ASSP & CO
CHARTERED ACCOUNTANTS

Portfolio Management Department,
Securities and Exchange Board of India,
Mumbai-400051

CERTIFICATE

we have examined the "Disclosure Document-31-01-2026 of M/s. Way2Wealth Brokers Private Limited (Portfolio Managers Registration No. INP000000829). In our opinion and to the best of our judgment and as per the information and explanations provided to us, we certify that it is true and fair and enable the investor to make a well-informed decision.

For ASSP & CO
Chartered Accountants
FRN: 009649S

CA RAVI S
Partner
MRN: 229778
UDIN: 26229778JMPNQW1175

Date: 09-07-2026
Place: Bengaluru

AMIT GOLIA Digitally signed by AMIT GOLIA Date: 2026.08.03 11:07:27 +05'30'

997, 2nd Main Road, Vijayanagar, Bangalore -560 040, E-mail: ravi.tmr@gmail.com
Mobile: +91 97401 10700

DISCLOSURE DOCUMENT

PORTFOLIO MANAGEMENT SERVICES

WAY2WEALTH BROKERS PRIVATE LIMITED

Rukmini Towers, 3rd & 4th Floor, No.3/1,
Platform Road, Sheshadripuram,
Bangalore-560020
(SEBI Regn. No. INP000000829)

ASSP & CO.
BENGALURU
CHARTERED ACCOUNTANTS

WAY2WEALTH BROKERS PVT LTD

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Classification of sixteen parameters of Disclosure document

Part-I Static section:

Part-II Dynamic Section:

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WAY2WEALTH BROKERS PVT. LTD.

WAY2WEALTH

FORM C

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

WAY2WEALTH BROKERS PRIVATE LIMITED
Rukmini Towers, 3rd & 4th Floor, No.3/1,
Platform Road, Sheshadripuram,
Bangalore-560020
(SEBI Regn. No. INP000000829)

We confirm that:

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

ii. the disclosures made in the document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us / investment through the Portfolio Manager;

iii. the Disclosure Document has been duly certified by an independent Chartered Accountant Mr. CA Ravi S, Chartered Accountant in practice bearing membership no. 229778 having office at # 997, 2nd Main Road, Vijayanagar, Bangalore – 560040 on 09-07-2026.

WAY2WEALTH BROKERS PVT. LTD.

Date: 31st January, 2026

Place: Bengaluru

Signature of the Principal Officer

Mr. Siddhanth Punjabi
Way2Wealth Brokers Private Limited
Rukmini Towers, 3rd & 4th Floor, No.3/1,
Platform Road, Sheshadripuram, Bangalore-560020

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.

ASSP & CO. BENGALURU CHARTERED ACCOUNTANTS

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2. Definitions

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

- a reference to any one gender includes a reference to all other genders, as well as to non-living entities;
- the singular includes the plural and vice versa;
- the headings are used for convenience and ease of reference and are not to be construed in the construction or interpretation of any provision of this document;
- the definition of **"Large Cap Company/ Mid Cap Company/ Small Cap Company"** shall have the meaning assigned to it by the Association of Mutual Funds in India (AMFI) as amended or modified periodically. Readers are advised to refer to the latest AMFI guidelines for the most current definition;

1. **"Act"** means the Securities and Exchange Board of India Act, 1992.

2. **"Accreditation Agency"** means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by SEBI from time to time.

3. **"Accredited Investor"** means any person who is granted a certificate of accreditation by an accreditation agency who:

    (i) in case of an individual, HUF, family trust or sole proprietorship has:
        (a) annual income of at least two crore rupees; or
        (b) net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees is in the form of financial assets; or
        (c) annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crore fifty lakh rupees is in the form of financial assets.
    (ii) in case of a body corporate, has net worth of at least fifty crore rupees;
    (iii) in case of a trust other than family trust, has net worth of at least fifty crore rupees;
    (iv) in case of a partnership firm set up under the Indian Partnership Act, 1932, each partner independently meets the eligibility criteria for accreditation:

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

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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. **"Blue Chip Companies"** mean financially sound companies that have demonstrated its ability to pay dividends in both good and bad times.

11. **"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.

12. **"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.

13. **"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.

14. **"Client Registration Form"** means the application, duly completed and signed by the Client and submitted to the Portfolio Manager to open a Portfolio Management Account.

15. **"Corporate Bonds"** mean a debt security issued by a corporation and sold to investors

16. **"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.

17. **"Depository"** means the depository as defined in the Depositories Act, 1996 (22 of 1996).

18. **"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.

19. **"Debt Funds"** means an open-ended mutual fund that invest in fixed income investments

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such as short-term or long-term bonds (government or corporate), securitized products, money market instruments or floating rate debt.

20. **"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.

21. **"Disclosure Document" or "Document"** means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.

22. **"Discretionary Portfolio Management Services"** means Portfolio Management Services where a Portfolio Manager exercises or may, under a contract relating to Portfolio Management, exercise any degree of discretion as to the investment or management of the portfolio of securities or the funds of the Client, as the case may be.

23. **"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).

24. **"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.

25. **"Fair Market Value"** means the price that the Security would ordinarily fetch on sale in the open market on the particular date.

26. **"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.

27. **"Financial Year"** means the year starting from April 1 and ending on March 31 in the following year.

28. **"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.

29. **"Government Bonds"** mean a certificate of debt (usually interest-bearing or discounted) that is issued by government in order to raise money; the issuer is required to pay a fixed sum annually until maturity and then a fixed sum to repay the principal.

30. **"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]

31. **"HUF"** means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.

32. **"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

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Portfolio Manager.

33. **"IT Act"** means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.

34. **"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.

35. **"Money Market Funds" "Liquid Funds" "Liquid Plus Funds"** means open ended mutual fund that invests in highly liquid short-term financial instruments (with maturities typically 90 days to less than one year) such as negotiable certificates of deposit, commercial paper, trade bill, treasury bills and usance bills; and pays money market account rates of interest.

