

Date: 07/12/2020

To
Investment Management Department
Division of Funds – 1
Mr. Tarun Sapahia, Manager
Securities and Exchange Board of India
Plot No. C4-A, 'G' Block,
Bandra Kurla Complex,
Mumbai - 400 051

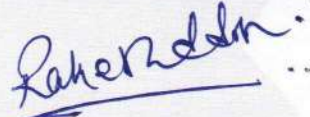
Ref: SEBI Registration No INP000006545

Sir,

In terms of Regulation 22(7) of SEBI (Portfolio Managers) Regulations, 2020, attached herewith, please find Disclosure Document of registered intermediary, Kriis Portfolio Private Limited as a Portfolio Manager.

Kindly take the same on record and acknowledge the receipt.

For and on behalf of
KRIIS – The Portfolio Management Company



CA Rakesh Doshi
Principal Officer and Fund Manager



DISCLOSURE DOCUMENT FOR PORTFOLIO MANAGEMENT
As required under Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020

- (i) The Disclosure Document has been filed with the Securities and Exchange Board of India (SEBI) along with the certificate in the specified format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.
- (ii) The purpose of the Disclosure Document is to provide essential information about the portfolio services in a manner to assist and enable the investors in making an informed decision for engaging a portfolio manager, Kriis Portfolio Private Limited.
- (iii) The necessary information about the portfolio manager required by an investor before investing is given herein and the investor is advised to retain the disclosure document for future reference.
- (iv) Details of the Principal Officer:
Name: CA Rakesh Doshi
Address: 1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080
Contact No: +91 9833218557
Email id: rakesh@kriis.in
- (v) Details of the Portfolio Manager:
Kriis Portfolio Private Limited
SEBI Registration Number: INP000006545
Registered Address: Office no. 606, Runwal R-square, LBS Marg, Mulund West, Mumbai 400080
Tel No: 022-25655808
Email id: info@kriis.in
Website: www.kriis.in



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INDEX

Item No	Contents	Page No
1	Disclaimer clause	3
2	Definitions	3-8
3	Description	
	History, present business and background of the portfolio manager	8-9
	Promoters of the portfolio manager, directors and their background	9-13
	Top 10 group companies/firms of the portfolio manager on turnover basis	13
	Details of the services being offered	13
4	Penalties, pending litigation or proceedings, findings of inspection or investigation for which action may have been taken or initiated by any regulatory authority	14
5	Services offered	14-18
6	Risk factors	18-19
7	Client Representation	19-21
8	Financial performance of the portfolio manager	21
9	Portfolio Management performance of the portfolio manager	21-22
10	Audit observations	22
11	Nature of expenses	22-24
12	Taxation	24-25
13	Accounting policies	25
14	Prevention of money laundering and Know Your Customer (KYC) requirements	25-26
15	Investor services	27-28
16	Form C by Principal officer	29
17	Annexure – Audited Financial statements and Auditors certificate	30-31

1. DISCLAIMER CLAUSE

The particulars of the Disclosure Document have been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and filed with SEBI.

This Disclosure Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of this Disclosure Document.

2. DEFINITIONS

"Act" shall mean the SEBI Act, 1992 as amended from time to time;

"Applicable Law" shall mean any statute, law, regulation, notification, circular, ordinance, rule, judgment, order, decree, bye-law, approval from a government authority, government resolution, directive, guideline, policy, announcement, procedure, requirement or other government restriction or any similar form of decision, or determination by, or any interpretation or adjudication having the force of law or any of the foregoing issued by any concerned authority having jurisdiction over the matter in question;

"Application" means the application made by the Client to the Portfolio Manager to place the monies and/or securities with the Portfolio Manager for Portfolio Management Services. On execution of the Agreement by the Portfolio Manager, the Application shall be deemed to form an integral part of the Agreement. Provided that in case of any conflict between the contents of the Application and the provisions of the Agreement, the provisions of the Agreement shall prevail;

"Assets" means (i) the Portfolio and/or (ii) the Funds and all accruals, benefits, allotments, calls, refunds, returns, privileges, entitlements, substitutions and/or replacements or any other beneficial interest including dividend, interest, rights, bonus as well as residual cash balances, if any (represented both by quantity and in monetary value) in relation to or arising out of the Portfolio and/or the funds;

"Authority" means any entity exercising executive, legislative, judicial, regulatory or administrative functions of or pertaining to government including but not limited to the SEBI and the Reserve Bank of India;



"Bank Account" means one or more bank accounts opened, maintained and operated by the Portfolio Manager with any of the Scheduled Commercial Banks in its name wherein the funds of the client are held by it on behalf of the Client in a pool account;

"Broker" shall mean a SEBI registered stock broker permitted to deal in securities in the Indian capital markets;

"Business Day" means a day other than (i) Saturday and Sunday; (ii) a day on which both the National Stock Exchange of India Limited/the Bombay Stock Exchange Limited and banks in Mumbai are closed; (iii) any other day declared by the Central Government, by notification in the Official Gazette, to be a public holiday;

"Client" shall mean the investors in the Company, duly registered with SEBI as a Portfolio Manager under the provisions of SEBI (Portfolio Managers) Regulations, 1993 as may be amended from time to time;

"Compliance officer" means the person appointed as such by the Portfolio Manager and intimated to SEBI, from time to time;

"Consultancy Services" means the consultancy/advisory services rendered by the Portfolio Manager which shall be in the nature of non-binding investment advice and may include the responsibility of inter-alia advising for renewal and reshuffling the portfolio, buying and selling of securities;

"Custodian" shall mean any SEBI registered custodian acting as Custodian to the Portfolio, with whom the Portfolio Manager, from time to time, enters into an agreement for availing of custodial services and to perform such other functions like of corporate actions associated with the securities in accordance with the regulations issued by SEBI from time to time;

"Depository Account" means one or more account or accounts opened, maintained and operated by the Portfolio Manager in the name of client with any depository or depository participant registered under the SEBI (Depositories and Participants) Regulations, 2018 (as may be amended from time to time), wherein the securities of the client are held by the Portfolio Manager on behalf of the Client in a separate depository account under the respective client's name;



