



Portfolio Management Services

Disclosure Document

May 2026

R D V & Associates
Chartered Accountants

709-710, GDITL Tower, B-08,
Netaji Subhash Place,
Pitampura, Delhi 110034
T. 9699048808, 8851659951
E. info@rdvglobal.com

13th May, 2026

The Principal Officer
Dolat Capital Market Private Limited,
Registered Address:

1401-1409, Dalal Street, Commercial Co-op. Soc. Ltd.,
Block 53 (Bldg No. 53E) Zone-5, Road-5E, GIFT City,
Gandhinagar – 382355 Gujarat, India.

Correspondence Address:

1203, A wing 12th Floor, Naman Midtown,
Senapati Bapat Marg, Prabhadevi,
Mumbai – 400013, Maharashtra, India.

**Certificate under Regulation 22 of Securities and Exchange Board of India
(Portfolio Managers) Regulations, 2020**

1. We have been requested by management of Dolat Capital Market Private Limited ('the Company'/'the Portfolio Manager') to certify the contents of Disclosure Document dated 4th May, 2026 for portfolio management services of the Company which is prepared by the Company in accordance with the Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 ('the SEBI Regulations'). We understand that the Disclosure Document is required to be submitted to the Securities and Exchange Board of India ("the SEBI") and to the clients of the Company.

2. Management's responsibility

The management of the Company is responsible for the maintenance of the books of account and such other relevant records as prescribed by applicable laws, which includes collecting, collating and validating data and designing, implementing and monitoring of internal controls relevant for the preparation and presentation of Disclosure Document.

The preparation of Disclosure Document and compliance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 is the responsibility of the management of the Company.

3. **Auditor's responsibility**

We have not performed an audit, the objective of which would be expression of an opinion on the financial statements, specified elements, accounts or items thereof, for the purpose of this certificate. Accordingly, we do not express such an opinion.

For the purpose of this certificate, we have planned and performed the following procedures to determine whether anything has come to our attention that causes us RDV & Associates Chartered Accountants to believe that the aforementioned Disclosure Document is not in compliance with the SEBI Regulations.

- a) The list of persons classified as group companies and list of related parties of the company are as per audited financial statements available on the Company website;
- b) The promoters and directors' qualifications, experience, ownership details are as confirmed by the Portfolio Manager and have been accepted without further verification;
- c) We have relied solely on representations provided by the management of the Company and not performed any procedures in relation to penalties or litigations against the Portfolio Manager, as mentioned in the Disclosure Document;
- d) We have relied solely on representations provided by the management of the Company and not performed any procedures in relation to the investment objectives and policies / investment philosophy.

6. **Conclusion**

Based on the procedures performed as stated above, the evidence obtained, and the information and explanations provided by the Company, nothing has come to our attention that causes us to believe that the Disclosure Document is not, in all material respects, in compliance with the SEBI Regulations. This certificate is being issued consequent to the change in the Principal Officer and the change in the Principal Place of Business of the Company. Further, based on our review, all documents and records pertaining to the aforesaid changes have been received by us. Accordingly, based on our review of the attached Disclosure Document and the other relevant records and information furnished by the Portfolio Manager, along with the representations provided by the management, we certify that the disclosures made in the attached Disclosure Document for Portfolio Management are true, fair, and adequate to enable investors to make a well-informed decision.

R D V & Associates
Chartered Accountants

709-710, GDITL Tower, B-08,
Netaji Subhash Place,
Pitampura, Delhi 110034
T. 9699048808, 8851659951
E. info@rdvglobal.com

7. This certificate is issued solely to comply with Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 (as amended from time to time) and may not be suitable for any other purpose. Accordingly, our certificate should not be quoted or referred to in any other document or made available to any other person or persons other than being part of Disclosure Document without our prior written consent. Also, we neither accept nor assume any duty or liability for any other purpose or to any other party to whom our certificate is shown or into whose hands it may come without our prior written consent.

FOR RDV & ASSOCIATES
CHARTERED ACCOUNTANT



CA KARAN DAGA
(Partner)
FRN: 006128C
M. No.: 197745
Place - Mumbai
UDIN - 26197745XWPOXC7491

Declaration:

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

PRINCIPAL OFFICER	PORTFOLIO MANAGER
<p>Name : Mr. Purvag Shah</p> <p>Phone : 9930023583</p> <p>E-Mail : purvag@dolatcapital.com</p>	<p>DOLAT CAPITAL MARKET PRIVATE LIMITED</p> <p>Registered Address: 1401-1409, Dalal Street, Commercial Co-op. Soc. Ltd., Block 53 (Bldg No. 53E) Zone-5, Road-5E, GIFT City, Gandhinagar – 382355 Gujarat, India.</p> <p>Correspondence Address: 1203, A wing 12th Floor, Naman Midtown, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013, Maharashtra, India.</p>

INDEX

Classification of sixteen parameters of Model Disclosure document

Part-I Static section

Sl. No.	Parameter	Pg. No.
1	Disclaimer clause	06
2	Definitions	06
3	Description	10
4	Penalties, pending litigation or proceedings, findings of inspection or investigation for which action may have been taken or initiated by any regulatory authority.	14
5	Services offered	15
6	Risk factors	17
7	Nature of Expenses	26
8	Taxation	27
9	Accounting policies	36
10	Investors services	37
11	Details of the diversification policy of the portfolio manager	39

Part-II Dynamic Section

Sl. No.	Parameter	Pg. No.
12	Client Representation	39
13	Financial Performance	40
14	Performance of Portfolio Manager	41
15	Audit observations of the preceding 3 years	41
16	Details of investments in the securities of related parties of the portfolio manager	41
17	General	41
18	Annexure I	43
19	Form C	73

PART- I Static Section

1. Disclaimer Clause

This Document has been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and filed with SEBI. This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of this Document.

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

2. Definitions

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

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

Provided that the Central Government and the State Governments, developmental agencies set up under the aegis of the Central Government or the State Governments, funds set up by the Central Government or the State Governments, qualified institutional buyers as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category I foreign portfolio investors, sovereign wealth funds and multilateral agencies and any other entity as may be specified by the Board from

- time to time, shall deemed to be an accredited investor and may not be required to obtain a certificate of accreditation.
4. “**Advisory Services**” means advising on the portfolio approach, investment and divestment of individual Securities in the Client’s Portfolio, entirely at the Client’s risk, in terms of the Regulations and the Agreement.
 5. “**Agreement**” or “**Portfolio Management Services Agreement**” or “**PMS Agreement**” means agreement executed between the Portfolio Manager and its Client for providing portfolio management services and shall include all schedules and annexures attached thereto and any amendments made to this agreement by the parties in writing, in terms of Regulation 22 and Schedule IV of the Regulations.
 6. “**Applicable Law/s**” means any applicable statute, law, ordinance, regulation, rule, order, bye-law, administrative interpretation, writ, injunction, directive, judgment or decree or other instrument including the Regulations which has a force of law, as is in force from time to time.
 7. “**Assets Under Management**” or “**AUM**” means aggregate net asset value of the Portfolio managed by the Portfolio Manager on behalf of the Clients.
 8. “**Associate**” means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager.
 9. “**Benchmark**” means an index selected by the Portfolio Manager in accordance with the Regulations, in respect of each Investment Approach to enable the Clients to evaluate the relative performance of the Portfolio Manager.
 10. “**Board**” or “**SEBI**” means the Securities and Exchange Board of India established under section 3 of the Securities and Exchange Board of India Act, 1992.
 11. “**Business Day**” means any day, which is not a Saturday, Sunday, or a day on which the banks or stock exchanges in India are authorized or required by Applicable Laws to remain closed or such other events as the Portfolio Manager may specify from time to time.
 12. “**Client(s)**” / “**Investor(s)**” means any person who enters into an Agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.
 13. “**Custodian(s)**” means an entity registered with the SEBI as a custodian under the Applicable Laws and appointed by the Portfolio Manager, from time to time, primarily for custody of Securities of the Client.
 14. “**Depository**” means the depository as defined in the Depositories Act, 1996 (22 of 1996).
 15. “**Depository Account**” means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.

16. **“Direct on-boarding”** means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.
17. **“Disclosure Document” or “Document”** means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.
18. **“Distributor”** means a person/entity who may refer a Client to avail services of Portfolio Manager in lieu of commission/charges (whether known as channel partners, agents, referral interfaces or by any other name).
19. **“Eligible Investors”** means a Person who: (i) complies with the Applicable Laws, and (ii) is willing to execute necessary documentation as stipulated by the Portfolio Manager.
20. **“Fair Market Value”** means the price that the Security would ordinarily fetch on sale in the open market on the particular date.
21. **“Foreign Portfolio Investors” or “FPI”** means a person registered with SEBI as a foreign portfolio investor under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time.
22. **“Financial Year”** means the year starting from April 1 and ending on March 31 in the following year.
23. **“Funds” or “Capital Contribution”** means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies mentioned in the account opening form, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of sale or other realization of the portfolio and interest, dividend or other monies arising from the assets, so long as the same is managed by the Portfolio Manager.
24. **“Group Company”** shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary.¹
25. **“HUF”** means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.
26. **“Investment Approach”** is a broad outlay of the type of Securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and Securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.
27. **“IT Act”** means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.
28. **“Large Value Accredited Investor”** means an Accredited Investor who has entered into an Agreement with the Portfolio Manager for a minimum investment amount of ten crore rupees.
29. **“Non-resident Investors” or “NRI(s)”** shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.

30. “NAV” shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.
31. “NISM” means the National Institute of Securities Markets, established by the Board.
32. “Person” includes an individual, a HUF, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.
33. “Portfolio” means the total holdings of all investments, Securities and Funds belonging to the Client.
34. “Portfolio Manager” means Dolat Capital Market Private Limited, a company incorporated under the Companies Act, 2013, registered with SEBI as a portfolio manager bearing registration number INP000009603 and having its registered office at 1401-1410, Dalal Street Commercial Co-op Ltd, Block 53 (Block No. 53E) Zon-S, Road-SE, Gift City, Gandhinagar, Pin Code- 382355
35. “Principal Officer” means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:
- (i) the decisions made by the Portfolio Manager for the management or administration of Portfolio of Securities or the Funds of the Client, as the case may be; and
 - (ii) all other operations of the Portfolio Manager
36. “Regulations” or “SEBI Regulations” means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended/modified and reinstated from time to time and including the circulars/notifications issued pursuant thereto.
37. “Related Party” means –
- (i) a director, partner or his relative;
 - (ii) a key managerial personnel or his relative;
 - (iii) a firm, in which a director, partner, manager or his relative is a partner;
 - (iv) a private company in which a director, partner or manager or his relative is a member or director;
 - (v) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two per cent. of its paid-up share capital;
 - (vi) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
 - (vii) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:

Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;

- (viii) any body corporate which is— (A) a holding, subsidiary or an associate company of the Portfolio Manager; or (B) a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary; (C) an investing company or the venturer of the Portfolio Manager— The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the Portfolio Manager would result in the Portfolio Manager becoming an associate of the body corporate;
- (ix) a related party as defined under the applicable accounting standards;
- (x) such other person as may be specified by the Board:
Provided that,
 - a) any person or entity forming a part of the promoter or promoter group of the listed entity; or
 - b) any person or any entity, holding equity shares:
 - (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;

38. “**Securities**” means security as defined in Section 2(h) of the Securities Contract (Regulation) Act, 1956, provided that securities shall not include any securities which the Portfolio Manager is prohibited from investing in or advising on under the Regulations or any other law for the time being in force.

3. Description

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

The Portfolio Manager is a company incorporated under the provisions of the Companies Act, 1956 on November 18, 1993, at Gujarat. It has a portfolio manager license (**registration number INP000009603**) to offer discretionary portfolio management services, non-discretionary portfolio management services, and advisory services to high net-worth individuals (HNIs), institutional clients, corporates, Accredited Investors, Large Value Accredited Investors and other permissible class of investors.

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

(a) **Promoters of the Portfolio Manager**

Dolat Group Master Trust, Promoter

Dolat Group Master Trust is promoter entity and beneficiaries of the trust are promoter trusts of Mr.Pankaj Shah, Mr.Rajendra Shah, Mr.Harendra Shah and Mr.Shailesh Shah. Through the trust and in individual capacity the promoter family owns majority stake in Dolat Capital Market Pvt.Ltd. The registered office of the trust is 301-308, 3rd Floor, Bhagwati House, A19, Veera Desai Road, Andheri West, Mumbai 400058.

Pankaj Shah, Promoter

[Please refer below for the background of Pankaj Shah.]

Shailesh Dolatrai Shah, Promoter

[Please refer below for the background of Shailesh Dolatrai Shah.]

Harendra Dolatrai Shah, Promoter

[Please refer below for the background of Harendra Dolatrai Shah.]

Rajendra Dolatrai Shah, Promoter

[Please refer below for the background of Rajendra Dolatrai Shah.]

(b) Directors of the Portfolio Manager

Harsha Shah, Director

Ms. Harsha Harendra Shah is one of the directors of the Portfolio Manager from August 01, 1998. She is in charge of back office department of Dolat Capital Market Private Limited. She has more than 22 years of experience in administration and management of the Portfolio Manager.

She is B.A graduate from Ruia College, Matunga, Mumbai.

Harendra Dolatrai Shah, Director

Mr. Harendra Dolatrai Shah has been appointed as director of the Portfolio Manager with effect from February 17, 2020. He was a member of Ahmadabad Stock Exchange and possess a vast experience in the field of share trading, broking, investment in shares and securities and finance. He has experience of overall aspects of financial management and administration. He is in charge of back office department.

Shailesh Dolatrai Shah, Director

Mr. Shailesh Dolatrai Shah has been appointed as director of the Portfolio Manager with effect from February 17, 2020. He was a member of Bombay Stock Exchange Limited for

last 20 years through his proprietary concern, Shailesh D. Shah. He has transferred his individual membership to one private company. He was market maker in nearly 150 scrips in BSE and his experience of large volume transactions in the exchange on behalf of various financial institutions, foreign portfolio investors. He is very active in primary market and has detailed knowledge of market movements. He is a Commerce graduate.

Pankaj Dolatrai Shah, Director

Mr. Pankaj D. Shah has been appointed as director of the Portfolio Manager with effect from February April 30th, 2019. extensive experience in the field of share trading, broking, investment in shares and securities and finance. He was member of Bombay Stock Exchange (BSE) for last 20 years. He was also the market maker in around 300 scrips in BSE, through his proprietary concern M/s D.A. Shah & Sons. He does large volume trading on behalf of various financial institutions, foreign institutional investors and big corporates. He has also marketed various public issues and has deep insight of stock market trend. He has converted his individual membership of BSE into corporate membership of BSE in the name of Dolat Capital Market Private Limited.

