

Date: 28/11/2022

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



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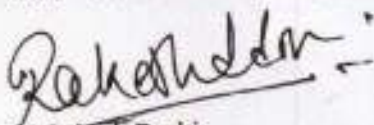
Ref: SEBI Registration No INP000006545

Dear 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



Regd. Address : Office No.606, R-Square, LBS Marg, Mulund-W, Mumbai - 400 080.  
CIN : U74999MH2016PTC288186

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**DISCLOSURE DOCUMENT FOR PORTFOLIO MANAGEMENT  
AS OF 25<sup>TH</sup> NOVEMBER, 2022**

- (i) This Disclosure Document is 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 this Disclosure Document is to provide essential information about the portfolio management services to assist and enable the investors in making an informed decision prior to engaging KRIIS.
- (iii) The Disclosure Document sets forth the necessary information about KRIIS required by an investor before investing and the investor is advised to retain this 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) Corporate details:  
SEBI Registration Number: INP000006545  
CIN: U74999MH2016PTC288186  
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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## 1. DISCLAIMER CLAUSE

The details provided in this Disclosure Document have been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 as amended till date 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 Securities and Exchange Board of India Act, 1992 as amended from time to time;

**"Applicable Law"** shall mean any stature, 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. 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.

**"Application"** means the application made by the Client to the Portfolio Manager and to the authorized intermediary for the purpose of opening demat account, 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 PMS 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 (for resident account holders);

**"Bank Account"** means one or more bank accounts opened, maintained and operated by the Portfolio Manager with any of the Scheduled Commercial Banks in the Client's name wherein the funds of the client will be deposited and/or withdrawn (for non-resident account holders);

**"Broker"** shall mean a Securities and Exchange Board of India registered stock broker permitted to deal in securities in the Indian capital markets;

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**"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 person who has opened a PMS account in the Company - Kriis Portfolio Private Limited, duly registered with the Securities and Exchange Board of India as a Portfolio Manager under the provisions of Securities and Exchange Board of India (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 Securities and Exchange Board of India, 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 Securities and Exchange Board of India 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 Securities and Exchange Board of India 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 Securities and Exchange Board of India (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 Securities and Exchange Board of India, as may be amended from time to time, pursuant to Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 and issued to the Client with an objective of providing essential information about the portfolio services provided by the portfolio manager to assist and enable the 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;



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**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, distributors, 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, dividend 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 Securities and Exchange Board of India to act as a Portfolio Manager under the Securities and Exchange Board of India (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"** shall mean CA Rakesh Doshi, Managing Director at KRIIS-The Portfolio Management Company and/or any other person duly appointed by the Board of Directors of the company and approved by Securities and Exchange Board of India who is responsible for the decisions made by the Portfolio Manager for the management and/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;

**"Fund Manager"** shall mean CA Rakesh Doshi, Managing Director, Mr. Harsh Mulchandani and Mr. Utsav Shrivastav, an employee at KRIIS-The Portfolio Management Company and/or any other person duly appointed by the Board of Directors of the company for day-to-day management and/or administration of the portfolio of securities or the funds of the client, as the case may be;

**"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 Securities and Exchange Board of India and other relevant authorities including without limitation Securities and Exchange Board of India (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 Reserve Bank of India Act, 1934;



**"Securities"** means either in electronic form which 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) 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.

**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.



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### 3. DESCRIPTION

#### (i) History, present business and background of KRIIS

Kriis Portfolio Private Limited (CIN: U74999MH2016PTC288186) is a private limited company incorporated under the Companies Act, 2013 on 6<sup>th</sup> December 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 SEBI (Portfolio Managers) Regulations, 1993 vide Registration No. INP000006545 dated 03.04.2019 and engaged in investing the funds of the 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 are levied by us.

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 client'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) KRIIS promoters, 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	16.25%

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	16.25%

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.



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c)

Name of the Promoter	Bhavya Rakesh Doshi
Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080
% of Equity Shares held	16.05%

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, 1996, ICAI Wealth Manager, ICAI
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: Managing Director & Fund Manager**

CA Rakesh Doshi is a leading advisor in the financial service space. He spearheads various companies engaged in portfolio & wealth management, tax & corporate advisory, and non-banking financial services. He has also diversified into real estate development with his upcoming township development project "Nirvana City".