36. **"Model(s)"** shall refer and include the plans as launched by the Portfolio Manager under the model / strategy viz.:

- Global India Portfolio (Growth Portfolio) – SENSEX & NIFTY
- Wealth Optimizer (Aggressive Growth portfolio) - SENSEX & NIFTY
- Wealth Escalator (Super Aggressive portfolio) - SENSEX & NIFTY
- Wealth Spiral (Dynamic model) - SENSEX & NIFTY
- Wealth Flexi Fund
- Wealth Absolute
- Wealth Focus
- Wealth Dominion
- Kalpavruksha
- Shall invest in equity and debt market including nifty index options & mutual fund units in different proportions depending on the model opted by the investor.

37. **"Non-resident Investors"** or **"NRI(s)"** shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.

38. **"Non-Discretionary Portfolio Management Services"** means Portfolio Management Services where a Portfolio Manager acts on the instructions received from the Client with regard to investment of the funds of the Client under a contract relating to Portfolio Management and will exercise no discretion as to the investment or management of the portfolio of securities or the funds of the client, as the case may be.

39. **"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.

40. **"NISM"** means the National Institute of Securities Markets, established by the Board.

41. **"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.

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42. **"Portfolio"** means the total holdings of all investments, Securities and Funds belonging to the Client.

43. **"Portfolio Management Agreement"** means the Agreement executed between the Client and the Portfolio Manager in connection with the Portfolio Management Account in the name of the Client.

44. **"Portfolio Management Account"** means an account opened and maintained by the Portfolio Manager in the name of the Client in its records to manage the Portfolio of the Client.

45. **"Portfolio Manager"** means **Way2Wealth Brokers Private Limited (WBPL)**, a Private Limited Company incorporated under the Companies Act, 1956, registered with SEBI as a portfolio manager bearing registration number **INP000000829** and is also registered with SEBI as a Stock-Broker (Registration No. INZ000178638), Depository Participant (Registration No. IN-DP-472-2020) and Research Analyst (Registration No. INH200002739) and having its registered office at **Rukmini Towers, 3rd & 4th Floor, No.3/1, Platform Road, Sheshadripuram, Bangalore-560020**.

46. **"Portfolio Funds"** means and refers to the cash amounts tendered by the Client for the purpose of deployment in Portfolio Securities while constructing and/or maintaining Portfolio of the Client.

47. **"Portfolio Securities / Securities"** shall include, but be not limited to, shares (voting, non-voting, and differential voting, and whether equity or preference), stocks, bonds (including government bonds, deep discount bonds, secured premium / promissory notes, debentures – non-convertible/fully/partly convertible), units of mutual funds (equity, debt, money market, tax schemes, liquid funds and whether growth or capital oriented), derivatives (options and futures), and all types of financial instruments, whether marketable or not, whether available for trading on any recognized stock exchange or not and issued by any company, body corporate or statutory authority or by government, whether central, state or local, but shall not include such securities or instruments in which investments are specifically barred under Rules and Regulations or any other relevant laws.

48. **"Portfolio Value"** means the aggregate of the Portfolio Funds and Value of Portfolio Securities.

49. **"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

50. **"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.

51. **"Related Party"** means –

    (i) a director, partner or his relative;

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(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;

52. **"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.

53. **"Value of Portfolio Securities"** shall be computed as follows: (i) For the first time when tendered by the Client at the time of execution of this Agreement, the value of Portfolio Securities shall be as per the prices prevailing on the stock exchange (NSE / BSE), or where any such securities are unlisted, or in respect of which no market quotation is available, the value arrived at by mutual understanding, keeping in mind accepted accounting and investment valuation practices. (ii) Thereafter, the value shall be as per the prices prevailing on the stock exchange (NSE / BSE) at the time of computation, and for securities, which are unlisted / for which no market quotation is available, as stated above.

54. **"Website"** means the Portfolio Manager's Internet website at www.way2wealth.com or at such other location as may be decided by the Portfolio Manager from time to time.

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3. Description

i. About Way2Wealth Brokers Private Limited.

Way2Wealth Brokers Private Limited was incorporated on August 16, 2000 and part of Shriram group which is one amongst the large financial services groups in India.

We offer a wide range of products & services encompassing the needs of the Retail investor, HNI's, SMEs, Corporate and Institution clientele. We offer Stock Broking (via BSE, NSE, MSEI & MCX, Depository Services (NSDL & CDSL), Distribution of Mutual Funds products, Portfolio Management Services, Equity Research etc.

Way2Wealth has a very credible management team, with well over 150 man-years of experience amongst themselves. A strong leadership, respected within industry circles and recognized among competitors as being formidable and strong, demonstrates high quality and a visionary management style.

ii. About Promoters of the Company.

We are a part of Shriram group, which is one amongst the large financial services groups in India.

Established in 1974, Shriram Group is one of the reputed and most respected Groups in India in the financial services sector with an established track record of more than 45 years and strong fundamentals. The brand "Shriram" is one of the most trusted brands in India which lends a competitive edge in attracting customers and exploring untapped business potential. People first" and "Serving the underserved" are the guiding principles followed at Shriram Group.

Shriram Credit Company Limited (SCCL) part of Shriram group has acquired our holding company M/s. Way2Wealth Securities Private Limited from Coffee Day group in December 2020. The transaction has been completed with necessary regulatory approvals.

iii. Board of Directors and their Background.

The Board of Directors of WBPL as on 31st January 2026 comprises of:

- Mr. G S Shridhar

  Mr. G S Shridhar has 26 years of experience in various fields of Securities, Debt and Capital Market. Previously he was working for MEMG Securities Limited (formally ICDS Securities Limited), a SEBI Registered Stock Broker from 2004 to 2019. He joined Way2Wealth Group on 13.11.2019 and he has been appointed as Director since 29.12.2020 and is currently working as Whole Time Director of Way2Wealth Brokers Private Limited. He is a Postgraduate in Business Administration and he also possess Engineering Degree BE.

- Mr. Gentil Augustine

  Mr. Gentil Augustine has more than 19 years of experience in various areas of Securities Debt and Capital Market, Wealth Management and Retail Stock Broking Operations. He joined Way2Wealth Group in 2007. He has been appointed as Director since 28.06.2021 and he was working as Whole Time Director of Way2Wealth Brokers Private Limited. He is a Post Graduate (MBA in HR)

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Note: He ceases to be Director of the Company due to his resignation as on the date of Disclosure Document.

