

Date: 19<sup>th</sup> February, 2026

To,  
Mehta Equities Private Limited.  
903, Lodha Supremus,  
Dr. E. Moses Road, Worli Naka,  
Mumbai - 400018

We have been requested by Mehta Equities Private Limited ('the Portfolio Manager') No. INP000005971) having office at 903, Lodha Supremus, Dr. E Moses Road, Worli Naka, Mumbai – 18, to certify the contents and information provided in the attached Disclosure Document required to be filed with the Securities and Exchange Board of India (SEBI) as per Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 (the Regulations) as amended from time to time

We have reviewed the Disclosure Document dated 18<sup>th</sup> February 2026 as required by SEBI (Portfolio Managers) Regulations, 2020 and other documents, records, Audited Financial statements as on 31<sup>st</sup> March, 2025 of Mehta Equities Private Limited and on the basis of the information and explanation given to us, it is confirmed that:

The disclosures made in the attached Disclosure Document dated 18<sup>th</sup> February, 2026 for the Portfolio Manager as required by SEBI (Portfolio Managers) Regulations, 2020 and the circulars, guidelines, notifications issued by SEBI from time to time are true, fair and adequate to enable the investors to make a well-informed decision

This certificate has been issued for onward submission to Securities and Exchange Board of India for the sole purpose of certifying the contents of Disclosure Document for the Portfolio Management and should not be used or referred to for any other purpose without our prior written consent.

Place : Mumbai  
Date : 19<sup>th</sup> February, 2026

UDIN : 26103834QOHMLP7352



For  
**D N MAHESHWARII AND COMPANY**  
*Chartered Accountants*  
**FRN : 162340W**

DEEPAK  
NARAYANLAL  
MAHESHWARII  
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DEEPAK NARAYANLAL  
MAHESHWARII  
Date: 2026.02.19  
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**Deepak N Maheshwarii**  
**Proprietor**  
**ICAI Memb. No. 103834**

**DISCLOSURE DOCUMENT**

**PORTFOLIO MANAGEMENT SERVICES**

**MEHTA EQUITIES PRIVATE LIMITED**

## Annexure-1

### Classification of sixteen parameters of Model Disclosure document

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## DISCLOSURE DOCUMENT OF MEHTA EQUITIES PRIVATE LIMITED

### 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.

The document contains necessary information about the Portfolio Manager required by an investor before investing. The investor is advised to carefully read this entire document before making any investment decision. The investor may also be advised to retain the document for future reference.

The previous Disclosure Document dated September 25, 2023 is submitted with SEBI and this updated disclosure document is prepared on the basis of SEBI Circular No. SEBI/HO/IMD/IMD-RAC-3/P/CIR/2025/125 dated 9<sup>th</sup> September 2025.

This Disclosure document is dated 18/02/2026.

| <b>Details of the Portfolio Manager</b> |  |
|---|--|
| Name of the Portfolio Manager           | Mehta Equities Private Limited                                       |
| SEBI Registration Number                | INP000005971   |
| Registered Office Address               | 903, Lodha Supremus, Dr. E. Moses Road,<br>Worli Naka, Mumbai 400018 |
| Phone                                   | 91-22-61507114   |
| Email                                   | <a href="mailto:in.support@plus500.com">in.support@plus500.com</a>   |
| Website                                 | <a href="http://www.mehtagroup.in">www.mehtagroup.in</a>             |

| <b>Name of the Principal Officer</b> |  |
|--------------------------------------|--|
| Name of the Principal Officer        | Rajat Rakesh Mehta   |
| Registered Office Address            | 903, Lodha Supremus, Dr. E. Moses Road,<br>Worli Naka, Mumbai 400018 |
| Phone                                | 91-22-61507114   |
| Email                                | <a href="mailto:rajat.mehta@plus500.com">rajat.mehta@plus500.com</a> |

## 2. Definitions

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

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

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

4. “**Advisory Services**” means advising on the portfolio approach, investment and divestment of individual Securities in the Client’s Portfolio, entirely at the Client’s risk, in terms of the Regulations and the Agreement.
5. “**Agreement**” or “**Portfolio Management Services Agreement**” or “**PMS Agreement**” means agreement executed between the Portfolio Manager and its Client for providing portfolio management services and shall include all schedules and annexures attached thereto and any amendments made to this agreement by the parties in writing, in terms of Regulation 22 and Schedule IV of the Regulations.
6. “**Applicable Law/s**” means any applicable statute, law, ordinance, regulation, rule, order, bye-law, administrative interpretation, writ, injunction, directive, judgment or decree or other instrument including the Regulations which has a force of law, as is in force from time to time.
7. “**Assets Under Management**” or “**AUM**” means aggregate net asset value of the Portfolio managed by the Portfolio Manager on behalf of the Clients.

8. **“Associate”** means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager.
9. **“Benchmark”** means an index selected by the Portfolio Manager in accordance with the Regulations, in respect of each Investment Approach to enable the Clients to evaluate the relative performance of the Portfolio Manager.
10. **“Board”** or **“SEBI”** means the Securities and Exchange Board of India established under section 3 of the Securities and Exchange Board of India Act, 1992.
11. **“Business Day”** means any day, which is not a Saturday, Sunday, or a day on which the banks or stock exchanges in India are authorized or required by Applicable Laws to remain closed or such other events as the Portfolio Manager may specify from time to time.
12. **“Client(s)” / “Investor(s)”** means any person who enters into an Agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.
13. **“Custodian(s)”** means an entity registered with the SEBI as a custodian under the Applicable Laws and appointed by the Portfolio Manager, from time to time, primarily for custody of Securities of the Client.
14. **“Depository”** means the depository as defined in the Depositories Act, 1996 (22 of 1996).
15. **“Depository Account”** means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.
16. **“Direct on-boarding”** means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.
17. **“Disclosure Document”** or **“Document”** means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.
18. **“Distributor”** means a person/entity who may refer a Client to avail services of Portfolio Manager in lieu of commission/charges (whether known as channel partners, agents, referral interfaces or by any other name).
19. **“Eligible Investors”** means a Person who: (i) complies with the Applicable Laws, and (ii) is willing to execute necessary documentation as stipulated by the Portfolio Manager.
20. **“Fair Market Value”** means the price that the Security would ordinarily fetch on sale in the open market on the particular date.
21. **“Foreign Portfolio Investors”** or **“FPI”** means a person registered with SEBI as a foreign portfolio investor under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time.
22. **“Financial Year”** means the year starting from April 1 and ending on March 31 in the following year.