Rajendra Dolatrai Shah, Director

Mr. Rajendra D. Shah has been appointed as director of the Portfolio Manager with effect from May 31st 2013. is one of the directors of the Portfolio Manager and is actively involved in financial management and day-to-day administration of the Portfolio Manager. He is in-charge of back office and related works. He has rich experience in computer engineering field, for production and marketing of the computers. He is Bachelor of Engineering in mechanical engineering from S. P. Engineering College, Andheri, Mumbai University.

Amit Khurana, Director

Mr. Amit Khurana has been associated with Dolat Capital Market Private Limited Since 2011 in various capacities & currently serve as Head of Equities. Mr. Khurana is CFA & MA from University of Delhi. Mr. Khurana has demonstrated exceptional leadership overseeing entire sell side business of the company. He is also involved in new businesses of the company and maintaining client relationship.

Mr. Purvag Shah, Director

He is responsible for shaping Business and future Strategies of the company. He has more than 10 years of experience in advising domestic & FII clients of the institutional equities desk of the company. He is CIO and Key Investment Person of the Alternative Investment Fund Business.

- (iii) **Top 10 Group companies/firms of the Portfolio Manager on turnover basis (latest audited financial statements may be used for this purpose)**

1. Jigar Commodities and Derivatives Private Limited
2. Nirpan Securities Private Limited
3. Shailesh Shah Securities Private Limited
4. Purvag Commodities and Derivatives Private Limited
5. Dolat Finserv Private Limited
6. Dolat Capital IFSC Private Limited
7. Dolat Algotech Limited (Formerly known as Dolat Investments Limited)
8. Nirshilp Commodities and Trading Private Limited
9. Churchgate Investments and Trading Company Private Limited
10. L. C. Raheja Forex Private Limited

(iv) **Details of the services being offered: Discretionary, Non-Discretionary and Advisory**

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

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

(a) **Discretionary Services:**

Under the discretionary PMS, the choice as well as the timings of the investment decisions rest solely with the Portfolio Manager and the Portfolio Manager can exercise any degree of discretion in the investments or management of assets of the Client. The Securities invested/divested by the Portfolio Manager for Clients may differ from Client to Client. In case of Large Value Accredited Investors, the Portfolio Manager may invest up to 100% of the assets under management of such Investors in unlisted securities, subject to the terms of the Agreement executed. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's account is absolute and final and cannot be called in question or be open to review at any time during the currency of the Agreement or any time except on the ground of fraud, mala fide intent, conflict of interest (other than those already disclosed in the Agreement) or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the Applicable Laws. Periodical statements in respect of the Client's assets under management shall be sent to the respective Clients in accordance with the Agreement and the Regulations.

(b) **Non-Discretionary Services:**

Under the non-discretionary PMS, the assets of the Client are managed in consultation with the Client. Under this service, the assets are managed as per the requirements of the Client after due consultation with the Client. The Client has complete discretion to decide on the investment (quantity and price or amount). The Portfolio Manager, *inter alia*, manages transaction execution, accounting, recording or corporate benefits, valuation and reporting aspects on behalf of the Client. In case of Large Value Accredited Investors, the Portfolio Manager may invest up to 100% of the assets under management of such Investors in unlisted securities.

(c) **Advisory Services:**

The Portfolio Manager may provide investment advisory services, in terms of the Regulations, which shall include the responsibility of advising on the Portfolio, Investment Approach and investment and divestment of individual Securities on the Client Portfolio, for an agreed fee structure and for a defined period, entirely at the Client's risk to all eligible category of Investors. The Portfolio Manager shall be solely acting as an advisor to the Client Portfolio and shall not be responsible for the investment/divestment of Securities and/or any administrative activities on the Client Portfolio. The Portfolio Manager shall provide advisory services in accordance with such guidelines and/or directives issued by the regulatory authorities and/or the Client, from time to time, in this regard. In case of Large Value Accredited Investors, the Portfolio Manager may advice to invest up to 100% of the assets under management of such Investors in unlisted securities.

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

Direct Onboarding of Clients:

A direct onboarding facility for Clients is available on the website of the Portfolio Manager to enable Clients to have direct interaction with the Portfolio Manager rather than routing through any distributors or other partners offering referral services of a similar nature.

For more details about the same, the Client is requested to reach out to the following officials:

Contact Person	Address	Contact No.	Email
Ms. Sachi Kheskani (VP Client Engagement)	1203, A wing 12 th Floor, Naman Midtown, Senapati Bapat Marg,	8976864296	sachik@dolatcapital.co m
Mr. Arush Chaturvedi (Compliance Officer)	Prabhadevi, Mumbai – 400013, Maharashtra, India.	8976864290 / 7977030733	arushc@dolatcapital.co m

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

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

There was a SEBI Order/AN/PR/2024-25/30671-30706 relating to transactions executed in year 2014-2015 between Nirshilp Commodities and Trading Pvt. Ltd. (Formerly known as Nirshilp Securities Pvt. Ltd.) and Individuals & HUF & companies of Dolat Group including -Dolat Capital Market Pvt. Ltd. Transactions were executed through group broking companies i.e. Nirpan Securities Pvt. Ltd., Vaibhav Stock and Derivatives Broking Pvt. Ltd. and Dolat Capital

Market Pvt. Ltd. for Nirshilp commodities to reduce overall high margin requirement. The transactions were found in default by SEBI under Section 15HA & 15HB of the Securities and Exchange Board of India Act, 1992. The said transactions found to be in violation of PFUTP Regulation 2003.

ii. **The nature of the penalty/direction.**

S. No.	Name of the Person/Company	Penalty under Section	Penalty Amount (in Rs.)
1	Dolat Capital Market Pvt. Ltd. (PAN: AAACD1518M) Order/AN/PR/2024-25/30671-30706	Section 15HA of the SEBI Act, 1992	Rs. 5,00,000 (Rupees Five Lakhs Only)
		Section 15HB of the SEBI Act, 1992	Rs.1,00,000 (Rupees One Lakh Only)

Both the penalties payments were made on 07/10/2024

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

None.

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

None.

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

None.

vi. **Any enquiry/ adjudication proceedings initiated by SEBI against the Portfolio Manager or its directors, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its directors, principal officer or employee, under the SEBI Act or rules or regulations made thereunder.**

None.

5. **Services Offered**

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

a) **Investment Objective**

The investment objective of the Portfolio Manager is to offer portfolio management services and advisory services. This may include decisions to buy and sell Securities, reshuffling portfolio holdings, keeping safe custody of the securities and monitoring book closures and corporate actions so that the due benefits accrue to the Client Portfolio, for an agreed fee structure and for a definite time frame as clearly defined, entirely at the Client's risk. The portfolio of a Client may differ from that of another Client investing in the same Investment Approach as per the discretion of the Portfolio Manager.

The Portfolio Manager shall not accept Capital Contribution of less than INR 50,00,000 (Indian Rupees Fifty Lakh) from the Client and/or such other amount as may be prescribed under the Regulations. In case of Large Value Accredited Investor, the minimum Capital Contribution shall be INR 10,00,00,000 (Indian Rupees Ten Crore) or any other amount as specified under the Applicable Laws. The minimum Capital Contribution per Client shall be applicable for new Clients. However, the said minimum Capital Contribution shall not be applicable to Accredited Investors and shall be as agreed with the Portfolio Manager.

Under discretionary and non-discretionary service, the Portfolio-Manager may invest in various portfolios with different terms and conditions from time to time. Discretionary and non-discretionary services are being offered under various strategies with various terms and conditions.

b) Type of securities in which Portfolio Manager will invest

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

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

Under the non-discretionary PMS, the Capital Contribution shall be invested in listed and/or unlisted securities (provided that investment in unlisted securities shall not exceed 25% (twenty-five percent) of the assets under management of such Client) and managed in consultation with the Client. In case of Large Value Accredited Investors, the Portfolio

Manager may advise to invest up to 100% of the assets under management of such Investors in unlisted securities.

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

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

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

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

(ii) **Investment Approach of the Portfolio Manager**

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

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

Not Applicable.

6. **Risk factors**

A. General Risk:

- i. Securities investments are subject to market risk and there is no assurance or guarantee that the objectives of the PMS will be achieved.
- ii. The Portfolio Manager has no previous experience/track record in the field of portfolio management services and has obtained a license to function as a portfolio manager only on 26.08.2025. However, the Principal Officer, directors and other key management personnel of the Portfolio Manager have rich individual experience.
- iii. Without prejudice to the above, the past performance of the Portfolio Manager does not indicate its future performance.
- iv. Any act, omission or commission of the Portfolio Manager under the Agreement would be solely at the risk of the Client and the Portfolio Manager will not be liable for any act, omission or commission or failure to act save and except in cases of gross negligence, willful default and/or fraud of the Portfolio Manager.
- v. The Client Portfolio may be affected by settlement periods and transfer procedures.
- vi. The PMS is subject to risk arising out of non-diversification as the Portfolio Manager under its PMS may invest in a particular sector, industry, few/single Portfolio Entity/ies. The performance of the Client Portfolio would depend on the performance of such companies/industries/sectors of the economy.
- vii. If there will be any transactions of purchase and/or sale of securities by Portfolio Manager and employees who are directly involved in investment operations that conflicts with transactions in any of the Client Portfolio the same shall be disclosed to the Client.
- viii. The group companies of Portfolio Manager may offer services in the nature of consultancy, sponsorship etc., which may be in conflict with the activities of portfolio management services.
- ix. The provisions of the Agreement and the principal and returns on the Securities subscribed by the Portfolio Manager may be subject to force majeure and external risks such as war, natural calamities, pandemics, policy changes of local / international markets and such events which are beyond the reasonable control of the Portfolio Manager. Any policy change / technology updates / obsolescence of technology would affect the investments made by the Portfolio Manager.

Other risks arising from the investment objectives, investment strategy, Investment Approach and asset allocation are stated as under:

B. Risks associated with investments in equity and equity linked securities

- i. Equity and equity related securities by nature are volatile and prone to price fluctuations on a daily basis due to both macro and micro factors.

- ii. In domestic markets, there may be risks associated with trading volumes, settlement periods and transfer procedures that may restrict liquidity of investments in equity and equity related securities.
- iii. In the event of inordinately low volumes, there may be delays with respect to unwinding the Portfolio and transferring the redemption proceeds.
- iv. The value of the Client Portfolio, may be affected generally by factors affecting securities markets, such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in policies of the government, taxation laws or policies of any appropriate authority and other political and economic developments and closure of stock exchanges which may have an adverse bearing on individual securities, a specific sector or all sectors including equity and debt markets. Consequently, the Portfolio valuation may fluctuate and can go up or down.
- v. Client may note that Portfolio Manager's investment decisions may not always be profitable, as actual market movements may be at variance with anticipated trends.

C. **Risk factors associated with investments in derivatives**

- i. Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the Portfolio Manager to identify such opportunities. Identification and execution of such strategies to be persuaded by the Portfolio Manager involve uncertainty and decisions of the Portfolio Manager may not always be profitable. No assurance can be given that the Portfolio Manager shall be able to identify or execute such strategies.
- ii. The risks associated with the use of derivatives are different from or possibly greater than, the risk associated with investing directly in securities and other traditional investments.
- iii. As and when the Portfolio Manager on behalf of Clients would trade in the derivatives market there are risk factors and issues concerning the use of derivatives that the Client should understand. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but also of the derivative itself. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price or interest rate movements correctly. There is a possibility that loss may be sustained by the Portfolio as a result of the failure of another party (usually referred as the “counterparty”) to comply with the terms of the derivatives contract. Other risks in using derivatives include the risk of mispricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices. Thus, derivatives are highly leveraged instruments. Even a small price movement in the underlying security could have a large impact on their value.

- iv. The options buyer's risk is limited to the premium paid, while the risk of an options writer is unlimited. However, the gains of an options writer are limited to the premiums earned.
- v. The writer of a put option bears the risk of loss if the value of the underlying asset declines below the exercise price. The writer of a call option bears a risk of loss if the value of the underlying asset increases above the exercise price.
- vi. Investments in index futures face the same risk as the investments in a portfolio of shares representing an index. The extent of loss is the same as in the underlying stocks.

D. Risks associated with investments in fixed income securities/products

Some of the common risks associated with investments in fixed income and money market securities are mentioned below. These risks include but are not restricted to:

- i. **Interest Rate Risk:** As with all debt securities, changes in interest rates affects the valuation of the portfolios, as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of longer-term securities generally fluctuate more in response to interest rate changes than do shorter-term securities. Interest rate movements in the Indian debt markets can be volatile leading to the possibility of large price movements up or down in debt and money market securities and thereby to possibly large movements in the valuation of portfolios.
- ii. **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.
- iii. **Credit Risk:** Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income security (i.e. risk that the issuer will be unable to make timely principal and interest payments on the security). Due to this risk, debentures are sold at a yield spread above those offered on treasury securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default.
- iv. **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.
- v. **Rating Risk:** Different types of debt securities in which the Client invests, may carry different levels and types of risk. Accordingly, the risk may increase or decrease depending upon its investment pattern, for instance corporate bonds carry a higher amount of risk than government securities. Further even among corporate bonds, bonds, which are AA rated, are comparatively riskier than bonds, which are AAA rated.

- vi. **Price Volatility Risk:** Debt securities may also be subject to price volatility due to factors such as changes in interest rates, general level of market liquidity and market perception of the creditworthiness of the issuer, among others (market risk). The market for these Securities may be less liquid than that for other higher rated or more widely followed Securities.

Investment and Liquidity Risks: There may be no active secondary market for investments of the kind the Portfolio Manager may make for the Client Portfolio. There are a variety of methods by which unlisted investments may be realized, such as the sale of investments on or after listing, or the sale or assignment of investments to joint-venture partners or to third parties subject to relevant approvals. However, there can be no guarantee that such realizations shall be achieved, and the Portfolio's investments may remain illiquid.

Since the Portfolio Manager may only make a limited number of investments, poor performance by one or a few of the investments could severely adversely affect the total returns of the PMS.

