KAPIL KUMAR AGARWAL & ASSOCIATES
Chartered Accountants
Regd Office: A-57, Amani Shah Road, Shahtri Nagar,
Jaipur, 302016- Rajasthan.
Email : carajeevsharma27@gmail.com

We have verified the Disclosure Document ("the Document") dated 30th September, 2026 for Portfolio Management Services prepared by M/s. **PRP Edge Wealth Pvt Ltd**, a Portfolio Manager registered with SEBI under the SEBI (Portfolio Managers) Regulations, 2020 (SEBI Reg. No. ***INP000007960***), having its Registered Office at **507, 5th Floor, Eros City Square, Rosewood City, Sector - 49-50, Gurugram - 122018, Haryana**.

The disclosure made in the document is made on the model disclosure document as stated in Schedule V of Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations 2020.

Our certification is based on the examination of records, data made available and information & explanations provided to us.

Based on such examination we certify that:

a. The Disclosure made in the document is true, fair and correct;
b. The information provided in the Disclosure Document is adequate to enable the investors to make well-informed decisions; and
c. Information updated in Part II Dynamic section of the Disclosure documents is true, fair and correct;

The enclosed document is stamped and initialed / signed by us for the purpose of identification.

Thanking you,

Yours faithfully,

For and on be half of
KAPIL KUMAR AGARWAL & ASSOCIATES
Chartered Accountants
FRN: 008174C

KAPIL KUMAR AGARWAL & ASSOCIATES ★ Chartered Accountants ★ FRN NO 008174C

Rajeev Sharma
Partner
Membership No. 075689
UDIN: 26075689BUXJQH4335
Date: 21/10/26

PORTFOLIO MANAGEMENT SERVICES
DISCLOSURE DOCUMENT
OF
PRP EDGE WEALTH PVT LTD.
(SEBI Registration No. INP000007960)

(As per the requirement of Regulation of SEBI (Portfolio Managers) Regulations, 2020)

(i) The document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended from time to time and filed with SEBI.

(ii) The Document has been filed with the Board (SEBI) along with the certificate in the prescribed format in terms of regulation of SEBI (Portfolio Managers) Regulation 2020.

(iii) The purpose of the Document is to provide essential information about the Portfolio Management Services (PMS) in a manner to assist and enable the investors in making an informed decision for engaging a Portfolio Manager.

(iv) The document contains necessary information about the Portfolio Manager required by an investor before investing, and the investor may also be advised to retain the document for future reference.

(v) This Disclosure Document is dated 21-10-2026 (financial data considered up to 31-Mar-2026).

Details of the Portfolio Manager

Name of Portfolio Manager	:	PRP Edge Wealth Pvt Ltd.
SEBI Registration Number	:	INP000007960 (Dated: 27-Mar-2023)
Registered Office Address	:	507, 5th Floor, Eros City Square, Rosewood City, Sector - 49-50, Gurugram - 122018, Haryana
Phone No.(s)	:	0124-4249000
E-mail address	:	pmsops@alphaamoney.com
Website	:	www.alphaamoney.com

Details of the Principal Officer

Name of Principal Officer	:	Rahul Jagetiya
Corporate Office Address	:	8th Floor, Sea Breeze Building, Appasaheb Marathe Marg, Prabhadevi Mumbai - 400 025
Mobile No.(s)	:	+91 97732 95579
E-mail address	:	rahul.jagetiya@alphaamoney.com

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PART-I- Static Section:

1.Disclaimer

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

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

2. Definitions

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

1. **"Act"** means the Securities and Exchange Board of India Act, 1992.
2. **"Accreditation Agency"** means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by SEBI from time to time.
3. **"Accredited Investor"** means any person who is granted a certificate of accreditation by an accreditation agency who:
    - (i) In case of an individual, HUF, family trust or sole proprietorship has:
        - (a) annual income of at least two crore rupees; or
        - (b) net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees is in the form of financial assets; or
        - (c) annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crore fifty lakh rupees is in the form of financial assets.
    - (ii) In case of a body corporate, has net worth of at least fifty crore rupees;
    - (iii) In case of a trust other than family trust, has net worth of at least fifty crore rupees;
    - (iv) In case of a partnership firm set up under the Indian Partnership Act, 1932, each partner independently meets the eligibility criteria for accreditation: *Provided that the Central Government and the State Governments, developmental agencies set up under the aegis of the Central Government or the State Governments, funds set up by the Central Government or the State Governments, qualified institutional buyers as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category I foreign portfolio investors, sovereign wealth funds and multilateral agencies and any other entity as may be specified by the Board from time to time, shall deemed to be an accredited investor and may not be required to obtain a certificate of accreditation.*
4. **"Advisory Services"** means advising on the portfolio approach, investment and divestment of individual Securities in the Client's Portfolio, entirely at the Client's risk, in terms of the Regulations and the Agreement.
5. **"Agreement"** or **"Portfolio Management Services Agreement"** or **"PMS Agreement"** means agreement executed between the Portfolio Manager and its Client for providing portfolio management services and shall include all schedules and annexures attached thereto and any amendments made to this agreement by the parties in writing, in terms of Regulation 22 and Schedule IV of the Regulations.

6. **"Applicable Law/s"** means any applicable statute, law, ordinance, regulation, rule, order, bye-law, administrative interpretation, writ, injunction, directive, judgment or decree or other instrument including the Regulations which has a force of law, as is in force from time to time.

7. **"Assets Under Management"** or **"AUM"** means aggregate net asset value of the Portfolio managed by the Portfolio Manager on behalf of the Clients.

8. **"Associate"** means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager.

9. **"Benchmark"** means an index selected by the Portfolio Manager in accordance with the Regulations, in respect of each Investment Approach to enable the Clients to evaluate the relative performance of the Portfolio Manager.

10. **"Board"** or **"SEBI"** means the Securities and Exchange Board of India established under section 3 of the Securities and Exchange Board of India Act, 1992.

11. **"Business Day"** means any day, which is not a Saturday, Sunday, or a day on which the banks or stock exchanges in India are authorized or required by Applicable Laws to remain closed or such other events as the Portfolio Manager may specify from time to time.

