payment of the tax shall be the personal responsibility and liability of the client. In case the client deducts and pays the withholding tax, the client shall provide a Tax Deduction Certificate in Form No. 16A as prescribed under the Income Tax Rules, 1962 to the Portfolio Manager within 30 days from the date of filing return or due date of filing TDS Return for the quarter whichever is earlier. The Portfolio Manager is not by law, contract, or otherwise required to discharge any obligation on behalf of the client to pay any taxes payable by the client.

#### 12.4 Tax on Capital Gains

In case the securities are sold within 12 months (for listed securities except for units other than units of equity-oriented mutual funds) or within 24 months for all other assets including (for unlisted securities) from the date of purchase, the resultant gains or losses are termed as short-term capital gains or losses. Short-term gains arising out of the transfer of equity shares if the securities are sold on a recognized stock exchange in India and on which securities transaction tax has been paid are taxed at a concessional rate of 15% (as increased by surcharge plus education cess), before 23<sup>rd</sup> July 2024 and w.e.f. 23<sup>rd</sup> July 2024 the same will be increased to 20% (as increased by surcharge plus education cess), in other cases, they would be taxed at the slab rate applicable to the respective PMS client type.

In case the securities are sold after 12 Months (for listed securities) or 24 Months (for all the assets including unlisted securities) and three years for units other than units of equity-oriented mutual funds from the date of purchase, the resultant gains or losses are termed as long term capital gains or losses and the gain is arising out of transfer of equity shares which are sold on a recognized stock exchange in India and on which securities transaction tax has been paid would be taxed at 10% (as

increased by surcharge plus education cess) in case of listed securities with the exemption limit of Rs. 1 Lakh till 23<sup>rd</sup> July 2024 and 20% (as increased by surcharge plus education cess) in case of unlisted securities and units other than units of equity-oriented mutual funds. W.e.f. 23<sup>rd</sup> July 2024, in case of transfer of all capital assets irrespective of securities transaction tax has been paid or not, the tax on Long Term Capital Gain is changed to 12.5% (as increased by surcharge plus education cess) and in case of listed securities and Mutual Funds exemption limit is increased to Rs.1.25 Lakhs (grandfathering clause). Further, w.e.f. 23<sup>rd</sup> July 2024, indexation will not be provided for any asset which is treated as a long-term capital asset.

Note: "Listed Securities" as defined under the explanation to section 112(1) of the Income Tax Act, means the securities as defined in clause 2(h) of the Securities Contract (Regulations) Act, 1956, and listed on any recognized stock exchange in India.

"Unlisted Securities" means securities other than listed securities.

"Units" shall have the meaning assigned to it in clause (b) of Explanation to section 115AB of the Income Tax Act, 1961.

**12.5 Tax on Income from a business in securities**

For those carrying on business in securities, the profit from such dealings is taxable, though such dealing may be liable to STT. STT is deductible while computing business income, for the transactions for which STT is paid.

**12.6 Tax on derivative products.**

Each client is advised to consult his/her/its tax advisor with respect to the tax consequences to him/her/it in respect of a transaction in derivative products. For clients carrying on the business, the transaction in Equity Derivatives will not be considered as a speculative transaction as per Sec. 43(5).

**12.7 Tax on Dividend.**

As per the Finance Act, 2020, all dividends received on or after 1st April 2020 are taxable in the hands of the Investor/Shareholder at a rate applicable to the respective category of the PMS Clients.

**12.8 Interests on Investment are taxable except in certain cases where it is exempted from tax under Income Tax Act 1961**

**13. Accounting Policies**

**13.1 Following are the key accounting policies:**

- a) All investments will be marked to market.
- b) Investment in shares will be valued on the basis of closing market prices of the National Stock Exchange of India Ltd. If securities are not listed on the National Stock Exchange of India Ltd., then the closing market values on the Bombay Stock Exchange Ltd. or on any other exchange on which the securities are listed will be considered for valuation.
- c) Investment in Mutual Funds  
Investments in units of close-ended schemes of mutual funds are listed on NSE will be valued at the closing market price on NSE. In case the units of the mutual fund are not listed on NSE or the units are not traded on NSE on a particular day, the closing price on BSE will be used for valuation purposes. In case the closing price of any of the units of the mutual fund is not

available either on NSE or on BSE, then the closing price of the units on the previous working day will be taken for the valuation purpose.