23. **"Funds"** or **"Capital Contribution"** means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies mentioned in the account opening form, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of sale or other realization of the portfolio and interest, dividend or other monies arising from the assets, so long as the same is managed by the Portfolio Manager.
24. **"Group Company"** shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary.<sup>1</sup>
25. **"HUF"** means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.
26. **"Investment Approach"** is a broad outlay of the type of Securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and Securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.
27. **"IT Act"** means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.
28. **"Large Value Accredited Investor"** means an Accredited Investor who has entered into an Agreement with the Portfolio Manager for a minimum investment amount of ten crore rupees.
29. **"Non-resident Investors"** or **"NRI(s)"** shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.
30. **"NAV"** shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.
31. **"NISM"** means the National Institute of Securities Markets, established by the Board.
32. **"Person"** includes an individual, a HUF, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.
33. **"Portfolio"** means the total holdings of all investments, Securities and Funds belonging to the Client.
34. **"Portfolio Manager"** means MEHTA EQUITIES PRIVATE LIMITED a company incorporated under the Companies Act, 1956 registered with SEBI as a portfolio manager bearing registration number INP000005971 and having its registered office at 903, Lodha Supremus, Dr. E Moses Road, Worli Naka, Mumbai 400018.
35. **"Principal Officer"** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:
  - (i) the decisions made by the Portfolio Manager for the management or administration of Portfolio of Securities or the Funds of the Client, as the case may be; and
  - (ii) all other operations of the Portfolio Manager

36. “**Regulations**” or “**SEBI Regulations**” means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended/modified and reinstated from time to time and including the circulars/notifications issued pursuant thereto.

37. “**Related Party**” means –

- (i) a director, partner or his relative;
- (ii) a key managerial personnel or his relative;
- (iii) a firm, in which a director, partner, manager or his relative is a partner;
- (iv) a private company in which a director, partner or manager or his relative is a member or director;
- (v) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two per cent. of its paid-up share capital;
- (vi) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
- (vii) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:  
Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
- (viii) any body corporate which is— (A) a holding, subsidiary or an associate company of the Portfolio Manager; or (B) a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary; (C) an investing company or the venturer of the Portfolio Manager— The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the Portfolio Manager would result in the Portfolio Manager becoming an associate of the body corporate;
- (ix) a related party as defined under the applicable accounting standards;
- (x) such other person as may be specified by the Board:

Provided that,

- (a) any person or entity forming a part of the promoter or promoter group of the listed entity; or
- (b) any person or any entity, holding equity shares:
  - (i) of twenty per cent or more; or
  - (ii) of ten per cent or more, with effect from April 1, 2023; in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediate preceding Financial Year; shall be deemed to be a related party;

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

### 3. Description

#### (i) History, Present Business and Background of the portfolio manager.

Mehta Equities Private Limited (MEPL) is a SEBI-registered Stock Broker, established in 1994 and promoted by Mr. Rakesh Mehta, a Chartered Accountant by profession. Headquartered in Mumbai, MEPL has been providing comprehensive stock broking services for over three decades.

MEPL services a robust client base of over 50000 clients and operates through a network of over 90 franchisees across India, reflecting its strong national presence and long-standing market credibility. Mehta Equities Private Limited is also registered with SEBI as a Portfolio Management Services (PMS) provider (Registration No.: INP000001736) and received SEBI approval on 3<sup>rd</sup> April 2018. Under the guidance of Mr. Rajat Mehta (Principal Officer) and Mr. Samridh Poddar (Fund Manager), the PMS division launched the scheme "Mehta Multi Focus Strategy" (MMFS) on 9<sup>th</sup> August 2018. PMS client base as on 15<sup>th</sup> January, 2026 stands at 96 clients.

Subsequently, Mehta Equities Private Limited also launched the Mehta Farlap Scheme on 14<sup>th</sup> February 2025, a collaborative initiative between the Mehta Group and the Farlap Group.

#### (ii) Promoters of the portfolio manager, directors and their background.

Mehta Equities Private Limited was established in 1994. It is among India's most reputed capital market intermediaries and financial service providers, known for its remarkable ability to nurture rewarding relationships with its clients by providing them personalized, value-enhancing services.

Its services include Equity Brokerage in Cash, Derivatives & Currency Markets, Depository and Distribution of Financial Products. It has an impressive geographical presence and reach, with over 80 locations spanning across the length and breadth of the country.

#### **Promoter Details and their background:**

Mehta Equities Private Limited has been acquired (100%) by Plus500 Limited with effect from 9<sup>th</sup> February, 2026. Plus500 Limited along with its nominee shareholder are the promoters of the company.

Plus500 Limited (**Plus500**) is a public company incorporated on 26 May 2008 under the laws of Israel having its registered office at MATAM, Building 10.2, HAIFA 3115001 Israel. Plus500 together with its subsidiaries (**Plus500 Group**) is a global multi-asset fintech group operating technology-based trading platforms. Plus500 offers customers a range of trading products, including OTC ("Over-the-Counter" products, namely Contracts for Difference (CFDs)) share dealing, as well as futures and options on futures.

The Plus500 Group retains operating licenses and is regulated in the United Kingdom, Australia, Cyprus, Israel, New Zealand, South Africa, Singapore, the Seychelles, the United States, Estonia, Japan, the United Arab Emirates, the Bahamas and Canada and through its OTC product portfolio, offers more than 2,500 different underlying global financial instruments, comprising equities, indices, commodities, options, ETFs, foreign exchange and cryptocurrencies. Customers of the Group can trade its OTC products in more than 60 countries and in 30 languages. Plus500's trading platforms are accessible from multiple operating systems (iOS, Android and Windows) and web browsers.