12. **"Client(s)"** / **"Investor(s)"** means any person who enters into an Agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.

13. **"Custodian(s)"** means an entity registered with the SEBI as a custodian under the Applicable Laws and appointed by the Portfolio Manager, from time to time, primarily for custody of Securities of the Client.

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

15. **"Depository Account"** means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.

16. **"Direct on-boarding"** means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.

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

18. **"Distributor"** means a person/entity who may refer a Client to avail services of Portfolio Manager in lieu of commission/charges (whether known as channel partners, agents, referral interfaces or by any other name).

19. **"Eligible Investors"** means a Person who: (i) complies with the Applicable Laws, and (ii) is willing to execute necessary documentation as stipulated by the Portfolio Manager.

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

21. **"Foreign Portfolio Investors"** or **"FPI"** means a person registered with SEBI as a foreign portfolio investor under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time.

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

23. **"Funds"** or **"Capital Contribution"** means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies mentioned in the account opening form, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of sale or other realization of the portfolio and interest, dividend or other monies arising from the assets, so long as the same is managed by the Portfolio Manager.

24. **"Group Company"** shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary.

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

26. **"Investment Approach"** is a broad outlay of the type of Securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and Securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.

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

28. **"Large Value Accredited Investor"** means an Accredited Investor who has entered into an Agreement with the Portfolio Manager for a minimum investment amount of ten crore rupees.

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

30. **"NAV"** shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.

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

32. **"Person"** includes an individual, a HUF, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.

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

34. **"Portfolio Manager"** means [Name of Portfolio Manager], [a company / limited liability partnership] incorporated under [the Companies Act, [2013/1956] / the Limited Liability Partnership Act, 2008], registered with SEBI as a portfolio manager bearing registration number ***INP000007960*** and having its registered office at **507, 5th Floor, Eros City Square, Rosewood City, Sector - 49-50, Gurugram - 122018, Haryana.**

35. **"Principal Officer"** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for: (i) the decisions made by the Portfolio Manager for the management or administration of Portfolio of Securities or the Funds of the Client, as the case may be; and (ii) all other operations of the Portfolio Manager.

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

37. **"Related Party"** means –

    (i) a director, partner or his relative;

    (ii) a key managerial personnel or his relative;

    (iii) a firm, in which a director, partner, manager or his relative is a partner;

    (iv) a private company in which a director, partner or manager or his relative is a member or director;

    (v) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two percent of its paid-up share capital;

    (vi) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;

    (vii) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:

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

    (viii) any body corporate which is— (A) a holding, subsidiary or an associate company of the Portfolio Manager; or (B) a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary; (C) an investing company or the venturer of the Portfolio Manager (The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the Portfolio Manager would result in the Portfolio Manager becoming an associate of the body corporate);

    (ix) a related party as defined under the applicable accounting standards;

(x) such other person as may be specified by the Board:
Provided that,

(a) any person or entity forming a part of the promoter or promoter group of the listed entity; or

(b) any person or any entity, holding equity shares:

(i) of twenty percent or more; or

(ii) of ten percent or more, with effect from April 1, 2023; in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediate preceding Financial Year; shall be deemed to be a related party.

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

Any term used in this Document but not defined herein (but defined in the Regulations) shall have the same meaning as assigned to them in the Regulations.

3. Description

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

(a) History of the Portfolio Manager:

The company was incorporated on 15th December, 2017 as "PRP Edge Wealth Pvt Ltd." under Companies Act, 2013 and having its registered office at 507, 5th Floor, Eros City Square, Rosewood City, Sector – 49-50, Gurugram – 122018, Haryana which is changed from ES-343, ESPACE Nirvana Country, Sector – 50, Gurugram – 122018, Haryana and was formed with a vision to change the wealth advisory landscape, Mr. Puneet Pandey and Mrs. Rashmi Pandey started their own venture.

(b) Present Business and Background:

"PRP Edge Wealth Pvt Ltd." is the sister concern of PRP Professional Edge Associates Pvt Ltd., which is SEBI Registered Investment Advisor and Merchant Banker, serving esteemed clientele since 2013. PRP Professional Edge as one of the prominent financial services firms, focuses on providing specialized Investment Advisory Services to diversified clientele including Corporates, Financial Institutions, Retirement Benefit Trust, Family Offices under Advisory Model. We have a fully operational and dedicated team especially for the advisory business to service Earmarked & Retiral Benefit Funds/PF Trust on an exclusive basis.

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

Mr. Puneet Pandey and Mrs. Rashmi Pandey are the Promoters and Directors of PRP Edge Wealth Pvt Ltd.

(a) Directors:

The Directors of the Company are as below:

- Mr. Puneet Pandey
- Mrs. Rashmi Pandey

(b) Director's backgrounds

- **Mr. Puneet Pandey:** An MBA Finance, a successful leader visionary and pioneer in the financial services industry having 28 years of experience spanning across Investment Banking - Capital Markets, Investment Assets Distribution & Wealth Management, Proprietary Book Management and Investment Advisory. He has successfully led and worked at leadership roles with highly reputed & established brands: Morgan Stanley, Ashok Leyland Investment Services, Mata Securities, SPA Capital, Religare, & JM Financial across asset classes, in this field.

- **Mr. Rashmi Pandey:** A post graduate in Personnel Management and an experienced professional having a generalist HR background and management skills that have been honed through managing multi

skilled teams. Accomplished in executing entire gamut of tasks in recruitment encompassing screening, short listing, selection and appointment, of candidates over the years.

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

(a) PRP Professional Edge Associates Pvt Ltd.
(b) PRP Realty Pvt Ltd.
(c) iAltInvest Pvt Ltd.

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

The Portfolio Manager proposes to primarily carry on discretionary portfolio management services and if opportunity arises thereafter, then it also proposes to render non-discretionary portfolio management services and advisory services.