Identification of Appropriate Investments: The success of the PMS as a whole depends on the identification and availability of suitable investment opportunities and terms. The availability and terms of investment opportunities will be subject to market conditions, prevailing regulatory conditions in India where the Portfolio Manager may invest, and other factors outside the control of the Portfolio Manager. Therefore, there can be no assurance that appropriate investments will be available to, or identified or selected by, the Portfolio Manager.

E. **Management and Operational risks**

Reliance on the Portfolio Manager

- i. The success of the PMS will depend to a large extent upon the ability of the Portfolio Manager to source, select, complete and realize appropriate investments and also reviewing the appropriate investment proposals. The Portfolio Manager shall have considerable latitude in its choice of portfolio entities and the structuring of investments. Furthermore, the team members of the Portfolio Manager may change from time to time. The Portfolio Manager relies on one or more key personnel and any change/removal of such key personnel may have material adverse effect on the returns of the Client.
- ii. The investment decisions made by the Portfolio Manager may not always be profitable.
- iii. Investments made by the Portfolio Manager are subject to risks arising from the investment objectives, Investment Approach, investment strategy and asset allocation.

Exit Load: Client may have to pay a high Exit Load to withdraw the funds/Portfolio (as stipulated in the Agreement with the Client). In addition, they may be restricted / prohibited from transferring any of the interests, rights or obligations with regard to the Portfolio except as may be provided in the Agreement and in the Regulations.

Non-diversification risks: This risk arises when the Portfolio is not sufficiently diversified by investing in a wide variety of instruments.

No Guarantee: Investments in Securities are subject to market risks and the Portfolio Manager does not in any manner whatsoever assure or guarantee that the objectives will be achieved. Further, the value of the Portfolio may increase or decrease depending upon various market forces and factors affecting the capital markets such as delisting of Securities, market closure, relatively small number of scrips accounting for large proportion of trading volume. Consequently, the Portfolio Manager provides no assurance of any guaranteed returns on the Portfolio.

Ongoing risk profiling risk: The Client would be subject to ongoing risk profiling in accordance with the Regulation. If in case during such ongoing risk profiling, it is found that the Client is not suitable for the investments in Securities or doesn't have risk appetite, the Portfolio Manager may terminate the Agreement with the Client.

F. **India-related Risks**

Political, economic and social risks: Political instability or changes in the government could adversely affect economic conditions in India generally and the Portfolio Manager's business in particular. The Portfolio Entity's business may be affected by interest rates, changes in government policy, taxation, social and civil unrest and other political, economic or other developments in or affecting India.

Since 1991, successive governments have pursued policies of economic liberalization and financial sector reforms. Nevertheless, the government has traditionally exercised and continues to exercise a significant influence over many aspects of the economy. Moreover, there can be no assurance that such policies will be continued and a change in the government's economic liberalization and deregulation policies in the future could affect business and economic conditions in India and could also adversely affect the Portfolio Manager's financial condition and operations. Future actions of the Indian central government or the respective Indian state governments could have a significant effect on the Indian economy, which could adversely affect private sector companies, market conditions, prices and yields of the Portfolio Entity/ies.

Inflation and rapid fluctuations in inflation rates have had, and may have, negative effects on the economies and securities markets of the Indian economy. International crude oil prices and interest rates will have an important influence on whether economic growth targets in India will be met. Any sharp increases in interest rates and commodity prices, such as crude oil prices, could reactivate inflationary pressures on the local economy and negatively affect the medium-term economic outlook of India.

Many countries had experienced outbreaks of infectious illnesses in recent decades, including severe acute respiratory syndrome and the COVID-19. The COVID-19 outbreak had resulted in numerous deaths and the imposition of both local and more widespread "work from home" and other quarantine measures, border closures and other travel restrictions, causing social unrest and commercial disruption on a global scale. The spread of the COVID-19 has, had, a material adverse impact on portfolio entities, local economies and also the global economy, as cross border commercial activity and market sentiment due to the government and other measures

seeking to contain its spread. Additionally, the Portfolio Manager's operations could be disrupted if any of its member or any of its key personnel contracts the COVID-19 and/or any other infectious disease. Any of the foregoing events could materially and adversely affect the Portfolio Manager's ability to source, manage and divest its investments and its ability to fulfil its investment objectives. Similar consequences may arise with respect to other comparable infectious diseases.

G. Legal and Tax risks:

Tax risks: Clients/ Investors are subject to a number of risks related to tax matters. In particular, the tax laws relevant to the Client Portfolio are subject to change, and tax liabilities could be incurred by the Clients/ Investors as a result of such change. The government of India, state governments and other local authorities in India impose various taxes, duties and other levies that could affect the performance of the Portfolio Entities. The tax consequences of an investment in the Portfolio Entities are complex, and the full tax impact of an investment in the Portfolio Entities will depend on circumstances particular to each Client/ Investor. Furthermore, the tax laws in relation to the Client Portfolio are subject to change, and tax liabilities could be incurred by Client as a result of such changes. Alternative tax positions adopted by the income tax authorities could also give rise to incremental tax liabilities in addition to the tax amounts already paid by the Client/Investors. An increase in these taxes, duties or levies, or the imposition of new taxes, duties or levies in the future may have a material adverse effect on the Client Portfolio's profitability.

Bankruptcy of Portfolio Entity: Various laws enacted for the protection of creditors may operate to the detriment of the PMS if it is a creditor of a Portfolio Entity that experience financial difficulty. For example, if a Portfolio Entity becomes insolvent or files for bankruptcy protection, there is a risk that a court may subordinate the Portfolio Investment to other creditors. If the PMS/Client holds equity securities in any Portfolio Entity that becomes insolvent or bankrupt, the risk of subordination of the PMS's/Client's claim increases.

Change in Regulation: Any change in the Regulation and/or other Applicable Laws or any new direction of SEBI may adversely impact the operation of the PMS.

H. Risk pertaining to Investments

Investment in Securities/Instruments

- i. The Client Portfolio may comprise of investment in unlisted securities, fixed income securities, debt securities/products and in case of such securities, the Portfolio Manager's ability to protect the investment or seek returns or liquidity may be limited.
- ii. In case of in-specie distribution of the Securities by the Portfolio Manager upon termination or liquidation of the Client Portfolio, the same could consist of such Securities for which there may not be a readily available public market. Further, in such cases the Portfolio Manager may not be able transfer any of the interests, rights or obligations with respect to such Securities except as may be specifically provided in the agreement with Portfolio Entities. If an in-specie distribution

- is received by the Client from the Portfolio Manager, the Client may have restrictions on disposal of assets so distributed and consequently may not be able to realize full value of these assets.
- iii. Some of the Portfolio Entities in which the Portfolio Manager will invest may get their Securities listed with the stock exchange after the investment by the Portfolio Manager. In connection with such listing, the Portfolio Manager may be required to agree not to dispose of its securities in the Portfolio Entity for such period as may be prescribed under the Applicable Law, or there may be certain investments made by the Portfolio Manager which are subject to a statutory period of non-disposal or there may not be enough market liquidity in the security to effect a sale and hence Portfolio Manager may not be able to dispose of such investments prior to completion of such prescribed regulatory tenures and hence may result in illiquidity.
 - iv. The Client Portfolio may be invested in listed securities and as such may be subject to the market risk associated with the vagaries of the capital market.
 - v. **Quantitative Risk:** Quantitative strategies rely on historical data and statistical models to predict future market behaviour. However, these models may not always accurately predict market movements, especially during periods of high volatility or unforeseen events. Clients should be aware that past performance is not indicative of future results, and the Portfolio Manager does not guarantee any specific outcomes. The Portfolio Manager shall not be responsible for any losses incurred due to the inherent risks associated with quantitative strategies.

The Portfolio Manager may also invest in portfolio entity/ies which are investment vehicles like mutual funds/trusts. Such investments may present greater opportunities for growth but also carry a greater risk than is usually associated with investments in listed securities or in the securities of established companies, which often have a historical record of performance. Provided investments in mutual funds shall be through direct plans only.

I. Risk associated with investments in mutual fund schemes

- i. Mutual funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the schemes will be achieved. The various factors which impact the value of the scheme's investments include, but are not limited to, fluctuations in markets, interest rates, prevailing political and economic environment, changes in government policy, tax laws in various countries, liquidity of the underlying instruments, settlement periods, trading volumes, etc.
- ii. As with any securities investment, the NAV of the units issued under the schemes can go up or down, depending on the factors and forces affecting the capital markets.
- iii. Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.
- iv. The Portfolio Manager shall not be responsible for liquidity of the scheme's investments which at times, be restricted by trading volumes and settlement periods. The time taken by the scheme for redemption of units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the schemes.

- v. The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes in the offer document(s)/scheme information document(s) of the scheme(s), which may vary substantially depending on the market risks, general economic and political conditions in India and other countries globally, the monetary and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.
- vi. The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.
- vii. While it would be the endeavor of the Portfolio Manager to invest in the schemes in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of this portfolio being adversely impacted.
- viii. The scheme specific risk factors of each of the underlying schemes become applicable where the Portfolio Manager invests in any underlying scheme. Investors who intend to invest in this portfolio are required to and are deemed to have read and understood the risk factors of the underlying schemes.

J. Risk arising out of Non-diversification

The investment according to investment objective of a Portfolio may result in concentration of investments in a specific security / sector/ issuer, which may expose the Portfolio to risk arising out of non-diversification. Further, the portfolio with investment objective to invest in a specific sector / industry would be exposed to risk associated with such sector / industry and its performance will be dependent on performance of such sector / industry. Similarly, the portfolios with investment objective to have larger exposure to certain market capitalization buckets, would be exposed to risk associated with underperformance of those relevant market capitalization buckets. Moreover, from the style orientation perspective, concentrated exposure to value or growth stocks based on the requirement of the mandate/strategy may also result in risk associated with this factor.

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

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

also be applicable while investing in securities of the Associates/Related Parties of the Portfolio Manager.

7. Nature of expenses

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

i. Management Fee:

The Management Fee relates to the portfolio management services offered to the Clients. The management Fee shall be upto 2.50% p.a. of the quantum of the funds being managed, as agreed in the Agreement. The Management Fee excludes all indirect taxes as applicable.

ii. Advisory fees:

The advisory fees relates to the advisory services offered by the Portfolio Manager to the Client. The advisory fee shall be upto 2.50% of the quantum of the funds being advised as agreed in the Agreement. The fees shall be exclusive of indirect taxes, if any.

iii. Performance Fee:

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

iv. Exit Load:

The Portfolio Manager may charge early withdrawal fee upto 3% of the value of Portfolio redeemed as per the terms and conditions of a particular Investment Approach as agreed in the Agreement.

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

v. Certification and professional charges:

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

vi. Other fees and expenses:

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

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

It is hereby clarified that at the time of on-boarding of Clients directly, no charges except statutory charges shall be levied.

The Most Important Terms and Conditions (MITC) document is provided along with the PMS Client Agreement and is to be read in conjunction therewith. Clients are required to review and acknowledge the MITC prior to commencement of portfolio management services.

A fee calculation tool is accessible on the Dolat Capital website at <https://www.dolatcapital.com/> and clients are encouraged to utilize this resource for informed decision-making.

8. **Taxation**

A. **General**

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

B. **Tax deducted at source**

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

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

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

C. Long term capital gains

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

(i) Period of Holding

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

Securities	Position upto 22 nd July, 2024 Period of Holding	Position on or after July 23 rd , 2024 Period of Holding	Characterization
Listed Securities (other than unit) and unit of equity oriented mutual fund, unit of UTI, zero coupon bonds	More than twelve (12) months	More than twelve (12) months	Long term capital asset
	Twelve (12) months or less	Twelve (12) months or less	Short term capital asset
Unlisted Shares of a company	More than twenty-four (24) months	More than twenty-four (24) months	Long term capital asset
	Twenty – four months (24) or less	Twenty – four months (24) or less	Short term capital asset

Other Securities (other than Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023; or unlisted bond or unlisted debenture	More than Thirty-six (36) months	More than twenty-four (24) months	Long term capital asset
	Thirty-six months (36) or less	Twenty-four (24) months or less	Short term capital asset
Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023	Any Period	Any period	Short term capital asset
Unlisted bond or unlisted debenture	More than 36 months		Long term capital asset
	36 months or less	Any period	Short term capital asset

(ii) **Definition of Specified Mutual Fund:**Before 1st April 2025:

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

On and after 1st April 2025:

“**Specified Mutual Fund**” means, —

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

(iii) **Definition of debt and money market instruments:**

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

(iv) **Definition of Market Linked Debenture:**

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

(v) **For listed equity shares in a domestic company or units of equity oriented fund or business trust**

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

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

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

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

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

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

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

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

Long-term capital gains in respect of capital asset (all securities and units other than listed shares and units of equity oriented mutual funds and business trust) is chargeable to tax at the rate of 20% plus applicable surcharge and education cess, as applicable. The capital gains are computed after taking into account cost of acquisition as adjusted by cost inflation index notified by the Central

Government and expenditure incurred wholly and exclusively in connection with such transfer. This tax rate is reduced from 20% to 12.5%; but no indexation benefit will be available with effect from 23 July 2024.

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

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

Long term capital gains, arising on sale of debt Securities, debt-oriented units (other than units purchased in foreign currency and capital gains arising from transfer of such units by offshore funds referred to in section 115AB) are taxable at the rate of 10% under Section 115AD of the IT Act.

This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024. Such gains would be calculated without considering benefit of (i) indexation for the COA and (ii) determination for capital gain/loss in foreign currency and reconversion of such gain/loss into the Indian currency.