“Disclosure Document” means this document filed by the Portfolio Manager with SEBI, as may be amended from time to time, pursuant to SEBI (Portfolio Managers) Regulations, 2020 and issued to the investors/Client with an objective of providing essential information about the portfolio services provided by the portfolio manager to assist and enable the investors/client in making an informed decision while engaging a portfolio manager, to manage their portfolios;

“Discretionary Portfolio Management Services” means the portfolio management services on discretionary basis rendered to the client, by the Portfolio Manager on the terms and conditions contained in the agreement, where-in-under the Portfolio Manager exercises any degree of discretion whilst making decisions for the investments or management of the portfolio of securities or the funds of the client;

“Family” means an individual, his/her spouse, their children born out of wedlock and their parents only;

Funds” means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and include the monies mentioned in the Application, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of the 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;

“Intermediaries” means custodian, banker to an issue, trustee, registrar to an issue, merchant banker, depositories, depository participants, transfer and pricing agents, accountants, investee companies, investment advisers, consultants, attorneys, printers, underwriters, brokers and dealers, insurers and any other persons in any capacity who may be associated with the securities market;

“Investment Objectives” means the investment objectives as may be agreed by the Client and the Portfolio Manager as detailed in the Application;

“Investments” means any form of investment including, without limitation, shares, debentures and other categories of securities, derivatives and mutual funds;

“Net Asset Value” shall mean the value of the assets of the portfolio of the Clients, including of but not restricted to the securities and cash and bank balances plus accrued income and amounts receivable less accrued expenses and amounts payable; all at market value or otherwise at relevant valuation mutually agreed to by the parties in writing;



"Non-Discretionary Portfolio Management Services" means the portfolio management services on non-discretionary rendered to the client, by the Portfolio Manager on the terms and conditions contained in the agreement, wherein the choice as well as the timing of the investment decisions rest solely with the client and Portfolio Manager shall manage the funds in accordance with the directions of the client;

"Parties" means the Portfolio Manager and the client and the word "Party" shall be construed accordingly;

"Person" means a natural person, company, corporation, association, unincorporated association, society, hindu undivided family, partnership (general or limited), joint venture, estate, trust, limited liability company, limited liability partnership, proprietorship, single business unit, division or undertaking of any of the above or any other legal entity, individual, government or governmental authority;

"Portfolio" means client's securities and funds belonging to the Client and maintained/managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes any securities mentioned in the Application, any further securities placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, securities acquired by the Portfolio Manager through investment of Funds and bonus and rights shares and on account of any corporate actions in respect of securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager pursuant to the agreement;

"Portfolio Investment Management Agreement" means the agreement entered or to be entered into between the client and the Portfolio Manager for availing portfolio management services rendered by it and shall include all annexures attached hereto, all modifications, alterations, amendments, additions and deletions thereto made in writing upon mutual consent of the parties to the agreement;

"Portfolio Management Fees" shall have the meaning attributed thereto in item/point no. 11 below;

"Portfolio Manager" means Kriis Portfolio Private Limited who has obtained certificate from SEBI to act as a Portfolio Manager under the SEBI (Portfolio Managers) Regulations, 1993 vide Registration No. INP000006545 dated 03.04.2019;

"Power of Attorney" means the Power of Attorney executed and granted by the client to the Portfolio Manager, in pursuance of the Agreement;

"Principal officer and Fund Manager" shall mean CA Rakesh Doshi, Managing Director at KRIIS - The Portfolio Management Company, appointed as such by the Company and intimated to SEBI who is responsible for the decisions made by the Portfolio Manager for the management or administration of the portfolio of securities or the funds of the client, as the case may be and all other operations of the Portfolio Manager;

"RBI" means the Reserve Bank of India established under the Reserve Bank of India Act, 1934;

"Rules" and "Regulations" means all rules and regulations prescribed by SEBI and other relevant authorities including without limitation SEBI (Portfolio Managers) Regulations, 2020 as may be amended from time to time;

"Scheduled Commercial Bank" means any bank included in the Second Schedule to the RBI Act, 1934;

"Securities" means either in the paper form or electronic form include:

- (i) shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of alike nature in or of any incorporated company or other body corporate;
 - (ii) derivatives;
 - (iii) units or any other instrument issued by any collective investment scheme to the investors in such schemes;
 - (iv) security receipt as defined in clause (zg) of section 2 of the Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002;
 - (v) units or any other such instrument issued to the investors under any mutual fund scheme;
- Explanation— For the removal of doubts, it is hereby declared that "securities" shall not include any unit linked insurance policy or scrips or any such instrument or unit, by whatever name called, which provides a combined benefit risk on the life of the persons and investment by such persons and issued by an insurer referred to in clause (9) of section 2 of the Insurance Act, 1938 (4 of 1938);
- (vi) any certificate or instrument (by whatever name called), issued to an investor by any issuer being a special purpose distinct entity which possesses any debt or receivable, including mortgage debt, assigned to such entity and acknowledging beneficial interest of such investor in such debtor receivable, including mortgage debt, as the case may be;
 - (vii) Government securities;
 - (viii) such other instruments as may be declared by the Central Government to be securities;
 - (ix) rights or interest in securities and such other securities as may be defined as "securities" under Securities Contracts (Regulation) Act, 1956; any special paper or instrument or security floated by the Central Government, State Government, Public Sector Organisations, Banks or Financial Institutions or Bodies Corporate; a savings certificate to which the Government Savings Certificate Act, 1959 (46 of 1959) applies;

- (x) or such other securities or instruments that foreign portfolio investors or mutual funds of alternative investment funds may be permitted to invest from time to time.

“Stock Exchange” means –

- (i) anybody of individuals, whether incorporated or not, constituted before corporatization and demutualization under section 4A and 4B or
- (ii) A body corporate incorporated under the Companies Act, 1956 (1 of 1956) whether under a scheme of corporatization and demutualization or otherwise;

for the purpose of assisting, regulating or controlling the business of buying, selling or dealing in securities.

Any references to laws and regulations in this disclosure document shall be deemed to include such laws and regulations as may be amended, revised, updated and/or supplemented from time to time.

Interpretation of certain terms or expressions

Any term or expression used but not defined herein shall have the same meaning attributable to it under applicable law.

