

## **Investor Charter for Depositories and Depository Participants**

## 1. Vision

Towards making Indian Securities Market - Transparent, Efficient, & Investor friendly by providing safe, reliable, transparent and trusted record keeping platform for investors to hold and transfer securities in dematerialized form.

#### 2. Mission

- To hold securities of investors in dematerialized form and facilitate its transfer, while ensuring safekeeping of securities and protecting interest of investors.
- To provide timely and accurate information to investors with regard to their holding and transfer of securities held by them.
- To provide the highest standards of investor education, investor awareness and timely services so as to enhance Investor Protection and create awareness about Investor Rights.

# 3. <u>Details of business transacted by the Depository and Depository</u> <u>Participant (DP)</u>

A Depository is an organization which holds securities of investors in electronic form. Depositories provide services to various market participants - Exchanges, Clearing Corporations, Depository Participants (DPs), Issuers and Investors in both primary as well as secondary markets. The depository carries out its activities through its agents which are known as Depository Participants (DP). Details available on the link [https://www.cdslindia.com/DP/dplist.aspx]

# 4. <u>Description of services provided by the Depository through Depository Participants (DP) to investors</u>

#### (1) Basic Services

Sr. No.	Brief about the Activity / Service	Expected Timelines for processing by the DP after receipt of proper documents
	Dematerialization of	
1.	securities	7 days
	Rematerialization of	
2.	securities	7 days
	Mutual Fund Conversion /	
3.	Destatementization	5 days

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Sr. No.	Brief about the Activity / Service	Expected Timelines for processing by the DP after receipt of proper documents
4.	Re-conversion / Restatementisation of Mutual fund units	7 days
5.	Transmission of securities	7 days
6.	Registering pledge request	15 days
7.	Closure of demat account	30 days
		For T+1 day settlements, Participants shall accept instructions from the Clients, in physical form up to 4 p.m. (in case of electronic instructions up to 6.00 p.m.) on T day for pay-in of securities.  For T+0 day settlements, Participants shall
		accept EPI instructions from the clients, till 11:00 AM on T day.
8.	Settlement Instruction	Note: 'T' refers 'Trade Day'

(2) Depositories provide special services like pledge, hypothecation, internet based services etc. in addition to their core services and these include

Sr. No.	Type of Activity /Service	Brief about the Activity / Service
1.	Value Added Services	Depositories also provide value added services such as  a. Basic Services Demat Account(BSDA) Basic Services b. Transposition cum dematerialization c. Linkages with Clearing System d. Distribution of cash and non-cash corporate benefits (Bonus, Rights, IPOs etc.), stock lending, demat of NSC / KVP, demat of warehouse receipts etc.
2.	Consolidated Account statement (CAS)	CAS is issued 10 days from the end of the month (if there were transactions in the previous month) or half yearly(if no transactions).
3.	Digitalization of services provided by the depositories	Depositories offer below technology solutions and e-facilities to their demat account holders through DPs:

CIN No.: U67120MH1997PTC109978



Sr. No.	Type of Activity /Service	Brief about the Activity / Service
NO.	70011100	<ul> <li>a. E-account opening: Details available on the link E-account opening<sup>4</sup></li> <li>a. Online instructions for execution: Details available on the link Online instructions for execution<sup>5</sup></li> <li>b. e-DIS / Demat Gateway: Details available on the link e-DIS / Demat Gateway<sup>6</sup></li> <li>b. e-CAS facility: Details available on the link e-CAS facility7</li> <li>c. Miscellaneous services: Details available on the link Miscellaneous services8</li> </ul>

## 5. Details of Grievance Redressal Mechanism

The Process of investor grievance redressal

1.	Investor C	Complaint/	
	Grievances	•	the Depository/DP in the following ways:
			, ,
			a. Electronic mode -
			(i) SCORES 2.0 (a web based centralized
			grievance redressal system of SEBI)
			https://scores.sebi.gov.in/
			Two Level Review for complaint/grievance
			against DP:
			<ul> <li>First review done by Designated Body</li> </ul>
			- Second review done by SEBI
			(ii) Respective Depository's web portal
			dedicated for the filing of compliant [link to
			be provided by Depositories]
			(iii) Emails to designated email IDs of
			Depository complaint@amsec.in
			b. Offline mode [details of link to the form to be
			provided by Depositories]
			The complaints/ grievances lodged directly with
			the Depository shall be resolved within 21 days.
			and Dopository orian bo received within 21 days.
2.	Online	Dispute	If the Investor is not satisfied with the resolution
	Resolution	(ODR)	provided by DP or other Market Participants, then