Long-term capital gains, arising on sale of listed shares in the company or units of equity oriented funds or units of business trust and subject to conditions relating to payment of STT, are taxable at 10% as mentioned in para 12.10.2 above. This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

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

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

D. **Short term capital gains**

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

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

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

E. Profits and gains of business or profession

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

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

F. Losses under the head capital gains/business income

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

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

G. General Anti Avoidance Rules (GAAR)

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

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

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

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

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

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

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

H. **FATCA Guidelines**

According to the Inter-Governmental Agreement read with the Foreign Account Tax Compliance Act (FATCA) provisions and the Common Reporting Standards (CRS), foreign financial institutions in India are required to report tax information about US account holders and other account holders to the Indian Government. The Indian Government has enacted rules relating to FATCA and CRS reporting in India. A statement is required to be provided online in Form 61B for every calendar year by 31 May. The reporting financial institution is expected to maintain and report the following information with respect to each reportable account:

- (a) the name, address, taxpayer identification number and date and place of birth;
- (b) where an entity has one or more controlling persons that are reportable persons:
 - (i) the name and address of the entity, TIN assigned to the entity by the country of its residence; and

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

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

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

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

J. Rates applicable for Securities Transactions Tax

Transactions/Particulars	Payable by Purchaser	Payable by Seller
Delivery based purchase transaction in equity shares entered into in a recognized stock exchange	0.1%	N.A.
Delivery based sale transaction in equity shares entered in a recognized stock exchange	N.A.	0.1%
Non-delivery based sale transaction in equity shares or units of equity-oriented fund entered in a recognised stock exchange	N.A.	0.025%
Delivery based sale transaction of unit of equity-oriented fund	N.A.	0.001%
Sale of options in securities, where option is exercised	0.125% of the difference between the strike price and settlement price of the option (In case option is exercised)	0.1%
Sale of futures in securities	N.A.	0.02%
Sale of unlisted shares under an offer for sale to the public	N.A.	0.2%
Sale of unlisted units of a business trust under an offer for sale	N.A.	0.2%

Sale of a unit of an equity oriented fund to the Mutual Fund.	N.A.	0.001%
---	------	--------

K. Stamp duty implications:

The Finance Act, 2019 has amended the Indian Stamp Act, 1899 to introduce the levy and collection of stamp duty on the issue and transfer of financial instruments at one place through stock exchanges, clearing corporation and depositories. State Governments will discontinue to charge/collect stamp duty on securities once amendments are effective. Stock exchange/clearing corporation/depository will transfer the stamp duty to respective state governments. Based on the present language, there will be incidence of stamp duty on:

- a) The unit holder, for transactions in the units of the fund; and
- b) The fund, for transactions by the fund.

Practically, levy of stamp duty will be subject to detailed rules to be notified. Rate of stamp duty is:

I. For securities other than debentures:-

Transaction/ Instruments	Rates in %
Issuance of securities other than debentures	0.005
Transfer of securities other than debentures on delivery basis	0.015
Transfer of securities other than debentures on non delivery basis	0.003
Derivatives: Futures (Equity and commodity)	0.002
Derivatives: Options (Equity and commodity)	0.003
Derivatives: Currency and Interest rates derivatives	0.0001
Other derivatives	0.002
Government securities	0
Repo on corporate bonds	0.00001

II. For debentures:-

Transaction/ Instruments	Rates in %
Issuance of debentures	0.005
Transfer and reissue debentures	0.0001

Note: Rates mentioned in tables covering securities other than debentures and for debentures are effective from July 1, 2020.

9. Accounting policies

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

Investments in Equities, Exchange Traded Fund (ETF), Mutual Funds and Debt instruments are stated at cost. Cost of the investments includes brokerage, Goods and Service Tax, stamp duty, transaction charges and turnover tax wherever applicable. However, securities transaction tax incurred on buying and selling of securities is recognized as expense. Transactions for purchase or sale of investments are recognized as of the trade date and not, as of the settlement date, so that the effect of all investments traded during the year is recorded and reflected in the financial statements for that year.

A. Market Value of Investments:

For the purpose of computation of net asset value and management fee, investments are valued as follows: -

- i. Equity instruments are valued at the closing market price of the security on the National Stock Exchange (NSE) on the valuation date.
- ii. Mutual fund units are valued at the Net Asset Value declared for the relevant scheme by the Mutual Fund.
- iii. In case market price / net asset value as mentioned above is not available on the valuation date, the latest available price on the NSE/BSE or the most recent Net Asset Value is considered. In case the latest available price is more than 3 months old, market value is considered as Zero.
- iv. Pending listing on NSE/BSE, securities resulting from demerger have been valued at their apportioned cost as per the ratios/book values published by the companies.

B. Revenue Recognition:

- i. Realized Gains : Realized gain/loss is recorded on the date of sale and is the difference between the purchase cost and sale price of the security sold. Realized gains/losses are calculated by applying the First-in-First-out principle. Such gains/ losses also include gains/ losses on sale of securities received as corpus. In case of securities withdrawn by client at the time of redemption of portfolio, notional gain/loss being the difference between the purchase cost and the market value of respective securities as on the date on which securities are withdrawn by client are reflected in Profit and Loss Account under Realized Gain/Loss for the purpose of calculation of performance of the portfolio. However, such notional gain/loss does not form part of Statement of Capital Gain/Loss since the same is not considered as an actual transfer of security as per Income Tax provisions.
- ii. Dividend : Dividend on shares is accounted on accrual basis i.e. income is recorded on the ex dividend date. Such dividend also includes dividend earned on securities brought in as corpus.
- iii. Interest Income : Interest income received from bank, if any, is recorded on receipt basis.

- iv. Cash received against fractional quantity arising out of corporate action is accounted on receipt basis.

C. Valuation of portfolio investments

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

10. Investors services

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

- (a) Reporting Portfolio actions and Client's statement of accounts at pre-defined frequency;
- (b) Attending to and addressing any Client query with least lead time;

- (c) Ensuring Portfolio reviews at predefined frequency.
- (i) **Name, address and telephone number of the investor relation officer who shall attend to the investor queries and complaints:**

Name	Ms. Sachi Kheskani
Designation	VP Client Engagement
Address	1203, A wing 12 th Floor, Naman Midtown, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013, Maharashtra, India.
Telephone No.	8976864296
Email id	sachik@dolatcapital.com

- (ii) **Grievance redressal and dispute settlement mechanism:**

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

1. **Quick action** – As soon as any grievance comes to the knowledge of the aforesaid personnel, it would be identified and resolved. This will lower the detrimental effects of the grievance.
2. **Acknowledging grievance** – The aforesaid officer shall acknowledge the grievance put forward by the Client and look into the complaint impartially and without any bias.
3. **Gathering facts** – The aforesaid official shall gather appropriate and sufficient facts explaining the grievance's nature. A record of such facts shall be maintained so that these can be used in later stage of grievance redressal.
4. **Examining the causes of grievance** – The actual cause of grievance would be identified. Accordingly, remedial actions would be taken to prevent repetition of the grievance.
5. **Decision making** – After identifying the causes of grievance, alternative course of actions would be thought of to manage the grievance. The effect of each course of action on the existing and future management policies and procedure would be analysed and accordingly decision should be taken by the aforesaid official. The aforesaid official would execute the decision quickly.
6. **Review** – After implementing the decision, a follow-up would be there to ensure that the grievance has been resolved completely and adequately.

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

Name	Mr. Arush Chaturvedi
Address	1203, A wing 12 th Floor, Naman Midtown, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013, Maharashtra, India.
Telephone No.	+ 91 8976864290 / 7977030733
Email id	arushc@dolatcapital.com

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

Any dispute unresolved by the above internal grievance redressal mechanism of the Portfolio Manager, can be submitted to mediation / conciliation/arbitration under online dispute resolution as specified by SEBI vide its circular no. SEBI/HO/OIAE/OIAE_IAD-3/P/CIR/2023/195 updated as on July 31, 2023 and further amendments thereto.

Without prejudice to anything stated above, the Client can also register its grievance/complaint through SCORES (SEBI Complaints Redress System), post which the complaint will be either routed to the Portfolio Manager or to SEBI (as applicable), which may then forward the complaint to the Portfolio Manager and the Portfolio Manager will suitably address the same. SCORES is available at <https://scores.sebi.gov.in/>. The Scores ID for PMS services- ispmn00103

11. Details of the diversification policy of the portfolio manager

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

Part-II- Dynamic Section

12. Client Representation

- (i) The Portfolio Manager has no previous experience/track record in the field of portfolio management services and has obtained a certificate of registration to function as a portfolio

manager only on 26th August 2025 and therefore has no record of representing any persons/entities in the capacity of a portfolio manager.

- (ii) Complete disclosure in respect of transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India.

Sr. No	Nature of Transactions	Associates	KMP & their Relatives	Enterprises having common KMP	LLP	Others
1	Margin Received as on reporting date	Nil (Nil)	Nil (Nil)	Nil (1.00)	Nil (Nil)	Nil (Nil)
2	Brokerage Earned	Nil (Nil)	Nil (Nil)	5.82 (6.62)	Nil (Nil)	Nil (Nil)
3	Rent Received	0.60 (0.40)	Nil (Nil)	0.60 (0.40)	Nil (Nil)	0.30 (0.20)
4	Reimbursement of expenses received	6.78 (6.29)	Nil (Nil)	4.06 (4.77)	Nil (Nil)	1.05 (1.20)
5	Directors Remuneration	Nil (Nil)	12.00 (12.00)	Nil (Nil)	Nil (Nil)	Nil (Nil)
6	Interest Received	27.52 (29.86)	Nil (Nil)	Nil (Nil)	Nil (Nil)	Nil (Nil)
7	Dividend Received	18.21 (18.21)	Nil (Nil)	Nil (Nil)	Nil (Nil)	Nil (Nil)
8	Share of partner profit	Nil (Nil)	Nil (Nil)	Nil (Nil)	15.38 (5.48)	Nil (Nil)
9	Rent paid	Nil (Nil)	4.38 (4.57)	Nil (Nil)	Nil (Nil)	Nil (Nil)
10	Clearing charges paid	12.38 (9.82)	Nil (Nil)	Nil (Nil)	Nil (Nil)	Nil (Nil)
11	Loans & advances on reporting date	Nil (202.17)	Nil (Nil)	Nil (Nil)	Nil (Nil)	Nil (Nil)
12	Trade Receivable (Due to clients)	Nil (Nil)	Nil (Nil)	Nil (0.01)	Nil (Nil)	Nil (Nil)

(Amt in Rs. Million)

Figures are as on 31/03/2024. Figures in bracket relates to previous year.

13. Financial Performance

The Financial Performance of the portfolio manager based on audited financial statements and in terms of procedure specified by the Board for assessing the performance.

	F.Y. 2021 - 2022	F.Y. 2022 - 2023	F.Y. 2023 - 2024	F.Y. 2024 - 2025

Paid-up Share Capital	50.88	50.88	50.88	50.88
Free reserves (excluding revaluation reserves)	155.26	163.62	181.35	206.41
Gross Receipts	95.45	88.25	114.14	146.24
Profit / (Loss) Before Tax	30.32	10.871	23.86	33.61
Profit / (Loss) After Tax	22.58	8.36	17.73	25.06

(Amt in crores)

14. Performance of Portfolio Manager

The Portfolio Manager has no previous experience/track record in the field of portfolio management services. Accordingly, the same is not applicable.

15. Audit Observations

None.

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

Not applicable.

17. General*Prevention of Money Laundering*

The Portfolio Manager shall presume that the identity of the Client and the information disclosed by the Client is true and correct. It will also be presumed that the funds invested by the Client through the services of the Portfolio Manager come from legitimate sources / manner only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, 1961, PML Laws, Prevention of Corruption Act, 1988 and/or any other Applicable Law in force and the investor is duly entitled to invest the said funds.

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

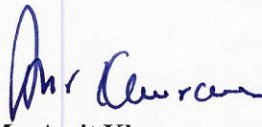



Where the funds invested are for the benefit of a person (beneficiary) other than the person in whose name the investments are made and/or registered, the Client shall provide an undertaking that

The Portfolio Manager will not seek fresh KYC from the Clients who are already KYC Registration Agency (“KRA”) compliant except the information required under any new KYC requirement. The Clients who are not KRA compliant, the information will be procured by the Portfolio Manager and uploaded.

The Portfolio Manager, and its directors, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Client’s account/rejection of any application or mandatory repayment/returning of funds due to non-compliance with the provisions of the PML Laws and KYC policy. If the Portfolio Manager believes that transaction is suspicious in nature within the purview of the PML Laws, then it will report the same to FIU-IND.

Notwithstanding anything contained in this Document, the provisions of the Regulations, PML Laws and the guidelines there under shall be applicable. Clients/Investors are advised to read the Document carefully before entering into an Agreement with the Portfolio Manager.

For and on behalf of Dolat Capital Market Private Limited

<p>DIN: 02734886 Director</p>	<p>:</p>	<p> Mr. Amit Khurana</p> 
<p>DIN: 00011154 Director</p>	<p>:</p>	<p> Mr. Purvag Shah</p> 

Place: Mumbai

Date: 4th May, 2026

Annexure I

Investment Approaches

A. **Investment Approach 1: Dolat Novent Growth Strategy**

1. **Investment Objective:**

The primary aim of this investment approach is to deliver above average returns over a medium-term horizon of 3 to 5 years. The portfolio will move across the market cap which includes large cap, mid cap, small-cap, and micro-cap stocks, offering a diversified approach to capital growth.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

Under this investment approach, the Portfolio Manager would primarily invest in listed equities and equity-linked instruments. Additionally, a portion of this investment approach may consist of debt instruments, which can include money market instruments, mutual fund units, fixed deposits, or other securities permitted by Applicable Laws. This framework ensures a balanced approach to long-term capital appreciation, using a diversified mix of equities and debt to manage risk and return.

3. **Basis of selection of such types of securities as part of the investment approach:**

The selection of listed equities and related instruments will be guided by the proprietary research conducted by our portfolio management team following **IMPACT** methodology, ensuring alignment with the portfolio's investment goals. Debt instruments, if utilized, will typically serve as a short-term solution for parking funds while awaiting market opportunities, with liquidity and safety being the key selection factors.

- i. **Investment Trends:** Identify significant sectoral trends, disruptive forces, or emerging themes that could reshape the market and create new growth opportunities.
- ii. **Market Events:** Monitor events such as earnings releases, regulatory changes, or economic developments that could significantly influence stock prices.
- iii. **Price Relevance:** Understand the relationship between a company's intrinsic value and its current market price, ensuring that good companies are not overpriced.
- iv. **Assessment of Opportunities:** Evaluate the buy/sell opportunities arising from market events or trends, focusing on timing and the size of the opportunity.
- v. **Competitive Position:** Assess a company's competitive advantage (moat), ensuring that it is well-positioned to capitalize on trends and defend against competitors.

- vi. **Time Horizon:** Determine the optimal time frame for the investment, considering short-term mean reversion and long-term growth prospects.
4. **Allocation of portfolio across types of securities:**
 - i. **Equity & Equity-Linked Instruments:** 70% - 100%
 - ii. **Debt Instruments:** 0% - 30%
 5. **Appropriate benchmark to compare performance and basis for choice of benchmark:**

The S&P BSE 500 TRI Index has been chosen as the benchmark for performance comparison. The rationale for this selection is that the Portfolio Manager under this investment approach would predominantly invest in large-cap stocks with selective exposure to mid-cap, small-cap, and micro-cap equities, making this equity benchmark an appropriate reference point. The benchmark is consistent with the guidelines provided by the Association of Portfolio Managers in India (APMI) as of March 2023.