- Mr. Manjit Singh

Mr. Manjit Singh has more than 23 years of experience in various areas of Securities Debt and Capital Market, He has been appointed as Independent Director of Way2Wealth Brokers Private Limited since 28.06.2021 and He is a Post Graduate (M.Sc.)
Note: He ceases to be a Independent Director of the Company and has been re-designated as Non-Executive Director since 11.11.2024

- Mr. Saleem Ali

Mr. Saleem Ali has more than 44 years of experience in Police Service, CBI, NDMA & HCCD He has been appointed as Independent Director of Way2Wealth Brokers Private Limited since 08.02.2022 and He is a Post Graduate (M.Sc. & MBA)

- Mr. Amit Golia

Mr. Amit Golia has more than 24 years of experience in the field of Securities, Debt and Capital Market. He hold Post Graduation Diploma in Business Administration. He has been appointed as Additional Director of Way2Wealth Brokers Private Limited on 01.01.2026.

- Mrs. Jayashree Mahesh

Mrs. Jayashree Mahesh has been appointed as Additional Director in the category of Independent Director of Way2Wealth Brokers Private Limited on 01.01.2026

iv. **Top Group Companies based on Turnover as on January 31, 2026**

Sr. No.	Name of the Company	Turnover / Income for the Financial Year 2024-25 [Rs in Lakhs]	Remarks
1.	Shriram Credit Company Limited (Holding Company)	3300.93	Audited Financials 2024-25
2.	Way2Wealth Commodities Private Limited (Subsidiary Company)	27.69	Audited Financials 2024-25

v. **Details of Services being offered:**
We offer Discretionary portfolio management & Non-discretionary Portfolio Management Services (as per the individual agreement with the client) under various schemes.

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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 the Board or the directions issued by the Board under the Act or rules or regulations made thereunder.	2 Case is pertaining to broking operations of M/s. Way2Wealth Brokers Private Limited
(ii) The nature of the penalty/direction.	Cases are pertaining as trading member of National Stock Exchange. • **Way2Wealth Brokers Private Limited v/s Securities Exchange Board of India (Whole Time Member)** In the matter of co-location, SEBI via Whole Time Member Order dated April 30 2019, imposed a penalty over Way2wealth and barred W2W from accepting new client enrolment for one year. Way2wealth Brokers filed an appeal with SAT against SEBI WTM Order (326/2019) SEBI vide its order of August 9, 2023 SAT set aside penalty imposed by SEBI and partly allowed the order. Furthermore, the SAT order is challenged by SEBI, and they have appealed before Supreme Court and currently awaiting further proceedings (CA.6471-6478/2023) • **Way2Wealth Brokers Private Limited v/s Securities Exchange Board of India (Adjudication Order)** In the matter of co-location, SEBI via its Adjudication Order dated June 28 2022 had imposed a monetary penalty on W2W and KMPs. Way2wealth Challenged the SEBI AO order at SAT, (482/2022) ,SAT in its order dated Dec 14 2023 reduced the penalty against Company and KMPs, which is complied with. Furthermore, the SAT order is challenged by SEBI, and they have appealed before Supreme Court and currently awaiting further proceedings (CA.4273- 4286 of 2024)
(iii) Penalties/fines imposed for any economic offence and/ or for violation of any securities laws.	NIL
(iv) Any pending material litigation/legal proceedings against the portfolio manager/key personnel with separate disclosure regarding	NIL

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pending criminal cases, if any.	
(v) Any deficiency in the systems and operations of the portfolio manager observed by the Board or any regulatory agency.	NIL
(vi) Any enquiry/ adjudication proceedings initiated by the Board against the portfolio manager or its directors, principal officer or employee or any person directly or indirectly connected with the portfolio manager or its directors, principal officer or employee, under the Act or rules or regulations made thereunder.	1 Case is pertaining to broking operations of M/s. Way2Wealth Brokers Private Limited

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5. Services Offered

a) GENERAL :

- The Portfolio Manager as a policy will evaluate all the investment opportunities in the same parameter and keeping in view the investor profile and the objective of the model / strategy.

- Even in the event if the investment in associate companies of the portfolio manager and associate merits investment consideration the portfolio manager shall ensure that the same shall not exceed 20% of the aggregate portfolio value.

- In the event if the Portfolio Manager makes an investment in the associate companies the same shall not exceed the market value or the fair value of the securities computed strictly in adherence to various accounting policies.

- The Services offered by the Portfolio Manager under the above models would be "Discretionary" in nature.

- The Portfolio Manager reserves absolute right to register any person for providing services under any of the PMS models. Further, in respect of existing clients, the Portfolio Manager reserves the right to allow them to shift within models or register under any new model.

b) MODELS:

(i) DISCRETIONARY

- **Global India Portfolio (formerly Wealth Weaver)**
  Global India Portfolio is a 'growth model', which aims to achieve growth while managing risk efficiently by investing in across a choice of investment products viz. Cash/Real Estate ETFs/ REITs/ InvITs/ Equities/commodities through ETFs. This model is suitable for investors who are comfortable investing in primarily equities but would like to spread their risk and limit excessive fluctuation by investing across the spectrum. Targeted returns would be better than, or in line with market returns.

- **Wealth Optimizer**
  Wealth Optimizer is an 'aggressive growth' model. The aim is to identify potential multi-baggers from mid-cap space, who can become large caps of tomorrow. This model is apt for investors who have a capacity to take higher risks and accordingly seek higher capital appreciation.

- **Wealth Escalator**
  Wealth Escalator is a 'super aggressive growth ' model, under this strategy the portfolio manager takes concentrated bets that are appropriate for investors who have substantial risk-tolerance levels and seek high capital appreciation.

  This model is suitable for investors who prefers to take higher risk for higher returns.

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- **Wealth Spiral (Dynamic model)**
  A unique proposition, combining the Fundamental analysis, Technical analysis and sectoral momentum, to trade in quality stock just-in-time.

  The model is designed and best suited for the momentum investor with a relatively short-term market view, to actively participate in the market momentum, while generating high returns.

  This model would invest in momentum stocks and sectors, with short-term perspectives ranging from 1 week to 6 months or on a selective basis, upto a year.

- **Wealth Flexi Fund:**
  The investment objective of this scheme is to seek long-term capital appreciation by creating a diversified portfolio of companies across market cap keeping in mind risk (stability) and returns (growth). The portfolio will pre-dominantly comprise of large cap companies, which will provide stability while trying to maximize returns by investing in high-growth mid-cap and small-cap companies.