platform for online Conciliation and Arbitration	the Investor has the option to file the complaint/ grievance on SMARTODR platform for its resolution through by online conciliation or arbitration.  [SMARTODR link <a href="https://smartodr.in/login">https://smartodr.in/login</a>
Steps to be followed in ODR for Review, Conciliation and Arbitration	<ul> <li>Investor to approach Market Participant for redressal of complaint</li> <li>If investor is not satisfied with response of Market Participant, he/she can escalate the complaint on SEBI SCORES portal.</li> <li>Alternatively, the investor may also file a complaint on SMARTODR portal for its resolution through online conciliation and arbitration.</li> <li>Upon receipt of complaint on SMARTODR portal, the relevant MII will review the matter and endeavour to resolve the matter between the Market Participant and investor within 21 days.</li> <li>If the matter could not be amicably resolved, then the Investor may request the MII to refer the matter case for conciliation.</li> <li>During the conciliation process, the conciliator will endeavor for amicable settlement of the dispute within 21 days, which may be extended with 10 days by the conciliator.</li> <li>If the conciliation is unsuccessful, then the investor may request to refer the matter for arbitration.</li> <li>The arbitration process to be concluded by arbitrator(s) within 30 days, which is extendable by 30 days.</li> </ul>

# 6. <u>Guidance pertaining to special circumstances related to market activities:</u> <u>Termination of the Depository Participant</u>

Sr.	Type of special circumstances	Timelines for the Activity/ Service
No.		



1.	<ul><li>Depositories to terminate the</li></ul>	Client will
	participation in case a participant	its securiti
	no longer meets the eligibility	of its choice
	criteria and/or any other grounds	the transfe
	as mentioned in the bye laws like	
	suspension of trading member by	letter/ema
	the Stock Exchanges.	

Client will have a right to transfer all its securities to any other Participant of its choice without any charges for the transfer within 30 days from the date of intimation by way of letter/email.

Sr. No.	Type of special circumstances	Timelines for the Activity/ Service
	<ul> <li>Participant surrenders the participation by its own wish.</li> </ul>	

## 7. Dos and Don'ts for Investors below:

Sr. No.	Guidance
i.	Always deal with a SEBI registered Depository Participant for opening a demat account.
ii.	Read all the documents carefully before signing them.
iii.	Before granting Power of attorney to operate your demat account to an intermediary like Stock Broker, Portfolio Management Services (PMS) etc., carefully examine the scope and implications of powers being granted.
iv.	Always make payments to registered intermediary using banking channels. No payment should be made in name of employee of intermediary.
V.	Accept the Delivery Instruction Slip (DIS) book from your DP only (pre-printed with a serial number along with your Client ID) and keep it in safe custody and do not sign or issue blank or partially filled DIS slips.
	Always mention the details like ISIN, number of securities accurately. In case of any queries, please contact your DP or broker and it should be signed by all demat account holders.
	Strike out any blank space on the slip and Cancellations or corrections on the DIS should be initialed or signed by all the account holder(s).
	Do not leave your instruction slip book with anyone else.
	Do not sign blank DIS as it is equivalent to a bearer cheque.
vi.	Inform any change in your Personal Information (for example address or Bank Account details, email ID, Mobile number) linked to your demat account in the prescribed format and obtain confirmation of updation in system
vii.	Mention your Mobile Number and email ID in account opening form to receive SMS alerts and regular updates directly from depository.



viii.	Always ensure that the mobile number and email ID linked to your demat account are the same as provided at the time of account opening/updation.
ix.	Do not share password of your online trading and demat account with anyone.
X.	Do not share One Time Password (OTP) received from banks, brokers, etc. These are meant to be used by you only.
xi.	Do not share login credentials of e-facilities provided by the depositories such as e-DIS/demat gateway, SPEED-e/easiest etc. with anyone else.
xii.	Demat is mandatory for any transfer of securities of Listed public limited companies.

Sr. No.	Guidance
xiii.	If you have any grievance in respect of your demat account, please write to designated email IDs of depositories or you may lodge the same with SEBI online at https://scores.sebi.gov.in
xiv.	Keep a record of documents signed, DIS issued and account statements received.
XV.	As Investors you are required to verify the transaction statement carefully for all debits and credits in your account. In case of any unauthorized debit or credit, inform the DP or your respective Depository.
xvi.	Appoint a nominee to facilitate your heirs in obtaining the securities in your demat account, on completion of the necessary procedures.
xvii.	Register for Depository's internet based facility or download mobile app of the depository to monitor your holdings.
xviii.	Ensure that, both, your holding and transaction statements are received periodically as instructed to your DP. You are entitled to receive a transaction statement every month if you have any transactions.
xix.	Do not follow herd mentality for investments. Seek expert and professional advice for your investments
XX.	Beware of assured/fixed returns.