6. **Investment Horizon:**

While equity investments ideally benefit from long-term compounding, a minimum investment horizon of at least 3 years is recommended for this investment approach to achieve its full growth potential.

7. **Risks associated with the investment approach**

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Company risk:** The performance of this Investment Approach will depend upon the business performance of the Portfolio Entity and its future prospects. Portfolio Manager's focus on studying the business and the sustainability with focus on studying the balance sheet and numbers will help the Portfolio Manager in mitigating these sector or company risks.
- ii. **Valuation risk:** Portfolio Manager will assess the Portfolio Entities from varied valuation number, Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations are reasonable while investing and reassess the same from time to time.
- iii. **Concentration Risk:** Endeavor to have adequately diversified portfolio of 30-40 stocks across market capitalization. Single stock exposure will be limited to 10% and sector exposure would be limited to 30%.
- iv. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.

- v. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- vi. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- vii. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

B. **Investment Approach 2: Dolat EDGE Strategy (Emerging & Developing Growth Enterprises)**

1. **Investment Objective:**

The primary goal of this investment approach is to achieve alpha by capitalizing on India's economic growth potential through a concentrated portfolio of high-growth, emerging businesses that are either leaders or poised to become leaders in their respective industries. The Portfolio Manager seeks to generate capital appreciation by predominantly investing in mid-cap and small-cap companies. Additionally, this investment approach may also consist of cash and money market instruments or funds as part of its investment strategy.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

Under this investment approach, the Portfolio Manager would primarily invest in listed equities and equity-related instruments. It may also include a limited exposure to debt instruments such as money market instruments, mutual fund units, fixed deposits, or any other securities permissible under Applicable Laws.

3. **Basis of selection of such types of securities as part of the investment approach:**

The selection of listed equities and equity-related instruments will be based on in-depth, proprietary research conducted by the portfolio management team. The focus will be on identifying opportunities that align with the portfolio's objective of capital appreciation. In cases where debt instruments are utilized, they will be selected based on their liquidity and safety, with the primary goal being to temporarily park funds before redeploying them into the market.

4. **Key Selection Criteria from the Portfolio Manager's Perspective:**

i. **Business Model Strength & Scalability:**

- a. Preference for companies with scalable and sustainable business models.
- b. Strong market positioning with a competitive edge (moats, unique offerings, or technological advantage).

- ii. **Management Quality & Corporate Governance:**
 - a. Leadership track record, experience, and strategic vision.
 - b. Alignment of promoter interests with minority shareholders.
 - c. Transparent accounting practices and governance standards.
- iii. **Financial Health & Balance Sheet Strength:**
 - a. Strong revenue growth with improving margins.
 - b. Healthy return ratios (ROE, ROCE) indicating efficient capital utilization.
 - c. Low leverage or prudent capital structure to mitigate financial distress risks.
- iv. **Earnings Growth & Valuation Metrics:**
 - a. Preference for companies with a high earnings growth trajectory (EPS growth of 15-25%+ over 3-5 years).
 - b. Valuation discipline: Ensuring entry at reasonable price-to-earnings (P/E), price-to-book (P/B), and enterprise value to EBITDA (EV/EBITDA) multiples.
 - c. Periodic reassessment of valuation to avoid excessive overvaluation risks.
- v. **Market Liquidity & Stock Holding Considerations:**
 - a. Adequate trading liquidity to ensure smooth entry and exit without significant market impact.
 - b. Position sizing based on stock liquidity, volatility, and correlation with other portfolio holdings.
- vi. **Sectoral Tailwinds & Macroeconomic Trends:**
 - a. Identifying industries benefiting from long-term structural growth trends.
 - b. Avoidance of highly cyclical businesses unless entering at favorable valuations.
- vii. **Momentum & Technical Factors (if applicable):**
 - a. Incorporation of momentum signals and relative strength metrics to optimize entry timing.
 - b. Screening for stocks that exhibit positive price momentum within their sector and market cap universe.
- viii. **Portfolio Diversification & Risk Management:**
 - a. Balanced allocation across 30-40 stocks to mitigate idiosyncratic risks.
 - b. Single stock exposure capped at 10% and sector exposure at 30%.
 - c. Regular portfolio rebalancing based on company performance, valuation changes, and evolving macroeconomic conditions.
- ix. **Debt Instruments (if utilized):**

While the portfolio primarily invests in equities, debt instruments may be used only for short-term capital parking. Selection of debt instruments will prioritize:

- a. **Liquidity:** High-rated money market instruments ensuring quick deployment.
- b. **Safety:** Preference for AAA-rated securities, government bonds, or high-quality liquid mutual funds.

5. **Allocation of portfolio across types of securities:**

- i. **Equity & Equity-Linked Instruments:** 70% - 100%
- ii. **Debt Instruments:** 0% - 30%

6. **Appropriate benchmark to compare performance and basis for choice of benchmark:**

The S&P BSE 500 TRI Index has been selected as the benchmark for this portfolio. Since the investment strategy focuses mainly on mid-cap and small-cap stocks, an equity benchmark is the most appropriate reference for performance comparison. This benchmark has been chosen in accordance with the guidelines issued by the Association of Portfolio Managers in India (APMI), as per their circular in March 2023.

7. **Investment Horizon:**

While equity investments tend to benefit most from long-term compounding, a minimum investment horizon of 3 years is recommended for this investment approach. This will provide sufficient time for the investments to generate meaningful returns, particularly in alignment with the portfolio's focus on emerging businesses.

8. **Risks associated with the investment approach**

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Company risk:** The performance of this Investment Approach will depend upon the business performance of the Portfolio Entity and its future prospects. Portfolio Manager's focus on studying the business and the sustainability with focus on studying the balance sheet and numbers will help the Portfolio Manager in mitigating these sector or company risks.
- ii. **Valuation risk:** Portfolio Manager will assess the Portfolio Entities from varied valuation number, Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations are reasonable while investing and reassess the same from time to time.
- iii. **Concentration Risk:** Endeavor to have adequately diversified portfolio of 30-40 stocks across market capitalization. Single stock exposure will be limited to 10% and sector exposure would be limited to 30%.

- iv. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- v. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- vi. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- vii. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

C. **Investment Approach 3: Dolat Infera Small & Micro-Cap Strategy**

1. **Investment Objective:**

The primary goal of this investment approach is to achieve alpha by capitalizing on India's economic growth potential through a concentrated portfolio of high-growth, emerging businesses, primarily within the small and micro-cap segments. These companies, while currently at an early stage, are poised to become leaders in their respective industries. The Portfolio Manager seeks to generate capital appreciation by investing predominantly in small and micro-cap companies, leveraging their growth potential. Additionally, this investment approach may also consist of cash and money market instruments or funds as part of its investment strategy.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

This Portfolio Manager under this investment approach will primarily invest in listed equities and equity-related instruments, with a focus on small and micro-cap businesses. It may also include a limited exposure to debt instruments, such as money market instruments, mutual fund units, fixed deposits, or any other securities permissible under Applicable Laws.

3. **Basis of selection of such types of securities as part of the investment approach:**

The selection of listed equities and equity-related instruments will be based on in-depth, proprietary research conducted by the portfolio management team, emphasizing both fundamental and quantitative analyses. The research methodology will include:

- i. **Fundamental Analysis:** The portfolio management team will assess the quality of businesses through detailed financial analysis, focusing on balance sheet strength, revenue growth potential, and cash flow generation. Special attention will be given to the management's track record and strategic initiatives.

- ii. **Quantitative Screening:** A proprietary screening model will be employed to identify potential candidates from the small and micro-cap universe. This will include evaluating metrics such as price-to-earnings ratios, return on equity, and market capitalization relative to peers.
- iii. **Sector Analysis and Trends:** The team will also focus on identifying sectors poised for structural growth, ensuring investments align with macroeconomic trends that benefit small and micro-cap entities. The portfolio will seek companies operating in underpenetrated markets or those with niche business models that have the potential to scale rapidly.
- iv. **Valuation Metrics and Risk Factors:** Valuation will be a critical part of the selection process, ensuring companies are not overvalued relative to their growth prospects. The team will assess each company's intrinsic value using models like discounted cash flow (DCF) and comparable multiples analysis, with periodic reassessment based on evolving market conditions.

In cases where debt instruments are utilized, they will be selected based on their liquidity and safety, with the primary goal being to temporarily park funds before redeploying them into the market.

4. Allocation of portfolio across types of securities:

- i. **Equity & Equity-Linked Instruments:** 70% - 100%
- ii. **Debt Instruments:** 0% - 30%

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

The portfolio performance will be benchmarked against the S&P BSE 500 TRI Index. This benchmark has been chosen as it represents a broad spectrum of companies across large, mid, and small-cap segments, aligning with the customised strategy approach. This benchmark has been chosen in accordance with the guidelines issued by the Association of Portfolio Managers in India (APMI), as per their circular in March 2023.

6. Investment Horizon:

Given the volatility and growth potential of small and micro-cap stocks, a minimum investment horizon of 3-5 years is recommended for this portfolio. This will provide sufficient time for the investments to benefit from the full growth cycle of emerging businesses.

7. Risks Associated with the Investment Approach

Below are select risks associated with this Investment Approach, apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate them.

- i. **Market Risk** – Broad market movements (due to macroeconomic changes, geopolitical tensions, or policy decisions) can impact portfolio performance, even if individual stock selection is strong.

- ii. **Company Risk:** The performance of this Investment Approach will depend upon the business performance and future prospects of the small and micro-cap Portfolio Entities. The Portfolio Manager's in-depth analysis of business fundamentals, including balance sheet strength and cash flows, will help in mitigating these risks.
- iii. **Valuation Risk:** Portfolio Manager will be vigilant in evaluating the Portfolio Entities using various valuation parameters to avoid overpaying and ensure reasonable valuations at the time of investment. Regular reassessments will be carried out as part of the risk management process.
- iv. **Concentration Risk:** The portfolio will endeavor to maintain adequate diversification across 30-40 small and micro-cap stocks. Single stock exposure will be limited to 10%, and sector exposure will be capped at 30%.
- v. **Liquidity Risk:** Small and micro-cap stocks may have lower liquidity compared to larger companies. The portfolio will carefully assess liquidity metrics and ensure an appropriate mix of high-conviction stocks without over-concentration in illiquid names.
- vi. **Regulatory & Compliance Risk** – Changes in SEBI guidelines, taxation laws, or investment restrictions may affect strategy execution.
- vii. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- viii. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- ix. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- x. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

D. **Investment Approach 4: Dolat Catalyst Alpha Opportunity Strategy**

1. **Investment objective**

To generate long-term capital appreciation by investing in mis-priced stocks facing special situations. The mis-pricing of stocks can occur due to companies facing special situations like regulatory/policy changes, management restructuring, technology led disruption and innovation or any temporary challenges in the operating environment.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

The Portfolio Manager will primarily invest in listed equities and equity-related instruments. This investment approach may also have a limited exposure to debt instruments such as money market instruments, mutual fund units, fixed deposits, or any other securities permissible under current laws and regulations.

3. **Basis of selection of such types of securities as part of the investment approach:**

Financial markets are inefficient and often slow to recognize the impact of special situations such as genuine disruptive innovation or are reluctant to accept the impact of disruption. This creates a gap between market expectations and likely outcomes and can lead to significant mis-pricing or unanticipated growth potential of these stocks.

The Portfolio Manager typically looks for companies where the market has overreacted to the special situation, causing an undervaluation or mispricing of the stock. The Portfolio Manager may take a contrarian approach by purchasing stocks that are currently out of favor but show strong potential for recovery once the special situation plays out. The key is to accurately identify these situations and analyse the probability of a successful outcome, whether it's due to a change in management, recovery from operational challenges, or the realization of value from innovation.

The Portfolio Manager will look to invest in stocks that are undergoing/ witnessing

- a. change in the outlook for the industry,
- b. impact of change in regulations,
- c. corporate restructuring or change in the management,
- d. increased demand for the products of the industry,
- e. company having won new business or customers,
- f. new capacities coming for the company, etc.
- g. Benefiting from disruptive change (disruptors, enablers, adaptors) on account of technology, regulatory, or any other factors or
- h. Witnessing a significant turnaround potential from a prolonged cyclical slowdown.

4. **Allocation of portfolio across types of securities:**

- i. **Equity & Equity-Linked Instruments:** 70% to 100%
- ii. **Debt Instruments:** 0% to 30%

5. **Appropriate benchmark to compare performance and basis for choice of benchmark:**

The S&P BSE 500 TRI index has been selected as the benchmark for this portfolio. Since the investment strategy focuses mainly on mid-cap and small-cap stocks, an equity benchmark is the most appropriate reference for performance comparison. This benchmark has been chosen in accordance with the guidelines issued by the Association of Portfolio Managers in India (APMI), as per their circular in March 2023.

6. Investment Horizon:

While equity investments tend to benefit most from long-term compounding, a minimum investment horizon of 3 years is recommended for this portfolio. This will provide sufficient time for the investments to generate meaningful returns, particularly in alignment with the portfolio's focus on emerging businesses.

7. Risks associated with the investment approach

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Company risk:** The performance of this Investment Approach will depend upon the business performance of the Portfolio Entity and its future prospects. Portfolio Manager's focus on studying the business and the sustainability with focus on studying the balance sheet and numbers will help the Portfolio Manager in mitigating these sector or company risks.
- ii. **Valuation risk:** Portfolio Manager will assess the Portfolio Entities from varied valuation number, Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations are reasonable while investing and reassess the same from time to time.
- iii. **Concentration Risk:** Endeavor to have adequately diversified portfolio of 30-40 stocks across market capitalization. Single stock exposure will be limited to 10% and sector exposure would be limited to 30%.
- iv. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- v. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- vi. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- vii. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

E. **Investment Approach 5: Dolat Quantum Leap Strategy**

1. **Investment Objective:**

The Dolat Quantum Leap Strategy aims to deliver alpha over a three year period by utilizing a systematic investment strategy. The investment approach focuses on momentum as the core factor for stock selection, with investments spread across a multi-cap (Nifty 500) universe. This approach seeks to capitalize on opportunities across large, mid, and small-cap stocks, optimizing returns while managing risk.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

The portfolio will predominantly be allocated to publicly listed equities across various market capitalizations, focusing on momentum-driven opportunities. Additionally, the Portfolio Manager may opportunistically invest in money market instruments, units of mutual funds, ETFs, or other permissible securities/products, in line with regulatory guidelines.