He is one of the highly revered investment minds, who have mastered the art of compounding wealth from stock through value investing. He started his career as a practicing Chartered Accountant, en route his professional journey, he became a qualified Wealth Manager and a prudent investor who fast-tracked his financial growth.

Principal Officer & Fund Manager, 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 and process. With over 20 years of expertise in Indian equities, he brings to the profession discipline, vigor, passion, and an ability to identify winners. He has also established his reputation as a devoted philanthropist and proponent of higher education.

At KRIIS he plays a key role in modelling & monitoring performances of portfolios. He is a personalised 360° financial advisor to HNIs & UHNIs and corporates on their strategic and financial needs.



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**Other Directorship Details**

Name of the LLP & Company	Appointment Date	No. of Shares/ Capital Contribution	(%)
Rise & 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	490000	75.38
Alag Nirman Private Limited (Non-Executive Director)	07/12/2020	20000	2.44

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 in Advisory capacity**

**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.

An anti-money laundering specialist & practicing CA at Rakesh Doshi & Associates, she has been dedicatedly providing services since past two decades. Her areas of specializations are audit, tax, accounting and consultancy, litigation support, start-up, and corporate advisory services. Her vision is to transform the entire practice into a 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.



#### Other Directorship Details

Name of the LLP & Company	Appointment Date	No. of Shares/ Capital Contribution	(%)
Venus Portfolio & Finance Private Limited (Non-Executive Director)	21/01/2014	150000	8.58
Alag Nirman Private Limited (Non-Executive Director)	01/07/2010	20000	2.44
Venus Nirvana LLP (Sleeping Partner)	07/08/2020	10000	1.54

c)

Name	Bhavya Doshi
Qualification	Bachelor's degree in Corporate Finance and Accounting from Bentley University, Boston Chartered Financial Analysts - Level II candidate
Date of Appointment	21/08/2019
DIN	08538499
Correspondence Address	1201, Tridev Tower, Bhakti Marg, Mulund West, Mumbai 400080 Mobile.: +91 9082650622 Email: bhavya@kriis.in

#### Brief Profile

**Bhavya Doshi: Executive Director**

**Specialisation:** Business Valuations, Behavioral Finance, Research Analyst

Bhavya Doshi brings in a shrewd financial wit with a solid market cognition built from his experience of living in a family full of wealth experts. He received his bachelor's degree in Corporate Finance and Accounting from Bentley University, Boston in 2022.

At Bentley, he acted in the role of a Senior Analyst at the Bentley Investment Group where he had developed various models that provide competitive analysis of consumer sector companies. He has prepared business models, developed spreadsheets, and assisted in the valuation of multiple companies along with analyzing market trends in several industries.

Acting as a significant driving force in the analysis of contemporary market trends, he developed interest in the stock market at a young age and believes in the power of equity to multiply money in a growing economy like India. With his versatile knowledge and skill of adaptiveness, he has been assisting in the development of investment strategies at KRIIS. With his ambition to become a consummate executor of the money market, he resolves to expand the wealth of his patrons. With an ambition to provide value to the lives of people, he introduces them with the right investment solution to yield superior returns on their capital.



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**Additional Certifications:**

NSE Academics Certifications in Financial Markets (NCFM) in

- Mutual Funds
- Equity Derivatives
- Investment Analysis & Portfolio Management Module

Flame University -Pune

- Flame Investment Lab- Behavioural Finance and Value Investing:- Prof Sanjay Bakshi

Corporate Finance Institute Certification in

- Accounting Fundamentals
- Behavioral Finance
- Financial Analysis Fundamentals
- Budgeting & Forecasting
- Business Valuations
- Mining Valuations
- Mergers & Acquisitions Financial Modelling

**Other Directorship Details**

Name of the LLP & Company	Appointment Date	No. of Shares/ Capital Contribution	(%)
Venus Legal Services Private Limited (Director)	23/08/2019	30000	30.00

**(iii) Top 10 group companies/firms on turnover basis**

KRIIS does not have any group companies/firms on turnover basis considering the latest audited financial statements.