Plus500 was admitted to trading on the London Stock Exchange (LON: PLUS) on 24 July 2013. It was admitted to the Equity Shares in Commercial Companies (ESCC) Category of the Official List and is a constituent of the FTSE 250 Index and the STOXX Europe 600 Index. Website: [www.plus500.com](http://www.plus500.com). The ISIN of the company is IL0011284465. The SEDOL code for Plus500 Ltd. is: BBT3PS9.

### **Directors Details and their background.**

#### **a) Mr. Rakesh Mehta - Director**

Mr. Rakesh Mehta is a director of Mehta Equities Private Limited. He is a Chartered Accountant and a member of ICAI. He has also completed Owner/President Management Program from Harvard Business School. He brings with him more than 30 years of experience in the capital market industry. He is responsible for overseeing the entire organization, including setting the strategic vision, ensuring effective corporate governance, and guiding senior management in achieving the Company's long-term objectives.

#### **b) Mr. Prashant Bhansali - Designated Director**

Mr. Prashant Bhansali is a director of Mehta Equities Private Limited. He is a qualified Chartered Accountant and having more than 23 years of experience of Corporate Finance and Wealth Management. He oversees the overall operations of the organization, ensuring effective management and alignment with the Company's strategic objectives.

#### **c) Mr. Manoj Maheshwari - Designated Director.**

Mr. Manoj Maheshwari is a director of Mehta Equities Private Limited. He holds a postgraduate degree of M.Com (Master of Commerce). He has an overall experience of over 28 years. He manages the day-to-day business operations of the Company and ensures smooth functioning across all operational areas.

#### **d) Mr. Elad Even-Chen - Director**

Mr. Elad Even-Chen is a director of Mehta Equities Private Limited. By profession he is an MBA with specialization in Financial Management; LL.B., Bachelor of Laws; CPA, BA in Accounting and Economics. He has an overall experience of over 17 years in the financial markets. He is also the group CFO of Plus500 Limited and its subsidiaries. He supervises the production of monthly reports including reconciliations, as well as financial statements and cash flow projections for use by executive management, Audit/Finance Committee and Board of Directors.

**e) Mr. David Zruia - Director**

Mr. David Zruia is a director of Mehta Equities Private Limited. By profession he is an BSc, Industrial Engineering and Management. He has an overall experience of over 15 years in the financial markets. He is also the CEO and Executive Director of Plus500 Limited. He supervises the management of the Plus500 Group including Plus500 Ltd and its subsidiaries.

**f) Mr. Nir Zats - Director**

Mr. Nir Zats is a director of Mehta Equities Private Limited. By profession he is an MBA with specialization in Start-Ups Development; BSc, Industrial Engineering and Management. He has an overall experience of over 18 years in the financial markets. He is also the Chief Marketing Officer of Plus500 Limited. He is responsible for a broad range of activities as parts of the Plus500 Group overall marketing strategy.

**g) Mr. Ofir Chudin - Director**

Mr. Ofir Chudin is a director of Mehta Equities Private Limited. By profession he is a Holder of the Basic Certification of Professional Competence - Cyprus Securities and Exchange Commission (CySEC); Adv, Dual Degree: Business Administration and LL.B, Bachelor of Laws - majoring in Finance and Financial Risk Management. He has an overall experience of over 14 years in the financial markets. He is also the CEO and Executive Director of Plus500CY Ltd. He is working closely with the parent company Plus500 Ltd in providing advice, recommendations, information and assistance to enable and sustain the growth of Plus500CY within the Group, and within the regulatory framework.

**Key Management Personnel (Portfolio Management Services)**

**Rajat Mehta: Principal Officer**

Mr. Rajat Mehta is the Principal Officer of PMS. By profession he is an MBA (PGDM) in Capital Markets. With over 10 years of experience, he leads the Wealth Management and contributes to the organization's Business Development and Human Resources. He has led the growth of human capital from 60 to 120 since he joined the firm with offices in Mumbai, Delhi and Jodhpur. He continues to grow and diversify his firm in various lines of services and strategically important locations in India. Rajat has initiated several new initiatives like Venture Funding, Portfolio Management (PMS-MMFS), and Alternate Investing opportunities for HNIs - UHNIs and Family office clients.

**Samridh Poddar: Fund Manager**

Mr. Samridh Poddar, holds a degree BSC in Accounting and Finance from Indiana University Bloomington having an experience in Capital Market at PMS Division for last 14 years of experience, he is having in-depth knowledge of investment covering Midcaps and Small-caps in the Indian Capital Markets across sectors. He had managed investments for Oculus Pte Ltd, a Japanese Family

office based out of Singapore into capital markets in India, Indonesia, the US and Singapore. Research Analyst at Steinberg India Advisors (a \$200mn AUM) covering midcaps in the Indian equities market.

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

- Plus500 Ltd
- Plus500UK Ltd
- Plus500AU Pty. Ltd
- Plus500US Financial Services LLC
- Plus500CY Ltd
- Plus500IL Ltd
- Plus500SG Pte. Ltd
- Plus500SEY Ltd
- Plus500EE AS
- Plus500JP Securities Ltd
- Plus500AE Ltd
- Plus500BHS Ltd
- Plus500Gulf Securities LLC
- Plus500CA Ltd
- Plus500BOS EOOD
- Plus500US Inc.
- Plus500US Futures Technologies, LLC

iv) **The Portfolio Manager broadly offers services under the following categories:**

**a) Discretionary Services:**

Under these services, the choice as well as the timings of the investment decisions rest solely with the Portfolio Manager. The Portfolio Manager may at times and at its own discretion, adhere to the views of the Client pertaining to the investment / disinvestment decisions of the Client's Portfolio. The Portfolio Manager shall have the sole and absolute discretion to invest in respect of the Client's account in any type of security as per the executed agreement and make such changes in the investments and invest some or all of the Client's account in such manner and in such markets at it deems fit. The Client may give informal guidance to customize the portfolio, however the final decision rests with the Portfolio Manager. The securities invested / disinvested by the Portfolio Manager for Clients may differ from Client to Client. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's account is absolute and final and cannot be called in question or be open to review at any time during the currency of the agreement or any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the relevant Acts, Rules, and Regulations,

guidelines and notifications in force from time to time. Under these services, the Clients may authorize the Portfolio Manager to invest their Portfolio funds in specific financial instruments or a mix of specific financial instruments or restrict the Portfolio Manager from investing in specific financial instruments or securities. Periodical statements in respect of Client's Portfolio shall be sent to the respective Client.