3. **Basis of selection of such types of securities as part of the investment approach:**

The Dolat Quantum Leap Strategy is driven by a systematic research methodology focused on identifying and allocating capital to momentum-driven stocks across the multi-cap universe. The portfolio diversification begins with a broad set of equities and related assets, narrowing down based on multiple momentum factors that have historically influenced market returns. This factor-based approach positions the portfolio to capitalize on periods of optimal market conditions, enhancing both entry timing and the potential for return maximization.

This investment approach integrates statistical and machine learning methods to analyze and model momentum trends, ensuring a data-driven decision-making process. These advanced techniques allow for the identification of subtle patterns in stock performance and market behavior, enabling more accurate forecasts and stock selections. The Portfolio Manager would dynamically adjust the allocations to momentum-driven stocks, guided by quantitative models.

Key components of the research methodology include:

i. **Quantitative Position Sizing & Risk Management:**

Rigorous quantitative models are used to determine optimal position sizes for each stock in the portfolio, balancing the risk-return trade-off. Position sizing is influenced by factors such as momentum strength, volatility, and correlations within the portfolio. This ensures that the capital is allocated efficiently, minimizing exposure to undesirable risk concentrations.

ii. **Optimal Trading & Turnover Control:**

The strategy implements a disciplined trading approach to control turnover and minimize transaction costs. This involves optimizing trade frequency, size, and timing, using quantitative models to assess the liquidity of stocks and market conditions. The goal is to ensure efficient execution without sacrificing returns.

iii. **Earnings Momentum:**

In addition to price momentum, the portfolio places emphasis on earnings momentum, an indicator of companies that are experiencing accelerating earnings growth. Stocks with strong earnings momentum often exhibit positive price momentum, making them attractive candidates for inclusion in the portfolio.

iv. **Debt Allocation During Equity Market Uncertainty:**

When the equity market presents limited opportunities, the portfolio may temporarily allocate funds to debt instruments. The selection of debt instruments is guided by liquidity, safety, and yield considerations, with the primary objective of capital preservation until suitable equity opportunities arise.

4. **Allocation of portfolio across types of securities:**

- i. **Equity & Equity-Linked Instruments:** 0% - 100%
- ii. **Debt Instruments:** 0% - 100%

5. **Appropriate benchmark to compare performance and basis for choice of benchmark:**

The portfolio performance will be benchmarked against the S&P BSE 500 TRI Index. This benchmark has been chosen as it represents a broad spectrum of companies across large, mid, and small-cap segments, aligning with the multi-cap approach of the strategy. This benchmark has been chosen in accordance with the guidelines issued by the Association of Portfolio Managers in India (APMI), as per their circular in March 2023.

6. **Investment Horizon:**

While equity investments tend to benefit most from long-term compounding, a minimum investment horizon of 3 years is recommended for this investment approach. This time frame allows the strategy to fully exploit market cycles and realize the benefits of its momentum-driven, multi-cap approach.

7. **Risk Associated with the Investment Approach**

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Company Specific Risk:** The performance of the investment strategy is driven by quantitative models that identify stocks based on momentum and other factor-based signals. However, individual stock performance may deviate from model predictions due to unforeseen fundamental shifts, such as sudden management changes, earnings surprises, or sector-specific disruptions.

- ii. **Valuation Risk:** The Portfolio Manager uses multiple valuation metrics to avoid overpaying for stocks. However, stocks exhibiting strong momentum may sometimes be overvalued. If the underlying fundamentals don't support these elevated valuations, there is a risk of price corrections, which can adversely affect returns.
- iii. **Concentration Risk:** The strategy aims to hold a concentrated portfolio of 20-25 stocks. While this concentration can amplify returns when stocks perform well, it also increases risk exposure to individual companies. If one or more concentrated positions experience negative developments, it could disproportionately impact the portfolio's overall performance.
- iv. **Momentum Reversal Risk:** Momentum strategies rely on the continuation of upward trends in stock prices. If market sentiment shifts abruptly, or if there's a sudden reversal in momentum due to macroeconomic changes, unexpected news, or profit-taking, stock prices may drop sharply, leading to significant losses.
- v. **Volatility Risk:** Stocks with strong momentum can experience high volatility, especially during periods of market uncertainty. The price of individual stocks in the portfolio can fluctuate widely, leading to periods of substantial short-term gains or losses, which can affect the overall performance of the strategy.
- vi. **Liquidity Risk:** Some momentum-driven stocks, especially in mid and small-cap segments, may have lower liquidity. In cases where liquidity is limited, it could be challenging to exit or adjust positions without affecting the stock's price, leading to potential slippage or unfavorable trade execution.
- vii. **Crowding Risk:** Momentum strategies are widely used by institutional and retail investors, which can lead to crowding in popular stocks. When many investors chase the same momentum stocks, sharp price movements in either direction may occur. A rapid exit by other investors can exacerbate volatility and negatively impact stock prices.
- viii. **Rebalancing Risk:** The strategy may require periodic rebalancing to maintain the desired exposure to momentum-driven stocks. However, timing rebalancing correctly in a fast-moving market presents risks, as the portfolio may miss opportunities or incur losses if stocks are sold or bought at unfavorable prices during periods of volatility.
- ix. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- x. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- xi. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.

- xii. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

F. **Investment Approach 6: Dolat AlphaNova Strategy**

1. **Investment Objective:**

The Dolat AlphaNova Strategy aims to generate high alpha and superior risk-adjusted returns by leveraging a systematic, momentum-driven investment approach. This strategy emphasizes momentum as the key factor for stock selection, with a primary focus on micro-cap stocks, specifically those ranked between 501 and 750 in terms of market capitalization. By capitalizing on growth opportunities in this under-researched segment of the market, the portfolio seeks to optimize returns while managing risk effectively.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

The portfolio will be primarily allocated to listed equities within the micro-cap space, targeting companies ranked from 501 to 750. Additionally, the Portfolio Manager may opportunistically invest in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with regulatory guidelines. The portfolio may also hold debt instruments as a temporary measure during periods when equity opportunities are limited.

3. **Basis of selection of such types of securities as part of the investment approach:**

The Dolat AlphaNova Strategy employs a systematic research methodology designed to identify and allocate capital to momentum-driven stocks within the micro-cap universe, specifically targeting companies ranked between 501 and 750 by market capitalization. Portfolio diversification begins with a broad set of micro-cap equities and related assets, which are narrowed down based on multiple momentum factors that have historically influenced market returns. This factor-based approach allows the portfolio to capitalize on periods of optimal market conditions, enhancing entry timing and the potential for return maximization.

This investment approach integrates statistical and machine learning methods to analyse and model momentum trends within the micro-cap segment, ensuring a data-driven decision-making process. These advanced techniques allow for the identification of subtle patterns in stock performance and market behaviour, enabling more accurate forecasts and stock selections. The Portfolio Manager dynamically adjusts the allocations to momentum-driven micro-cap stocks, guided by quantitative models.

Key components of the research methodology include:

- i. **Proprietary Screening Methodology for Business Quality:** A proprietary screening process is used to weed out businesses with undesirable attributes. This screening focuses on identifying companies with strong financial health and avoiding those with low-quality business fundamentals. Altman Z-scores and other forensic accounting metrics are used to filter out companies that demonstrate financial instability or the potential for distress. Businesses with low scores on these key metrics are excluded from the portfolio, ensuring the inclusion of companies with robust financials.

- ii. **Quantitative Position Sizing & Risk Management:** Rigorous quantitative models are used to determine optimal position sizes for each stock in the portfolio, balancing the risk-return trade-off. Position sizing is influenced by factors such as momentum strength, volatility, and correlations within the portfolio. This ensures that capital is allocated efficiently, minimizing exposure to undesirable risk concentrations within the micro-cap space.
 - iii. **Trading Optimization:** The strategy employs trading optimization techniques to enhance execution efficiency while minimizing transaction costs. By using quantitative models, the portfolio optimizes trade frequency, size, and timing to ensure that transactions are conducted under favorable market conditions. This approach considers liquidity constraints specific to micro-cap stocks, aiming to reduce slippage and impact costs, thereby maximizing returns without unnecessary turnover.
 - iv. **Earnings Momentum:** In addition to price momentum, the portfolio emphasizes earnings momentum, an indicator of companies that are experiencing accelerating earnings growth. Stocks with strong earnings momentum often exhibit positive price momentum, making them attractive candidates for inclusion in the portfolio.
 - v. **Debt Allocation During Equity Market Uncertainty:** When the micro-cap equity market presents limited opportunities, the Portfolio Manager may temporarily allocate funds to debt instruments. The selection of debt instruments is guided by liquidity, safety, and yield considerations, with the primary objective of capital preservation until suitable micro-cap equity opportunities arise.
4. **Allocation of portfolio across types of securities:**
- **Equity & Equity-Linked Instruments:** 0% - 100%
 - **Debt Instruments (for Liquidity Management):** 0% - 100%
5. **Appropriate benchmark to compare performance and basis for choice of benchmark:**
- The portfolio performance will be measured against the S&P BSE 500 TRI Index, which serves as a broad market benchmark, capturing large, mid, and small-cap stocks. While the strategy primarily focuses on micro-cap stocks, this benchmark offers a comprehensive measure to evaluate performance across market cycles. The benchmark has been selected based on guidelines from the Association of Portfolio Managers in India (APMI), following their circular issued in March 2023.
6. **Investment Horizon:**
- To allow the strategy sufficient time to benefit from market cycles and momentum-driven opportunities, a minimum investment horizon of 3 years is recommended. While micro-cap stocks can be highly volatile in the short term, this time frame supports long-term compounding and maximizes the potential for superior returns in the micro-cap universe.
7. **Risk Associated with the Investment Approach:**

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Company-Specific Risk:** Micro-cap stocks are more vulnerable to unexpected developments like management changes or earnings surprises, which may cause deviations from the strategy's predictions.
- ii. **Valuation Risk:** Momentum-driven micro-cap stocks can become overvalued quickly. If valuations exceed the company's fundamentals, price corrections may negatively impact the portfolio.
- iii. **Concentration Risk:** Holding a concentrated portfolio of 10 stocks increases exposure to individual companies. A negative event in one stock could disproportionately affect overall performance.
- iv. **Momentum Reversal Risk:** Micro-cap stocks are prone to sudden momentum reversals. Abrupt market shifts or profit-taking may cause sharp declines, affecting the portfolio.
- v. **Volatility Risk:** Micro-cap stocks often experience higher price volatility. Short-term price fluctuations can lead to larger-than-expected gains or losses, influencing the portfolio's stability.
- vi. **Liquidity Risk:** Micro-cap stocks have lower liquidity, making it difficult to execute trades efficiently. Limited liquidity may cause slippage and unfavorable trade outcomes.
- vii. **Crowding Risk:** Momentum strategies in micro-caps may lead to crowding, where many investors chase the same stocks. A sudden exit by other investors can trigger price drops.
- viii. **Rebalancing Risk:** Rebalancing micro-cap momentum positions can be challenging in fast-moving markets, increasing the risk of buying or selling at less favorable prices.
- ix. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- x. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- xi. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- xii. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

G. **Investment Approach 7: Dolat Factor Fusion Strategy**

1. **Investment Objective:**

The Dolat Factor Fusion Strategy seeks to deliver high alpha and superior risk-adjusted returns by utilizing a systematic investment approach that incorporates multiple factors, including Momentum, Quality, Value, Low Volatility, etc. This investment approach focuses on identifying stocks within the Nifty 500 universe that exhibit strong characteristics across these factors, aiming to provide diversified and optimized exposure to the Indian equity market while managing risk effectively.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

The portfolio will be primarily invested in listed equities within the Nifty 500 universe, encompassing large, mid, and small-cap stocks. The strategy will allocate capital to stocks demonstrating favourable momentum, quality, value, low volatility (and other) factors. Additionally, the Portfolio Manager may opportunistically invest in money market instruments, mutual funds, ETFs, or other permissible securities/products, permissible under the Applicable Laws.

3. **Basis of selection of such types of securities as part of the investment approach:**

The Dolat Factor Fusion Strategy systematically selects and invests in stocks across the Nifty 500 universe based on a combination of Momentum, Quality, Value, and Low Volatility (and other) factors. The portfolio construction starts by diversifying across the Nifty 500 stocks and then applying a multi-factor model to rank and select companies that score highly across these factors. This dynamic approach ensures that the portfolio captures the best opportunities across different market conditions. During periods when attractive equity opportunities are limited, the portfolio may temporarily allocate capital to debt instruments for liquidity management and capital preservation.

Research Methodology:

- i. **Factor Scoring & Ranking:** A multi-factor scoring model is applied to rank companies based on their exposure to each of the identified factors. Each stock is assigned a score, and factor weights are dynamically adjusted based on market conditions. The AI/ML tools evaluate how each factor performs under different market cycles, enabling the model to place greater emphasis on the factors likely to drive performance in the prevailing environment.
- ii. **Dynamic Factor Allocation:** The model uses a machine learning-based dynamic allocation system that adjusts the weight given to each factor based on real-time market indicators. For example, during bull markets, momentum and value factors may receive higher weightings, while quality and low volatility may dominate during periods of market uncertainty.
- iii. **Alpha Decay Monitoring:** It is used to assess the longevity of factor efficacy. Over time, certain factors may lose their predictive power due to overuse or changes in market conditions. By monitoring alpha decay, the strategy reduces exposure to factors that are losing their edge and introduces new factors or combinations that are emerging as effective.

- iv. **Factor Crowding Analysis:** Our strategy will try to identify trends of many market participants trying to chase the same factors, which eventually reduces their effectiveness and liquidity. It can be monitored by analyzing market data on factor-driven trades and dynamically adjust their exposure to avoid participating in overcrowded trades.
 - v. **Position Sizing & Diversification:** Advanced quantitative models are used to determine optimal position sizes, balancing risk and return based on factor exposures and stock correlations. This ensures a diversified portfolio with minimal risk concentration.
 - vi. **Trading Optimization:** The strategy employs trading optimization techniques to minimize transaction costs while enhancing execution efficiency. Quantitative models guide trade frequency, size, and timing, particularly considering the liquidity of selected stocks.
 - vii. **Debt Allocation During Equity Market Uncertainty:** During periods of limited equity opportunities, the strategy may temporarily allocate to debt instruments, focusing on liquidity and safety until suitable equity investments are identified.
4. **Allocation of portfolio across types of securities:**
- i. **Equity & Equity-Linked Instruments (Nifty 500, Multi-Factor Focus):** 0% - 100%
 - ii. **Debt Instruments (for Liquidity Management):** 0% - 100%

5. **Appropriate benchmark to compare performance and basis for choice of benchmark:**

The portfolio performance will be benchmarked against the BSE 500 Index, which provides broad market exposure across large, mid, and small-cap stocks. This benchmark has been chosen because it aligns with the portfolio's focus on the Nifty 500 universe and allows for an accurate evaluation of performance across various market cycles. The benchmark selection is in accordance with the guidelines issued by the Association of Portfolio Managers in India (APMI), based on their circular from March 2023.