PRP Edge Wealth Pvt Ltd shall provide the above services to the following category of clients:

Client Category	**Nature of services**
Indian resident individuals, non – resident Indians, bodies corporate, partnership firms, trust, societies, association of persons, limited liability partnership and such other persons as may be deemed by the Portfolio Manager to be eligible to avail the services of the Portfolio Manager	Discretionary/ Non-discretionary/ Advisory
Foreign Portfolio Investors and their sub - accounts	Discretionary/ Non-discretionary/ Advisory

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

(a) Discretionary Services:

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

(b) Non - Discretionary Services:

Under the non-discretionary PMS, the assets of the Client are managed in consultation with the Client. Under this service, the assets are managed as per the requirements of the Client after due consultation with the Client. The Client has complete discretion to decide on the investment (quantity and price or amount). The Portfolio Manager, *inter alia*, manages transaction execution, accounting, recording or corporate benefits, valuation and reporting aspects on behalf of the Client.

(c) Advisory Services:

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

4. **Penalties, pending litigation or proceedings, findings of inspection 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 SEBI Act or rules or regulations made thereunder.**
None.

ii. **The nature of the penalty/direction.**
None.

iii. **Penalties/fines imposed for any economic offence and/ or for violation of any securities laws.**
None.

iv. **Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.**
None.

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

The Portfolio Manager received a Warning Letter dated 29 June 2026 from SEBI regarding non-compliance with the minimum net worth requirement of Rs. 5 crore for the period from 1 March 2024 to January 2025. The Portfolio Manager implemented necessary corrective actions in January 2025 to restore and maintain the regulatory net worth threshold. A comprehensive response detailing the corrective measures and compliance status was formally submitted to SEBI on 13 July 2026.

vi. **Any enquiry/ adjudication proceedings initiated by SEBI against the Portfolio Manager or its partners, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its partners, principal officer or employee, under the SEBI Act or rules or regulations made thereunder.**
None.

5. Services Offered

(i) The present investment objectives and policies including the types of securities in which it generally invests shall be clearly and concisely stated in the Document for easy understanding of the potential investor.

a. Investment Objective:

The funds of the Clients shall be invested in such capital and money market instruments, including securities as defined under the Securities Contract (Regulation) Act, 1956, and shall include any securities, derivatives and other instruments which are tradable on any of Exchanges as wells such units of Unit Trust of India and / or other mutual funds (whether listed or unlisted), government securities, debt instruments, negotiable instruments, unlisted securities, certificates of deposit, participation certificates, commercial paper, securitized debt instruments, investments in company deposits, bank deposits, treasury bills and such other eligible modes of investment and/or forms of deployment within the meaning of the Regulation issued by SEBI as amended from time to time.

The Portfolio Manager may, however, enter into futures contracts, options in securities, options on indices and other similar types of investment, which may result in the Client having to provide initial margin payments and which would be deemed. The Portfolio Manager shall observe a high standard of integrity and fair dealing in all transactions involving the Client's Account. The investment in the securities mentioned in the above point will be in accordance with the objectives as given in the agreement and also any of the product/plan categories accepted by the client.

The investment objectives would be one or more of the following or combination thereof:

a. To provide investment flexibility to the client across various market segments
b. To generate good returns on investments
c. To generate short term and/ or long-term capital appreciation

The Portfolio Manager offers various investment strategies-based portfolios to allow for standardized customization in sync with investor profile and also customized portfolio as per suitability and specific requirements of the client. The general objective is to formulate and device the investment philosophy to achieve long term growth of capital.

The objective of the Derivative Exposure: The objective to use derivatives is purely to protect the portfolio in case of a severe market correction. We seek to use derivatives purely to protect the client's portfolio in case of sharp drawdowns of the aggregate market. The Derivatives will only be used for hedging and/or portfolio rebalancing.

b. Types of Securities

The portfolio manager/fund manager shall invest in all such types of securities as defined in above (Please refer to definitions) and in all such securities as permissible from time to time.

Consistent with the investment objective and subject to Regulations, the corpus will be invested in any of (but not exclusively) the following securities:

a) Equity and equity-related securities including convertible bonds (including equity-linked debentures) and debentures and warrants carrying the right to obtain equity shares;
b) Securities issued/guaranteed by the Central, State Governments and local governments (including but not limited to coupon bearing bonds, zero coupon bonds, and treasury bills);
c) Obligations of Banks (both public and private sector) and Development Financial Institutions like Certificate of Deposits (CDs), Coupon bearing Bonds, Zero Coupon Bonds;
d) Money Market instruments permitted by SEBI/RBI;
e) Certificate of Deposits (CDs);
f) Commercial Paper (CPs);
g) Mutual Fund units, Fixed Deposits, Bonds, debentures etc.;
h) Units of venture funds;
i) Securitization instruments;
j) Foreign securities as permissible by Regulations from time to time;
k) Any other securities and instruments as permitted by the Regulations from time to time.

The securities mentioned above could be listed, unlisted, privately placed, secured, unsecured, rated or unrated and of any maturity. The securities may be acquired through Initial Public Offerings (IPOs), secondary market operations, private placement, rights offer or negotiated deals.

c. Minimum Investment Amount

The Portfolio Manager will not accept an initial corpus of less than Rs. 50.00 lacs or such minimum amount as specified by SEBI from time to time. The client may on one or more instances or on a continual basis, make further placements of funds/securities under the services.

Investment Objective

The investment objective of the Portfolio Manager is to endeavor to deliver superior risk adjusted returns for the Client.

The Portfolio Manager seeks to deliver superior portfolio performance without taking undue risk thereby benefiting the Clients and helping them achieve their goals. Keeping the Clients' interests before its own, the Portfolio Manager intends to focus on best business practices of the fund management industry.

(ii) Investment Approach of the Portfolio Manager

Presently following investment approaches are being offered to the investors based on profile, investment objective and other relevant factors, the portfolio of the clients are presently Managed by Mr. Jyoti Prakash.

A. Alphaa MPT Plus Fund

- **Fund Manager:** Jyoti Prakash

- **Investment Objective:** To focus on investment to maximize return within acceptable level of risk based on Modern Portfolio Theory formulated by Harry Markowitz.
- **Investment Approach:** The fund will invest in listed securities and money market instruments. The universe of stocks meets EPFO guidelines plus other qualitative and quantitative parameters. Selection of stocks would be based on Modern Portfolio Theory formulated by Harry Markowitz.