Investments in units of mutual funds, which are not listed on stock exchanges (NSE/BSE), will be valued at the previous days' NAVs published by the Mutual Fund Houses on the date of the Report. Where no NAV is published for a particular day, the previous working day's published NAV will be taken for the valuation purpose.

- d) Investment in Government Securities, Bonds, Treasury bills, etc. will be valued as per the closing market price available at NSE or based on the valuation as provided by CRISIL Bond valuer / GILT valuer or as displayed on the website of FIMMDA (Fixed Income Money Market and Derivatives Association of India). When the closing market price is not available the same will be valued on basis of the principle of fair valuation.
- e) Transaction relating to equity instruments will be recognized as of the trade date and not as of the settlement date so that the effect of all investments traded during the year are recorded and reflected in the financial statement for that year.
- f) The costs of investments acquired or purchased would exclude STT charges and include brokerage, accrued interest, stamp charges, and any charge customarily included in the brokers' contract note/trade confirmation or levied by any statute.
- g) For derivative transactions (if any) unrealized gains and losses on open positions will be calculated by the mark to the market method.
- h) For Corporate Actions Ex-date accounting will be followed. Dividend income earned on Equity by the Portfolio shall be recognized on the date of intimation is received from the Custodian. In case of dividend declared by Mutual Funds then the same would be accounted on the day Funds Accounting team receives the intimation from the respective Mutual Funds. The same procedure will be followed for bonus and Split.
- i) Interest (if any) shall be accounted for on an accrual basis.
- j) For interest-bearing investment is purchased, interest paid for the period from the last interest due date up to the date of purchase should not be treated as a cost of purchase but shall be debited to interest Recoverable Account, similarly interest received at the time of sale for the period from the last interest due date up to the date of sale must not be treated as an addition to sale value but shall be credited to interest recoverable account.
- k) Investment transactions take place outside the stock market, i.e. acquisition through private placement or purchases or sales through private treaty, the transaction would be recorded, in the event of purchase, as of the date on which the portfolio obtain an enforceable obligation to pay the price o, in the event of a sale, when the portfolio obtains an enforceable right to collect the proceeds of sale or an enforceable obligation to deliver the instruments would.
- l) In respect of privately placed debt instruments any front-end discount offered shall be reduced from the cost of the investment.
- m) Underwriting commission shall be recognized as revenue only when there is no devolvement on the Portfolio. Where there is devolvement on the portfolio, the full underwriting commission received and not merely the portion applicable to the devolvement shall be reduced from the cost of the investment.

### 13.2 Basis of Accounting

The following Accounting Policies will be applied for accounting for the Investments of the Client and reporting to them.

- a. The Books of Account of the Client is maintained on a historical cost basis.
- b. Realized gains/losses will be calculated by applying the first-in/first-out method.
- c. For derivatives/futures and options, unrealized gains and losses will be calculated by marking all the open positions to market.
- d. Unrealized gains/losses are the differences between the current market values/NAV and the historical cost of the securities.
- e. All income will be accounted for on an accrual or receipt basis, whichever is earlier.
- f. All expenses will be accounted for on a due or payment basis, whichever is earlier.
- g. The Portfolio Manager and the Client can adopt any specific norms or methodology for valuation of investment or for accounting the same, as may be mutually agreed between them on a case-by-case basis.
- h. Purchase and Sale transactions are accounted for on a trade date basis.
- i. Purchases are accounted at the cost of acquisition inclusive of brokerage, stamp duty, transaction charges, and entry loads in case of units of the mutual fund. Sales are accounted for based on proceeds net of brokerage, stamp duty, transaction charges, and exit loads in case of units of the mutual fund. Securities Transaction Tax, Demat charges, and Custodian fees on purchase/ sale transaction would be accounted as an expense on receipt of bills. Transaction fees on unsettled trades are accounted for as and when debited by the Custodian.
- j. Bonus shares are recorded on the ex-benefit date (ex-date).
- k. Dividend income is recorded on the ex-dividend date (ex-date).
- l. Interest on Debt instruments/ Fixed Deposit with banks is accounted for on an accrual basis.
- m. Tax deducted at source (TDS) on interest on Fixed Deposits is considered as withdrawal of Portfolio and debited accordingly.
- n. Portfolio received from the Clients in the form of securities will be accounted for at the previous day's closing price on NSE. Where the Client withdraws Portfolio in the form of securities, the same will be accounted at the closing price on NSE on the date of withdrawal. In case any of the securities are not listed on NSE or they are not traded on NSE on a particular day, the closing price on Bombay Stock Exchange Ltd. (BSE) will be used for aforesaid accounting purposes.  
The Client may contact the Portfolio Manager for the purpose of clarifying or elaborating on any of the above policy issues.
- o. Dividend & fractional amount (on bonus & split shares) is directly credited to the client's personal account. The same amount will get updated in the PMS account as capital outflow on a periodical basis.