6. **Investment Horizon:**

To maximize the benefits of the multi-factor strategy, a minimum investment horizon of 3 years is recommended. While equity investments, especially those incorporating multiple factors, may experience short-term volatility, the strategy is designed to capture long-term growth potential and superior risk-adjusted returns through compounding over time.

7. **Risk Associated with the investment approach:**

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Company-Specific Risk:** The multi-factor model selects stocks based on metrics such as earnings quality, growth, and valuation. However, unexpected company-specific events—such as management changes, earnings revisions, or sector disruptions—may lead to performance deviations that the model doesn't anticipate, affecting returns negatively.
- ii. **Valuation Risk:** Although the model incorporates valuation factors to avoid overpaying for stocks, market conditions can lead to temporary overvaluation of certain stocks. If stocks score highly on other factors, such as momentum or growth, the model may still select them, resulting in potential price corrections when fundamentals don't align with valuations.
- iii. **Concentration Risk:** Even with a diversified factor approach, the strategy typically holds a concentrated portfolio of 20-25 stocks. This increases exposure to individual stock risks. If a concentrated stock or sector underperforms due to factor underperformance or company-specific events, it could disproportionately impact the portfolio's overall returns.
- iv. **Factor Reversal Risk:** Market sentiment and macroeconomic conditions can lead to rapid shifts in factor performance. For instance, periods of economic uncertainty may favor defensive factors like low volatility, while growth-focused factors may underperform. A sudden reversal in the effectiveness of key factors could lead to underperformance, especially if the portfolio is tilted toward certain factors at the time.
- v. **Volatility Risk:** Stocks that rank highly on certain factors, such as growth or momentum, may experience higher levels of volatility. While these stocks may offer significant upside potential, they can also be subject to sharp price swings, particularly during periods of market stress or corrections, leading to greater portfolio volatility.
- vi. **Liquidity Risk:** Some stocks favored by multi-factor models, particularly in the small or mid-cap segment, may have limited liquidity. In such cases, executing trades without significantly affecting stock prices can become difficult, leading to potential slippage, higher transaction costs, or delayed execution in volatile markets.
- vii. **Crowding Risk:** Multi-factor strategies are widely adopted by institutional investors globally, leading to crowded trades in popular factor-driven stocks. This concentration of interest in certain stocks or sectors can exacerbate price movements, increasing volatility when investors exit or rotate out of these positions simultaneously, especially during downturns.
- viii. **Rebalancing Risk:** The strategy involves periodic rebalancing to maintain factor exposures. However, timing rebalancing in a rapidly shifting market can be challenging. Incorrect timing could result in unfavorable trades or missed opportunities, as factors such as momentum or value can be cyclical and sensitive to external economic or market events.
- ix. **Market Timing Risk:** While the multi-factor model seeks to identify stocks with strong factor scores, no model can perfectly time the market. Changes in interest rates, geopolitical events, or macroeconomic trends can lead to periods where factor-based strategies underperform broader indices or non-factor-based approaches.

- x. **Factor Correlation Risk:** Different factors may become correlated under certain market conditions, reducing the diversification benefit. For example, during periods of market stress, factors like quality and low volatility may behave similarly, increasing exposure to the same risks and leading to diminished portfolio protection.
- xi. **Sector Concentration Risk:** Some factors may naturally favor specific sectors (e.g., growth factors may overweight technology, while value factors may tilt toward financials or industrials). This implicit sector bias could lead to concentration in certain areas of the market, increasing risk if those sectors underperform or face regulatory or economic challenges.
- xii. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- xiii. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- xiv. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- xv. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

H. **Investment Approach 8: Dolat Liquid Strategy**

1. **Investment Objective:**

The investment objective of the Dolat Liquid Strategy is to primarily allocate capital in liquid mutual funds, short-term debt funds, money market mutual funds, and other debt instruments, providing investors with the flexibility to make strategic asset allocation decisions between cash and equity.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

The Portfolio Manager will predominantly invest in liquid mutual funds, short-term debt funds, money market mutual funds, and other permissible debt instruments, as per applicable regulatory laws and guidelines.

3. **Basis of selection of such types of securities as part of the investment approach:**

The Dolat Liquid Strategy seeks to generate optimal returns for investors while maintaining moderate levels of risk and liquidity. The selection process is focused on investing in debt and money market instruments to provide a balance between safety, liquidity, and yield.

4. Allocation of portfolio across types of securities:

The portfolio will consist primarily of debt instruments, including government securities, corporate debt, term deposits, and money market instruments.

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

The performance of the portfolio will be benchmarked against the CRISIL Composite Bond Fund Index. This benchmark is considered appropriate due to its comprehensive coverage of the bond market, and it aligns with the portfolio's objective of generating stable returns while managing liquidity and risk. The selection of this benchmark follows SEBI's guidelines, effective from April 1, 2023.

6. Investment Horizon:

The recommended investment horizon for the Dolat Liquid Strategy is typically between 3 and 6 months. This time frame is designed to align with the focus of investment approach on short-term debt and liquidity management, offering investors an opportunity to allocate funds between equity and debt in the near term.

7. Risks Associated with the investment approach:

Below are select risks associated with this Investment Approach apart from those disclosed in Clause 6 of this Document and the Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

- i. **Market Risk:** The portfolio's performance will be influenced by fluctuations in interest rates and broader economic conditions. Factors such as changes in inflation, government policies, and political developments may impact the portfolio, leading to short-term price volatility in the underlying investments.
- ii. **Interest Rate Risk:** Changes in interest rates directly affect the prices of debt instruments. As interest rates increase, the value of fixed-income securities typically decreases, and vice versa. Longer-term securities are generally more sensitive to interest rate changes compared to shorter-term instruments.
- iii. **Reinvestment Risk:** Investments in fixed-income securities may face reinvestment risk, where the proceeds from interest payments or matured bonds are reinvested at lower prevailing rates, which may reduce the overall returns of the portfolio.
- iv. **Prepayment Risk:** Some debt securities may be called back by the issuer before their maturity date, particularly in times of declining interest rates. In such cases, the portfolio might need to reinvest the proceeds in lower-yielding securities, reducing interest income.
- v. **Spread Risk:** For floating rate securities, the spread over the benchmark rate may change over time. A widening spread could result in a decrease in the value of these securities, even if the benchmark rate remains stable.

- vi. **Credit Risk:** The risk that the issuer of a security may default on interest or principal payments. A downgrade in the issuer's credit rating can also lead to a decrease in the security's price. However, government securities generally carry minimal credit risk.
- vii. **Liquidity Risk:** Liquidity risk arises when securities cannot be sold quickly without a significant drop in value. The Indian debt market, especially for fixed-income securities, may face limited liquidity due to low trading volumes and extended settlement periods. In case of high redemption requests, the portfolio could face delays in liquidating assets, which might affect the speed of capital returns to investors.
- viii. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

I. **Investment Approach 9: Dolat Segregated Strategy**

1. **Investment Objective:**

The Dolat Segregated Strategy is highly customizable, tailored to the unique requirements of each client. It does not adhere to a singular investment approach, allowing for flexibility to adopt specific mandates such as ESG-compliant investing, Jain investment principles, Sharia-compliant investing, sector-restrictive approaches, focused strategies, or any other personalized preferences. This ensures that the portfolio reflects the client's ethical, religious, or sectoral preferences, while still maintaining a disciplined and systematic approach.

2. **Description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc.:**

The Portfolio Manager will primarily invest in publicly listed equities across various market capitalizations, with a core focus on identifying momentum-driven opportunities. Additionally, the Portfolio Manager may opportunistically allocate funds to money market instruments, units of mutual funds, ETFs, or other permissible securities/products, in line with Applicable Laws. The inclusion of these instruments allows for flexibility in managing liquidity and risk during market downturns or when equity opportunities are limited.

3. **Basis of selection of such types of securities as part of the investment approach:**

The Dolat Segregated Strategy employs a systematic research methodology that adapts to a broad range of investment styles and objectives. The initial universe of investments will encompass a wide set of equities and related assets, which will be filtered based on client-specific preferences, such as ethical guidelines, sectoral focus, or thematic interests. The Portfolio Manager leverages multiple investment factors and strategies, which could include value, growth, quality, or other relevant metrics.

4. **Allocation of portfolio across types of securities:**

- i. **Equity & Equity-Linked Instruments:** 0% - 100%
- ii. **Debt Instruments:** 0% - 100%

5. **Appropriate benchmark to compare performance and basis for choice of benchmark:**

The portfolio performance will be benchmarked against the S&P BSE 500 TRI Index. This benchmark has been chosen as it represents a broad spectrum of companies across large, mid, and small-cap segments, aligning with the customised strategy approach. This benchmark has been chosen in accordance with the guidelines issued by the Association of Portfolio Managers in India (APMI), as per their circular in March 2023.

6. **Investment Horizon:**

While equity investments tend to benefit most from long-term compounding, a minimum investment horizon of 3 years is recommended for this investment approach. This time frame allows the strategy to fully exploit market cycles and realize the benefits of its momentum-driven, multi-cap approach.

7. **Risks Associated with the Investment Approach**

Below are select risks associated with this Investment Approach, apart from those disclosed in Clause 6 of this Document and Agreement. The risks may affect Portfolio performance even though the Portfolio Manager may take measures to mitigate them.

- i. **Market Risk** – Broad market movements (due to macroeconomic changes, geopolitical tensions, or policy decisions) can impact portfolio performance, even if individual stock selection is strong.
- ii. **Company Risk:** The performance of this Investment Approach will depend upon the business performance and future prospects of the small and micro-cap Portfolio Entities. The Portfolio Manager's in-depth analysis of business fundamentals, including balance sheet strength and cash flows, will help in mitigating these risks.
- iii. **Valuation Risk:** Portfolio Manager will be vigilant in evaluating the Portfolio Entities using various valuation parameters to avoid overpaying and ensure reasonable valuations at the time of investment. Regular reassessments will be carried out as part of the risk management process.
- iv. **Concentration Risk:** The portfolio will endeavor to maintain adequate diversification across 30-40 small and micro-cap stocks. Single stock exposure will be limited to 10%, and sector exposure will be capped at 30%.
- v. **Liquidity Risk:** Small and micro-cap stocks may have lower liquidity compared to larger companies. The portfolio will carefully assess liquidity metrics and ensure an appropriate mix of high-conviction stocks without over-concentration in illiquid names.
- vi. **Regulatory & Compliance Risk** – Changes in SEBI guidelines, taxation laws, or investment restrictions may affect strategy execution.

- vii. **Interest Rate Risk:** The value of debt securities fluctuates with changes in interest rates. Prices generally rise when interest rates fall and decline when rates increase. Longer-duration securities are more sensitive to interest rate movements, which can be volatile in Indian debt markets.
- viii. **Credit Risk:** This refers to the possibility of the issuer defaulting on interest or principal payments. To compensate for this risk, corporate debentures typically offer higher yields than sovereign securities, which are considered default-free. The market value of debt instruments can fluctuate based on perceived credit risk.
- ix. **Reinvestment Risk:** When interest or principal payments are received, they may need to be reinvested at lower prevailing interest rates, potentially reducing returns compared to the original investment yield.
- x. **Price Volatility Risk:** Debt securities may experience price fluctuations due to interest rate changes, market liquidity, or the issuer's creditworthiness. Lower-rated or less widely traded securities may have limited liquidity, increasing price volatility.

J. Investment Approach 10: Dolat India Blend ETF Strategy

1. Investment Objective

The Dolat India Blend ETF Strategy seeks to generate superior risk-adjusted returns by building a diversified, multi-asset portfolio of Exchange-Traded Funds (ETFs) and index-based products across Indian equities, international equities (accessible domestically), fixed income, and commodities. The strategy is structured to participate in India's long-term growth story while also benefiting from global diversification, thereby reducing concentration and stock-specific risks through a systematic and disciplined allocation framework.

The strategy combines the liquidity, transparency, and cost-efficiency of ETFs with a quantitative asset allocation framework, allowing investors to participate in both domestic growth opportunities and global structural themes. Through systematic selection and disciplined weekly rebalancing, the strategy seeks to balance return potential with prudent risk management, ensuring adaptability across market cycles.

2. Types of Securities:

The investment universe comprises all liquid Domestic ETFs listed in India, spanning equities (large-, mid- and small-cap), fixed income, commodities and International ETF listed in India. Eligible ETFs must demonstrate consistent trading volumes, efficient price discovery, and tight tracking to their underlying indices. By restricting investments to liquid ETFs, the strategy ensures cost-efficient execution, low slippage, and ease of portfolio rebalancing. Fund may also invest in Index Funds or Liquid Funds.

3. Selection Criteria:

The selection process involves rigorous quantitative and qualitative evaluation across the following dimensions:

- i. **Liquidity & Market Efficiency:** ETFs with high average daily turnover, narrow bid-ask spreads, and efficient replication of their benchmark indices are prioritized.

- ii. **Tracking Error & Cost:** Preference is given to ETFs with low tracking error and competitive expense ratios to enhance net returns.
- iii. **Underlying Factor/Thematic Exposure:** Evaluation of the ETF's underlying index methodology to ensure representation of desired factors (such as momentum, quality, value, or low volatility) or structural themes (such as infrastructure, manufacturing, or consumption).
- iv. **Diversification & Correlation:** Correlation metrics across ETFs are analyzed to ensure meaningful diversification and minimal overlap in holdings.
- v. **Performance Consistency:** Historical and risk-adjusted performance are reviewed to assess consistency across market cycles.

The allocation across ETFs is dynamically managed, with weights adjusted based on relative strength, and prevailing factor or sector leadership.