3. DESCRIPTION

(i) History, present business and background of the portfolio manager

Kriis Portfolio Private Limited (Formerly known as Kriis Portfolio Management Services Private Limited) is a private limited company incorporated under the Companies Act, 2013 on 06.12.2016 and having its registered office at office no 606, Runwal R-square, LBS Marg, Mulund West, Mumbai - 400080.

We are registered with SEBI as a portfolio manager under the SEBI (Portfolio Managers) Regulations, 1993 vide Registration No. INP000006545 dated 03.04.2019.

We are engaged in investing the funds of our Clients in securities on their behalf and providing them portfolio management services on discretionary/non-discretionary/advisory basis after ascertaining their investment needs and objectives.

We also provide an option to clients to be on boarded directly, without intermediation of persons engaged in distribution services and at the time of on-boarding of clients directly, no charges except statutory charges shall be levied.

We house a strong and dedicated research team and financial experts with a diversified rich experience with sustainable long-term growth potential; each contributing their strengths, knowledge, and expertise towards a clear goal and vision, with a shared philosophy.

We blend disciplined approach with a set of strong values to identify quality companies based on our detailed preliminary research. Identifying investor's needs and personalizing our services is our forte. We aim to create & preserve client's wealth with integrity and transparency while building client's an everlasting legacy.

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

Particulars of Promoters:

a)

Name of the Promoter	CA Rakesh Doshi
Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080
% of Equity Shares held	5.56%

Note: - CA Rakesh Doshi, Promoter of the Company, is also a Managing Director (Executive Director) on Board of the Company and his background is given below.

b)

Name of the Promoter	CA Funali Doshi
Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080
% of Equity Shares held	5.56%

Note: - CA Funali Doshi, Promoter of the Company, is also a Non-Executive Director on Board of the Company and her background is given below.

c)

Name of the Promoter	Bhavya Doshi
Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080
% of Equity Shares held	5.11%

Note: - Bhavya Doshi, Promoter of the Company, is also an Executive Director on Board of the Company and his background is given below.



Particulars of Directors and their background

a)

Name	CA Rakesh Doshi
Qualification	Bachelor of Commerce, Mulund College Of Commerce Chartered Accountant, ICAI Wealth Manager, ICAI NISM-Series V-A: Mutual Fund Distributors Pursuing CFA Certification
Date of Appointment	06/12/2016 (Appointed as Managing Director since 11/04/2018)
DIN	02918999
Correspondence Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080 Mobile: 91-9833218557 Email: rakesh@kriis.in

Brief Profile

CA Rakesh Doshi – Founder, Managing Director (Executive), Principal Officer & Fund Manager at KRIIS

Specialization: Wealth Management, Portfolio Management, Family Legacy Planning, Philanthropic Planning.

CA Rakesh Doshi is one of the highly revered investment minds, who has mastered the art of compounding wealth from stock through value investing. Starting as a Practicing Chartered Accountant, en route in his professional journey, he became a qualified Wealth Manager and a prudent investor who fast-tracked his financial growth.

His passion to compound wealth through value investing has been the key motive behind the inception of KRIIS. Besides investment advice, he spearheads the firm's overall Management philosophy & process. With over 20 years of expertise in Indian equities, he brings to the profession; discipline, vigour, passion and an ability to identify winners. He has also established his reputation as a devoted philanthropist & proponent of higher education.

Responsibilities at KRIIS:

- Modelling Portfolios
- Monitoring Performance
- Personalized Wealth Management
- Planning Legacies & Estate Planning
- Retirement & Philanthropic Planning



Additional Courses

- Behavioral Finance & Value Investing with Sanjay Bakshi (2017)
- Value Investing Blueprint with Vishal Khandelwal (2017)
- The Art of Investing with Neeraj Marathe, Flame University (2018)

Other Directorship Details

Name of the LLP/Company	Appointment Date	No. of Shares/ Capital Contribution	(%)
Rise and Shine Trading LLP (Designated Partner)	22/11/2017	60000	60.00
Venus Legal Services Private Limited (Managing Director)	03/06/2019	70000	70.00
Venus Nirvana LLP (Designated Partner)	07/08/2020	250000	38.46

b)

Name	CA Funali Doshi
Qualification	Bachelor of Commerce, R.A. Podar College of Commerce & Economics Chartered Accountant, ICAI Anti-Money Laundering Specialists, ICAI
Date of Appointment	06/12/2016
DIN	01873601
Correspondence Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080 Mobile.: 91-8080905822 Email: funali@kriis.in

Brief Profile

CA Funali Doshi – Non-Executive Director and Finance head at KRIIS

Specialization: Finance, Taxation, Corporate Advisory Services

A Visionary Leader, CA Funali Doshi has always designed pathways that transform vision into reality. Guided by values of competency, professionalism, responsibility, accountability and honesty, she believes in providing value-added services to her clients in making the best financial decisions possible.

Since the last 20 years, as a Practicing Chartered Accountant at Rakesh Doshi & Associates, she has been dedicatedly providing services in the areas of audit, tax, accounting & consultancy, litigation support, start-up and corporate advisory services. Her vision is to transform the entire practice into a

platform of quality-driven Industry. Her opinions are always sought on issues such as corporate governance, transparency, disclosure standard, and shareholders value creation.

With her finely honed leadership skills at KRIIS, she is instrumental to inspire people to do things they never thought they could by boosting employee morale. She has created a squad of value-driven enthusiastic team players. What excites her to contribute at KRIIS is the opportunity to empower others with financial literacy & growth.