**b) Non-Discretionary Services:**

Under these services, the Client decides their own investments, with the Portfolio Manager, wherein the portfolio manager facilitates only with research/recommendation and execution of transactions. The Portfolio Manager's role would include but not limited to providing research, structuring of client's portfolios, investment advice, and guidance and trade execution at the Client's request. The Portfolio Manager shall execute orders as per the mandate received from Clients. Portfolio manager and client will have an agreed fee structure for a definite described period, entirely at the Client's risk.

The deployment (investment / disinvestment) of the Client's Funds by the Portfolio Manager on the instructions of the Client is absolute and final and can never be called in question or shall not be open to review at any time during the currency of the Client agreement or at any time thereafter except on the ground of malafide fraud, conflict of interest or gross negligence. The Portfolio Manager executes the investment instructions and follows up with payments, settlements, custody and other back-office functions. The Portfolio Manager will accept funds from the client and provide the client a comprehensive advisory package designed to help the client in his investment decisions. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the Act, Rules and/or Regulations, guidelines and notifications in force from time to time.

The Portfolio Manager's advice (taken in good faith) in deployment of funds is absolute and final and cannot be called in question or be open to review at any time during the currency of the agreement or any time thereafter except on the ground of malafide fraud, conflict of interest or gross negligence. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the relevant Act, rules and regulations, guidelines and notifications in force from time to time.

The Portfolio manager may identify investment opportunities and showcase the same to the client. The client on the basis of the information and such other checks which he may wish to carry on, could decide to participate in the opportunity. On obtaining his consent the Portfolio manager may process the instruction and execute the deal in the interest of the client. The client is fully aware that the risks and rewards belong to the client and portfolio manager shall not be held responsible for such decisions of the client.

**c) Advisory Services:**

The Portfolio Manager will provide Advisory Portfolio Management Services, in terms of the Regulations, which shall be in the nature of investment advisory and shall include the responsibility of advising on the investment and disinvestment of individual securities in the client's portfolio, for an agreed fee structure, entirely at the Client's risk.

The Portfolio Manager shall be solely acting as an advisor to the Portfolio of the client and shall not be responsible for the Investment/Disinvestment of Securities and /or administrative activities of the clients Portfolio. The Portfolio Manager shall provide advisory services in accordance with such guidelines and / or directives issued by the regulatory authorities and/or the client from time to time in this regard. It will be the discretion/responsibility of the client whether to execute trades based on the advice of Portfolio Manager.

The advisory services offered to clients may be for investment up to 25% of the assets under management of such clients in unlisted securities, in addition to the securities permitted for discretionary portfolio management.

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

No penalties / directions have been issued by the SEBI under the SEBI Act or Regulations made there under relating to Portfolio Management Services. There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority against the Portfolio Manager or its Directors, principal officers or employees or any person directly or indirectly connected with the Portfolio Manager under the SEBI Act and Regulations made there under relating to Portfolio Management Services.

|     |  |      |
|-----|--|------|
| i   | All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Regulations made there under relating to Portfolio Management Services.   | None |
| ii  | The nature of the penalty/direction against the Portfolio Manager.   | None |
| iii | Penalties/fines imposed for any economic offence and/ or for violation of any securities laws against the Portfolio Manager.   | None |
| iv  | Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.   | None |
| v   | Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory agency.  | None |
| vi  | Any enquiry/ adjudication proceedings initiated by 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. | None |

## 5. Services Offered

- (i) Investment Objective - To generate sustainable returns over medium to long term by making investments which primarily comprise of equity securities.
- (ii) Description of Securities - Under MMFS, client monies would primarily be invested in equity shares and equity linked instruments issued by companies which are listed in India. Some part of client monies might be invested in units of money market and liquid funds and some part might be retained as bank balance in bank account.
- (iii) Basis of Selection of type of security - The MMFS investment approach is based on generating returns by investing in participating instruments of companies which have a proven track record of steady growth in revenues alongside the ability to consistently deliver a return on capital employed in excess of the cost of capital. Hence, under this investment approach, investments are primarily made in equity shares and equity linked instruments issued by companies listed in India. To keep some part of client monies in liquid form, such monies are either invested in units of money market funds or liquid fund or they are retained in the bank account in form of bank balance.

- (iv) Allocation of portfolio across types of securities

| Type of security                                 | Allocation in portfolio |
|--|-------------------------|
| Equity and equity linked instruments             | =>80%                   |
| Money market funds / Liquid funds / Bank balance | < 20%                   |

- (v) Appropriate Benchmark to compare performance - Nifty 50.
- (vi) Basis for choice of benchmark - Most of the portfolio companies fall in Mid-cap and large-cap category based on market Capitalization.
- (vii) Minimum investment - The minimum value of Funds/investments which will be accepted towards initial corpus under MMFS Investment Approach would be decided by the Portfolio Manager from time to time and the minimum sum will not be less than any amount as may be **stipulated by the Regulations from time to time (Currently it is Rs. 50,00,000)**. The uninvested amounts forming part of the Client's Assets may be at the discretion of the Portfolio Manager held in cash or deployed in liquid fund schemes, exchange traded index funds, debt-oriented schemes of mutual funds, gilt schemes, bank deposits and other short-term avenues for investment.

- (viii) Indicative tenure or investment horizon – 3 years – 10 years
- (ix) Minimum tenure – not applicable under this investment approach.
- (x) Lock-in period – DPMS Investments managed under MMFS Investment Approach shall not be subject to any lock-in period.
- (xi) Exit loads – There shall be no levy of exit load on withdrawal of monies being managed under this approach.
- (xii) Redemptions / Partial withdrawals – Partial withdrawal shall be allowed only to such extent that portfolio value after recovery of fees, charges and payment of withdrawal amount is not less than the minimum investment specified in Clause vii of this schedule.
- (xiii) Risks associated with the investment approach – Please refer the clause 6 on Risk Factors

**NOTE:**

- Investment under Portfolio Management Services will be only as per the SEBI Regulations on PMS
- The un-invested amounts forming part of the Client's Assets may be at the discretion of the Portfolio Manager be held in cash or deployed in Liquid fund schemes, Exchange Traded Index Funds, debt-oriented schemes of Mutual funds, Gilt schemes, Bank deposits and other short-term avenues for Investment.
- The Portfolio Manager, with the consent of the Client, may lend the securities through an Approved Intermediary, for interest.
- The Portfolio Manager will not invest any of the funds of the Client in the shares, mutual funds, debt, deposits and other financial instruments of group companies of the Portfolio Manager.