4. Research Methodology:

The research and allocation framework integrates systematic, data-driven models with active oversight:

- i. **Macro & Factor Analysis:** Evaluates macroeconomic data, liquidity conditions, and factor leadership to identify which segments - equity, debt, or commodities are likely to outperform.
- ii. **Dynamic Allocation Model:** A proprietary model determines optimal weight distribution across ETFs each week, based on momentum, volatility, and risk-adjusted return metrics.
- iii. **Volatility Management:** Utilizes rolling volatility measures and correlation structures to control total portfolio risk and manage drawdowns.
- iv. **Risk Calibration:** The model continuously monitors portfolio-level volatility, drawdown patterns, and correlations to maintain stability and avoid excessive exposure to any single theme or asset class.
- v. **Alpha Decay & Efficiency Checks:** Periodic reviews ensure that selected ETFs continue to exhibit factor relevance and operational efficiency. Underperforming or inefficient ETFs are systematically replaced.
- vi. **Execution & Optimization:** Quantitative trade execution algorithms help minimize trading costs and slippage during rebalancing, ensuring efficient portfolio transitions.
- vii. **Momentum & Factor Overlay:** Identifies leadership trends across sectors, geographies, and investment styles (growth, value, quality, low volatility).
- viii. **Currency & Global Risk Modelling:** Monitors INR/USD and other major currency movements to assess the impact on global ETF exposures.
- ix. **Execution & Optimization:** Quantitative trade execution algorithms help minimize trading costs and slippage during rebalancing, ensuring efficient portfolio transitions.

5. Asset Allocation:

- i. **Equity & Equity-Linked Instruments:** 0% - 100%
- ii. **Debt Instruments (for Liquidity Management):** 0% - 100%

- iii. **Commodity & Commodity Linked Instruments:** 0% - 100%
- iv. **International Equity (Domestically Listed ETF's):** 0% - 100%

6. **Benchmark:**

The strategy is benchmarked against the Nifty 500 Index, which captures a broad representation of India's equity market across capitalization tiers. The Nifty 500 serves as an appropriate benchmark due to the strategy's diversified exposure to multiple equity styles, sectors, and asset classes, and enables a realistic comparison of performance against the Indian market's overall trajectory.

7. **Investment Horizon:**

The strategy is best suited for investors with a minimum investment horizon of 3+ years, seeking to capture India's structural growth while mitigating volatility through disciplined diversification. Short-term fluctuations may occur due to sectoral or asset-class rotations, but the systematic approach is designed to deliver steady, compounding-driven growth over time.

8. **Risk to the strategy:**

While the Dolat India Blend ETF Strategy incorporates systematic diversification and quantitative risk controls, investors should be aware of the following key risks:

- i. **Market Risk:** The portfolio's performance is influenced by overall market movements across equity, debt, and commodity segments. Prolonged market downturns or sudden macroeconomic shocks may result in portfolio drawdowns even with diversified ETF exposure.
- ii. **Tracking Error Risk:** ETFs may not perfectly mirror their benchmark indices due to replication methodology, fund expenses, or liquidity constraints. Persistent tracking error can lead to return deviations from the intended exposure.
- iii. **Liquidity Risk:** ETFs with lower trading volumes or wider bid-ask spreads may experience higher impact costs during execution or rebalancing. This risk is particularly relevant for newly launched or thematic ETFs with limited market depth.
- iv. **Concentration Risk:** Despite being diversified across ETFs, the underlying indices may themselves exhibit sectoral or style concentration (e.g., value ETFs overweighting financials). Such implicit exposure can amplify risk during adverse sector cycles.
- v. **Sector/Theme Concentration Risk:** Exposure to certain sectors or factors may increase cyclicality during downturns.
- vi. **Interest Rate Risk:** Debt ETFs are sensitive to changes in interest rates. Rising rates generally reduce the market value of bond ETFs, particularly those with longer duration exposure.
- vii. **Credit Risk:** Corporate bond ETFs face the risk of default or credit downgrades of their underlying issuers, potentially affecting ETF valuation and yield.

- viii. **Reinvestment Risk:** Cash flows from coupon payments or maturities in debt ETFs may need to be reinvested at lower prevailing interest rates, reducing overall portfolio yield.
- ix. **Commodity Price Risk:** Commodity ETFs, such as gold or silver, are exposed to fluctuations driven by global macroeconomic conditions, currency movements, and changes in real interest rates.
- x. **Rebalancing Risk:** Since the strategy rebalances weekly, there is potential for near-term underperformance if market reversals occur between rebalancing cycles. Over- or under-reaction to short-term volatility can temporarily impact returns.
- xi. **Execution Risk:** Frequent rebalancing may lead to transaction costs; poor timing could affect near-term returns.
- xii. **Market Timing Risk:** No systematic model can perfectly anticipate turning points in market sentiment or economic cycles. Delays in adjusting exposures could result in temporary performance drag relative to benchmarks.
- xiii. **Crowding Risk:** Popular factor or thematic ETFs may experience crowded positioning, where large-scale investor flows amplify volatility. Rapid reversals in such trades can lead to price dislocations and higher drawdowns.
- xiv. **Currency and Global Exposure Risk:** Commodity ETFs and certain international ETFs (if permitted in future) may be affected by currency fluctuations, global liquidity shifts, or geopolitical tensions, impacting returns in INR terms.
- xv. **Volatility and Correlation Shifts:** During market stress, correlations across asset classes may rise, reducing diversification benefits and increasing overall portfolio volatility.
- xvi. **Operational and Execution Risk:** Errors in trade execution, data feeds, or ETF rebalancing processes can impact performance. The strategy employs robust operational controls and automated systems to mitigate such risks.
- xvii. **Regulatory and Taxation Risk:** Changes in taxation, transaction costs (such as STT or GST), or regulatory guidelines for ETFs may affect liquidity, costs, or overall performance.
- xviii. **Geopolitical and Regional Risk:** Global ETFs may be impacted by political instability, trade policy changes, or regional conflicts affecting the performance of specific markets or sectors.

K. **Investment Approach 11: Dolat India Spectrum ETF Strategy**

1. **Investment Objective**

The Dolat India Spectrum ETF Strategy aims to deliver consistent, risk-adjusted returns by offering a comprehensive and diversified exposure to India's equity, equity related instrument and debt markets through a carefully curated basket of Exchange-Traded Funds (ETFs) and index-based products. The strategy is designed to participate in India's long-term growth trajectory while minimizing concentration and stock-specific risks through systematic diversification.

This approach combines the efficiency of passive investing with dynamic allocation across sectors, factors, and asset classes to capture opportunities arising from economic cycles, sectoral trends, and factor rotations. The objective is to achieve superior long-term capital appreciation and portfolio stability through disciplined rebalancing and quantitative allocation techniques.

2. Types of Securities:

The investment universe comprises all liquid Domestic ETFs listed in India across equity & Equity Related Instrument. Eligible ETFs must demonstrate consistent trading volumes, efficient price discovery, and tight tracking to their underlying indices. By restricting investments to liquid ETFs, the strategy ensures cost-efficient execution, low slippage, and ease of portfolio rebalancing. Fund may also invest in Index Funds or Liquid Funds.

3. Selection Criteria:

The selection process involves rigorous quantitative and qualitative evaluation across the following dimensions:

- i. **Liquidity & Market Efficiency:** ETFs with high average daily turnover, narrow bid-ask spreads, and efficient replication of their benchmark indices are prioritized.
- ii. **Tracking Error & Cost:** Preference is given to ETFs with low tracking error and competitive expense ratios to enhance net returns.
- iii. **Underlying Factor/Thematic Exposure:** Evaluation of the ETF's underlying index methodology to ensure representation of desired factors (such as momentum, quality, value, or low volatility) or structural themes (such as infrastructure, manufacturing, or consumption).
- iv. **Diversification & Correlation:** Correlation metrics across ETFs are analyzed to ensure meaningful diversification and minimal overlap in holdings.
- v. **Performance Consistency:** Historical and risk-adjusted performance are reviewed to assess consistency across market cycles.

The allocation across ETFs is dynamically managed, with weights adjusted based on relative strength, macroeconomic indicators, and prevailing factor or sector leadership.

4. Research Methodology:

The research and allocation framework integrates systematic, data-driven models with active oversight:

- i. **Macro & Factor Analysis:** Evaluates macroeconomic data, liquidity conditions, and factor leadership to identify which segments—equity, debt, or commodities—are likely to outperform.
- ii. **Dynamic Allocation Model:** A proprietary model determines optimal weight distribution across ETFs each week, based on momentum, volatility, and risk-adjusted return metrics.
- iii. **Risk Calibration:** The model continuously monitors portfolio-level volatility, drawdown patterns, and correlations to maintain stability and avoid excessive exposure to any single theme or asset class.
- iv. **Volatility Management:** Utilizes rolling volatility measures and correlation structures to control total portfolio risk and manage drawdowns.

- v. **Momentum & Factor Overlay:** Identifies leadership trends across sectors, geographies, and investment styles (growth, value, quality, low volatility).
- vi. **Alpha Decay & Efficiency Checks:** Periodic reviews ensure that selected ETFs continue to exhibit factor relevance and operational efficiency. Underperforming or inefficient ETFs are systematically replaced.
- vii. **Execution & Optimization:** Quantitative trade execution algorithms help minimize trading costs and slippage during rebalancing, ensuring efficient portfolio transitions.

5. **Asset Allocation:**

- i. **Equity & Equity-Linked Instruments:** 0% - 100%
- ii. **Debt Instruments (for Liquidity Management):** 0% - 100%

6. **Benchmark:**

The strategy is benchmarked against the Nifty 500 Index, which captures a broad representation of India's equity market across capitalization tiers. The Nifty 500 serves as an appropriate benchmark due to the strategy's diversified exposure to multiple equity styles, sectors, and asset classes, and enables a realistic comparison of performance against the Indian market's overall trajectory.

7. **Investment Horizon:**

The strategy is best suited for investors with a minimum investment horizon of 3+ years, seeking to capture India's structural growth while mitigating volatility through disciplined diversification. Short-term fluctuations may occur due to sectoral or asset-class rotations, but the systematic approach is designed to deliver steady, compounding-driven growth over time.

8. **Risk to the strategy:**

While the Dolat India Spectrum ETF Strategy incorporates systematic diversification and quantitative risk controls, investors should be aware of the following key risks:

- i. **Market Risk:** The portfolio's performance is influenced by overall market movements across equity, debt, and commodity segments. Prolonged market downturns or sudden macroeconomic shocks may result in portfolio drawdowns even with diversified ETF exposure.
- ii. **Tracking Error Risk:** ETFs may not perfectly mirror their benchmark indices due to replication methodology, fund expenses, or liquidity constraints. Persistent tracking error can lead to return deviations from the intended exposure.
- iii. **Liquidity Risk:** ETFs with lower trading volumes or wider bid-ask spreads may experience higher impact costs during execution or rebalancing. This risk is particularly relevant for newly launched or thematic ETFs with limited market depth.
- iv. **Concentration Risk:** Despite being diversified across ETFs, the underlying indices may themselves exhibit sectoral or style concentration (e.g., value ETFs overweighting financials). Such implicit exposure can amplify risk during adverse sector cycles.
- v. **Sector/Theme Concentration Risk:** Exposure to certain sectors or factors may increase cyclicality during downturns.

- vi. **Interest Rate Risk:** Debt ETFs are sensitive to changes in interest rates. Rising rates generally reduce the market value of bond ETFs, particularly those with longer duration exposure.
- vii. **Credit Risk:** Corporate bond ETFs face the risk of default or credit downgrades of their underlying issuers, potentially affecting ETF valuation and yield.
- viii. **Reinvestment Risk:** Cash flows from coupon payments or maturities in debt ETFs may need to be reinvested at lower prevailing interest rates, reducing overall portfolio yield.
- ix. **Rebalancing Risk:** Since the strategy rebalances weekly, there is potential for near-term underperformance if market reversals occur between rebalancing cycles. Over- or under-reaction to short-term volatility can temporarily impact returns.
- x. **Execution Risk:** Frequent rebalancing may lead to transaction costs; poor timing could affect near-term returns.
- xi. **Market Timing Risk:** No systematic model can perfectly anticipate turning points in market sentiment or economic cycles. Delays in adjusting exposures could result in temporary performance drag relative to benchmarks.
- xii. **Crowding Risk:** Popular factor or thematic ETFs may experience crowded positioning, where large-scale investor flows amplify volatility. Rapid reversals in such trades can lead to price dislocations and higher drawdowns.
- xiii. **Volatility and Correlation Shifts:** During market stress, correlations across asset classes may rise, reducing diversification benefits and increasing overall portfolio volatility.
- xiv. **Operational and Execution Risk:** Errors in trade execution, data feeds, or ETF rebalancing processes can impact performance. The strategy employs robust operational controls and automated systems to mitigate such risks.
- xv. **Regulatory and Taxation Risk:** Changes in taxation, transaction costs (such as STT or GST), or regulatory guidelines for ETFs may affect liquidity, costs, or overall performance.

FORM C

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

Name	Dolat Capital Market Private Limited
Address	1203, A wing 12 th Floor, Naman Midtown, Senapati Bapat Marg, Prabhadevi, Mumbai – 400013, Maharashtra, India.
Phone Number	+91 22 40969700
Mobile Number	9930023583
Email	purvag@dolatcapital.com

We confirm that:

- (i) the Disclosure Document forwarded to SEBI is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by SEBI from time to time;
- (ii) the disclosures made in the Document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of the portfolio to us / investment through the Portfolio Manager;
- (iii) the Disclosure Document has been duly certified by an independent Chartered Accountant, as on 13th May 2026. The details of the Chartered Accountants are as follows:
- Name of the Firm : RDV & Associates
 Registration Number : 006128C
 Proprietor : Karan Daga
 Membership Number : 197745
 Address: : 709-710, GDITL Tower, B -08, Netaji Shubhash Place, Pritmapura, Delhi - 110034
 Telephone Number : 9711929324 / 8851659951

(enclosed is a copy of the Chartered Accountants' certificate to the effect that the disclosures made in the Document are true, fair and adequate to enable the investors to make a well informed decision).

For and on behalf of Dolat Capital Market Private Limited

Date: 13th May, 2026.

Signature of the Principal Officer: _____



Mr. Purvag Shah

Place: Mumbai



Registered Address: 1401-1409, Dalal Street, Commercial Co-op. Soc. Ltd., Block 53 (Bldg No. 53E) Zone-5, Road-5E, GIFT City, Gandhinagar – 382355 Gujarat, India