**(iv) Details of the services being offered by KRIIS**

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



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

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

**5. Services offered**

A. The Portfolio Management Services shall be offered as per the following Investment Approaches:

**I. INVESTMENT APPROACH - KRIIS MULTICAP ADVANTAGE STRATEGY**

(Fund Manager: CA Rakesh Doshi)

**(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.

Client's portfolio investments will be typically concentrated in 15-20 stocks. However, this would not limit the Portfolio Manager from increasing the number of securities in the clients' portfolios, from time to time.

Portfolio allocation	
Particular	% exposure
Large cap	30-50%
Mid cap	20-30%
Small Cap	30-40%

(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 the amount prescribed by SEBI Regulations 2020 as amended from time to time. 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:

We would generally invest in Equity Shares, Derivatives, Equity and Debt Mutual Funds, Debentures, Government Securities and 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.

Following will be the portfolio allocation across types of securities

Category	% exposure
Public Listed Securities	90-100%
Cash and Cash Equivalent	0-10%

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 BSE 500.

h) Indicative tenure or investment horizon:

We shall invest funds of the clients in securities for a long term. Investment horizon can be reviewed/amended based on economic/market scenarios.

i) Minimum tenure/lock in period:

There is no minimum tenure/lock in period for assets placed with us for portfolio management services.

j) Exit load:

There shall be no levy of exit load on withdrawal of monies being managed under this approach.

k) 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 level 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: We 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.

**i) Other salient features, if any:**

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.

**II. INVESTMENT APPROACH - KRIIS COMPOUNDERS PORTFOLIO STRATEGY**  
(Fund Manager: CA Harsh Mulchandani)

**(i) Investment Philosophy and strategy**

Our core philosophy is to first take care of downside risk as we believe that upsides can take care of themselves. So our framework revolves around capital protection in the long term followed by eventual capital appreciation.

We intend to significantly outperform the benchmark during market drawdowns as we believe that this philosophy helps in long term outperformance vis a vis benchmark. Therefore we intend to invest in public listed equities that have historically created wealth for its shareholders with a strong focus on sound corporate governance.

The portfolio companies should pass through certain checklists that are as follows:

1. Strong corporate governance history
2. Consistently high Return on Capital Employed
3. Consistent track record of revenue and EPS growth
4. Ability of the company to generate consistent free cash flows so that it should not resort to external finance
5. High growth outlook due to either market under penetration or significant potential to improve market share



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Based on these parameters we prepare a portfolio with upto 25 companies that we believe is a reasonable diversification.

Portfolio allocation	
Particular	% exposure
Large cap + Mid cap	25-50%
Small Cap	50-75%

**(ii) Investment objective**

The investment objective is to provide long term capital appreciation and generate returns by investing in a portfolio of quality companies with strong corporate governance and long term growth potential. The objective is also to create consistent alpha over benchmark indices for long term wealth creation for shareholders.

**a) Minimum Investment Amount:**

We shall not accept from the Client, funds or securities worth less than the amount prescribed by SEBI Regulations 2020 as amended from time to time. 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:**

We would generally invest in public listed securities including large cap, mid cap and small cap companies with respect to market capitalization. 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:**

The securities will be selected from the list of securities that is released by The Association of Mutual Funds in India (AMFI) on a periodic basis. The portfolio companies will be largely selected from Top 500 stocks in the AMFI list on the basis of Market capitalization. Although there could be few companies that are beyond 500th in market capitalization ranking that can find place in the portfolio.

The categorization is as follows

Portfolio allocation		
Category	Identification	% exposure
Large cap + Mid cap	Top 100-250 <sup>th</sup> companies in Market Capitalization	25-50%
Small cap	251-1000 <sup>th</sup> company in Market capitalization	50-75%



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.