Responsibilities at KRIIS:

- Organizational Goal Setting
- Development of Governance Framework

Personal Attributes:

- Dynamic & Dependable
- Empathetic & Empowering
- Resourceful & Result-Oriented

Other Directorship Details

Names of the LLP/Company	Appointment Date	No. of Shares/ Capital Contribution	(%)
BNC and Associates LLP (Designated Partner)	01/04/2019	5000	1.00
Venus Portfolio & Finance Private Limited (Director)	21/01/2014	150000	8.58
Alag Nirman Private Limited (Director)	01/07/2010	20000	2.44
Venus Nirvana LLP (Partner)	07/08/2020	10000	1.54

c)

Name	Bhavya Doshi
Qualification	Currently pursuing Bachelor of Science - Economics & Finance from Bentley University, Massachusetts, United States of America
Date of Appointment	21/08/2019
DIN	08538499
Correspondence Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080 Mobile.: +91 9082650622 Email: bhavyadoshi931@gmail.com

Brief Profile

Bhavya Doshi – Executive Director at KRIIS

- Bhavya is a finance enthusiast with diverse experience.
- At Bentley, he acts in the role of Senior Analyst at the Bentley Investment Group where he has developed various models that provide competitive analysis of Consumer Sector Companies.
- He completed his internship
 - a) as a Junior Analyst at Banyan Tree Advisors Private Limited, a Portfolio Management Company registered with Securities and Exchanges Board of India (SEBI) bearing no INP000001173.
 - b) as a Sales associate at Manba Finance Limited which is registered as a non-deposit taking NBFC with Reserve Bank of India. It is one of Mumbai's leading non-banking Finance companies spread across Mumbai.
- He specialises in business models, developed spreadsheets and assisted in the valuation of multiple companies along with analysing market trend in several industries.
- He is well equipped with database software like Bloomberg, Ace-Equity and Factset.
- Bhavya is always keen to upgrade his skills and has a brilliant mix of technology clubbed with finance, which is the need of the hour, in his portfolio of qualifications.
- He has completed several certificate courses in Data Analytics, Linear Algebra, Python and a financial modelling course.
- Recently, he also completed a course in Behavioural Finance with Sanjay Baskhi from Flame University, Pune.

Other Directorship Details

Names of the Company	Appointment Date	No. of Shares/ Capital Contribution	(%)
Venus Legal Services Private Limited (Director)	23/08/2019	30000	30.00
Venus Nirvana LLP (Designated Partner)	07/08/2020	240000	36.92

(iii) Top 10 group companies/firms of the portfolio manager on turnover basis

There are no group companies/firms on turnover basis considering the latest audited financial statements.

(iv) Details of the services being offered

We provide portfolio management services to our clients on discretionary/non-discretionary/advisory basis after ascertaining their investment needs and objectives.

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

All cases of penalties imposed by SEBI or the directions issued by SEBI under the Act or Rules or Regulations made thereunder	None
The nature of the penalty/direction	Not Applicable
Penalties/fines imposed for any economic offence and/or for violation of any securities laws	None
Any pending material litigation/legal proceedings against the portfolio manager/key personnel with separate disclosures regarding pending criminal cases, if any	None
Any deficiency in the systems and operations of the portfolio manager observed by SEBI or any regulatory agency	None
Any enquiry/adjudication proceedings initiated by SEBI against the portfolio manager or its directors, principal officer or employee or any person directly or indirectly connected with the portfolio manager or its directors, principal officer or employee, under the Act or Rules or Regulations made thereunder	None

5. Services offered

(i) Investment Philosophy and strategy

The four investment principles have been intrinsic to us since our inception and are embedded in the KRIIS culture. They represent both our past and future – an enduring philosophy that guides us to make the right investment decisions for our clients.

a) Simplicity

Simple businesses with sustainable long-term growth potential are the ones that create wealth. Our role at KRIIS is to look out for and identify businesses that generate positive free cash flows and provide ample growth opportunities in the future.

b) Competitive moat

We constantly look out for companies that are gradually widening their midst and the foundation of the business has the ability to sustain technological disruptions. These moats can be in the form of strong brands, distribution networks, economies of scale, inherent cost advantages, or intellectual property rights.

c) Margin of safety

We follow a principle of margin safety, factoring in growth and quality. In periods of extreme euphoria, we may stay in cash and invest in periods of extreme distress. We steadfastly follow the principle of "Be fearful when others are greedy and greedy when others are fearful".

d) Corporate Governance

We invest in businesses with strong ethics and values. Moreover, we identify managements that are technologically competent and in their approach. In the long term, we believe stable returns are generated by managements that demonstrate high integrity and passion.

We put our philosophies to practical use so that client's investments multiply.

Our investment philosophy and strategy involves the use of intensive fundamental analysis, both quantitative and qualitative, to build and monitor our clients' portfolios actively, while at the same time avoiding excessive trading and to control risk by keeping our clients portfolio adequately diversified, both in terms of the sectors included in those portfolios, as well as with respect to the level of concentration in any specific security.

(ii) **Investment objective**

The investment objective shall be to manage and administer the Assets of the Client aiming to generate returns on the Client's investment in line with the provisions of the Agreement and Investment Objectives, while at the same time endeavoring to reduce the risk of capital loss.

a) Minimum Investment Amount:

We shall not accept from the Client, funds or securities worth less than Rs.50,00,000/-. However, we can fix a higher limit as mutually agreed. The Client may place further funds or securities with our prior consent.

b) Manner of payment:

The Clients can either give a cheque or make payment by any other mode as permitted of a requisite amount or the securities having a minimum market value of a requisite amount. Alternatively, the assigned portfolio can be a mix of cash and securities having a minimum total value of a requisite amount.

c) Type of securities in which investment shall be made:

Asset Class

Equity Shares

Derivatives

Mutual Funds: Equity

Mutual Funds: Debt

Debentures

Government Securities

Any other Money Market Instruments

In periods of extreme euphoria, we may stay in cash and invest in periods of extreme distress.

d) Restrictions on investment:

The funds of the Clients shall not be invested in instruments that are expressly prohibited by SEBI or any other legal authority from time to time.

e) Basis of selection of such types of securities as part of the investment approach:

Many of the best compounders in India are listed companies that have been compounding their earnings and cash flows with high returns on capital for long period of time. The analysis will be done based on available facts and figures, decision making parameters and by putting rich experience and understanding of the fund manager. The rationale will also be prepared for each such investment decision.

f) Allocation of portfolio across types of securities:

We expect to create a diversified Portfolio both in terms of the sectors included in those portfolios, as well as with respect to the level of concentration in any specific security.