**Investments in Group/Associate Companies of the Portfolio Manager: None**

## **6. Risk factors**

### **A. General Risks Factors**

- (1) Investment in Securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc.
- (2) The Portfolio Manager does not assure that the objectives of any of the Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
- (3) Past performance of the Portfolio Manager does not indicate the future performance of the same or any other Investment Approach in future or any other future Investment Approach of the Portfolio Manager. 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.

## **B. Risk associated with equity and equity related instruments**

- (10) Equity and equity related instruments by nature are volatile and prone to price fluctuations on a daily basis due to macro and micro economic factors. The value of equity and equity related instruments may fluctuate due to factors affecting the securities markets such as volume and volatility in the capital markets, interest rates, currency exchange rates, changes in law/ policies of the government, taxation laws, political, economic or other developments, which may have an adverse impact on individual Securities, a specific sector or all sectors. Consequently, the value of the Client's Portfolio may be adversely affected.
- (11) Equity and equity related instruments listed on the stock exchange carry lower liquidity risk, however the Portfolio Manager's ability to sell these investments is limited by the overall trading volume on the stock exchanges. In certain cases, settlement periods may be extended significantly by unforeseen circumstances. The inability of the Portfolio Manager to make intended Securities purchases due to settlement problems could cause the Client to miss certain investment opportunities. Similarly, the inability to sell Securities held in the Portfolio may result, at times, in potential losses to the Portfolio, should there be a subsequent decline in the value of Securities held in the Client's Portfolio.
- (12) Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small number of scrip's accounting for a large proportion of trading volume among others.

## **C. Risk associated with debt and money market securities**

- (13) Interest Rate Risk  
Fixed income and money market Securities run interest-rate risk. Generally, when interest rates rise, prices of existing fixed income Securities fall and when interest rate falls, the prices increase. In case of floating rate Securities, an additional risk could arise because of the changes in the spreads of floating rate Securities. With the increase in the spread of floating rate Securities, the price can fall and with decrease in spread of floating rate Securities, the prices can rise.
- (14) Liquidity or Marketability Risk  
The ability of the Portfolio Manager to execute sale/purchase order is dependent on the liquidity or marketability. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. The Securities that are listed on the stock exchange carry lower liquidity risk, but the ability to sell these Securities is limited by the overall trading volumes. Further, different segments of Indian financial markets have different settlement cycles and may be extended significantly by unforeseen circumstances.
- (15) Credit Risk  
Credit risk or default risk refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). Because of

this risk corporate debentures are sold at a higher yield above those offered on government Securities which are sovereign obligations and free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the changes in the perceived level of credit risk as well as any actual event of default. The greater the credit risk, the greater the yield required for someone to be compensated for the increased risk.

(16) Reinvestment Risk

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

**D. Risk associated with derivatives instruments**

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

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

**E. Risk associated with investments in mutual fund schemes**

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

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

- (21) Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.
- (22) The Portfolio Manager shall not be responsible for liquidity of the scheme's investments which at times, be restricted by trading volumes and settlement periods. The time taken by the scheme for redemption of units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the schemes.
- (23) The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes in the offer document(s)/scheme information document(s) of the scheme(s), which may vary substantially depending on the market risks, general economic and political conditions in India and other countries globally, the monetary and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.
- (24) The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.
- (25) While it would be the endeavor of the Portfolio Manager to invest in the schemes in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of this portfolio being adversely impacted.
- (26) The scheme specific risk factors of each of the underlying schemes become applicable where the Portfolio Manager invests in any underlying scheme. Investors who intend to invest in this portfolio are required to and are deemed to have read and understood the risk factors of the underlying schemes.

**F. Risk arising out of non-diversification**

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

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

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

## 7. Nature of expenses

### (i) Investment management and advisory fees.

Management and Advisory fees charged may be a fixed fee or a return-based fee or a combination of both as detailed in the Schedule to the Portfolio Management Services agreement. The Fees may be charged upfront and/or at the end of a specified tenure as agreed between the Client and the Portfolio Manager

### (ii) Custodian fee

Custodian fees are charged as on actual basis by custodian i.e. Kotak Mahindra Bank Limited.

### (iii) Registrar and transfer agent fee: NIL

### (iv) Brokerage and transaction cost

The investments under Portfolio Management would be done through registered members of the Stock Exchange(s) who charge brokerage up to a maximum of 2.5% of contract value. In addition to the brokerage, transaction cost like network charges, turnover charges, stamp duty, transaction costs, turnover tax, Securities transaction tax or any other tax levied by statutory authority (ies), foreign transaction charges (if any) and other charges on the purchase and sale of shares, stocks, bonds, debt, deposits, other financial instruments would also be levied by the broker (including Mehta Equities Private Limited) Entry or exit loads (if any) on units of Mutual Funds will also be charged from Clients.

## **8. Taxation**

### **A. General**

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

### **B. Tax deducted at source**

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

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

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

### **C. Long term capital gains**

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

### **Period of Holding**

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

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

- *a fund which invests sixty-five per cent. or more of its total proceeds in units of a fund referred to in sub-clause (a).*
- Definition of debt and money market instruments:

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

- Definition of Market Linked Debenture:

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

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

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

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

Long term capital gains arising on transaction undertaken on a recognized stock exchange located in any International Financial Services Centre and consideration is paid or payable in foreign currency, where STT is not chargeable, is also taxed at a rate of 10%. This benefit is available to all assesses. 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 index notified by the Central Government and expenditure incurred wholly and exclusively in connection with such transfer. This tax rate is reduced from 20% to 12.5%; but no indexation benefit will be available with effect from 23 July 2024.