- This approach can be taken on both a discretionary and non-discretionary basis. If the client chooses to be managed on a non-discretionary basis, the investor will have complete control over investments initiated under the scheme. Ideas will be generated by PRP Wealth, but the investor consent is required before implementation. Investors may also have specific ideas that he/ she may like to be validated by the detailed research process we follow and based on our recommendations, the investor may or may not agree to move forward. Such an arrangement will help the investor to get an independent perspective of the idea before he/ she acts on it. In addition to that, we will be guiding their portfolio towards the value framework that they hold. Such a process could lead to a varied set of stock ideas across investors, thus providing them with a customized portfolio and service.

- **Asset Allocation:**

Securities	Allocation %
Listed Securities	Up to 100% of corpus
Money Market	Up to 100% of corpus

- **Description of types of securities:** Equities, REITs, InvITs, ETF, Sovereign gold bonds and money market instruments.

- **Investment horizon:** Recommended time horizon for effective portfolio returns is minimum 36 months.

- **Benchmark:** NIFTY 50 TRI Index
  Pursuant to SEBI circular dated December 16, 2022 only three benchmarks under the strategy "Equity" have been defined, one of which is Nifty 50 Index. Accordingly, the portfolio Manager has chosen Nifty 50 Index.

  NIFTY 50 INDEX is broad based index representing Indian market, and its composition broadly covers all major Industries in the India economy.

B. Alphaa Better Risk Reward 30 Stocks Portfolio

- **Fund Manager:** Jyoti Prakash

- **Investment objective:** The objective of the Fund is to generate long term capital appreciation from a portfolio of Equity and Equity related securities. Maximum 30 Stocks are picked on bottoms-up fundamental analysis.

- **Investment Approach:** Each stock plays on underlying themes like strong demand environment, market share gains, growth in earnings, etc. in addition to being reasonably valued. The strategy's universe would include the diverse investment opportunity that exists in the listed space.

- This approach can be taken on a discretionary and non-discretionary basis. If the client chooses to be managed on a non-discretionary basis, the investor will have complete control over investments initiated under the scheme. Ideas will be generated by PRP Wealth, but the investor consent is required before implementation. Investors may also have specific ideas that he/ she may like to be validated by the detailed research process we follow and based on our recommendations, the investor may or may not agree to move forward. Such an arrangement will help the investor to get an independent perspective of the idea before he/ she acts on it. In addition to that, we will be guiding their portfolio towards the value framework that they hold. Such a process could lead to a varied set of stock ideas across investors, thus providing them with a customized portfolio and service.

- **Asset Allocation:**

Securities	Allocation %
Listed securities	Up to 100% of corpus
Money Market	Up to 100% of corpus

- **Description of types of securities:** Equities, REITs, InvITs, ETF, Sovereign gold bonds and money market instruments.

- **Investment horizon:** Recommended time horizon for effective portfolio returns by portfolio manager is minimum 36 months.

- **Benchmark:** NIFTY 50 TRI Index
  Pursuant to SEBI circular dated December 16, 2022 only three benchmarks under the strategy "Equity" have been defined, one of which is Nifty 50 Index. Accordingly, the portfolio Manager has chosen Nifty 50 Index.

  NIFTY 50 INDEX is broad based index representing Indian market, and its composition broadly covers all major Industries in the India economy.

C. Alphaa focused Small-cap Portfolio

- **Fund Manager:** Jyoti Prakash

- **Investment objective:** The objective of the Fund is to generate long term capital appreciation from a portfolio of Equity and Equity related securities.

- **Investment approach:** The fund will invest predominantly in Small-cap stocks as per AMFI's classification of Small-cap. Stocks would be picked based on fundamental analysis with emphasis on Value as a factor.

- This approach can be taken on a discretionary and non-discretionary basis. If the client chooses to be managed on a non-discretionary basis, the investor will have complete control over investments initiated under the scheme. Ideas will be generated by PRP Wealth, but the investor consent is required before implementation. Investors may also have specific ideas that he/ she may like to be validated by the detailed research process we follow and based on our recommendations, the investor may or may not agree to move forward. Such an arrangement will help the investor to get an independent perspective of the idea before he/ she acts on it. In addition to that, we will be guiding their portfolio towards the value framework that they hold. Such a process could lead to a varied set of stock ideas across investors, thus providing them with a customized portfolio and service.

- **Asset Allocation:**

Securities	Allocation %
Listed securities	Up to 100% of corpus
Money Market	Up to 100% of corpus

- **Description of types of securities:** Equities, REITs, InvITs, ETF, Sovereign gold bonds and money market instruments.

- **Investment horizon:** Recommended time horizon for effective portfolio returns by portfolio manager is minimum 36 months.

- **Benchmark:** NSE50 TRI Index
  Pursuant to SEBI circular dated December 16, 2022 only three benchmarks under the strategy "Equity" have been defined, one of which is Nifty 50 Index. Accordingly, the portfolio Manager has chosen Nifty 50 Index

  NIFTY 50 INDEX is broad based index representing Indian market, and its composition broadly covers all major Industries in the India economy.

D. AlphaaMoney Equity + Portfolio

- **Fund Manager:** Jyoti Prakash

- **Investment objective:** The objective of the fund is to provide a strategic asset allocation to match investor's risk-taking ability with their preference between preservation of capital and capital appreciation.

- **Investment approach:** Our algorithm will set up an investor's optimal portfolio and consequent allocation to different categories of instruments based on the Return / Risk / Covariance framework. The fund will invest in instruments such as Exchange Traded Funds (ETFs)/ Index Funds/ Open-ended Mutual Funds having low expense ratio, to provide suitable risk-adjusted returns to the investor.

- This approach can be taken on a discretionary and non-discretionary basis. If the client chooses to be managed on a non-discretionary basis, the investor will have complete control over investments initiated under the scheme. Ideas will be generated by PRP Wealth, but the investor consent is required before implementation. Investors may also have specific ideas that he/ she may like to be validated by the detailed research process we follow and based on our recommendations, the investor may or may not agree to move forward. Such an arrangement will help the investor to get an independent perspective of the idea before he/ she acts on it. In addition to that, we will be guiding their portfolio towards the value framework that they hold. Such a process could lead to a varied set of investment ideas across investors, thus providing them with a customized portfolio and service.