## 8. Rights of investors [link to be provided by the Rightsofinvestors11

- i. Receive a copy of KYC, copy of account opening documents.
- ii. No minimum balance is required to be maintained in a demat account.
- iii. No charges are payable for opening of demat accounts.
- iv. If executed, receive a copy of Power of Attorney. However, Power of Attorney is not a mandatory requirement as per SEBI / Stock Exchanges. You have the right to revoke any authorization given at any time.
- v. You can open more than one demat account in the same name with single DP/ multiple DPs.
- vi. Receive statement of accounts periodically. In case of any discrepancies in statements, take up the same with the DP immediately. If the DP



- does not respond, take up the matter with the Depositories.
- vii. Pledge and /or any other interest or encumbrance can be created on demat holdings.
- viii. Right to give standing instructions with regard to the crediting of securities in demat account.
- ix. Investor can exercise its right to freeze/defreeze his/her demat account or specific securities / specific quantity of securities in the account, maintained with the DP.
- x. In case of any grievances, Investor has right to approach Participant or Depository or SEBI for getting the same resolved within prescribed timelines.
- xi. Every eligible investor shareholder has a right to cast its vote on various resolutions proposed by the companies for which Depositories have developed an internet based 'e-Voting' platform.
- xii. Receive information about charges and fees. Any charges/tariff agreed upon shall not increase unless a notice in writing of not less than thirty days is given to the Investor.
- xiii. Right to indemnification for any loss caused due to the negligence of the Depository or the participant.
- xiv. Right to opt out of the Depository system in respect of any security.

## 9. Responsibilities of Investors [link to be provided by the Responsibilities of Investors<sup>12</sup>

- i. Deal with a SEBI registered DP for opening demat account, KYC and Depository activities.
- ii. Provide complete documents for account opening and KYC (Know Your Client). Fill all the required details in Account Opening Form / KYC form in own handwriting and cancel out the blanks.
- iii. Read all documents and conditions being agreed before signing the account opening form.
- iv. Accept the Delivery Instruction Slip (DIS) book from DP only (preprinted with a serial number along with client ID) and keep it in safe custody and do not sign or issue blank or partially filled DIS.
- v. Always mention the details like ISIN, number of securities accurately.
- vi. Inform any change in information linked to demat account and obtain confirmation of updation in the system.
- vii. Regularly verify balances and demat statement and reconcile with trades / transactions.
- viii. Appoint nominee(s) to facilitate heirs in obtaining the securities in their demat account.
- ix. Do not fall prey to fraudsters sending emails and SMSs luring to trade in stocks

/ securities promising huge profits.



# 10. Code of Conduct for Depositories [link to be provided by the Code of Conduct (Part D of Third Schedule of SEBI (D & P) regulations, 2018)

## A Depository shall:

- (a) always abide by the provisions of the Act, Depositories Act, 1996, any Rules or Regulations framed thereunder, circulars, guidelines and any other directions issued by the Board from time to time.
- (b) adopt appropriate due diligence measures.
- (c) take effective measures to ensure implementation of proper risk management framework and good governance practices.
- (d) take appropriate measures towards investor protection and education of investors.
- (e) treat all its applicants/members in a fair and transparent manner.
- (f) promptly inform the Board of violations of the provisions of the Act, the Depositories Act, 1996, rules, regulations, circulars, guidelines or any other directions by any of its issuer or issuer's agent.
- (g) take a proactive and responsible attitude towards safeguarding the interests of investors, integrity of depository's systems and the securities market.
- (h) endeavor for introduction of best business practices amongst itself and its members.
- (i) act in utmost good faith and shall avoid conflict of interest in the conduct of its functions.
- (j) not indulge in unfair competition, which is likely to harm the interests of any other Depository, their participants or investors or is likely to place them in a disadvantageous position while competing for or executing any assignment.
- (k) segregate roles and responsibilities of key management personnel within the depository including
  - a. Clearly mapping legal and regulatory duties to the concerned position
  - b. Defining delegation of powers to each position
  - c. Assigning regulatory, risk management and compliance aspects to business and support teams
- (I) be responsible for the acts or omissions of its employees in respect of the conduct of its business.

(m)monitor the compliance of the rules and regulations by the participants and shall further ensure that their conduct is in a manner that will safeguard the interest of investors and the securities market.



- 11. Code of Conduct for Participants [link to be provided by Code of Conduct (Part A of Third Schedule of SEBI (D & P) regulations, 2018)
  - 1. A participant shall make all efforts to protect the interests of investors.
  - 2. A participant shall always endeavour to—
    - (a) render the best possible advice to the clients having regard to the client's needs and the environments and his own professional skills;
    - (b) ensure that all professional dealings are effected in a prompt, effective and efficient manner;
    - (c) inquiries from investors are adequately dealt with;
    - (d) grievances of investors are redressed without any delay.
  - 3. A participant shall maintain high standards of integrity in all its dealings with its clients and other intermediaries, in the conduct of its business.
  - 4. A participant shall be prompt and diligent in opening of a beneficial owner account, dispatch of the dematerialisation request form, rematerialisation request form and execution of debit instruction slip and in all the other activities undertaken by him on behalf of the beneficial owners.
- 5. A participant shall endeavour to resolve all the complaints against it or in respect of the activities carried out by it as quickly as possible, and not later than one month of receipt.
- 6. A participant shall not increase charges/fees for the services rendered without proper advance notice to the beneficial owners.
- 7. A participant shall not indulge in any unfair competition, which is likely to harm the interests of other participants or investors or is likely to place such other participants in a disadvantageous position while competing for or executing any assignment.
- 8. A participant shall not make any exaggerated statement whether oral or written to the clients either about its qualifications or capability to render certain services or about its achievements in regard to services rendered to other clients.
- 9. A participant shall not divulge to other clients, press or any other person any information about its clients which has come to its knowledge except with the approval/authorisation of the clients or when it is required to disclose the information under the requirements of any Act, Rules or Regulations.
- 10. A participant shall co-operate with the Board as and when required.