13.3 Books of accounts would be separately maintained in the name of the client as are necessary to account for the assets and any additions, income, receipts, and disbursements in connection therewith as provided under SEBI (Portfolio Managers) Regulations, 2020.

13.4 **Audit of Accounts**

The Portfolio accounts of the Portfolio Manager shall be audited annually by an independent Chartered Accountant and a copy of the certificate issued by the Chartered Accountant shall be given to the client.



- 13.5 The client may appoint a Chartered Accountant to audit the books and accounts of the Portfolio Manager relating to his transactions and the Portfolio Manager shall co-operate with such Chartered Accountant in course of the audit.
- 13.6 The client may contact the customer services official of the portfolio manager for the purpose of clarifying or elaborating on any of the above policy issues.
- 13.7 It is also clarified that the aforesaid is not applicable to clients who have availed only Advisory Portfolio Management Services.

**The Accounting Policies and Standards as outlined above are subject to changes made from time to time by Portfolio Manager. However, such changes would be in conformity with the Regulations.**

**14. Custody of Securities**

Custody of all securities of the client shall be with the custodian / DP who shall be appointed by the Portfolio Manager. The custodian / DP shall act on the instruction of the Portfolio Manager. All such custodian /DP fees, charged by the custodian / DP shall be payable by the client.

The Portfolio Manager shall not be liable for any act of the custodian / DP, done with or without the instruction of the Portfolio Manager, which may cause or is likely to cause any loss or damage to the clients.

**15. Investor Services**

Name, address, and telephone number of the investor relations officer who shall attend to the client's queries and complaints.

Name	: Mr. Bhushan Koli
Designation	: Head Operations
Address	: 503/504, B Wing, Naman Midtown, Off Senapati Bapat Marg, Elphinstone Road, Mumbai – 400 013.
Telephone No.	: +91 22 42360312
Email Address	: <a href="mailto:investorservices@alfaccurate.com">investorservices@alfaccurate.com</a>

The official mentioned above will ensure prompt investor services. The Portfolio Manager will ensure that this official is vested with the necessary authority, independence, and means to handle investor complaints.

**16. Grievance redressal and dispute settlement mechanism**

The Portfolio Manager will endeavor to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable, amicable manner and time. If the client remains dissatisfied with the remedies offered, the client and the portfolio manager shall abide by the following mechanisms:

The agreement with the Client shall be governed by, construed, and enforced in accordance with the laws of India. Any action or suit involving the agreement with a client or the performance of the agreement by either party of their obligations will be conducted exclusively in courts located within the city of Mumbai in the State of Maharashtra in India. There will be occasions when investors have a complaint against an intermediary registered with SEBI. In the event of such a complaint, an investor should first approach the concerned intermediary against whom the investor has a complaint. However, if investors may not be

satisfied with their response, then the investor may lodge their complaint online with SEBI in SCORES. The following is the link of the same: <https://scores.sebi.gov.in>  
**SCORES** facilitates investors to lodge their complaints online with **SEBI** and subsequently view its status.