  Depending upon the market outlook, the Fund manager shall have the flexibility to switch between the market caps so as to minimize risks and optimize returns.

  Investment approach of the scheme would be to create a portfolio of companies which offers combination of growth and value investing by selecting companies based on future potential, superior capital efficiency and favorable valuation parameters. The appropriate benchmark to compare the performance is BSE500.

Investment Approach	Tagged to strategy	Benchmark
Wealth Flexi	Equity	BSE500

- **Wealth Absolute**
  The Investment objective of this model is to trade Nifty futures both long and short with an objective to make money both in rising and falling markets. Most investment strategies will make money only if the prices of the asset that they invest into actually rise during the tenure of the investment. This scheme will attempt to make money not just when asset prices rise but also when asset prices fall.

  The scheme will invest 80% of its corpus into liquid funds which will be used as margin to trade Nifty futures. The remaining 20% will be used as cash for MTM purposes. The scheme will NEVER leverage i.e. the total gross exposure in Nifty will never be more than the client's total investment in the scheme. The returns from the scheme will comprise the returns from trading and the returns from the liquid fund.

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The liquid fund returns will reduce the volatility of returns of the scheme.

The Nifty trading is done using a trend following methodology. The Fund manager will never attempt to catch the top or bottom of the market. The attempt will always be to position in the direction of market's movement. So, if Nifty future starts moving up the fund manager will try and remain long in the Nifty. If the market changes direction and starts moving down, then the scheme will cut its long position and go short on the market. In this way the scheme will make money if the Nifty either trends up or trends down.

The scheme will lose money when the Nifty becomes volatile in a narrow range. If the Nifty moves up and down in a very narrow range, then the scheme will keep going long and short on the Nifty and lose money on both the sides. So, while the attempt is to make an absolute return irrespective of market conditions, the fact remains that a loss is always a possibility. There is no guarantee explicit or implicit that the scheme will only make money. This is NOT a risk-free arbitrage product. Our experience, however, suggests that one should make a positive return on an annual basis with low volatility in returns.

- **Wealth Focus:**
  Wealth Focus – The objective of the portfolio is to focus on long term wealth creation. In the process it will invest in Indian equities & maintain a concentrated portfolio. The scheme ensures agnostic to market capitalization & sectorial exposure.

  Scheme has a strategic category allocation which will be based on broader market expectations. We aim to reduce overall portfolio risk by sectorial exposure.

- **Wealth Dominion:**
  The focus of the portfolio is to create long term wealth for investors by investing in companies which are market leaders in their respective industry or companies having monopolistic business within their industry. The portfolio will be concentrated and agnostic to market capitalization and sectorial exposure.

  The scheme will invest in companies which has unique businesses and have an edge over peers and deliver sustainable long-term growth in the top and bottom line.

  We aim to reduce the risk by changing the allocation between large, mid and small cap companies based on forward-looking valuation and overall market expectation. If required, we will increase the allocation to cash or money market instruments to reduce the risk.

- **Kalpavruksha**

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The Investment objective of this model is to generate steady regular income in a tax efficient manner with focus on long term capital appreciation and reduced portfolio volatility.

Plus is a mutual fund portfolio strategy that invests into a basket of underlying Mutual Funds with an objective to generate consistent risk adjusted returns over a period of time. Each basket has been designed based on the risk profile of the investment portfolio and intends to invest in a well-diversified blend of investments. Each portfolio contains a number of highly rated underlying funds that aim to outperform their respective benchmarks.

The scheme provides clients seven plans to choose from depending upon their risk profile. They are:

- Ultra Conservative
- Conservative
- Moderate
- Aggressive
- Plus- Equity – Aggressive
- Plus- Balanced-Moderate
- Plus- Debt- Conservative

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6. **Risk factors**

A. **General Risks Factors**

(1) Investment in Securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc.

(2) The Portfolio Manager does not assure that the objectives of any of the Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable for all the investors.

(3) [Past performance of the Portfolio Manager does not indicate the future performance of the same or any other Investment Approach in future or any other future Investment Approach of the Portfolio Manager. [OR] The Portfolio Manager has no previous experience/track record in the field of portfolio management services. However, the Principal Officer, directors and other key management personnel of the Portfolio Manager have rich individual experience.]

(4) The names of the Investment Approach do not in any manner indicate their prospects or returns.

(5) Appreciation in any of the Investment Approach can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any Investment Approach may also be affected due to any other asset allocation factors.

(6) When investments are restricted to a particular or few sector(s) under any Investment Approach; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the Portfolio value will be adversely affected.

(7) Each Portfolio will be exposed to various risks depending on the investment objective, Investment Approach and the asset allocation. The investment objective, Investment Approach and the asset allocation may differ from Client to Client. However, generally, highly concentrated Portfolios with lesser number of stocks will be more volatile than a Portfolio with a larger number of stocks.

(8) The values of the Portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.

(9) The Portfolio Manager shall act in fiduciary capacity in relation to the Client's Funds and shall endeavor to mitigate any potential conflict of interest that could arise while dealing in a manner which is not detrimental to the Client.

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B. Risk associated with equity and equity related instruments

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

(11) Equity and equity related instruments listed on the stock exchange carry lower liquidity risk, however the Portfolio Manager's ability to sell these investments is limited by the overall trading volume on the stock exchanges. In certain cases, settlement periods may be extended significantly by unforeseen circumstances. The inability of the Portfolio Manager to make intended Securities purchases due to settlement problems could cause the Client to miss certain investment opportunities. Similarly, the inability to sell Securities held in the Portfolio may result, at times, in potential losses to the Portfolio, should there be a subsequent decline in the value of Securities held in the Client's Portfolio.

(12) Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small number of scrip's accounting for a large proportion of trading volume among others.

C. Risk associated with debt and money market securities

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

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

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

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

D. Risk associated with derivatives instruments

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

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

E. Risk associated with investments in mutual fund schemes

(19) Mutual funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the schemes will be achieved. The various factors which impact the value of the scheme's investments include, but are not limited to, fluctuations in markets, interest rates, prevailing political and economic environment, changes in government policy, tax laws in various countries, liquidity of the underlying instruments, settlement periods, trading volumes, etc.