Following will be the portfolio allocation across types of securities

Category	% exposure
Public Listed Securities	90-100%
Cash and Cash Equivalent	0-10%

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 NIFTY 500.

h) Indicative tenure or investment horizon:

We shall invest funds of the clients in securities for a long term. Investment horizon can be reviewed/amended based on economic/market scenarios.

i) Minimum tenure/lock in period:

There is no minimum tenure/lock in period for assets placed with us for portfolio management services.

m) Exit load:

There shall be no levy of exit load on withdrawal of monies being managed under this approach.

j) Risks associated with the investment approach:

- The value of the portfolio may increase or decrease depending on various market forces and therefore there is no assurance of any guaranteed returns in the portfolio.
- As the portfolio is equity oriented, there is a risk of loss of capital although the focus as mentioned earlier is to protect the downside by investing in quality companies.
- The portfolio performance is also based on list of securities picked by the fund manager that may not always create value for the clients and occasionally some securities may result in loss booking.
- Macro-economic factors like GDP growth, interest rate volatility, inflation, changes in government policies and regulation with regards to industries may have a direct or indirect impact on the portfolio companies that may impact portfolio returns in the long term.
- There can be some liquidity risk in the portfolio while having some exposure to small cap companies in terms of market capitalization.

k) Other salient features, if any:

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. INVESTMENT APPROACH - KRIIS METaverse EQUITY FUND STRATEGY

(Fund Manager: Utsav Shrivastav)

#### (i) Investment Philosophy and strategy

The Metaverse Portfolio will be guided by two primary investing principles - maximizing returns while commensurately minimizing the risk.

We have arrived at the following tenets that would help us in implementing our investment philosophy & strategy.

#### a) Promoter Capability & Experience

We will bet on promoter groups where we see the capability and execution skills to build the business to the next level on a sustainable basis.

#### b) Market and product potential

The business will have a competitive moat within a growth market with expandable adjacencies. The competitive moats can include all or some product patent/innovation, brand strength, size and scale of operation, distribution & strategic business partnerships.

#### c) Balance Sheet strength and quality of financials

The fund will avoid investments in companies with deteriorating balance sheets/ return ratios and operating cash flows which will be based on our internal forecasts and assumptions.

#### d) 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".

#### e) Corporate Governance & Shareholder friendly

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

#### f) Valuation

We will not chase momentum and entry valuation with significant upside potential will be our primary driver. A favorable risk-reward ratio will be kept in mind while considering the entry valuation.

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.



Client's portfolio investments will typically be concentrated in not more than 30 stocks with no stock accounting for over 10% initial equity allocation. It may happen that when our investments pay off their "mark to market" allocation may exceed the 10% limit on allocation. However, we may not restrict this if the Portfolio Manager believes that substantial profit potential still exists.

Our investment strategy is market cap agnostic. We believe that our above guiding principle sufficiently filter the risk profile of our investments. Hence no exposure limits based on market cap have been considered. We believe that our investment philosophy and strategy substantially take this into account.

**(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 the amount prescribed by SEBI Regulations 2020 as amended from time to time. 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:**

We would generally invest in Equity Shares, Equity and Debt Mutual Funds, Debentures, Government Securities and any other Money Market Instruments. The idle funds would be deployed in liquid funds. 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 a 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.



Following will be the portfolio allocation across types of securities

Category	% exposure
Public Listed Securities	90-100%
Cash and Cash Equivalent	0-20%

- 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 BSE 500.
- h) Corporate Governance & Share holder friendly  
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.
- i) Indicative tenure or investment horizon:  
We shall invest funds of the clients in securities for a long term. Investment horizon can be reviewed/amended based on economic/market scenarios.
- j) Minimum tenure/lock in period:  
There is no minimum tenure/lock in period for assets placed with us for portfolio management services.
- k) Exit load:  
There shall be no levy of exit load on withdrawal of monies being managed under this approach.
- l) Risks associated with the investment approach:
- Investments 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 is subject to default risk and interest rate risk, interest rate risk results from changes in demand and supply for money and other macroeconomic 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: We 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.