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

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

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

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

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

Under section 115E of the IT Act, any income from investment or income from long-term capital gains of an asset other than specified asset as defined in Section 115C (specified assets include shares of Indian company, debentures and deposits in an Indian company which is not a private company and Securities issued by Central Government or such other Securities as notified by Central Government) is chargeable at the rate of 20%. Income by way long-term capital gains of the specified asset is,

however, chargeable at the rate of 10% plus applicable surcharge and cess (without benefit of indexation and foreign currency fluctuation). This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

#### **D. Short term capital gains**

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

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

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

#### **E. Profits and gains of business or profession**

If the Securities under the portfolio management services are regarded as business/trading asset, then any gain/loss arising from sale of such Securities would be taxed under the head "Profits and Gains of Business or Profession" under section 28 of the IT Act. The gain/ loss is to be computed under the head "Profits and Gains of Business or Profession" after allowing normal business expenses (inclusive of the expenses incurred on transfer) according to the provisions of the IT Act. Interest income arising on Securities could be characterized as 'Income from other sources' or 'business income' depending on facts of the case. Any expenses incurred to earn such interest income should be available as deduction, subject to the provisions of the IT Act.

#### **F. Losses under the head capital gains/business income**

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

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

### **G. General Anti Avoidance Rules (GAAR)**

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

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

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

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

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

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

- 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.

## 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.

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

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

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

## 10. Investors services

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

|                    |   |
|--------------------|---|
| Name of the person | Mr. Rajat Mehta   |
| Designation        | Principal Officer   |
| Address            | 903, Lodha Supremus, Dr. E. Moses Road, Worli Naka, Mumbai- 400 018 |
| Email              | <a href="mailto:in.support@plus500.com">in.support@plus500.com</a>  |
| Telephone          | +91-22-61507100   |

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

Grievances, if any, that may arise pursuant to the Portfolio Management Services Agreement entered into shall as far as possible be redressed through the administrative mechanism by the Portfolio Manager and are subject to SEBI (Portfolio Managers) Regulations 2020 and any amendments made thereto from time to time. However, all the legal actions and proceedings are subject to the jurisdiction of the court in Mumbai only and are governed by Indian laws.

All disputes, differences, claims and questions whatsoever arising from (i) the Agreement between the Client and the Portfolio Manager and (ii) the services to be rendered by the Portfolio Manager and / or their respective representatives shall be attempted to be resolved by discussions between the parties and amicable settlement. Where the Client has any grievances, he should promptly notify of the same to the Portfolio Manager in writing, giving sufficient details to enable the Portfolio Manager to take necessary steps. The Portfolio Manager, upon receipt of any such grievance shall take prompt action to redress the same. In case the disputes remain unsettled for 30 days, the same shall be referred to a sole arbitrator and such arbitration shall be in accordance with and subject to the provisions of The Arbitration and Conciliation Act, 1996, or any statutory modification or re-enactment thereof for the time being in force. Such Arbitration proceedings shall be held at Mumbai.

Arbitration shall be held in English. The arbitration award shall be treated as final and shall be binding on the Parties. This arbitration clause is subject to the jurisdiction of courts in Mumbai only.

SEBI has introduced an online platform "SCORES", where investors can lodge complaints against the registered intermediaries.

SCORES enables investors to lodge and follow up their complaints and track the status on Redressal of such complaints online. All the activities, starting from lodging a complaint till its closure by SEBI is carried out online in an automated environment. Since this is a web-based service, it is available around the clock. A client can register complaints and reminders at the SCORES website (<http://scores.gov.in>).

## **11. Details of the diversification policy of the portfolio manager**

Portfolio diversification is a strategy of risk management used in investing, which allows to reduce risks by allocating the funds in multiple asset types. It helps to mitigate the associated risks on the overall investment portfolio.

The Portfolio Manager shall invest in equity and equity related securities. However, from time to time on opportunistically basis, may also choose to invest in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws. The Portfolio Manager may also, from time to time, engage in hedging strategies by investing in derivatives and permissible securities/instruments as per Applicable Laws.

**Part-II- Dynamic Section**

**12. Client Representation**

**(i) Client Information for Last 3 Years**

| Sr. No | Category of Clients               | No. Of Clients | Funds Managed (Amount in Rs. Crores) | No. Of Clients | Funds Managed (Amount in Rs. Crores) | No. Of Clients | Funds Managed (Amount in Rs. Crores) | Discretionary / non-discretionary (If available) |
|--------|-----------------------------------|----------------|--------------------------------------|----------------|--------------------------------------|----------------|--------------------------------------|--|
|        |                                   | FY 2024-25     |                                      | FY 2023-24     |                                      | FY 2022-23     |                                      |  |
| 1      | <b>Associates/group companies</b> |                |                                      |                |                                      |                |                                      |  |
|        | Individual                        | 6              | 3.01                                 | 6              | 2.54                                 | 6              | 2.54                                 | Discretionary                                    |
|        | Corporate                         | 0              | 0                                    | 0              | 0                                    | 0              | 0                                    |  |
|        | <b>Subtotal (i)</b>               | <b>6</b>       | <b>3.01</b>                          | <b>6</b>       | <b>2.54</b>                          | <b>6</b>       | <b>2.54</b>                          |  |
| 2      | <b>Other</b>                      |                |                                      |                |                                      |                |                                      |  |
|        | Individual                        | 68             | 103.89                               | 53             | 76.78                                | 39             | 38.23                                | Discretionary                                    |
|        | Corporate                         | 20             | 38.29                                | 13             | 32.54                                | 9              | 24.4                                 |  |
|        | <b>Subtotal (ii)</b>              | <b>88</b>      | <b>142.18</b>                        | <b>66</b>      | <b>109.32</b>                        | <b>48</b>      | <b>62.63</b>                         |  |
| 3      | <b>TOTAL (i)+(ii)</b>             | <b>94</b>      | <b>145.19</b>                        | <b>72</b>      | <b>111.86</b>                        | <b>54</b>      | <b>65.17</b>                         |  |

\*Note - Corporates include entities other than individuals like HUF's, Partnership Firms, Limited Liability Partnership, Trusts Companies etc.