(20) As with any securities investment, the NAV of the units issued under the schemes can go up or down, depending on the factors and forces affecting the capital markets.

(21) Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.

(22) The Portfolio Manager shall not be responsible for liquidity of the scheme's investments which at times, be restricted by trading volumes and settlement periods. The time taken by the scheme for redemption of units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the schemes.

(23) The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes

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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 monitory and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.

(24) The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.

(25) While it would be the endeavor of the Portfolio Manager to invest in the schemes in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of this portfolio being adversely impacted.

(26) The scheme specific risk factors of each of the underlying schemes become applicable where the Portfolio Manager invests in any underlying scheme. Investors who intend to invest in this portfolio are required to and are deemed to have read and understood the risk factors of the underlying schemes.

F. Risk arising out of Non-diversification

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

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

(28) All transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations shall be disclosed if found having conflict of interest with the transactions in any of the client's portfolio.

(29) The Portfolio Manager may utilize the services of its group companies or associates for managing the portfolios of the client. In such scenarios, the Portfolio Manager shall endeavor to mitigate any potential conflict of interest that could arise while dealing with such group companies/associates by ensuring that such dealings are at arm's length basis.

(30) The Portfolios may invest in its Associates/ Related Parties relating to portfolio management services and thus conflict of interest may arise while investing in securities of the Associates/Related Parties of the Portfolio Manager. Portfolio Manager shall ensure that such transactions shall be purely on arms' length basis and to the extent and limits permitted under the Regulations. Accordingly, all market risk and investment risk as applicable to securities may also be applicable while investing in securities of the Associates/Related Parties of the Portfolio Manager.

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7. **Nature of expenses**

(i) Investment management and advisory fees.

The Portfolio Management fees relate to the portfolio management services offered to the Clients. The fees may be a fixed charge or a percentage of quantum of the funds being managed or shall be linked to the performance of the portfolio of each Client or a combination of these.

The Client would be individually intimated about the fees charged to him by way of an annexure to the PMS agreement.

General

- The Portfolio Manager shall send a monthly Portfolio statement to each client.
- Any deviation on the portfolio management fees shall be at the discretion of the Portfolio Manager.

(ii) Custodian fee.

Charges relating to opening and operation of demat account, custodian charges, dematerialization and rematerialization, etc. shall be debited on actuals based on bills received from Depository Participant / Custodian (Axis Bank).

(iii) Registrar and transfer agent fee.

Fees payable to the Registrars and Transfer Agents in connection with effecting transfer of any or all of the securities and bonds including stamp duty, cost of affidavits, notary charges, postage stamps and courier charges shall be debited on actuals based on bills received in this regard.

(iv) Brokerage and transaction cost (Other cost & charges).

Charges like fund accounting, stamp duty, transaction cost and statutory levies such as Goods & service tax, securities transaction tax, SEBI turnover fees and such other levies shall be debited on actuals based on bills received in this regard.

Portfolio Manager will generally execute all broking transactions and Depository Operations under these models through itself i.e. Way2Wealth Brokers Private Limited which is registered with Bombay Stock Exchange Limited and National Stock Exchange of India Limited as a stock broker and is also a Registered Depository Participant (DP) in NSDL, CDSL. Portfolio Manager shall have the option of executing his broking transactions through any other SEBI Registered Broker and Depository Participant.

Portfolio Manager will generally execute all mutual fund transactions under these models through Way2Wealth Brokers Private Limited which is registered with Association of Mutual Funds of India (AMFI) bearing AMFI Certificate No. ARN 77558. Portfolio Manager shall have the option of executing mutual fund transactions through any other AMFI Registered distributor.

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(v) Certification charges or professional charges

The charges payable to outsourced professional services like accounting, taxation and any legal services, notarization, etc. shall be debited on actuals based on bills received in this regard.

(vi) Fees and charges in respect of investment in mutual funds, if any

Expenses charged by Mutual Funds towards management fees and other incidental expenses and such fees and charges shall be debited on actuals based on bills received in this regard.

(vii) Any other incidental or ancillary expenses

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

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8. Taxation

A. General

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

B. Tax deducted at source

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

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

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

C. Long term capital gains

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

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

Securities	Position upto 22 July 2024 Period of Holding	Position on or after 23 July 2024 Period of Holding	Characterization
Listed Securities (other than unit) and unit of equity oriented mutual	More than twelve (12) months	More than twelve (12) months	Long-term capital asset

funds, unit of UTI, zero coupon bonds	Twelve (12) months or less	Twelve (12) months or less	Short-term capital asset
Unlisted shares of a company	More than twenty-four (24) months	More than twenty-four (24) months	Long-term capital asset
	Twenty-four (24) or less	Twenty-four (24) or less	Short-term capital asset
Other Securities (other than Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023; or unlisted bond or unlisted debenture)	More than Thirty-six (36) months	More than twenty-four (24) months	Long-term capital asset
	Thirty-six (36) months or less	Twenty-four (24) or less	Short-term capital asset
Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023	Any period	Any period	Short-term capital asset
Unlisted bond or unlisted debenture	More than 36 months		Long-term capital asset
	36 months or less	Any period	Short-term capital asset

- **Definition of Specified Mutual Fund:**

  Before 1st April 2025:

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

  On and after 1st April 2025:

  *"**Specified Mutual Fund**" means, —*

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

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

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

- **Definition of Market Linked Debenture:**

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

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

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 recognized stock exchange as on the 31 January 2018, or which became the property of the assessee in consideration of share which is not listed on such exchange as on the 31 January 2018 by way of transaction not regarded as transfer under section 47 (e.g. amalgamation, demerger), but listed on such exchange subsequent to the date of transfer, where such transfer is in respect of sale of unlisted equity shares under an offer for sale to the public included in an initial public offer.

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

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

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

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

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

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

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

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

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

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

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

D. Short term capital gains

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

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

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

E. Profits and gains of business or profession

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

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

F. Losses under the head capital gains/business income

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

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

G. General Anti Avoidance Rules (GAAR)

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

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

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

- Disregarding or combining or recharacterising any step in, or a part or whole of the arrangement;
- Ignoring the arrangement for the purpose of taxation law;
- Relocating place of residence of a party, or location of a transaction or situation of any

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to a place other than provided in the arrangement;
- Looking through the arrangement by disregarding any corporate structure; or
- Recharacterising equity into debt, capital into revenue, etc.