**B. 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**

We do not have any Associates/Group Companies as on date. Thus, we have not formulated policies and prescribed the maximum percentage for investments in Associates/Group Companies. However, we shall constitute, implement the policy and prescribe the maximum percentage of investments in Associates/Group Companies whenever it is applicable to us.

**6. Risk Factors**

The client must read and fully understand this disclosure document including the risks mentioned above 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.

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 is no conflict of interest with the transactions taken in any of the client's portfolio. However, we shall disclose the transactions whenever there is a conflict of interest with the transactions taken in any of the client's portfolio.

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. Strategies**

**i. KRIIS Multicap Advantage Strategy**

As of 25<sup>th</sup> November, 2022

Category of clients (since inception date 09.05.2019)	No of clients	Funds Managed (Rs. Cr.)					Discretionary/ Non- Discretionary/ Advisory
		Equity	Plain Debt	Mutual Funds	Others	Total	
Associates/group companies	-	-	-	-	-	-	-
Resident Corporates and Non Corporates, Non Residents	78	50.17	-	-	2.10	52.26	Discretionary
<b>Total</b>	<b>78</b>	<b>50.17</b>	<b>-</b>	<b>-</b>	<b>2.10</b>	<b>52.26</b>	



ii. **KRIIS Compounders Portfolio Strategy**

The details of clients and funds managed under this strategy as of 25<sup>th</sup> November, 2022 is not provided herewith as this is a newly launched strategy and no clients are on-boarded yet under this strategy.

iii. **KRIIS Metaverse Equity Fund Strategy**

The details of clients and funds managed under this strategy as of 25<sup>th</sup> November, 2022 is not provided herewith as this is a newly launched strategy and no clients are on-boarded yet under this strategy.

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, 2020 March 31, 2021 and March 31, 2022.**

Details of related party transactions for the year ended March 31, 2020, March 31, 2021 and March 31, 2022 have been disclosed in the financial statements as required by Accounting Standard 18.

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

The Company shall comply with the net worth requirement of not less than Rs.5 crores within prescribed time as laid down in Regulation 9 of SEBI (Portfolio Managers) Regulations, 2020. Details of its last 3 years financials is attached in the Annexure A.

9. **Portfolio Management performance of the Portfolio Manager for the last two 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**

A. **KRIIS Multicap Advantage Strategy**

Below is our portfolio performance in comparison to relevant benchmark indices as of 25<sup>th</sup> November, 2022

Account	Inception Date	Assets	% Assets	1 Month	3 Months	6 Months	1 Year	Since inception date
Kriis Portfolio Private Limited	09.05.2019	52,26,47,219.23	100.00	0.93	1.37	14.74	-6.12	21.61
BSE 500				3.66	4.07	15.71	4.08	16.02

**Notes:**

1. All returns are based on Time Weighted Rate of Return method (TWRR) and are net of fees and expenses.
2. Returns for periods greater than a year are annualized and returns for periods less than a year are absolute.
3. Performance related information provided here is not verified by SEBI.



**B. KRIIS Compounders Portfolio Strategy**

Portfolio performance of KRIIS Compounders Portfolio Strategy in comparison to relevant benchmark indices as of 25<sup>th</sup> November, 2022 is not provided herewith as this is a newly launched strategy and no clients are on-boarded yet under this strategy.

**C. KRIIS Metaverse Equity Fund Strategy**

Portfolio performance of KRIIS Metaverse Equity Fund Strategy in comparison to relevant benchmark indices as of 25<sup>th</sup> November, 2022 is not provided herewith as this is a newly launched strategy and no clients are on-boarded yet under this strategy.

**10. Audit Observations**

In connection with the audit of the financial statements of the Company which is examined by the statutory auditor, proper books of accounts are maintained as required by law and complied with the Accounting Standards specified under the Act. Based on the audit report given by the statutory auditor, the financial statements present a true and fair view of the state of affairs, its profit/loss and cash flows of the Company during the last 3 financial years and had no observations.

**11. Nature of expenses**

**I. For KRIIS Multicap Advantage Strategy and KRIIS Compounders Portfolio Strategy**

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 in which his/her/its account is activated.
- (iii) **Demat and bank charges**
  - a) No demat charges and bank charges will be charged.