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

The appropriate benchmark chosen to compare the performance of the assets/portfolio managed by us is S&P BSE 500.

h) Indicative tenure or investment horizon

We will invest funds of the clients in securities for a long term. Investment horizon can be reviewed/amended based on economic/market scenarios. However, we may decide to buy/sell/rebalance the securities for a short term if required for reasons including but not limited to the latest views on the attractiveness of the investments made and best opportunities available in the market in client's best interest.

i) Risks associated with the investment approach

- Investment in equities, derivatives and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the investments will be achieved. The past performance of the Portfolio Manager does not indicate its future performance.
- As with any investment in securities, the NAV of the portfolio can go up or down depending upon the factors and forces affecting the capital markets.
- The performance of the investments may be affected by changes in Government policies, general levels of interest rate and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- Investment in debt instruments are subject to default risk and interest rate risk, interest rate risk results from changes in demand and supply for money and other macro-economic factors and creates price changes in the value of the debt instruments. Consequently, the NAV of the portfolio may be subject to fluctuation.
- Investments in debt instruments are subject to reinvestment risks as interest rates prevailing on interest or maturity due dates may differ from the original coupon of the bond, which might result in the proceeds being invested at a lower rate.
- The investments made by the portfolio manager are subject to risks arising from the investment approach, investment objective, investment strategy and asset allocation.
- Risks arising out of non-diversification: Portfolio Manager manage fully diversified equity portfolios and the risk of such investments is restricted to market risks.
- Investment in schemes of Mutual Funds is subject to risk factors defined in the offering document of the respective schemes.

j) Other salient features, if any

Client's portfolio will be constructed using a bottom up fundamental research approach and margin of safety analysis with the portfolio investments typically concentrated in 20-25 stocks. However, this would not limit the Portfolio Manager from increasing the number of securities in the clients' portfolios, from time to time.

We shall not while dealing with Client's funds indulge in speculative transactions i.e. we shall not enter into any transaction for purchase or sale of any security which is periodically or ultimately settled otherwise than by actual delivery or transfer of security except the transactions in derivatives.



(iii) Policies for investments in Associates/Group Companies of the portfolio manager and the maximum percentage of such investments therein subject to the applicable laws/regulations/guidelines

As of now, no policy has been formulated and we do not expect to invest being there are no Associates/Group Companies of us. However, we will form and implement the policy and shall prescribe maximum percentage of investments in Associates/Group Companies of us whenever it is applicable to us.

6. Risk Factors

The client must read and fully understand this disclosure document including the risks and should be aware of the risks associated with the investment of funds in instruments/securities and shall be solely responsible for the obligations thereunder.

Details of risk foreseen by us and the risk relating to the securities recommended by us for investment/disinvestments includes but are not restricted to the following:

- (i) Investment in equities, derivatives and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the investments will be achieved. The past performance of the Portfolio Manager does not indicate its future performance.
- (ii) As with any investment in securities, the NAV of the portfolio can go up or down depending upon the factors and forces affecting the capital markets.
- (iii) The performance of the investments may be affected by changes in Government policies, general levels of interest rate and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- (iv) Investment in debt instruments are subject to default risk and interest rate risk, interest rate risk results from changes in demand and supply for money and other macro-economic factors and creates price changes in the value of the debt instruments. Consequently, the NAV of the portfolio may be subject to fluctuation.
- (v) Investments in debt instruments are subject to reinvestment risks as interest rates prevailing on interest or maturity due dates may differ from the original coupon of the bond, which might result in the proceeds being invested at a lower rate.
- (vi) The investments made by the portfolio manager are subject to risks arising from the investment approach, investment objective, investment strategy and asset allocation.
- (vii) Risks arising out of non-diversification: Portfolio Manager manage fully diversified equity portfolios and the risk of such investments is restricted to market risks.
- (viii) Investment in schemes of Mutual Funds is subject to risk factors defined in the offering document of the respective schemes.



Transactions of purchase and/or sale of securities taken by the Portfolio Manager and its employees who are directly involved in investment operations are not mentioned in this disclosure document being there was no conflict of interest with the transactions taken in any of the client's portfolio. However, we shall disclose the transactions whenever it is applicable to us.

We do not have any group companies. Hence, a disclosure of conflict of interest related to services offered by group companies is not disclosed in this disclosure document. However, we shall comply with the same whenever it is applicable to us.

7. Client Representation

(i) As of 30th November, 2020

Category of clients (since inception date 09.05.2019)*	No of clients	Funds Managed (Rs. Cr.)					Discretionary/ Non- Discretionary
		Equity	Plain Debt	Mutual Funds	Others	Total	
Associates/group companies	-	-	-		-	-	-
Others - (Resident Individuals)	26	14.99	-	0.65	1.39	17.02	Discretionary
Total	26	14.99	-	0.65	1.39	17.02	

* We received a certificate from SEBI to provide portfolio management services vide Registration No. INP000006545 dated 03.04.2019 and the inception date is 09.05.2019. Hence, the above mentioned data is being reflected since inception date 09.05.2019.

We invest for our clients as we would do for our family and make best efforts to manage client accounts in their best interest.



- (ii) Disclosure in respect of transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India: (Source: As per audited books of accounts for the year ended March 31, 2018, March 31, 2019 and March 31, 2020.

Details of related parties:

Sr. No	Names of related parties	Description of relationship
1	CA Rakesh Doshi	Managing Director & Fund Manager
2	CA Funali Doshi	Director
3	Bhavya Rakesh Doshi	Director
4	Alag Nirman Private Limited	Common Director (CA Funali Doshi)

(Amount in Rs)

Names of the Related Party	Nature of Transactions	31 st March, 2018			
		Opening balance	Addition during the year	Repayment during the year	Closing Balance
CA Rakesh Doshi	Loan taken	17,53,242	20,40,803	37,94,045	-
CA Funali Doshi	Loan taken	5,05,000	-	5,05,000	-
Alag Nirman Private Limited	Investment	1,00,00,000	-	5,00,000	95,00,000

(Amount in Rs)

Names of related parties	Nature of transactions	31 st March, 2019			
		Opening balance	Addition during the year	Repayment during the year	Closing Balance
CA Rakesh Doshi	Loan Taken	-	25,17,381	13,45,101	11,72,280
CA Funali Doshi	Loan Taken	-	21,16,298	10,95,000	10,21,298
Alag Nirman Private Limited	Investment	95,00,000	-	37,50,000	57,50,000





KRIIS
PORTFOLIO PRIVATE LIMITED

(Amount in Rs)

Names of related parties	Nature of transactions	31 st March, 2020			
		Opening balance	Addition during the year	Repayment during the year	Closing Balance
CA Rakesh Doshi	Loan Taken	11,72,280	1,10,36,756	46,60,040	75,48,996
CA Funali Doshi	Loan Taken	10,21,298	21,88,000	28,09,298	4,00,000
Bhavya Rakesh Doshi	Loan Taken	-	2,00,000	-	2,00,000
Alag Nirman Private Limited	Investment	57,50,000	35,00,000	32,50,000	60,00,000