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

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

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

H. FATCA Guidelines

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

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

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

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

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

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9. Accounting policies

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

A. Client Accounting

(1) The Portfolio Manager shall maintain a separate Portfolio record in the name of the Client in its book for accounting the assets of the Client and any receipt, income in connection therewith as provided under Regulations. Proper books of accounts, records, and documents shall be maintained to explain transactions and disclose the financial position of the Client's Portfolio at any time.

(2) The books of account of the Client shall be maintained on an historical cost basis.

(3) Transactions for purchase or sale of investments shall be recognized as of the trade date and not as of the settlement date, so that the effect of all investments traded during a Financial Year are recorded and reflected in the financial statements for that year.

(4) All expenses will be accounted on due or payment basis, whichever is earlier.

(5) The cost of investments acquired or purchased shall include brokerage, stamp charges and any charges customarily included in the broker's contract note. In respect of privately placed debt instruments any front-end discount offered shall be reduced from the cost of the investment. Sales are accounted based on proceeds net of brokerage, stamp duty, transaction charges and exit loads in case of units of mutual fund. Securities transaction tax, demat charges and Custodian fees on purchase/ sale transaction would be accounted as expense on receipt of bills. Transaction fees on unsettled trades are accounted for as and when debited by the Custodian.

(6) Tax deducted at source (TDS) shall be considered as withdrawal of portfolio and debited accordingly.

B. Recognition of portfolio investments and accrual of income

(7) In determining the holding cost of investments and the gains or loss on sale of investments, the "first in first out" (FIFO) method will be followed.

(8) Unrealized gains/losses are the differences between the current market value/NAV and the historical cost of the Securities. For derivatives and futures and options, unrealized gains and losses will be calculated by marking to market the open positions.

(9) Dividend on equity shares and interest on debt instruments shall be accounted on accrual basis. Further, mutual fund dividend shall be accounted on receipt basis.

(10) Bonus shares/units to which the security/scrip in the portfolio becomes entitled will be recognized only when the original share/scrip on which bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.

(11) Similarly, right entitlements will be recognized only when the original shares/security on which the right entitlement accrues is traded on the stock exchange on the ex-right basis.

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

(13) Where investment transactions take place outside the stock exchange, for example, acquisitions through private placement or purchases or sales through private treaty, the transactions shall be recorded, in the event of a purchase, as of the date on which the scheme obtains an enforceable obligation to pay the price or, in the event of a sale, when the scheme obtains an enforceable right to collect the proceeds of sale or an enforceable obligation to deliver the instruments sold.

C. Valuation of portfolio investments

(14) Investments in listed equity shall be valued at the last quoted closing price on the stock exchange. When the Securities are traded on more than one recognised stock exchange, the Securities shall be valued at the last quoted closing price on the stock exchange where the security is principally traded. It would be left to the portfolio manager to select the appropriate stock exchange, but the reasons for the selection should be recorded in writing. There should, however, be no objection for all scrips being valued at the prices quoted on the stock exchange where a majority in value of the investments are principally traded. When on a particular valuation day, a security has not been traded on the selected stock exchange, the value at which it is traded on another stock exchange may be used. When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than thirty days prior to the valuation date.

(15) Investments in units of a mutual fund are valued at NAV of the relevant scheme. Provided investments in mutual funds shall be through direct plans only.

(16) Debt Securities and money market Securities shall be valued as per the prices given by third party valuation agencies or in accordance with guidelines prescribed by Association of Portfolio Managers in India (APMI) from time to time.

(17) Unlisted equities are valued at prices provided by independent valuer appointed by the Portfolio Manager basis the International Private Equity and Venture Capital Valuation (IPEV) Guidelines on a semi-annual basis.

(18) In case of any other Securities, the same are valued as per the standard valuation norms applicable to the mutual funds.

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

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

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10. Investors services

(i) The details of Compliance Officer of the Portfolio Manager are as under:

Ms. Sandhya
Way2Wealth Brokers Private Limited
Rukmini Towers, 3rd & 4th Floor, No.3/1,
Platform Road, Sheshadripuram, Bangalore-560020
Phone No: 080 4367 6869; Fax: 080 4367 6999
Kind Attention: Portfolio Management Division

(ii) Grievance redressal and dispute settlement mechanism.

Where the Client has any grievances, he should promptly notify the same to the Investor's Relations Officer of Portfolio Manager in writing or e-mail us at grievance@way2wealth.com, giving sufficient details to enable the Portfolio Manager to take necessary steps. The Portfolio Manager upon receipt of such grievance shall take prompt action to resolve the same.

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11. Details of the diversification policy of the portfolio manager

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

Services Offered:

Way2Wealth's Portfolio Management division focuses on the management of investment portfolios for high-net-worth individuals and corporate entities. Our goal is to provide our clients with a framework for the creation and preservation of wealth. Our strategy is to question, listen, learn and research. We question the clients' needs and priorities, and through our research we provide answers and solutions that are designed to help achieve these investment goals. We put our financial and investment experience and education to work, thus ensuring steady portfolio maintenance and success.

Our philosophy may be summarized as follows:

- A high level of personal service and management attention with complete confidentiality.
- A disciplined investment approach to all elements of the investment process to produce consistent results.
- Monthly portfolio reports and quarterly newsletters.

We aim to build and protect the assets of our clients to suit each individual's requirements. We strive to achieve consistent long-term performance for our clients. Client portfolios shall be invested in the following securities; equities, debt, derivatives, debentures, mutual funds, and money market instruments. Percentage allocation to each class of securities shall be based on the client's risk profile as identified from the Client Registration Form (CRF).