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

**A. Related party where control exists irrespective whether transactions have occurred or not**

Holding Company: Plus500 Limited

**B. Other related parties: Associate of Holding Company:**

|                                    |                                       |
|------------------------------------|---------------------------------------|
| • Plus500 Ltd                      | • Plus500JP Securities Ltd            |
| • Plus500UK Ltd                    | • Plus500AE Ltd                       |
| • Plus500AU Pty. Ltd               | • Plus500BHS Ltd                      |
| • Plus500US Financial Services LLC | • Plus500Gulf Securities LLC          |
| • Plus500CY Ltd                    | • Plus500CA Ltd                       |
| • Plus500IL Ltd                    | • Plus500BOS EOOD                     |
| • Plus500SG Pte. Ltd               | • Plus500US Inc.                      |
| • Plus500SEY Ltd                   | • Plus500US Futures Technologies, LLC |
| • Plus500EE AS                     |                                       |

### Director details of the Company:

Mr. Rakesh Mehta

Mr. Prashant Bhansali

Mr. Manoj Maheshwari

Mr. Elad Even-Chen

Mr. David Zruia

Mr. Nir Zats

Mr. Ofir Chudin

### Director details of Holding Company (Plus500 Limited)

Prof. Jacob A Frenkel

Mr. David Zruia

Mr. Elad Even-Chen

Prof. Varda Liberman

Mr. Daniel King

Ms. Tami Gottlieb

Mr. Steve Baldwin

- Independent Non-Executive Director and Chairman

- Group CEO and Director

- Group CFO and Director

- Senior Independent Non-Executive Director

- Independent Non-Executive Director and External Director

- Independent Non-Executive Director and External Director

- Independent Non-Executive Director

### Details of close relatives of directors:

| Relatives Name            | Relation                        | Relatives Name                                   | Relation                               |
|---------------------------|---------------------------------|--|--|
| Mrs. Nidhi Mehta          | Spouse of Rakesh Mehta          | Amikam Even-Chen                                 | Father of Elad Even-Chen               |
| Mr. Rajat Mehta           | Son of Rakesh Mehta             | Tova Shoshana Even-Chen                          | Mother of Elad Even-Chen               |
| Mrs. Chesta Arora         | Daughter of Rakesh Mehta        | Ari Even-Chen                                    | Son of Elad Even-Chen                  |
| Mrs. Trisha Mehta         | Daughter in law of Rakesh Mehta | Adam Even-Chen                                   | Son of Elad Even-Chen                  |
| Mr. Rajesh Mehta          | Brother of Rakesh Mehta         | Ella Even-Chen                                   | Daughter of Elad Even-Chen             |
| Mrs. Sangeeta Lodha       | Sister of Rakesh Mehta          | Assaf Even-Chen                                  | Brother of Elad Even-Chen              |
| Mrs. Shobha Mohnot        | Sister of Rakesh Mehta          | Itay Even-Chen                                   | Brother of Elad Even-Chen              |
| Rakesh Mehta HUF          | HUF of Rakesh Mehta             | Shamara Brenna                                   | Spouse of Ofir Chudin                  |
| Mrs. Ranju Bhansali       | Spouse of Prashant Bhansali     | Avi Chudin                                       | Father of Ofir Chudin                  |
| Ms. Riddhi Bhansali       | Daughter of Prashant Bhansali   | Tamar Chudin                                     | Mother of Ofir Chudin                  |
| Ms. Preksha Bhansali      | Daughter of Prashant Bhansali   | Oren Chudin                                      | Brother of Ofir Chudin                 |
| Mrs. Maya Bhansali        | Mother of Prashant Bhansali     | Adi Misher Zats                                  | Spouse of Nir Zats                     |
| Mr. Sushant Bhansali      | Brother of Prashant Bhansali    | Haim Zats  | Father of Nir Zats                     |
| Mrs. Shweta Mehta         | Sister of Prashant Bhansali     | Ariela Zats                                      | Mother of Nir Zats                     |
| Prashant Bhansali HUF     | HUF of Prashant Bhansali        | Maor Zats  | Son of Nir Zats                        |
| Laxminarayan Maheshwari   | Father of Manoj Maheshwari      | Ido Zats   | Son of Nir Zats                        |
| Kanta Devi Maheshwari     | Mother of Manoj Maheshwari      | Yuval Zats                                       | Daughter of Nir Zats                   |
| Mayank Maheshwari         | Son of Manoj Maheshwari         | Roni Zats  | Daughter of Nir Zats                   |
| Rajesh Maheshwari         | Brother of Manoj Maheshwari     | Eiran Zats                                       | Brother of Nir Zats                    |
| Manojkumar Maheshwari HUF | HUF of Manoj Maheshwari         | Itay Zats  | Brother of Nir Zats                    |
| Adi Zruia                 | Spouse of David Zruia           | Mehta Financial Services Private Limited         | Director - Rakesh Mehta                |
| Meir Zruia                | Father of David Zruia           | Jai Gurudev Consultancy Services Private Limited | Director - Rakesh Mehta                |
| Rebeca Cecilia Zruia      | Mother of David Zruia           | Abhiyan Capital (India) Private Limited          | Director - Rakesh Mehta                |
| Rom Zruia                 | Son of David Zruia              | Mehta Foundation                                 | Director - Rakesh Mehta                |
| Dean Zruia                | Son of David Zruia              | Mumbai Vaish Seva Sanshtan                       | Director - Rakesh Mehta                |
| Gefen Zruia               | Daughter of David Zruia         | Epilepsy Foundation                              | Director - Rakesh Mehta                |
| Gal Zruya                 | Brother of David Zruia          | Mehta Energy LLP                                 | Designated Partner - Rakesh Mehta      |
| Neta Zruia                | Sister of David Zruia           | Mangaldeep Infratech LLP                         | Mehta                                  |
| Neta Even-Chen            | Spouse of Elad Even-Chen        | Swajan Consultants LLP                           | Designated Partner - Prashant Bhansali |