8. Financial performance of the portfolio manager for the last 3 financial years (based on the audited financial statements)

Financial Year	Income	Expenditure	Profit/(loss) before tax	Profit/(loss) after tax
March 31, 2020	2,21,057,148	2,21,266,918	(2,09,770)	99,765
March 31, 2019	2,78,926	14,56,430	(11,77,504)	(9,88,302)
March 31, 2018	15,37,265	13,96,799	1,40,466	2,64,199

9. 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 weighted average method in terms of Regulation 22 of the SEBI (Portfolio Managers) Rules and Regulations, 2020

Below is our portfolio performance in comparison to relevant benchmark indices as of 30th November, 2020

Account	Inception Date	Assets	% Assets	1 Month	3 Months	6 Months	1 Year	Since inception date
Kriis Portfolio Private Limited	09.05.2019	17,02,48,209.83	100	7.01	9.47	36.69	17.22	17.07
S&P BSE 500				11.7	14.14	36.89	9.17	9.32



Method:

Since inception, performance (absolute in case of investments <1 year & annualised in case of investments >1 year) is calculated after accounting for cash flows using Time Weighted Rate of Return method (TWRR). Since Inception, performance of the benchmark is calculated on absolute basis in case of investments <1 year & annualised in case of investments >1 year.

Taxes:

Calculations are on pre-tax basis.

Fees:

Calculations are after deduction of fees.

10. Audit Observations

There are no audit observations made by the statutory auditor for the preceding three financial years i.e. 2017-18, 2018-19 and 2019-20.

Further, even by an internal auditor there were no observations made for the half yearly internal audit report as on 30.09.2019, 31.03.2020 and 30.09.2020.

11. Nature of expenses

The client shall pay the portfolio management fees to us at the rates and in the manner provided hereunder:

- (i) **Annual Fixed Investment Management Fees:** Zero annual fixed investment management fees.
- (ii) **Performance Fees for discretionary services and non-discretionary services:**
 - a) Performance based management fees would be charged based on performance over and above a hurdle rate of 5%. In case the portfolio return achieved is above the hurdle rate, a Performance Fee would be charged on the incremental return at 20% per annum.
 - b) We shall charge performance based fee only on increase in portfolio value in excess of the previously achieved high water mark.
 - c) All the above fees would be charged pro-rata basis for accounts opened during the quarter.
 - d) All fees will incur GST @ 18% as applicable.
 - e) In case the performance of the portfolio is below the hurdle rate of 5% in any year, we would have to make up for this hurdle rate and the subsequent year's hurdle rate before the performance fee would be applicable.

- f) The client will be billed on an annual basis at the end of the month in which his/her/its account is activated. (e.g if the account is opened on January 12, 20XX, the first bill will be raised on January 31, 20XX and every subsequent bill will be raised on January 31 of subsequent years).

(iii) Demat and bank charges

- a) No demat charges and bank charges will be charged.

(iv) Other charges:

The following are the fees charged by the other intermediaries in the portfolio management process and paid directly to the respective intermediary.

- a) Custodian (Edelweiss Custodian Services Limited)

Fixed Custodian Fees is 0.03% plus GST @ 18% of Average Assets under Custody per annum.
No transaction fees will be levied.

- b) Brokerage and Transaction cost (Edelweiss Broking Ltd)

Brokerage fees is 0.10% of the transaction value plus other statutory levies included in the contract note.

All the regulatory charges are subject to changes as per the notification issued by the government from time to time and we may revise and amend the Portfolio Management Fees from time to time with the prior consent of the Client.

The fee/charges/expenses shall be collected by debiting the Client's portfolio account as and when it becomes due.

All functions in relation to the Portfolio Management Services or otherwise performed by the Portfolio Manager for and on behalf of, and the risk and cost of the Client and all liabilities concerning the Assets or the Portfolio Management services shall be borne by the Client.



In addition to the Portfolio Management Fees, all costs, fees, charges and expenses whatsoever nature incurred by the Portfolio Manager or any other person appointed by the Portfolio Manager arising out of or in connection with or in relation to management, acquisition, holding, custody, sale and/or transfer, of the Assets or the rendering of Portfolio Management Services or the performance of any act pursuant to or in connection with an agreement including without limitation to the generality of the aforesaid, the expenses and cost of safe keeping of Assets, custodian fees, registration and transfer charges for effecting transfer of Securities and includes stamp charges, notary charges, cost of affidavit, courier, post, audit and attestation fees including legal fees of the Portfolio Manager incurred on behalf of the Client, brokerage and stamp duty cost to be paid for the execution of an agreement, all other incidental and ancillary documentation pursuant to an agreement, shall be paid or reimbursed by the Client.

12. Taxation

The provisions of the Income Tax Act, 1961 shall inter-alia apply to the funds invested by the Clients under the Portfolio Management Services.

We shall be entitled to rely upon and deduct tax at source on the basis of certificates and/or statements of calculation of income and capital gains given to us by the Client or the Client's Chartered Accountant. The tax deducted at source shall also be recorded in the books of accounts. We shall not be liable for any inaccuracy or error in the computation thereby and shall be entitled to rely upon the same as being true, fair and complete in all respects. The Client shall indemnify to us for all causes as a consequence of any misrepresentation, incompleteness, inaccuracy or error in such computations/statements/certificates, as the case may be.

We shall provide adequate statements on a periodical basis, prior to the due dates of income tax payments, to enable the client to meet their tax obligations under the Income Tax Act, 1961.

The client will be solely responsible and liable for

- (i) complying with any applicable laws and regulations and the management of the Client's tax affairs.
- (ii) making payment of Income Tax/GST and any other taxes, if any payable, on the income, arising whether by way of interest, dividend, short term and long term capital gain or otherwise howsoever and on the value of the Assets and irrespective as to whether such Assets are held and/or registered in the name of the Client or the Portfolio Manager or any other person nominated by the Portfolio Manager;
- (iii) making payment of all the aforesaid taxes, levies, duties, payments to be paid on the Assets including payment for unpaid calls on shares, as and when the same are to be paid under law; and
- (iv) filing all tax returns, statements, applications under the provisions of law.