- **Asset allocation at the time of Investment:**

Asset Class	Allocation %
Equity	Up to 100% of corpus
Money Market	Up to 100% of corpus
Precious Metal	Up to 100% of corpus

- **Description of types of securities:** Equity and Precious Metals Exchange Traded Funds, Index Funds, Open-ended Funds, Liquid funds

- **Investment horizon:** Recommended time horizon for effective portfolio returns by portfolio manager is minimum 36 months.

- **Benchmark:** Nifty50 TRI Index
  Pursuant to SEBI circular dated December 16, 2022 only three benchmarks under the strategy "Equity" have been defined, one of which is Nifty 50 Index. Accordingly, the portfolio Manager has chosen Nifty 50 Index.

  NIFTY 50 Index is broad based index representing Indian market, and its composition broadly covers all major Industries in the India economy.

E. PRP Fixed Income Fund

- **Fund Manager:** Jyoti Prakash

- **Investment Objective:** The fund will generate income and capital appreciation by predominantly investing in BBB and above rating instruments while maintaining safety and moderate liquidity by maintaining investments in money market instruments.
  However, there is no guarantee or assurance that the investment objective of the scheme will be achieved. The scheme does not assure or guarantee any returns.

- **Asset allocation:**

Instruments / Securities	Allocation %
Corporate debt	0% - 100%
G-Sec	0% - 100%
Money Market Instruments	0% - 20%
Securitized debt	0% - 40%
REITs & InvITs	0% - 25%

- **Description of types of securities:** Debt instruments rating with BBB & above and money market instruments with rating A1 & above.

- **Investment horizon**: Recommended time horizon for effective portfolio returns by portfolio manager is minimum 36 months.

- **Benchmark:** Nifty Medium to Long Duration Debt Index
  Pursuant to SEBI circular dated December 16, 2022 only three benchmarks under the strategy "Debt" have been defined, one of which is Nifty Medium to Long Duration Debt Index. Accordingly, the portfolio Manager has chosen Nifty Medium to Long Duration Debt Index.

- **Investment Risk**:

  The Scheme may invest in debt and debt related instruments, as may be permitted by SEBI, from time to time. Trading volumes, settlement periods and transfer procedures may restrict the liquidity of these investments. Different segments of Indian financial markets have different settlement periods, and such periods may be extended significantly by unforeseen circumstances. The inability of the Scheme to make intended securities' purchases due to settlement problems could cause the Scheme to miss certain investment opportunities. The length of time for settlement may affect the Scheme in the event the Scheme has to meet an exceptionally large number of redemption requests. The Scheme will retain certain investments in cash or cash equivalents for its day-to-day liquidity requirements.

  There are certain other risk associated with the investment such as Prepayment risk, Reinvestment risk, Regulatory risk, Interest rate risk, change in Instrument price, Downgraded credit rating.

F. Alphaa factor Investing Fund

- **Fund Manager:** Jyoti Prakash

- **Investment objective:** The objective of the Fund is to generate long term capital appreciation from a portfolio of Equity and Equity related securities.

- **Investment approach:** The fund will invest predominantly in listed securities. Stocks would be picked based on analyzing list of factors like size, volatility, value, momentum, and quality etc.

  This approach can be taken on a discretionary and non-discretionary basis. If the client chooses to be managed on a non-discretionary basis, the investor will have complete control over investments initiated under the scheme. Ideas will be generated by PRP Wealth, but the investor consent is required before implementation. Investors may also have specific ideas that he/ she may like to be validated by the detailed research process we follow and based on our recommendations, the investor may or may not agree to move forward. Such an arrangement will help the investor to get an independent perspective of the idea before he/ she acts on it. In addition to that, we will be guiding their portfolio towards the value framework that they hold. Such a process could lead to a varied set of securities idea across investors, thus providing them with a customized portfolio and service.

- **Asset Allocation:**

Securities	Allocation %
Listed securities	Up to 100% of corpus
Money Market	Up to 100% of corpus

- **Description of types of securities:** Equities, REITs, InvITs, ETF, Sovereign gold bonds and money market instruments.

- **Investment horizon:** Recommended time horizon for effective portfolio returns by portfolio manager is minimum 36 months.
- **Benchmark:** NIFTY 50 TRI Index
  Pursuant to SEBI circular dated December 16, 2022 only three benchmark under the strategy "Equity" have been defined, one of which is Nifty 50 Index. Accordingly, the portfolio Manager has chosen Nifty 50 Index.

  NIFTY 50 Index is broad based index representing Indian market, and its composition broadly covers all major Industries in the India economy.

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

The Portfolio Manager will not be making investments on behalf of the Client in its associates/group companies.

(iv) Distributors: The Portfolio Manager may

(i) appoint channel partners/distributors to on-board the Client

(ii) On-board the Client directly without intermediation of any channel partners/distributors.

6. Risk factors

A. General Risks Factors

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

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

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

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

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

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

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

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

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

B. Risk associated with equity and equity related instruments

(10) Equity and equity related instruments by nature are volatile and prone to price fluctuations on a daily basis due to macro and micro economic factors. The value of equity and equity related instruments may fluctuate due to factors affecting the securities markets such as volume and volatility in the capital markets, interest rates,

currency exchange rates, changes in law/policies of the government, taxation laws, political, economic or other developments, which may have an adverse impact on individual Securities, a specific sector or all sectors. Consequently, the value of the Client's Portfolio may be adversely affected.

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

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

C. Risk associated with debt and money market securities

(13) Interest Rate Risk

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

(14) Liquidity or Marketability Risk

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

(15) Credit Risk

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

(16) Reinvestment Risk

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

D. Risk associated with derivatives instruments

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

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

E. Risk associated with investments in mutual fund schemes

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

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

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

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

of an inordinately large number of redemption requests or of a restructuring of the schemes.

(23) The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes in the offer document(s)/scheme information document(s) of the scheme(s), which may vary substantially depending on the market risks, general economic and political conditions in India and other countries globally, the monitory and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.