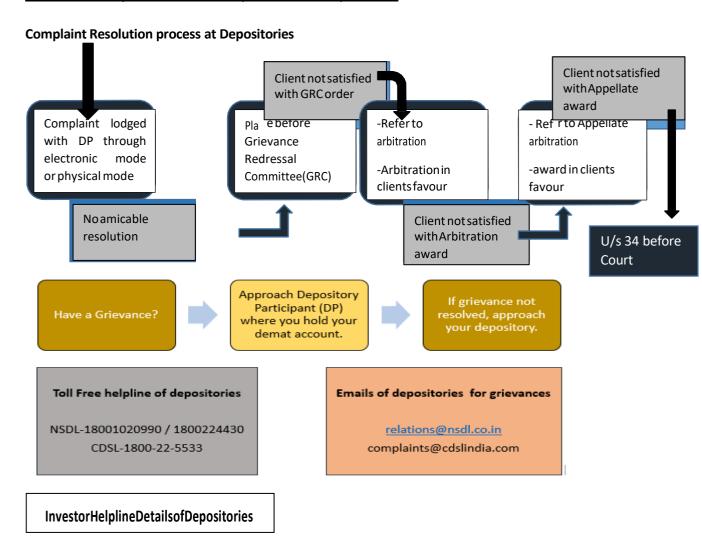


- 11.A participant shall maintain the required level of knowledge and competency and abide by the provisions of the Act, Rules, Regulations and circulars and directions issued by the Board. The participant shall also comply with the award of the Ombudsman passed under the Securities and Exchange Board of India (Ombudsman) Regulations, 2003.
- 12. A participant shall not make any untrue statement or suppress any material fact in any documents, reports, papers or information furnished to the Board.
- 13. A participant shall not neglect or fail or refuse to submit to the Board or other agencies with which it is registered, such books, documents, correspondence, and papers or any part thereof as may be demanded/requested from time to time.
- 14. A participant shall ensure that the Board is promptly informed about any action, legal proceedings, etc., initiated against it in respect of material breach or non-compliance by it, of any law, Rules, regulations, directions of the Board or of any other regulatory body.
- 15. A participant shall maintain proper inward system for all types of mail received in all forms.
- 16.A participant shall follow the maker—Checker concept in all of its activities to ensure the accuracy of the data and as a mechanism to check unauthorised transaction.
- 17. A participant shall take adequate and necessary steps to ensure that continuity in data and record keeping is maintained and that the data or records are not lost or destroyed. It shall also ensure that for electronic records and data, upto-date back up is always available with it.
- 18.A participant shall provide adequate freedom and powers to its compliance officer for the effective discharge of his duties.
- 19. A participant shall ensure that it has satisfactory internal control procedures in place as well as adequate financial and operational capabilities which can be reasonably expected to take care of any losses arising due to theft, fraud and other dishonest acts, professional misconduct or omissions.
- 20. A participant shall be responsible for the acts or omissions of its employees and agents in respect of the conduct of its business.
- 21.A participant shall ensure that the senior management, particularly decision makers have access to all relevant information about the business on a timely basis.
- 22. A participant shall ensure that good corporate policies and corporate governance are in place.



## Para 5(2) of Investor Charter

## Complaint Resolution process at Depositories<sup>11</sup>



**Asian Markets Securities Private Limited** 

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CIN No.: U67120MH1997PTC109978



Format for Investor Complaints Data to be displayed by **Depository** Participants on their respective websites

Data for every month ending - March- 2025

Dala	for every me	onun enai	ng – warc	n- 2023				
S	Received	Carried	Received	Total	Resolved*	Pending a	at the end	Average
N	from	forward	during	Pending		of the mo	nth**	Resolution
		from	the					time A
		previou	month					(In days)
		s month						
						Pending	Pending	
						for less	for	
						than 3	more	
						months	than 3	
1	2	3	4	5	6	7	7	8
1	Directly from	0	0	0	N.A	0		N.A
	Investors							
2	SEBI	0	0	0	N.A	0		N.A
	(SCORES)							
3	Depositories	0	О	0	N.A	0		N.A
4	Other	0	0	0	N.A	0		N.A
	Sources							
	Grand Total	0	0	0	N.A	0		N.A

 $\textbf{E}_{\textbf{nd} \ \textbf{of} \ \textbf{monthly disposal} \ \textbf{of complaints} }$ 

SN	Month	Carried forward from previous month	Received	Resolved*	Pending**
1	2	3	4	5	6
1	April 2024	0	0	0	0
2	May 2024	0	0	0	0
3	June 2024	0	0	0	0
4	July 2024	0	0	0	0
5	August 2024	0	0	0	0
6	September-2024	0	0	0	0
7	October-2024	0	0	0	0
8	November-2024	0	0	0	0
9	December-2024	0	0	0	0
10	January-2025	0	0	0	0
11	February-2025	0	0	0	0
12	March-2025	0	0	0	0

<sup>\*</sup>Should include complaints of previous months resolved in the current month, if any.\*\*



Should include total complaints pending as on the last day of the month, if any. Average resolution time is the sum total of time taken to resolve each complaint in the current month divided by total number of complaints resolved in the current month.