Tax with respect to dividend, if any, shall be charged to the Clients' account and shall be borne by the Client in full.

13. Accounting Policies

The following accounting policies will be applied for the portfolio management of Client(s):

- (i) Investments in equities will be valued at the closing market prices;
- (ii) Realized gains/losses will be calculated by applying the First In First Out (FIFO) method;
- (iii) Transactions for purchase or sale of securities will be recognized as of the trade date and not as of the settlement date so that the effect of all investments during a Financial Year are recorded and reflected in the financial statements for that year;
- (iv) For derivative transactions (if any), unrealized gains and losses on open positions will be calculated by mark to market method;
- (v) Unrealized gains/losses are the differences between the current market values or net asset value and the historical cost of the Securities;
- (vi) Stocks, for NAV purposes, would be valued based on the closing stock prices on National Stock Exchange. If the stock is not listed on NSE, closing prices on Bombay Stock Exchange would be used. Revenue arising from interest and dividends is accounted on accrual basis;
- (vii) Stamp duty, brokerage, GST on brokerage and other fees will be capitalized. Securities Transaction Tax will however not be capitalized and will be treated as an expense;
- (viii) On bonds and other debt instruments, the coupon terms will be recorded and interest will be accrued on daily basis. Accrued interest payable or receivable on trade will not be included in the cost.
- (ix) All settlements and custody of assets are handled by a recognized Custodian.

The accounting policies and standards as stated above may be modified from time to time by us, subject to such modifications being in conformity with the applicable regulations.

14. Prevention of money laundering and Know Your Customer (KYC) requirements

The Prevention of Money Laundering Act, 2002 came into force with effect from July 1, 2005, forming the core of the legal framework to combat money laundering. As per the provisions of the Act, Intermediaries, including portfolio managers, have certain obligations regarding verification of the identity of their clients, maintaining records and furnishing information to the Financial Intelligence Unit – India (FIU - IND). SEBI has vide various circulars directed all Intermediaries, including portfolio managers to formulate and implement policies and procedures for dealing with money laundering and adoption of 'Know Your Customer' (KYC) Policy.

The Client, including all his/her/its representatives, power of attorney holder or any other person in any representative capacity of the client who has either made any payment on behalf of the client, or has the power to effect any transactions or receive any payment on behalf of the Client, should ensure that the Assets of the Account are derived through legitimate sources only and does not involve and are not designed for the purpose of any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of The Prevention of Money Laundering Act, 2002, The Prevention of Money Laundering Rules, 2005, Income Tax Act, Anti Money Laundering Guidelines, Anti Corruption Act, SEBI Act and or any other applicable laws enacted by the Government of India from time to time.

The client shall be responsible for complying with all applicable laws, regulations, protocols and other requirements relating to the prevention of money laundering and any requirements and/or requests made by the Portfolio Manager, either generally or in respect of a specific transaction, in order to comply with all applicable laws, regulations, protocols and other applicable requirements relating to the avoidance of money laundering including without limitation to Prevention of Money Laundering Act, 2002, the Rules issued thereunder and the guidelines/circulars issued by SEBI thereto (herein referred to as the "Money Laundering Requirements").

The Client should agree as a condition precedent to any transaction taking effect to comply with all and any Money Laundering Requirements. The Client should further agree, if he/she/it is becoming holder of the Assets of the Account in his/her/its own name, to provide the Portfolio Manager with adequate information on his/her/its identity if at any time requested so by the Portfolio Manager.

We reserve all the rights to take all steps and actions including recording clients' telephonic calls and/or obtain and retain documentation for establishing the identity of the client, proof of residence, sources of funds, etc. in accordance with the applicable laws from the client/custodian, as may be required to ensure appropriate identification/verification/re-verification of the client, the sources of funds etc. under the KYC policy. If at any time, we believe that the transaction is suspicious in nature within applicable laws, we shall have the absolute discretion to report the suspicious transaction to FIU – IND and/or any other statutory body. We can also reject any application, freeze the account, compulsorily close the account of the client and the termination proceeds shall be paid to the client at NAV subject to payment of fees and expenses, if any.

We and our directors, employees, agents and persons acting on our behalf shall not be responsible/liable for any loss incurred to the client in any manner whatsoever due to reporting to the FIU-IND, the rejection of any application or freezing of the accounts or compulsory closure of an account or termination of the agreement entered into between the client and the Company, due to non-compliance by the client with the provisions of the laws, rules, regulations, KYC policy etc. and/or where we make reporting to FIU – IND of suspicious transaction.

15. Investor Services

(i) Details of the Investor Relation Officer:

All investor queries and complaints should be addressed to Compliance Officer, whose contact co-ordinates are provided below:

CS Mansi Nagda

KRIIS – The Portfolio Management Company

Registered Address: Office no. 606, Runwal R-square, LBS Marg, Mulund West, Mumbai 400080

Contact No: 022-25655808

Email id: info@kriis.in

(ii) Grievance redressal and dispute settlement mechanism

The Company have in place a dedicated system for addressing complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time.

In the event, the investor have any grievance on the services that we have agreed to provide, then the investor shall write to CS Mansi Nagda, Compliance Officer at the address specified above or write by email to info@kriis.in. The Compliance Officer shall acknowledge the receipt of email within 2 working days. Further, the Compliance Officer shall, within a period of 7 working days, address the grievance of the client and write to the client in the form of an Action Taken Report (ATR) stating the action taken and where the grievance is of the nature that can be repetitive, the steps taken so that the grievance does not arise again.

In the event of any dispute arising out of or related to the Agreement, which cannot be resolved through negotiations between the parties, the same shall be settled exclusively by arbitration in accordance with the Arbitration and Conciliation Act, 1996 and shall be referred to the sole arbitration of a person to be nominated/appointed by the Portfolio Manager. The venue of arbitration shall be Mumbai (India) and be conducted in English Language. The award of the arbitrator shall be final and conclusive and binding upon the parties and the parties shall be entitled (but not obliged) to enter judgment thereon in any one or more of the highest courts having jurisdiction.