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

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

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

F. Risk arising out of Non-diversification

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

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

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

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

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

7. Nature of expenses

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

i. Investment Management fee:

The management fee relates to the portfolio management services offered to the Clients. The fee may be a fixed charge or a percentage of the quantum of the funds being managed as agreed in the Agreement.

ii. Advisory fees:

The advisory fees relate to the advisory services offered by the Portfolio Manager to the client. The fee may be a fixed charge or a percentage of the quantum of the funds being advised as agreed in the Agreement.

iii. Performance fee:

The performance fee relates to the share of profits charged by the Portfolio Manager, subject to hurdle rate and high-water mark principle as per the details provided in the Agreement.

iv. Exit Load:

The Portfolio Manager may charge early withdrawal fee as a percentage of the value of the Portfolio /withdrawn Portfolio as per the terms and conditions of a particular Product as agreed in the Agreement

v. Custodian Fee

The custody fees are charged by the custodian for these services and are borne solely by the Client on actuals. The charges may include account maintenance fees, transaction fees, custody charges based on portfolio size, and any applicable taxes.

vi. Registrar and Transfer Agent Fees

Not applicable

vii. Brokerage and transaction cost.

The Portfolio Manager incurs brokerage charges and transaction costs while executing securities transactions on behalf of clients. These include brokerage fees payable to brokers, statutory levies such as Securities Transaction Tax (STT), Goods and Services Tax (GST), stamp duty, exchange transaction charges, and other regulatory levies

applicable to each trade.

viii. Other fees and expenses:

The Portfolio Manager may incur the following expenses which shall be charged/ reimbursed by the Client:

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

Provided the Portfolio Manager shall not charge any up-front fees to the Client whether directly or indirectly. Notwithstanding the above, the Portfolio Manager may charge up-front costs and expenses so attributable to the Client in terms of the Agreement.

The above fees are payable in accordance with the agreements executed with the client for services and are subject to applicable regulatory limits and disclosures mandated by SEBI. Clients should refer to the detailed fee schedule annexed to the Agreement for specific rates and computation methodologies.

8. Taxation

A. General

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

B. Tax deducted at source

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

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

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

C. Long term capital gains

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

Period of Holding

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

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

- **Definition of Specified Mutual Fund:**

  Before 1st April 2025:
  "Specified Mutual Fund" *means a Mutual Fund by whatever name called, where not more than thirty-five per cent of its total proceeds is invested in the equity shares of domestic companies.*

  On and after 1st April 2025:
  "Specified Mutual Fund" *means, —*
  (a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent. of its total proceeds in debt and money market instruments; or
  (b) a fund which invests sixty-five per cent. or more of its total proceeds in units of a fund referred to in sub-clause (a).

- **Definition of debt and money market instruments:**
  "debt and money market instruments" shall include any securities, by whatever

name called, classified or regulated as debt and money market instruments by the Securities and Exchange Board of India.

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

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

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

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

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

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

  Specifically in case of long term capital gains arising on sale of shares or units acquired originally as unlisted shares/units up to 31 January 2018, COA is substituted with the "indexed COA" (instead of FMV) where sale consideration is higher than the indexed COA. Where sale value is higher than the COA but not higher than the indexed COA, the sale value is deemed as the COA. This benefit is available only in the case where the shares or units, not listed on a recognised

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

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

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

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

  Long-term capital gains in respect of capital assets (all securities and units other than listed shares and units of equity oriented mutual funds and business trust) is chargeable to tax at the rate of 20% plus applicable surcharge and education cess, as applicable. The capital gains are computed after taking into account cost of acquisition as adjusted by cost inflation index notified by the Central Government and expenditure incurred wholly and exclusively in connection with such transfer. This tax rate is reduced from 20% to 12.5%; but no indexation benefit will be available with effect from 23 July 2024.

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

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

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

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

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

  Under section 115E of the IT Act, any income from investment or income from long-term capital gains of an asset other than specified asset as defined in Section

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

D. Short term capital gains

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

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

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

E. Profits and gains of business or profession

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

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

F. Losses under the head capital gains/business income

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

the subsequent 8 assessment years. A long-term capital loss arising during a year is allowed to be set-off only against long term capital gains. Balance loss, if any, shall be carried forward and set-off against long term capital gains arising during the subsequent 8 assessment years.

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

G. General Anti Avoidance Rules (GAAR)

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

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

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

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

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

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

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

H. FATCA Guidelines

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

(a) the name, address, taxpayer identification number and date and place of birth;

(b) where an entity has one or more controlling persons that are reportable persons:

(i) the name and address of the entity, TIN assigned to the entity by the country of its residence; and

(ii) the name, address, date of birth, place of birth of each such controlling person and TIN assigned to such controlling person by the country of his residence.

(c) account number (or functional equivalent in the absence of an account number);

(d) account balance or value (including, in the case of a cash value insurance contract or annuity contract, the cash value or surrender value) at the end of the relevant calendar year; and

(e) the total gross amount paid or credited to the account holder with respect to the account during the relevant calendar year.

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

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

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

9. Accounting policies

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

A. Client Accounting

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

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

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

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

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

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

B. Recognition of portfolio investments and accrual of income

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

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

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

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

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

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

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

C. Valuation of portfolio investments

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

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

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

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

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

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

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

10. Investors services

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

(a) Reporting portfolio actions and client statement of accounts at pre-defined frequency;
(b) Attending to and addressing any client query with least lead time;
(c) Ensuring portfolio reviews at predefined frequency.

Client has an option for direct onboarding without intermediation of person engaged in distribution services.

Name, address and telephone number of the investor relation officer who shall attend to the investor queries and complaints:

Name of the person	Sankalp Nayak
Designation	Compliance Officer
Address	8th Floor, Sea Breeze Building, Appasaheb Marathe Marg, Prabhadevi Mumbai - 400 025
Email	compliance@alphaamoney.com
Investor Grievance Email ID	pmsops@alphaamoney.com
Telephone	0124-4249000

Grievance redressal and dispute settlement mechanism:

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

The Portfolio Manager will endeavor to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time. If the Investor remains dissatisfied with the remedies offered or the stand taken by the Portfolio Manager, the investor, and the Portfolio Manager shall abide by the following mechanisms: -

All disputes, differences, claims and questions whatsoever arising between the Client and the Portfolio Manager and/or their respective representatives shall be settled in accordance with the provision of The Arbitration and Conciliation Act, 1996 or any

statutory requirement, modification, or re-enactment thereof for the time being in force. Such arbitration proceedings shall be held at Mumbai or such other place as the Portfolio Manager thinks fit.