In general, clients will fall into different risk profile categories for which asset allocation models follow:

Global India Portfolio (Growth Portfolio) [Formerly Wealth Weaver]		*Wealth Escalator (Super Aggressive portfolio)*	
	%		%
Equity	**30-100**	**Equity**	**40-100**
Blue Chips/ Large Cap	0-100	Blue Chips/ Large Cap	0-70
Mid Cap	0-30	Mid Cap	20-60
Small Cap	0-20	Small Cap	0-50
Cash / Debt and Money Market Funds	**0-50**	**Cash / Debt and Money Market Funds**	**0-10**
Non-Equity Exposure (G-Sec, Corporate Bonds, Real Estate	0-25	Debt Funds and money market funds	0-10

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ETFs/ REITs/ InvITs/ commodities through ETFs Debt, Multi-asset plans)	100	Government Bonds Corporate Bonds	0-10 0-10 100
Wealth Optimizer (Aggressive Growth portfolio)		*Wealth Spiral (Dynamic Model)*	
	%		%
Equity	**50-100**	**Equity**	**20-100**
Blue Chips/ Large Cap	0-30	Blue Chips/ Large Cap	0-100
Mid Cap	0-90	Mid Cap	0-80
Small Cap	- 0-50	Small Cap	0-80
		Cash / Debt and Money Market Funds	0-40
Cash / Debt and Money Market Funds Debt Funds and money market funds Government Bonds Corporate Bonds	**0-50** 0-50 0-50 100	Debt Funds and money market funds Government Bonds Corporate Bonds	**0-50** 100
Wealth Dominion		*Wealth Flexi Fund*	
	%		%
Equity	**75-100**	**Equity**	**0 - 100**
Large cap Mid cap Small cap	0-100 0-80 0-50	Large Cap	0-100
Debt / Cash:		Mid Cap	0-50
Debt / Money Market Funds / Overnight Funds / Mutual Funds / ETF / Cash	**0-25**	Small Cap **Debt/ Money market funds/ Overnight funds/ Mutual Funds/ ETF/ Cash**	0-100 **0-100**
	100		**100**
Wealth Absolute	%	*Wealth Focus*	%
Nifty [futures & options]	0-20	**Equity** Large Caps	**20-80** 20-80

		Mid Cap Small Cap **Debt** (Mutual Funds and Secondary Bonds, Listed Debt securities like NCDs, Tax free Bonds etc) Exchange Traded ETFs	0-40 0-20 **20-80** 0-20
Debt and Money Market funds	0-80 **100**		**100**
Kalpavruksha	**%**	***Kalpavruksha***	**%**
Ultra conservative		**Conservative**	
Equity Oriented Exposure (Equity MF, REIT, InvIT) Non-Equity Exposure (G-Sec, Corporate Bonds, Gold, Debt, Multi-asset plans)	0-5 95-100	Equity Oriented Exposure (Equity MF, REIT, InvIT) Non-Equity Exposure (G-Sec, Corporate Bonds, Gold, Debt, Multi-asset plans)	20-30 70-80
Moderate		**Kalpavruksha - Aggressive**	
Equity Oriented Exposure (Equity MF, REIT, InvIT) Non-Equity Exposure (G-Sec, Corporate Bonds, Gold, Debt, Multi-asset plans)	30-50 50-70	Equity Oriented Exposure (Equity MF, REIT, InvIT) Non-Equity Exposure (G-Sec, Corporate Bonds, Gold, Debt, Multi-asset plans)	50-75 25-50
Plus- Equity – Aggressive		**Plus- Balanced-Moderate**	
Equity Oriented Exposure Non-Equity Exposure	75 -100 0-25	Equity Oriented Exposure Non-Equity Exposure	50-75 25-50
Plus- Debt- Conservative			
Equity Oriented Exposure Non-Equity Exposure	0-10 90-100		

Asset allocation strategy as well as the definitions such as Blue Chip, Large Cap, Mid Cap and Small Cap specified in the document may change depending on the fluctuations in the Market condition or market cap of the scrips.

Asset Allocation

How you divide your investment portfolio among various asset classes is the most important decision you can make about your money. Studies have shown that asset allocation is the primary determinant of investment performance over time. Diversifying your investment capital among different asset categories and industry sectors, each with a proven long-term track record of generating attractive returns is a more important factor in investment performance than individual security selection or market timing. We will be diversifying client portfolios using equities, debt, mutual funds, and money-market securities

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Part-II- Dynamic Section

12. Client Representation

(i)

Year	Category of clients	No. of clients	Funds managed (Rs. Cr.)	Discretionary / Non-Discretionary (if available)
2024-25	Individual	39	59.44	Discretionary
	Corporate	1	0.58	Discretionary
	NRI	6	6.16	Discretionary
	Individual	1	0.86	Non-Discretionary
2023-24	Individual	46	63.73	Discretionary
	Corporate	1	0.59	Discretionary
	NRI	8	8.73	Discretionary
	Individual	3	1.75	Non-Discretionary
2022-23	Individual	57	57.26	Discretionary
	Corporate	1	0.48	Discretionary
	NRI	5	5.9	Discretionary
	Individual	4	1.78	Non-Discretionary
	NRI	1	0.28	Non-Discretionary
2024-25	**Total**	**47**	**67.04**	

(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.	Investment Approach, if any	Name of the associate/ related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores)	percentage of total AUM as on last day of the previous calendar quarter
1.	N/A	N/A	N/A	N/A	N/A

13. Financial Performance

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

Particulars	**2024-25 [Rs in Lakhs]**	**2023-24 [Rs in Lakhs]**	**2022-23 [Rs in Lakhs]**
Total Income	8585.91	8578.91	6182.16
Expenses	7894.37	8521.90	6995.69
Operating Profit /(Loss)Before Tax	691.92	57.01	(813.54)
Provision for taxation	232.52	1.35	(168.43)
Operating Profit / (Loss) After Tax	**458.60**	**55.66**	**(645.11)**

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14. Performance of Portfolio Manager

Portfolio Management performance of the portfolio manager for the last three years, and in case of discretionary portfolio manager disclosure of performance indicators calculated using 'Time Weighted Rate of Return' method in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.

[Provided that this sub-clause shall not apply in case of the Co-investment Portfolio Manager.]

Portfolio Management performance for the last three years has been attached as Annexure-1

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15. Audit Observations

Audit observations of the preceding 3 years:

Period	Audit observation
April 2024 – March 2025	NIL
April 2023 – March 2024	NIL
April 2022 – March 2023	NIL

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

The details of investment of client's funds by the portfolio manager in the securities of its related parties or associates - NIL

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Amit Golia
Additional Director
DIN: 10022072

WAY2WEALTH BROKERS PVT. LTD.