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**(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 Capital 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**

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

**II. For KRIIS Metaverse Equity Fund Strategy**

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 Fee would be charged at flat 20% per annum on the profits generated.
- b) We shall charge performance based fee only on increase in portfolio value in excess of the previously achieved high water mark.

**High Water Mark Principle:** High Water Mark shall be the highest value that the portfolio/account has reached. Value of the portfolio/account for computation of high watermark shall be taken to be the value on the date when performance fees are charged.

**Illustration:** Consider that frequency of charging of performance fees is annual. A client's initial contribution is Rs.10,00,000 which then rises to Rs.12,00,000 in its first year, a performance fee/profit sharing would be payable on the Rs.2,00,000 return. In the next year, the portfolio value drops to Rs.11,00,000 hence no performance fee would be payable. If in the third year, the Portfolio rises to Rs.13,00,000, a performance fee/profit sharing would be payable only on Rs.1,00,000 profit which is portfolio value in excess of the previously achieved high water mark of Rs.12,00,000 rather than on the full return during that year from Rs.11,00,000 to Rs.13,00,000.

- 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) The client will be billed on an annual basis in which his/her/its account is activated.

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

**For KRIIS Multicap Advantage Strategy, KRIIS Compounders Portfolio Strategy and KRIIS Metaverse Equity Fund Strategy**

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 fees/charges/expenses shall be collected by debiting the Client's portfolio account as and when it becomes due if not paid within 15 days of receipt of invoice.

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 Performance 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 the management, acquisition, holding, custody, sale and/or transfer, of the Assets or rendering of the Discretionary Portfolio Management Services or the performance of any act pursuant to or in connection with this 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 this Agreement, all other incidental and ancillary documentation pursuant to this 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 us for all causes as a consequence of any misrepresentation, incompleteness, inaccuracy or error in such computations/statements/certificates, as the case may be.

Regd. Address : Office No.606, R-Square, LBS Marg, Mulund-W, Mumbai - 400 080.

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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/or 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) Additional corpus introduced by the client into their respective portfolios are booked/recorded as of the date of introduction into the portfolio.
- (iii) In case of Securities IN, valuation of Stock corpus is booked as per previous day T-1 price for meeting minimum capital requirement prescribed by SEBI regulations 2020 as amended from time to time;
- (iv) Realized gains/losses will be calculated by applying the First In First Out (FIFO) method of accounting;
- (v) 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;
- (vi) For derivative transactions (if any), unrealized gains and losses on open positions will be calculated by mark to market method;
- (vii) Unrealized gains/losses are the differences between the current market values or net asset value and the historical cost of the Securities;
- (viii) As far as possible, the portfolio manager is complying with the relevant accounting standards issued by the Institute of Chartered Accountants of India. 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;
- (ix) 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;
- (x) 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;
- (xi) 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.

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#### 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 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.



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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 the 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 has any grievance on the services standards or reporting 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 a dis-agreement, dispute, difference, claim, question whatsoever between the investor and us and/or their respective representatives, the same shall be submitted to and settled by a sole arbitrator under the provisions of Arbitration and Conciliation Act, 1996. The sole arbitrator shall be appointed by us. The venue of arbitration shall be Mumbai (India) and be conducted in English Language. The rules of arbitration shall be as approved by the board of directors which shall be provided to the investor upon request. 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  
For KRIIS PORTFOLIO PRIVATE LIMITED

  
CA Animesh Doshi  
MANAGING DIRECTOR & FUND MANAGER  
Managing Director & Fund Manager  
DIN: 02918999

Place: Mumbai

Date: 25/11/2022

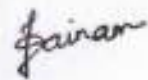
For and on behalf of

KRIIS – The Portfolio Management Company

For KRIIS PORTFOLIO PRIVATE LIMITED

  
Bhavya Doshi  
Director / Authorised Signatory  
Director  
DIN: 08538499





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

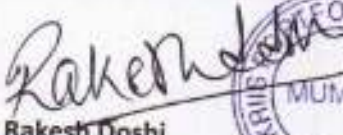
Dear Investors,

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 in this regard;
- ii) the disclosures made in the Disclosure Document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of their portfolio to us / investment through the Portfolio Manager;
- iii) the Disclosure Document has been duly certified on 25<sup>th</sup> November, 2022 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 information provided and disclosures made in the disclosure 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: 25/11/2022