Alternatively, with effect from September 2011, SEBI has launched a new web-based centralized grievance system called SCORES i.e., SEBI Complaints Redressal System, for online filing, forwarding, and tracking of resolution of investor complaints. The Client may also make use of the SCORES facility for any escalations on redressal of their grievances. Following is the link to visit the website and inform their dispute/complaints against the company. https://scores.gov.in/scores/complaintRegister.html

SEBI vide press release PR No. 80/2012 dated 30th August' 2012 has extended its toll-free helpline service for Investors (1800 22 7575 / 1800 266 7575) to Saturday and Sunday from the existing Monday to Friday. The service on Saturday and Sunday would be available initially to investors from all over India in English, Hindi, Marathi, and Gujarati from 9:30 a.m. to 5:30 p.m. For any queries/ feedback or assistance, the Client may also e-mail to sebi@sebi.gov.in.

The agreement with the client shall be governed by construed and enforced in accordance with the laws of India. Any dispute with the client shall at first be settled by mutual discussion, failing which the same will be referred to and settled by arbitration in accordance subject to the provisions of the Arbitration and Conciliation Act, 1996 or any statutory modification/enactment thereof for the time being in force. A sole arbitrator will be appointed by mutual consent of the portfolio manager and the client. The arbitration shall be held in Mumbai and be conducted in the English language. Any action or suit involving the agreement with a client or the performance of the agreement by either party of its obligations will be exclusively in courts located at any place in India subject to the jurisdiction clause in the portfolio agreement.

ODR Portal could be accessed, if unsatisfied with the response. Your attention is drawn to the SEBI circular no. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated July 31, 2023, on "Online Resolution of Disputes in the Indian Securities Market". A common Online Dispute Resolution Portal ("ODR Portal") which harnesses conciliation and online arbitration for resolution of disputes arising in the Indian Securities Market has been established. ODR Portal can be accessed via the following link - https://smartodr.in/

11. Details of the diversification policy of the portfolio manager

The portfolio manager implements a well-defined diversification aimed at balancing risk and return effectively. This policy emphasizes spreading investments across various sectors and industries to achieve broad market exposure. Additionally, the portfolio typically includes a balanced number of holdings to maintain a diversified yet focused

investment approach, thereby seeking to optimize risk-adjusted returns while minimizing concentration risks.

12. Custody of Securities

i) Custody of all Securities of the Client shall be with the Custodian who shall be appointed, from time to time, at the discretion of the Portfolio Manager.
ii) The Custodian shall act on instructions of the Portfolio Manager.
iii) All such custodian fees, charged by the Custodian shall be payable by the Client.
iv) The Portfolio Manager shall not be liable for any act of the Custodian, done with or without the instruction of the Portfolio Manager, which may cause or is likely to cause any loss or damage to the Client.

13. General

Prevention of Money Laundering

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

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

Where the funds invested are for the benefit of a person (beneficiary) other than the person in whose name the investments are made and/or registered, the Client shall provide an undertaking that the Client, holding the funds/securities in his name, is legally authorised/entitled to invest the said funds/securities through the services of the Portfolio Manager, for the benefit of the beneficiaries.

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

The Portfolio Manager, and its directors, shareholders, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Client's account/rejection of any application or mandatory

repayment/returning of funds due to non- compliance with the provisions of the PML Laws and KYC policy. If the Portfolio Manager believes that transaction is suspicious in nature within the purview of the PML Laws, then it will report the same to FIU-IND.

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

PART-II- Dynamic Section:

14. Client Representation:

(i) The Portfolio Manager has obtained a certificate of registration to function as a portfolio manager on Mar 27, 2023 and therefore has no record of representing any persons/entities in the capacity of a portfolio manager before registration.
Details of clients as on 30th September 2026.

Category of Clients	**As on**	**No. of Clients**	**Fund Managed (Rs. Cr.)**	**Discretionary/ Non-Discretionary (if available)**
Associates / group companies (last 3 Years)	30/09/2026	NIL	NIL	**Discretionary**
	31/03/2026	NIL	NIL	**Discretionary**
	31/03/2025	NIL	NIL	**Discretionary**
	31/03/2024	NIL	NIL	**Discretionary**
Associates / group companies (last 3 Years)	30/09/2026	1	0.952	**Non-Discretionary**
	31/03/2026	1	0.465	**Non-Discretionary**
	31/03/2025	NIL	NIL	**Non-Discretionary**
	31/03/2024	NIL	NIL	**Non-Discretionary**
Others (last 3 years)	30/09/2026	12	62.278	**Discretionary**
	31/03/2026	13	58.660	**Discretionary**
	31/03/2025	5	44.542	**Discretionary**
	31/03/2024	3	11.807	**Discretionary**
Others (last 3 years)	30/09/2026	NIL	NIL	**Non-Discretionary**
	31/03/2026	NIL	NIL	**Non-Discretionary**
	31/03/2025	NIL	NIL	**Non-Discretionary**
	31/03/2024	NIL	NIL	**Non-Discretionary**

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

Please refer below for related parties with whom transactions have taken place during the year 2025-26 (audited).