## End of annual disposal of complaints

SN	Year	Carried forward	Received	Resolved	Pending at
		from previous	during the	during the	the end of the
		year	year	year	year
1	2017-18	0	0	0	0
2	2018-19	0	0	0	0
3	2019-20	0	0	0	0
4	2020-21	0	0	0	0
5	2021-22	0	0	0	0
6	2022-23	0	0	0	0
7	2023-24	0	0	0	0
8	2024-25	0	0	0	0
	Grand Total	0	0	0	0



## <u>Investor Charter in Respect of Portfolio Management Services</u>

#### A. Vision and Mission Statements for investors.

#### Vision:

To implement diligently researched customized investment strategies which help investors meet their long-term financial goals in a risk appropriate manner.

#### Mission:

To ensure that the PMS industry provides a viable investment avenue for wealth creation by adopting high levels of skill, integrity, transparency and accountability.

# B. Details of business transacted by the organization with respect to the investors.

- a. appropriate risk profiling of investors
- b.to provide Disclosure Document to investors
- c. executing the PMS agreement
- d.Making investment decisions on behalf of investors (discretionary) investment decisions taken at the discretion of the Investor (nondiscretionary) or advising investors regarding their investment decisions (advisory), as the case may be.

#### C. Details of services provided to investors and estimated timelines:-

- i. Discretionary & Non-Discretionary Portfolio Management Services (PMS):-Under these services, all an investor has to do, is to give his portfolio in any form
  - i.e. in stocks or cash or a combination of both. The minimum size of the portfolio under the Discretionary and/ or Non-Discretionary Funds Management Service



should be Rs.50 lakhs as per the current SEBI Regulations. However, the PMS provider reserves the right to prescribe a higher threshold product-wise or in any other manner at its sole discretion. The PMS provider will ascertain the investor's investment objectives to achieve optimal returns based on his risk profile. Under the Discretionary Portfolio Management service, investment decisions are at the sole discretion of the PMS provider if they are in sync with the investor's investment objectives. Under the Non-Discretionary Portfolio Management service, investment decisions taken at the discretion of the Investor.

#### ii. Investment Advisory Services: -

Under these services, the Client is advised on buy/sell decision within the overall profile without any back-office responsibility for trade execution, custody of securities or accounting functions. The PMS provider shall be solely acting as an Advisor to the Client and shall not be responsible for the investment/divestment of securities and/or administrative activities on the client's portfolio. The PMS provider shall act in a fiduciary capacity towards its Client and shall maintain arm's length relationship with its other activities. The PMS provider shall provide advisory services in accordance with guidelines and/or directives issued by the regulatory authorities and/or the Client from time to time in this regard.

## iii. Client On-boarding

- a. Ensuring compliance with KYC and AML guidelines.
- b. franking & signing the Power of Attorney to make investment decisions on behalf of the investor.
- c. opening demat account and funding of the same from the investor's verified bank account and/or transfer of securities from verified demat account of the investor and
- d. Mapping the said demat account with Custodian.



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## iv. Ongoing activities

- a. To provide periodic statements to investors as provided under the PMS Regulations 2020 and other SEBI notifications and circulars ("PMS Regulations") and
- b. Providing each client an audited account statement on an annual basis which includes all the details as required under the PMS Regulations.

#### v. Fees and Expenses

Charging and disclosure of appropriate fees & expenses in accordance with the PMS Regulations.

#### vi. Closure and Termination

Upon termination of PMS Agreement by either party, the securities and the funds lying in the account of the investor shall be transferred to the verified bank account/ demat account of the investor.

## vii. Grievance Redressal

Addressing in a time bound manner investor's queries, service requests and grievances, if any, on an ongoing basis.

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Timelines of the services provided to investors are as follows:

Sr.	Service / Activity	Timeline		
No.	Gervioe / Addivity			
1	Opening of PMS account (including demat account) for residents.	documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.		
2	Opening of PMS account (including demat account) for non-individual clients.	14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.		
3	Opening of PMS account (including demat account, bank account and trading account) for non-resident clients.	14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.		
4	Registration of nominee in PMS account and demat account.	Registration of nominee should happen along with account opening, therefore turnaround time should be same as account opening turnaround time.		
5	Modification of nominee in PMS account and demat account.	10 days from receipt of requisite nominee modification form, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.		