SEBI vide press release PR No. 80/2012 dated 30th August 2012 has extended its toll-free helpline service for Investors (1800 22 7575 / 1800 266 7575) to Saturday and Sunday from the existing Monday to Friday. The service on Saturday and Sunday would be available initially to investors from all over India in English, Hindi, Marathi, and Gujarati from 9:30 a.m. to 5:30 p.m. For any queries/ feedback or assistance, the Client may also e-mail [sebi@sebi.gov.in](mailto:sebi@sebi.gov.in)

**Online dispute resolution (“ODR”) mechanism:**

Disputes between Clients (including institutional/corporate clients) and Portfolio Managers can be resolved in accordance with the ODR mechanism or by harnessing online conciliation and/or online arbitration as specified in the Master Circular No. SEBI/HO/OIAE/OIAE\_IAD-3/P/CIR/2023/195 dated 20 December, 2023 as updated from time to time.

**Dispute Settlement Mechanism:**

All disputes, differences, claims and questions whatsoever arising from the PMS Disclosure Document or PMS Agreement between the Client and the Portfolio Manager and/or their respective representatives touching any clause mentioned herein or otherwise in any way relating to or arising from these presents or in the event of failure by the parties to resolve the dispute in the manner set out above within 30 days from the date when the dispute arose, the dispute shall be submitted to a 23 dispute resolution mechanism that includes mediation and/or conciliation and/or arbitration, in accordance with the procedure specified by the Board.

**Arbitration:**

Any dispute with the client shall at first be settled by mutual discussion, failing which the same will be referred to and settled by arbitration in accordance subject to the provisions of the Arbitration and Conciliation Act, 1996 or any statutory modification/enactment thereof for the time being in force. A sole arbitrator will be appointed by mutual consent of the portfolio manager and the client. The arbitration shall be held in Mumbai and be conducted in the English language. Any action or suit involving the agreement with a client or the performance of the agreement by either party of its obligations will be exclusively in courts located at any place in India subject to the jurisdiction clause in the portfolio agreement.

**17. Details of investments in the securities of related parties of the portfolio manager:**

**Investments in the securities of associate / related parties of Portfolio Manager:**

Sr. no	Investment Approach, if any	Name of the associate/ related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores)	Percentage of total AUM as on last day of the previous calendar quarter
	NIL	NIL	NIL	NIL	NIL

**18. Details of the diversification policy of the portfolio manager**

The Portfolio Manager follows a diversified approach for investing in its Investment Approach as mentioned in point 5.4 above. Further, the Portfolio Manager has not made any investments on behalf of Clients in any of its associates or group companies/related parties.

**19. List of Approved Share Brokers involved for Portfolio Management activities:**

Sr. No.	Name	SEBI Registration No.
1.	ICICI Securities Ltd.	INZ000183631
2.	Kotak Securities Ltd	INZ000200137
3.	HDFC Securities	INZ000186937
4.	Motilal Oswal Securities Ltd	INZ000158836
5.	Nuvama Wealth Management Ltd	INZ000166136
6.	DAM Capital Advisors Ltd	INZ000207137
7.	BOB Capital Markets Ltd	INZ000159332
8.	Emkay Shares & Stock Brokers Pvt. Ltd.	INZ000203933
9.	Anand Rathi Share and Stock Broker Ltd.	INZ000170832
10.	Elara Securities India Pvt Ltd.	INZ000238236
11.	Systematix Shares & Stock (I) Ltd.	INZ000171134
12.	WealthFirst Portfolio Managers	INZ000018333
13.	Incred Capital Wealth Managers Pvt Ltd	INZ000294632
14.	Batliwala & Karani Securities Pvt Ltd	INZ000284836
15.	Antique Stock Broking Ltd	INZ000001131
16.	J M Financial Services Ltd	INZ000163434
17.	Spark Institutional Equities Pvt Ltd	INZ000307037
18.	IIFL Securities Ltd	INZ000164132
19.	Ambit Capital Pvt Ltd	INZ000259334
20.	Investec Capital Services (India) Pvt Ltd	INZ000007138
21.	Jefferies India Private Limited	INZ000243033
22.	Sunidhi Securities & Finance Ltd	INZ000169235

**20. Other Disclosures by Portfolio Manager:**

- The Company may undertake proprietary investment in its independent capacity.
- The Company has outsourced its fund accounting and custodial service.