(iii) SEBI Complaints Redress system (SCORES)

SEBI have set up a centralized web-based complaints redress system called "SCORES for easy retrieval and tracking of complaints of the investors.

The investor can approach SEBI, lodge their complaints and track the status of such complaint from anywhere through SCORES at <https://scores.gov.in> if an investor do not get a response or are not satisfied with the response provided by Compliance Officer.

On receipt of complaints through SCORES, SEBI takes up the matter with the concerned market intermediary and follows up with them.

Any action taken by the Company is not taken as complete if the relevant details/supporting documents are not uploaded on SCORES and consequently, the complaint will continue to be treated as pending.

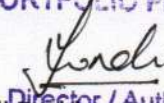
A complaint shall be treated as resolved/disposed/closed only when SEBI disposes/closes the complaint in SCORES. Hence mere filing of ATR with respect to the complaint will not mean that the complaint is not pending against them.

For and on behalf of
KRIIS – The Portfolio Management Company


CA Rakesh Doshi
Managing Director & Fund Manager
DIN: 02918999



For KRIIS PORTFOLIO PRIVATE LIMITED


CA Funali Doshi
Director / Authorised Signatory
Director
DIN: 01873601



Place: Mumbai
Date: 07/12/2020





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

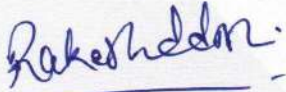
Dear Investors,

We confirm that:

- i) the Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
- ii) the disclosures made in the document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of the portfolio to us / investment through the Portfolio Manager;
- iii) the Disclosure Document has been duly certified on 07th December, 2020 by an independent chartered accountant, Mr. Jainam Vijay Doshi, Proprietor of Jainam Doshi & Associates (FRN: 153262W) having its office at Flat No 103, Siddha Shila, B P Cross No 3, Nilkanth Nagar, Mulund West, Mumbai 400080 (Contact No:+91 9769910544).

Enclosed herewith, please find independent chartered accountant certificate to the effect that the disclosures made in the document are true, fair and adequate to enable the investors to make a well informed decision.

For and on behalf of
KRIIS – The Portfolio Management Company



CA Rakesh Doshi
Principal Officer



Date: 07/12/2020

Place: Mumbai



KRIIS
PORTFOLIO PRIVATE LIMITED

Summary of Audited Standalone Financial Statements

Audited Standalone Financial Statements	Amt in Rs.		
	As on 31.03.2020	As on 31.03.2019	As on 31.03.2018
Profit & loss Statement			
Revenue:			
Revenue from operations	90,58,000	-	8,50,000
Other Income	2,11,999,148	2,78,926	6,87,265
Total Revenue	2,21,057,148	2,78,926	15,37,265
Expenses:			
Employee benefit expenses	28,00,887	-	1,77,096
Depreciation and amortization expenses	24,52,369	12,74,478	10,33,557
Other expenses	2,16,013,662	1,81,952	1,86,146
Total Expenses	2,21,266,918	14,56,430	13,96,799
Profit/(loss) before tax	(2,09,770)	(11,77,504)	1,40,466
Profit/(loss) after tax	99,765	(9,88,302)	2,64,199
Balance sheet			
SOURCES OF FUNDS			
Shareholder's funds			
Share capital	2,25,00,000	2,25,00,000	2,25,00,000
Reserves and surplus	(3,86,486)	(4,86,251)	5,02,051
Current Liabilities			
Short term borrowings	81,48,996	21,93,578	-
Trade payables	1,41,399	1,18,000	2,01,916
Other current liabilities	22,051	2,22,700	2,62,354
Short term provisions	-	-	43,000
Total Liabilities	3,04,25,960	2,45,48,027	2,35,09,321
APPLICATION OF FUNDS			
Non-current assets			
Property, Plant and Equipment			
Tangible Assets	1,50,22,885	29,45,160	42,19,637
Capital Work in progress	-	61,34,877	-
Non-current investments	97,99,348	1,09,17,176	1,42,14,086
Deferred Tax assets (Net)	6,65,922	3,56,387	1,67,185
Long Term loans and advances	-	-	27,34,493
Other non-current assets	21,25,000	26,29,300	1,38,980
Current Assets			
Trade Receivables	12,42,040	-	7,65,000
Cash and cash equivalents	1,07,869	3,26,094	4,98,704
Other current Assets	14,62,896	12,39,033	7,71,236
Total Assets	3,04,25,960	2,45,48,027	2,35,09,321

Auditor:

Jainam Doshi & Associates
Chartered Accountants
Flat No 103, Siddha Shila,
B P Cross No 3, Nilkanth Nagar,
Mulund West, Mumbai 400080



Jainam



JAINAM DOSHI & ASSOCIATES

Chartered Accountants

TO WHOMSOEVER IT MAY CONCERN

I, Jainam Vijay Doshi, Chartered Accountants, Mumbai duly appointed by Kriis Portfolio Private Limited, a registered intermediary as a Portfolio Manager ('the Company') bearing SEBI registration no INP000006545 to examine and certify the information provided and disclosures made in the Disclosure Document dated 07th December, 2020 in accordance with Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020.

On the basis of my verification of the attached Disclosure Document dated 07th December, 2020 and taking into consideration the audited financial statements, other relevant records and information provided to me by the management and to the best of my knowledge, I confirm and certify that the information provided and disclosures made in the attached disclosure document of even date for Portfolio Management Services of the Company as required by Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020 are true, fair and adequate to enable the investors to make a well informed decision.

This certificate is been issued pursuant to Regulation 22(5) of SEBI (Portfolio Managers) Regulations, 2020 and at the request of the Company for submission to SEBI and sharing with its clients for the sole purpose of certifying the contents of the Disclosure Document for Portfolio Management Services of the Company and should not be used or referred to for any other purpose without my prior written consent.

For Jainam Doshi & Associates
Chartered Accountants
FRN: 153262W

Jainam

Jainam Vijay Doshi
(Proprietor)
Mem No: 192441



Date: 07/12/2020

Place: Mumbai

UDIN: 20192441AAAAAC1798

Regd Office: 103, Siddh Shila, B.P. Cross Road No. 3, Neelkanth Nagar, Mulund (West) - 400 080
Proprietor: CA Jainam Vijay Doshi
31 Mob: +91 9769910544/+91 9082909896
Mail: ca.jdoshi@gmail.com