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Sr.		
No.	Service / Activity	Timeline
6	Uploading of PMS account in KRA and CKYC database.	10 days from date of account opening (Portfolio Manager may rely on the custodian for updating the same).
7	Whether portfolio manager is registered with SEBI, then SEBI registration number.	At the time of client signing the agreement; this information should be a part of the account opening form and disclosure document.
8	Disclosure about latest networth of portfolio manager and total AUM.	Disclosure of portfolio manager's total AUM - monthly to SEBI  Disclosure of latest networth should be done in the disclosure document whenever there are any material changes.
9	Intimation of type of PMS account – discretionary.	At the time of client signing the agreement; this information should be a part of the account opening form.
10	Intimation of type of PMS account - non discretionary.	At the time of client signing the agreement; this information should be a part of the account opening form.
11	Intimation to client what discretionary account entails and powers that can be exercised by portfolio manager.	this information should be a part of the
12	Intimation to client what non- discretionary account entails and powers that can be exercised by portfolio	At the time of client signing the agreement; this information should be a part of the account opening form.

Sr.		
No.	Service / Activity	Timeline
	manager.	
13	Copy of executed PMS agreement sent to client.	Within 3 days of client request.
14	Frequency of disclosures of available eligible funds.	All details regarding client portfolios should be shared quarterly (point 26).
15	Issuance of funds and securities balance statements held by client.	This data should be shared on a quarterly basis or upon client request.
16	Intimation of name and demat account number of custodian for PMS account.	Within 3 days of PMS and demat account opening.
17	Conditions of termination of contract.	At the time of client signing the agreement; this information should be a part of the account opening form.
18	Intimation regarding PMS fees and modes of payment or frequency of deduction.	At the time of client signing the agreement; this information should be a part of the account opening form.
19	POA taken copy providing to client.	Within 3 days of client request.
20	Intimation to client about what all transactions can portfolio manager do using PoA.	At the time of client signing the agreement; this information should be a part of the account opening form.
21	Frequency of providing audited reports to clients	Annual.
22	Explanation of risks involved in investment.	At the time of client signing the agreement; this information should be a part of the account opening form.



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Sr.		
No.	Service / Activity	Timeline
23	Intimation of tenure of portfolio investments.	Indicative tenure should be disclosed at the time of client signing the agreement; this information should be a part of the account opening form.
24	Intimation clearly providing restrictions imposed by the investor on portfolio manager.	Negative list of securities should be taken from the client at the time of client signing the agreement; this information should be a part of the account opening form.
25	Intimation regarding settling of client funds and securities.	Settlement of funds and securities is done by the Custodian. The details of clients' funds and securities should be sent to the clients in the prescribed format not later than on a quarterly basis.
26	Frequency of intimation of transactions undertaken in portfolio account.	Not later than on a quarterly basis or upon clients' request.
27	Intimation regarding conflict of interest in any transaction.	The portfolio manager should provide details of related party transactions and conflict of interest in the Disclosure Document which should be available on website of portfolio manager at all times.
28	Timeline for providing disclosure document to investor.	The latest disclosure document should be provided to investors prior to account opening and the latest disclosure documents should be available on website of portfolio manager at all times.
29	Intimation to investor about	Within 3 days of PMS and demat account





Sr. No.	Service / Activity	Timeline
	details of bank accounts where client funds are kept.	opening
30	Redressal of investor grievances.	Within 30 days, subject to all the information required to redress the complaint is provided by the complainant to the portfolio manager

#### Notes:

1 The number of days in the above timelines indicate clear working days

#### D. Details of grievance redressal mechanism and how to access it

- 1. It is mandatory for every PMS provider to register itself on SEBI SCORES (SEBI Complaint Redress System). SCORES is a centralised online complaint resolution system through which the complainant can take up his grievance against the PMS provider and subsequently view its status.
  - (https://scores.gov.in/scores/Welcome.html)
- 2. The details such as the name, address and telephone number of the investor relations officer of the PMS provider who attends to the investor queries and complaint should be provided in the PMS Disclosure document.
- 3. The grievance redressal and dispute mechanism should be mentioned in the Disclosure Document.
- 4. Investors can approach SEBI for redressal of their complaints. On receipt of complaints, SEBI takes up the matter with the concerned PMS provider and follows up with them.
- 5. Investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.



#### E. Expectations from the investors (Responsibilities of investors)

- 1. Check registration status of the intermediary from SEBI website before availing services.
- 2. Submission of KYC documents and application form in a timely manner with signatures in appropriate places and with requisite supporting documents.
- 3. Read carefully terms and conditions of the agreement before signing the same.
- 4. Thorough study of the Disclosure Documents of the PMS to accurately understand the risks entailed by the said investment in PMS.
- 5. Accurate and sincere answers given to the questions asked in the 'Risk Questionnaire' shall help the PMS provider properly assess the risk profile of the investor.
- 6. Thorough study of the quarterly statements sent by the PMS provider to the investor intimating him about the portfolio's absolute and relative performance, its constituents and its risk profile.
- 7. Ensure providing complete details of negative list of securities as part of freeze instructions at the time of entering into PMS agreement and every time thereafter for changes, if any, in a timely manner.
- 8. To update the PMS provider in case of any change in the KYC documents and personal details and to provide the updated KYC along with the required proof.