**21. Anti-Money Laundering Compliances:**

The Government of India has put a policy framework to combat money laundering through the Prevention of Money Laundering Act, 2002 (PMLA 2002). PMLA 2002 and the Rules notified thereunder (PMLA Rules) came into effect from July 1, 2005. Director, FIU-IND, and Director (Enforcement) have been conferred with exclusive and concurrent powers under relevant sections of the Act to implement the provisions of the Act. Consequently, SEBI has mandated that all registered intermediaries formulate and implement a comprehensive policy framework on anti-money laundering and adopt 'Know Your Customer (KYC) norms.

Further, SEBI vides Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2019/113 dated June 06, 2024 (which supersedes all the earlier circular) issued a 'Master Circular for Guidelines on Anti Money 24 Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules frame thereunder' consolidating all the requirements/instructions/obligations of Securities Market Intermediaries and Circular No. SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2023/091 dated June 16, 2023 issued Amendment to Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under. Accordingly, the investors should ensure that the amount invested by them is through legitimate sources only and does not involve and are not designed for the purpose of any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of Income Tax Act,

Prevention of Money Laundering Act, Anti-Corruption Act and or any other applicable laws enacted by the Government of India from time to time. The Portfolio Manager is committed to complying with all applicable anti-money laundering laws and regulations in all of its operations. Accordingly, the Portfolio Manager reserves the right to reject or refund or freeze the account of the client if the client doesn't comply with the internal policies of the Portfolio Manager or any of the Applicable Laws including the KYC requirements.

The Portfolio Manager shall not be held liable in any manner for any claims arising whatsoever on account of freezing the account/rejection or refund of the application etc. due to non-compliance with the provisions of any of the aforesaid Regulations or Applicable Laws.

Investors are requested to note that KYC is mandatory for all investors. SEBI vide circular no. MIRSD/SE/Cir-21/2011 dated October 5, 2011, and CIR/MIRSD/ 11/2012 dated September 5, 2012, have mandated that the uniform KYC form and supporting documents shall be used by all SEBI registered intermediaries in respect of all new clients from January 1, 2012. Further, SEBI vides circular no. MIRSD/Cir-23/2011 dated December 2, 2011, has developed a mechanism for centralization of the KYC records in the securities market to bring about uniformity in securities markets.

Accordingly, KYC registration is being centralized through KYC Registration Agencies (KRA) registered with SEBI. Thus, each investor has to undergo a uniform KYC process only once in the securities market and the details would be shared with other intermediaries by the KRA. Applications shall be liable to be rejected if the investors do not comply with the aforesaid KYC requirements.

As per the 2015 amendment to PML (Maintenance of Records) Rules, 2005 (the rules), every reporting entity shall capture the KYC information for sharing with the Central KYC Records Registry in the manner mentioned in the Rules, as per the KYC template for 'Individuals' finalized by CERSAI. Accordingly, the KYC template finalized by CERSAI shall be used by the registered intermediaries as Part I of AOF for individuals.

Further, in terms of Rule 9 (1A) of the PML (Maintenance of Records) Rules, 2005 (the rules) and, as per the circular/guidelines issued by the respective regulator, every reporting entity shall capture the KYC information pertaining to Legal Entities from 01<sup>st</sup> April 2021.

## 22. General

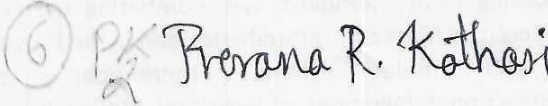
The portfolio manager and the client can mutually agree to be bound by specific terms through a written two-way agreement between themselves in addition to the standard agreement.

For AlfAccurate Advisors Private Limited.

  
Rajesh B. Kothari  
Managing Director  
Din no. 02644487

Place: Mumbai  
Date: 31-01-2025




  
Prerana R. Kothari  
Director  
Din no. 02644468

Place: Mumbai  
Date: 31-01-2025

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

We confirm that:

- i) The Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
- 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 in the Portfolio Management.
- iii) The Disclosure Document has been duly certified by an independent Chartered Accountant M/s B Y & Associates, Chartered Accountants, 8A-2, Chander Mukhi Building, 8th Floor, Nariman Point, Opposite Nirmal Bldg., Mumbai – 400 021, phone number 4017 2000, firm registration number 123423W on 31-01-2025.