Place: Mumbai





**KRIIS**  
PORTFOLIO PRIVATE LIMITED

Annexure A

Summary of Audited Standalone Financial Statements

Audited Standalone Financial Statements	As on 31.03.2022	As on 31.03.2021	Amt in Rs. As on 31.03.2020
<b>Profit &amp; loss Statement</b>			
<b>Revenue:</b>			
Revenue from operations	1,57,39,672	53,97,386	90,58,000
Other Income	8,21,178	63,91,890	2,11,999,148
<b>Total Revenue</b>	<b>1,65,60,850</b>	<b>1,17,89,276</b>	<b>2,21,057,148</b>
<b>Expenses:</b>			
Employee benefit expenses	34,76,709	24,91,829	28,00,887
Depreciation and amortization expenses	39,87,662	18,00,359	24,52,369
Other expenses	74,30,474	74,65,859	2,16,013,662
<b>Total Expenses</b>	<b>1,48,94,845</b>	<b>1,17,58,047</b>	<b>2,21,266,918</b>
Profit/(loss) before tax	16,66,005	31,229	(2,09,770)
<b>Profit/(loss) after tax</b>	<b>8,60,825</b>	<b>31,229</b>	<b>99,765</b>
<b>Balance sheet</b>			
<b>SOURCES OF FUNDS</b>			
<b>Shareholder's funds</b>			
Share capital	2,25,00,000	2,25,00,000	2,25,00,000
Reserves and surplus	5,05,569	(3,55,257)	(3,86,486)
<b>Current Liabilities</b>			
Short term borrowings	6,22,829	2,22,869	81,48,996
Trade payables	79,083	2,28,779	1,41,399
Other current liabilities	8,84,722	3,66,477	22,051
<b>Total Liabilities</b>	<b>2,45,92,203</b>	<b>2,29,62,868</b>	<b>3,04,25,960</b>
<b>APPLICATION OF FUNDS</b>			
<b>Non-current assets</b>			
Property, Plant and Equipment			
Tangible Assets	95,08,366	1,33,26,509	1,50,22,885
Non-current investments	16,00,005	37,71,080	97,99,348
Deferred Tax assets (Net)	13,52,319	8,77,206	6,65,922
Long Term Loans and Advances	1,03,50,000	-	-
Other non-current assets	10,25,000	21,25,000	21,25,000
<b>Current Assets</b>			
Trade Receivables	2,58,334	15,11,696	12,42,040
Cash and cash equivalents	2,19,631	9,33,094	1,07,869
Other current Assets	2,78,548	4,18,283	14,62,896
<b>Total Assets</b>	<b>2,45,92,203</b>	<b>2,29,62,868</b>	<b>3,04,25,960</b>

**Auditor:**

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



*Jainam*

Regd. Address : Office No.606, R-Square 32 LBS Marg, Mulund-W, Mumbai - 400 080,

CIN : U74999MH2016PTC288186

☎ 022 2565 5808 ✉ info@kriis.in 🌐 www.kriis.in



# **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 as of 25<sup>th</sup> November, 2022 to be submitted by the Company to Securities and Exchange Board of India ('SEBI') under Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020.

I have verified the attached Disclosure Document of even date of the Portfolio Management Services of the Company based on the books of accounts and other financial records maintained by the Company. On the basis of my verification and information provided by the management, I confirm and certify that the information provided and disclosures made in the attached disclosure document are true, fair and adequate to enable the investors to make a well informed decision.

This certificate is prepared solely for the purpose of submitting the same to SEBI and sharing with its clients 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 Vijay Doshi  
(Proprietor)

Mem No: 192441

Date: 25/11/2022

Place: Mumbai

UDIN: 22192441BEJRCL4071