#### **Complaint Data to be displayed by Portfolio Managers**

Format for investor complaints data to be disclosed by Portfolio Managers on their website on monthly basis:

Data for the month ending - March - 2025

Sr. No.	Received From	Pending at the end of last month	Received	Resolved *	Total Pending #	Pending Complaints > 3 months	Average Resolution Time^ (in days)
1	Directly from Investors	0	0	N.A.	0	0	N.A.
2	SEBI (SCORES)	0	0	N.A.	0	0	N.A.
3	Other Sources (if any)	0	0	N.A.	0	0	N.A.
	<b>Grand Total</b>	0	0	N.A.	0	0	N.A.

<sup>^</sup> Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.

#### Trend of monthly disposal of complaints

Sr. No.	Received From	Pending at the end of last month	Received	Resolved *	Total Pending #	Pending Complaints > 3 months	Average Resolution Time^ (in days)
1	April, 2024	0	0	0	0	0	0
2	May, 2024	0	0	0	0	0	0
3	June, 2024	0	0	0	0	0	0
4	July,2024	0	0	0	0	0	0
5	August,2024	0	0	0	0	0	0
6	September-2024	0	0	0	0	0	0
7	October-2024	0	0	0	0	0	0
8	November 2024	0	0	0	0	0	0
9	December-2024	0	0	0	0	0	0
10	January 2025	0	0	0	0	0	0
11	February-2025	0	0	0	0	0	0
12	March 2025	0	0	0	0	0	0
	<b>Grand Total</b>	0	0	0	0	0	0



\*Inclusive of complaints of previous months resolved in the current month. #Inclusive of complaints pending as on the last day of the month.

Trend of annual disposal of complaints

Sr. No.	Year	Carried forward from previous year	Received	Resolved **	Total Pending ##
1	2018-19	0	0	0	0
2	2019-20	0	0	0	0
3	2020-21	0	0	0	0
4	2021-22	0	0	0	0
5	2022-23	0	0	0	0
6	2023-24	0	0	0	0
7	2024-25	0	0	0	0
	<b>Grand Total</b>	0	0	0	0

<sup>\*\*</sup> Inclusive of complaints of previous years resolved in the current year. ## Inclusive of complaints pending as on the last day of the year.

B-709, Express Zone, Western Express Highway, Opp. Adani Electricity, Malad (East), Mumbai – 400097

Investor Charter in respect of Research Analyst (RA)

A. Vision and Mission Statements for investors.

available in the public domain.

		Vis	ion
		Inv	est with knowledge & safety.
		Mis	ssion
		Eve	ery investor should be able to invest in right investment products based on
		the	ir needs, manage and monitor them to meet their goals, access reports and
		enj	by financial wellness.
В.	D	etai	ls of business transacted by the Research Analyst with respect to the
	<u>in</u>	ves	tors.
			To publish research report based on the research activities of the RA.
			To provide an independent unbiased view on securities.
			To offer unbiased recommendation, disclosing the financial interests in
			recommended securities.
			To provide research recommendation, based on analysis of publicly
			available information and known observations.
			To conduct audit annually.
C.	D	etai.	s of services provided to investors (No Indicative Timelines)
			Onboarding of Clients.
			Disclosure to Clients
			o To distribute research reports and recommendations to the clients
			without discrimination.

□ To maintain confidentiality w.r.t publication of the research report until made



| +91 22 43435000 | B-709, Express Zone, Western Express Highway, www.amsec.in Opp. Adani Electricity, Malad (East), info@amsec.in Mumbai – 400097

#### D. Details of grievance redressal mechanism and how to access it

In case of any grievance / complaint, an investor should approach the concerned research analyst and shall ensure that the grievance is resolved within 30 days.

If the investor's complaint is not redressed satisfactorily, one may lodge a complaint with SEBI on SEBI's SCORES portal which is a centralized web based complaints redressal system. SEBI takes up the complaints registered via SCORES with the concerned intermediary for timely redressal. SCORES facilitates tracking the status of the complaint.

With regard to physical complaints, investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.

#### E. Expectations from the investors (Responsibilities of investors).

- □ Do's
  - i. Always deal with SEBI registered Research Analyst.
- ii. Ensure that the Research Analyst has a valid registration certificate.
- iii. Check for SEBI registration number.
- Please refer to the list of all SEBI registered Research Analysts which is iv. available on SEBI website in the following link:

(https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yes

&intml)



B-709, Express Zone, Western Express Highway, Opp. Adani Electricity, Malad (East), Mumbai – 400097

v.	Always pay attention towards disclosures made in the research reports before
	investing.
vi.	Pay your Research Analyst through banking channels only and maintain duly
	signed receipts mentioning the details of your payments.
vii.	Before buying securities or applying in public offer, check for the research
	recommendation provided by your research Analyst.
viii.	Ask all relevant questions and clear your doubts with your Research Analyst
	before acting on the recommendation.
ix.	Inform SEBI about Research Analyst offering assured or guaranteed returns.
□ D	on'ts
i.	Do not provide funds for investment to the Research Analyst.
ii.	Don't fall prey to luring advertisements or market rumours.
iii.	Do not get attracted to limited period discount or other incentive, gifts, etc.
	offered by Research Analyst.
iv.	Do not share login credentials and password of your trading and demand
	accounts with the Research Analyst.