Details of Transactions are as follows:

| Nature of Transactions   | FY 2024-25       |
|--|------------------|
|  | Rs. In '000'     |
| <b>Remuneration Paid</b>   |                  |
| Rakesh Mehta   | 15,170.00        |
| Prashant Bhansali  | 13,850.00        |
| Ghanshyam Dadhich  | 2,026.37         |
| Manoj Maheshwari   | 2,534.61         |
| Rajat Mehta  | 6,510.00         |
|  | <b>40,090.98</b> |
| <b>Professional Fees / Sitting Fees Paid</b>                             |                  |
| Trisha Mehta   | 600.00           |
| Sharad Shukla  | 125.00           |
|  | <b>725.00</b>    |
| <b>Commission Paid (w.r.t. Bank Guarantee)</b>                           |                  |
| Nidhi Mehta  | 7,300.00         |
|  | <b>7,300.00</b>  |
| <b>Rent given</b>  |                  |
| Rakesh Mehta   | 8,590.00         |
| Nidhi Mehta  | 9,455.00         |
|  | <b>18,045.00</b> |
| <b>Brokerage Earned</b>  |                  |
| Rakesh Mehta   | 8.77             |
| Prashant Bhansali  | 21.09            |
| Prashant Bhansali HUF  | 847.2            |
| Swajan Consultancy LLP   | 23.06            |
| Nidhi Mehta  | 10.81            |
| Ghanshyam Dadhich  | 2.59             |
| Shweta Mehta   | 67.18            |
| Rajat Mehta  | 1.37             |
| Trisha Mehta   | 0.12             |
| Rakesh Mehta Huf   | 85.32            |
| Ranju Bhansali   | 298.01           |
| Maya Bhansali  | 172.31           |
| Mehta Financial Services Pvt. Ltd.                                       | 289.64           |
| Mehta Energy LLP   | 766.35           |
| Mangaldeep Infratech LLP   | 447.93           |
| Manoj Kumar Maheshwari HUF   | 12.48            |
| Total  | <b>3,054.23</b>  |
| <b>Expenditure on Corporate Social Responsibility</b>                    |                  |
| Mehta Foundation   | <b>1,150.00</b>  |
|  | <b>1,150.00</b>  |
| <b>Client Ledger Balances (Including Margins)- Receivable/ (Payable)</b> |                  |
| Shweta Mehta   | 2,042.88         |
| Mehta Energy LLP   | 54,803.73        |
| Mangaldeep Infratech LLP   | -387.99          |
|  | <b>56,458.62</b> |

### 13. Financial Performance

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

#### a). Capital Structure (Amount Rs. in '000)

| Particulars        | As on              | As on              | As on              |
|--------------------|--------------------|--------------------|--------------------|
|                    | 31-Mar-25          | 31-Mar-24          | 31-Mar-23          |
|                    | Audited            | Audited            | Audited            |
| a) Paid-Up Capital | 30,570.00          | 30,570.00          | 30,570.00          |
| b) Free Reserves   | 4,83,389.79        | 4,32,556.57        | 3,36,743.57        |
| <b>Total</b>       | <b>5,13,959.79</b> | <b>4,63,126.57</b> | <b>3,67,313.57</b> |

#### b). Deployment of Resources (Amount Rs. in '000)

| Particulars                         | As on              | As on              | As on              |
|-------------------------------------|--------------------|--------------------|--------------------|
|                                     | 31-Mar-25          | 31-Mar-24          | 31-Mar-23          |
|                                     | Audited            | Audited            | Audited            |
| a) Fixed Assets (Intangible Assets) | 5,278.90           | 2,713.09           | 1,677.46           |
| b) Property, Plant & Equipment      | 38,287.76          | 39,912.82          | 16,991.56          |
| c) Investments                      | 394.51             | 1,492.15           | 7,142.23           |
| d) Others                           | 4,69,998.62        | 4,19,008.51        | 3,41,502.32        |
| <b>Total</b>                        | <b>5,13,959.79</b> | <b>4,63,126.57</b> | <b>3,67,313.57</b> |

#### c). Major Sources of Income: (Amount Rs. in '000)

| Particulars                | As on              | As on              | As on              |
|----------------------------|--------------------|--------------------|--------------------|
|                            | 31-Mar-25          | 31-Mar-24          | 31-Mar-23          |
|                            | Audited            | Audited            | Audited            |
| a) Revenue from Operations | 4,35,896.84        | 4,76,440.37        | 2,58,660.39        |
| b) Other Income            | 74,727.52          | 53,837.66          | 49,560.95          |
| <b>Total</b>               | <b>5,10,624.35</b> | <b>5,30,278.02</b> | <b>3,08,221.34</b> |

#### d). Net Profit (Amount Rs. in '000)

| Particulars          | As on     | As on       | As on     |
|----------------------|-----------|-------------|-----------|
|                      | 31-Mar-25 | 31-Mar-24   | 31-Mar-23 |
|                      | Audited   | Audited     | Audited   |
| a) Profit Before Tax | 79,137.98 | 1,19,015.33 | 63,027.53 |
| b) Profit After Tax  | 50,833.22 | 95,813.01   | 50,397.01 |

#### 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.

| Strategy Wise Report (in %) |                            |            |                       |
|-----------------------------|----------------------------|------------|-----------------------|
| Strategy Name               | Mehta Multi Focus Strategy |            |                       |
| Year wise                   | Benchmark Index            |            | Portfolio Returns (%) |
|                             | Nifty Fifty                | BSE MIDCAP |                       |
| 2022-2023                   | -0.6%                      | -0.2%      | 2.4%                  |
| 2023-2024                   | 30.08%                     | N/A        | 41.43%                |
| 2024-2025                   | 6.64%                      | N/A        | 9.40%                 |

#### 15. Audit Observations

There are no audit observations made by the statutory auditor pertaining to the Portfolio Management services for the preceding three financial years FY 2022-23, FY 2023-24 and FY 2024-25.

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

The Portfolio Manager confirms that it has not made, and does not currently hold, any investments in the securities of its related parties. Further, the Portfolio Manager has adequate internal controls and compliance mechanisms in place to ensure identification, monitoring, and prevention of any such investments, and to avoid conflicts of interest. Accordingly, there are no transactions, exposures, or arrangements involving investments in the securities of related parties as on date of this disclosure document.

For Mehta Equities Private Limited

*R G Mehta*

Rakesh Mehta  
Director

*Prashant*

Prashant Bhansali  
Director



Date: 18/02/2026  
Place: Mumbai