  
**Managing Director / Principal Officer**

Mr. Rajesh Kothari

Date: 31/01/2025

Place: 503, B Wing, Naman Midtown, Senapati Bapat Marg, Elphinstone Road,  
Mumbai – 400 013.



  
**Director**

Mrs. Prerana Kothari

Date: 31/01/2025

Place: 503, B Wing, Naman Midtown, Senapati Bapat Marg, Elphinstone Road,  
Mumbai – 400 013.



Encl.:

- 1) A copy of the chartered accountants' certificate
- 2) Disclosure Document.

**CERTIFICATE**

We hereby certify that we have reviewed the Disclosure Document dated 31<sup>st</sup> January 2025, prepared by M/s. AlfAccurate Advisors Private Limited (SEBI Registered Portfolio Manager – INP000003419) having address as 503/504, B Wing, Naman Midtown, Off Senapati Bapat Marg, Elphinstone Road, Mumbai – 400 013, in accordance with disclosure document as stated in Schedule V of Regulation 22(3) of Securities and Exchange Board of India (“SEBI”) (Portfolio Managers) Regulations, 2020, (‘the Regulations’).

**Management Responsibility:**

The Management of the Company is responsible for the preparation of the attached Disclosure Document in accordance with the Regulations.

**Our Responsibility:**

Our responsibility is to issue the certificate based on our review which is primarily limited to inquiries of the Company’s personnel, tracing the financial information from the audited financial statements for the year ended March 31, 2022, March 31, 2023, and March 31, 2024 and previous disclosure document submitted to SEBI, other relevant records, the information, explanations, and representations furnished by the Management.

We have relied on the representation given by the Management about the penalties or litigations, group companies, performance calculation of the Portfolio Manager and audit observations (if any) against the Portfolio Manager mentioned in the Disclosure Document.

**Opinion:**

Further to our comments, we certify that the disclosures made in the Disclosure Document dated 31<sup>st</sup> January 2025 are true, fair, and adequate to enable the investors to make well-informed decisions.

**Restrictions on Use:**

This Certificate has been issued pursuant to Schedule V of Regulation 22 (3) of Securities and Exchange Board of India ("SEBI") (Portfolio Managers) Regulations, 2020, ('the Regulations') and at the request of M/s. AlfAccurate Advisors Private Limited for the purpose of submitting the same to SEBI and the Portfolio Management Service Clients. The same should not be used or referred to for any other purpose without our prior written consent.

**Place: Mumbai**

**Date: 31<sup>st</sup> January 2025**

**For BY & Associates**

**Chartered Accountants**

**Firm Reg. No. 123423W**

**KIRIT**  
**RAMCHANDRA**  
**JAIN**  
**CA Kirit Jain**

Digitally signed by KIRIT  
RAMCHANDRA JAIN  
Date: 2025.02.20  
19:24:27 +05'30'

**Partner**

**M. No: 179354**

**UDIN: 25179354BMKSRO1699**

**Format for material Change in Disclosure Document**

1. Name of the Portfolio Manager: **AlfAccurate Advisors Private Limited**
2. Registration No.: **INP000003419**
3. Material Change: **Addition of Investment Approaches**

<b>Sl. No.</b>	<b>Material Change</b>	<b>Existing</b>	<b>Proposed Change</b>
<b>1.</b>	Change in control of the Portfolio Manager	-	-
<b>2.</b>	Principal Officer	-	-
<b>3.</b>	fees charged	-	-
<b>4.</b>	charges associated with the services offered	-	-
<b>5.</b>	investment approaches offered (along with the impact of such change)	Existing 29 Investment Approaches in PMS DD	In addition to existing Investment Approaches already in PMS DD, 2 New Investment Approaches were added in the latest Disclosure Document.
<b>6.</b>	other changes as specified by SEBI from time to time	-	-