Details of related parties:

Sr. No.	Relationship	Names of related parties
1	Director	Puneet Pandey
2	Director	Rashmi Pandey
3	Director	Prakhar Pandey
4	Common Director	PRP Professional Edge Associates Private Limited
6	Common Director	Ialtinvest Private Limited

Details of related party transactions during the year ended March 31, 2026

Sr. No.	Particulars	Group Enterprise 2025-26	Key Management Personnel 2025-26
1	**(A) Expenditure**		-
	Ialtinvest Private Limited	5,14,200	
	PRP Professional Edge Associates Private Limited	12,09,000	
		-	-
	(B) Revenue		
	PRP Professional Edge Associates Private Limited	1,70,00,000	
	Ialtinvest Private Limited	50,00,000	-
	(C)Unsecured loan given		
	PRP Professional Edge Associates Private Limited	-	
	(D) Proceeds from repayment of unsecured loan given		-
	PRP Professional Edge Associates Private Limited	2,60,00,000	
	(E) Interest Income		
	PRP Professional Edge Associates Private Limited	9,33,100	
	Outstanding balance at the year end		
	(F) Revenue		
	PRP Professional Edge Associates Private Limited	1,70,00,000	-
	Ialtinvest Private Limited	50,00,000	-

Sr. No.	Name of the related parties	Nature of Payment	Amount (in Rs.)
1	Puneet Pandey (Director)	Remuneration	Nil
2	Rashmi Pandey (Director)	Remuneration	Nil

15. The Financial Performance of Portfolio Manager

(based on audited financial statements)

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

8.1 Capital Structure (in Rs.)

Particulars	As on 31- March-2024	As on 31- March-2025	As on 31- March-2026
a) Paid-up capital	5,41,800	5,55,900	5,55,900
b) Free reserves (excluding re-valuation reserves)	4,31,04,000	5,39,91,500	5,25,32,700
c) Total (a) + (b)	**4,36,45,800**	**5,45,47,400**	**5,30,88,600**

8.2 Deployment of Resources (in Rs.)

Particulars	As on 31- March-2024	As on 31- March-2025	As on 31- March-2026
(a) Fixed Assets	**0.00**	**0.00**	**0.00**
(b) Plant & Machinery & Office Equipment's	**71,300**	**25,000**	**8,100**
(c) Investments	**0.00**	**0.00**	**0.00**
(d) Others	**98,40,000**	**86,10,000**	**73,80,000**
Total	**99,11,300**	**86,35,000**	**73,88,100**

8.3 Major Sources of Income: (in Rs.)

Particulars	As on 31- March-2024	As on 31- March-2025	As on 31- March-2026
(a) Income from Wealth Management Fee	**2,45,100**	**22,19,600**	**2,53,84,000**
Total	**2,45,100**	**22,19,600**	**2,53,84,000**

8.4 Net Profit (In Rs.)

`	As on 31- March-2024	As on 31- March-2025	As on 31- March-2026
Profit After Tax	**(141.22)**	**(210.29)**	**(26.24)**

16. Performance of the Portfolio Manager

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

Performance data as on September 30, 2026 -

Investment Approach	AUM (INR Cr.)	1 Month	3 Month	6 Month	1 Year	2 Year	3 Year	Since Inception
Alphaa Better Risk Reward 30 Stocks Portfolio	6.23	-5.12%	-5.36%	3.43%	-11.58%	-8.68%	5.63%	5.93%
Benchmark: Nifty 50 TRI		-6.03%	-4.91%	2.13%	-7.09%	-5.29%	6.06%	6.58%
Alphaa factor Investing Fund	23.56	-6.32%	-3.77%	1.59%	-7.45%	-3.62%	-	-10.93%
Benchmark: Nifty 50 TRI		-6.03%	-4.91%	2.13%	-7.09%	-5.29%	-	5.71%
Alphaa Focused Small-Cap Portfolio	14.57	-4.74%	-3.95%	11.96%	-7.44%	-8.49%	7.77%	8.89%
Benchmark: Nifty 50 TRI		-6.03%	-4.91%	2.13%	-7.09%	-5.29%	6.06%	5.61%
Alphaa MPT plus Fund	16.60	-7.33%	-3.01%	8.85%	-3.95%	-1.70%	10.93%	10.30%
Benchmark: Nifty 50 TRI		-6.03%	-4.91%	2.13%	-7.09%	-5.29%	6.06%	5.78%
AlphaaMoney Equity+ Portfolio	1.29	-5.06%	-3.52%	9.23%	6.23%	4.90%	-	14.98%
Benchmark: Nifty 50 TRI		-6.03%	-4.91%	2.13%	-7.09%	-5.29%	-	5.85%
Alphaa factor Investing Fund NDPMS	0.56	-8.25%	-9.58%	24.76%	-1.57%	-	-	-1.25%
Benchmark: Nifty 50 TRI		-6.03%	-4.91%	2.13%	-7.09%	-	-	-9.50%
AlphaaMoney Equity+ Portfolio NDPMS	0.38	-5.73%	-	-	-	-	-	-5.35%
Benchmark: Nifty 50 TRI		-6.03%	-	-	-	-	-	-7.14%

17. Audit Observations for preceding three years

There were no adverse observations in the audit report of last financial year.

18. Details of investments in the securities of related parties of the Portfolio Manager:
Investments in the securities of associates/related parties of Portfolio Manager:

Sr. No.	Investment Approach, if any	Name of the associate/ related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores	Percentage of total AUM as on last day of the previous calendar quarter
-	NIL	NIL	NIL	NIL	NIL

For and on behalf of PRP Edge Wealth Pvt Ltd

Mr. Puneet Pandey **Director**	:	
Mr. Rashmi Pandey **Director**	:	

Place: Gurugram, Haryana
Date: **21.10.2026**

FORM C

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

Name of Investment Advisor	:	**PRP Edge Wealth Pvt Ltd.**
SEBI Registration Number	:	**INP000007960 (Dated: 27-Mar-2023)**
Registered Office Address	:	507, 5th Floor, Eros City Square, Rosewood City, Sector - 49-50, Gurugram - 122018, Haryana
Phone No(s)	:	**0124-4249000**
E-mail address	:	pmsops@alphaamoney.com
Website	:	www.alphaamoney.com

We confirm that:

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

(ii) the disclosures made in the Document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us / investment through the Portfolio Manager; Information updated in Part II Dynamic section of the Disclosure documents is true, fair and correct;

(iii) the Disclosure Document has been duly certified by an independent Chartered Accountant, as on October 21, 2026. The details of the Chartered Accountants are as follows:

Name of the Firm:	Kapil Kumar Agarwal and Associates
Registration Number:	008174E
Partner:	Rajeev Sharma
Membership Number:	075689
Address:	A-57, Amani Shah Road, Shahtri Nagar, Jaipur - 302016, Rajasthan

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

For and on behalf of PRP Edge Wealth Pvt Ltd

Date: **21.10.2026**

Signature of the Principal Officer:
Mr. Rahul Jagetiya

Place: Mumbai

PRP Edge Wealth Private Limited Mumbai