G S Shridhar
CEO & Whole Time Director
DIN: 00106780

Date: 31st January 2026
Place: Bengaluru

WAY2WEALTH

ANNEXURE - 1

Way2Wealth Brokers Private Limited
Portfolio Management Performance

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty
Wealth Validator (Aggressive Growth)																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	4	8,24,84,186	1,56,03,697	15.47	19.08	4	8,87,75,711	1,20,71,242	10.10	-0.85	5	15,50,35,[illegible]	1,26,71,242	95.15	27.05	4	15,22,55,367	-1,53,65,367	37.40	5.35
TOTAL	4	8,24,84,186	1,56,03,697	15.47	19.08	4	8,87,75,711	1,20,71,242	10.10	-0.85	5	15,50,35,[illegible]	1,26,71,242	95.15	27.05	4	15,22,55,367	-1,53,65,367	37.40	5.35

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty
Wealth Weaver (Growth)																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	5	3,24,76,818	47,64,458	18.57	19.12	3	3,03,25,102	42,14,030	2.02	-0.52	5	3,81,12,570	21,64,808	32.72	29.69	4	2,40,42,947	28,76,243	-6.29	4.80
TOTAL	5	3,24,76,818	47,64,458	18.57	19.12	3	3,03,25,102	42,14,030	2.02	-0.52	5	3,81,12,570	21,64,808	32.72	29.69	4	2,40,42,947	28,76,243	-6.29	4.80

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty
Wealth Spiral (Dynamic Fund)																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	6	2,20,03,876	1,29,72,953	40.72	18.94	5	1,93,44,027	56,39,923	-5.82	-0.53	4	1,77,86,090	57,39,923	39.22	28.14	2	82,33,181	8,77,000	1.57	5.58
TOTAL	6	2,20,03,876	1,29,72,953	40.72	18.94	5	1,93,44,027	56,39,923	-5.82	-0.53	4	1,77,86,090	57,39,923	39.22	28.14	2	82,33,181	8,77,000	1.57	5.58

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty
Wealth Pick Fast																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	1	4,39,40,350	66,96,053	2.56	18.55	1	4,33,24,724	61,98,653	1.87	-0.56	1	4,80,59,236	57,96,653	14.64	28.86	1	4,07,32,318	-68,03,347	7.18	5.28
TOTAL	1	4,39,40,350	66,96,053	2.56	18.55	1	4,33,24,724	61,98,653	1.87	-0.56	1	4,80,59,236	57,96,653	14.64	28.86	1	4,07,32,318	-68,03,347	7.18	5.28

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty
Wealth Force																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	46	44,28,85,201	38,43,83,230	7.16	18.29	29	41,25,13,460	40,63,84,339	-10.72	0.23	24	42,24,04,186	25,87,24,704	24.77	28.86	20	34,86,25,047	20,88,84,826	4.90	5.24
TOTAL	46	44,28,85,201	38,43,83,230	7.16	18.29	29	41,25,13,460	40,63,84,339	-10.72	0.23	24	42,24,04,186	25,87,24,704	24.77	28.86	20	34,86,25,047	20,88,84,826	4.90	5.24

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	CNX 500	No of Clients	Value	Corpus	Annualised Return % Scheme	CNX 500	No of Clients	Value	Corpus	Annualised Return % Scheme	CNX 500	No of Clients	Value	Corpus	Annualised Return % Scheme	CNX 500
Wealth Dominion																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	3	3,90,44,308	3,90,64,308	-2.70	8.53	8	3,87,19,263	4,56,41,643	-13.05	-2.57	4	1,50,17,030	1,35,00,100	34.04	44.19	2	1,07,19,303	85,00,300	0.40	1.67
TOTAL	3	3,90,44,308	3,90,64,308	-2.70	8.53	8	3,87,19,263	4,56,41,643	-13.05	-2.57	4	1,50,17,030	1,35,00,100	34.04	44.19	2	1,07,19,303	85,00,300	0.40	1.67

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY Short Duration G-Sec Index	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY Short Duration G-Sec Index	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY Short Duration G-Sec Index	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY Short Duration G-Sec Index
Kalpavruksha - Elite Concentric																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	NIL	NIL	NIL	NIL	NIL	1	38,38,940	35,00,000	8.55	7.87	1	38,38,940	35,00,000	8.55	7.87	1	43,42,504	35,00,000	7.83	8.42
TOTAL	0	0	0	0.00	0.00	1	38,38,940	35,00,000	8.55	7.87	1	38,38,940	35,00,000	8.55	7.87	1	43,42,504	35,00,000	7.83	8.42

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY 50 Hybrid Composite Debt 40:60 Index	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY 50 Hybrid Composite Debt 40:60 Index	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY 50 Hybrid Composite Debt 40:60 Index	No of Clients	Value	Corpus	Annualised Return % Scheme	NIFTY 50 Hybrid Composite Debt 40:60 Index
Kalpavruksha - [illegible]																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	NIL	NIL	NIL	NIL	NIL	1	1,63,21,794	1,40,13,361	20.26	10.18	1	1,63,21,794	1,40,13,361	20.26	25.55	2	3,97,37,468	3,58,98,525	4.64	5.13
TOTAL	0	0	0	0.00	0.00	1	1,63,21,794	1,40,13,361	20.26	10.18	1	1,63,21,794	1,40,13,361	20.26	25.55	2	3,97,37,468	3,58,98,525	4.64	5.13

Strategy	upto 31/03/2022					upto 31/03/2023					upto 31/03/2024					upto 31/03/2025				
	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty	No of Clients	Value	Corpus	Annualised Return % Scheme	S&P CNX Nifty
Non Discretionary Portfolio																				
Associates / Group Companies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Others	8	5,01,17,808	4,36,52,112	16.07	19.90	3	2,06,79,181	1,58,54,[illegible]	0.61	-0.65	3	1,75,93,202	98,61,700	40.68	28.61	1	86,20,290	44,62,793	-22.86	5.34
TOTAL	8	5,01,17,808	4,36,52,112	16.07	19.90	3	2,06,79,181	1,58,54,[illegible]	0.61	-0.65	3	1,75,93,202	98,61,700	40.68	28.61	1	86,20,290	44,62,793	-22.86	5.34

[illegible] computation of annualised return for the respective strategy and S&P CNX Nifty is based on TWRR

ASSP & Co. CHARTERED ACCOUNTANTS BENGALURU

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