## Complaint Data to be displayed By RAs

Format for Investor Complaints Data to be displayed by RA on their respective websites

#### Data for every month ending - March- 2025

SN	Received from	Carried forward from previou	Received during the month	Total Pending	Resolved*	Pending a of the mo		Average Resolutio n time A (In days)
						Pending	Pending	
						for less	for	
						than 3	more	
						months	than 3	
1	2	3	4	5	6		7	8
1	Directly from	NIL	NIL	NIL	NIL	NIL		NIL
	Investors							
2	SEBI	NIL	NIL	NIL	NIL	NIL		NIL
	(SCORES)							
3	RA		NIL	NIL	NIL	NIL		NIL
	SCORES(ANY)							
4	Other	NIL	NIL	NIL	NIL	NIL		NIL
	Sources w							
	Grand Total	0	0	0	0	0		0

## End of monthly disposal of complaints

SN	Month	Carried forward from	Received	Resolved*	Pending**
1	2	3	4	5	6
1	April 2024	0	0	0	0
2	May 2024	0	0	0	0
3	June 2024	0	0	0	0
4	July 2024	0	0	0	0
5	August 2024	0	0	0	0
6	September 2024	0	0	0	0
7	October-2024	0	0	0	0
8	November-2024	0	0	0	0
9	December-2024	0	0	0	0
10	January-2025	0	0	0	0
11	February-2025	0	0	0	0
12	March-2025	0	0	0	0

<sup>\*</sup>Should include complaints of previous months resolved in the current month, if any.\*\*



Should include total complaints pending as on the last day of the month, if any. Average resolution time is the sum total of time taken to resolve each complaint in the current month divided by total number of complaints resolved in the current month.

## End of annual disposal of complaints

SN	Year	Carried forward from previous	Received during the	Resolved during the	Pending at the end of the
		year	year	year	year
1	2017-18	0	0	0	0
2	2018-19	0	0	0	0
3	2019-20	0	0	0	0
4	2020-21	0	0	0	0
5	2021-22	0	0	0	0
6	2022-23	0	0	0	0
7	2023-24	0	0	0	0
8	2024-25	0	0	0	0
	Grand Total	0	0	0	0

B-709, Express Zone, Western Express Highway, Opp. Adani Electricity, Malad (East), Mumbai – 400097

#### Investor Charter – Stock Brokers

#### **VISION**

To follow highest standards of ethics and compliances while facilitating the trading by clients in securities in a fair and transparent manner, so as to contribute in creation of wealth for investors.

#### **MISSION**

- i) To provide high quality and dependable service through innovation, capacity enhancement and use of technology.
- ii) To establish and maintain a relationship of trust and ethics with the investors.
- iii) To observe highest standard of compliances and transparency.
- iv) To always keep 'protection of investors' interest' as goal while providing service.

#### Services provided to Investors

- Execution of trades on behalf of investors.
- Issuance of Contract Notes.
- Issuance of intimations regarding margin due payments.
- Facilitate execution of early pay-in obligation instructions.
- Settlement of client's funds.
- Intimation of securities held in Client Unpaid Securities Account (CUSA) Account.
- Issuance of retention statement of funds.
- Risk management systems to mitigate operational and market risk.
- Facilitate client profile changes in the system as instructed by the client.
- Information sharing with the client w.r.t. exchange circulars.
- Redressal of Investor's grievances.

#### **Rights of Investors**

- Ask for and receive information from a firm about the work history and background of the person handling your account, as well as information about the firm itself.
- Receive complete information about the risks, obligations, and costs of any investment before investing.
- Receive recommendations consistent with your financial needs and investment objectives.
- Receive a copy of all completed account forms and agreements.
- Receive account statements that are accurate and understandable.
- Understand the terms and conditions of transactions you undertake.
- Access your funds in a timely manner and receive information about any restrictions or limitations on access.

- Receive complete information about maintenance or service charges, transaction or redemption fees, and penalties.
- Discuss your grievances with compliance officer of the firm and receive prompt attention to and fair consideration of your concerns.

#### Various activities of Stock Brokers with timelines

S.No.	Activities	Expected Timelines
1.	KYC entered into KRA System and CKYCR	10 days of account opening
2.	Client On boarding	Immediate, but not later than one week
3.	Order execution	Immediate on receipt of order, but not
		later than the same day
4.	Allocation of Unique Client Code	Before trading
5.	Copy of duly completed Client	7 days from the date of upload of Unique
	Registration Documents to clients	Client Code to the Exchange by the
		trading member
6.	Issuance of contract notes	24 hours of execution of trades
7.	Collection of upfront margin from	Before initiation of trade
	client	
8.	Issuance of intimations regarding	At the end of the T day
	other margin due payments	
9.	Settlement of client funds	30 days / 90 days for running account
		settlement (RAS) as per the preference of
		client.
		If consent not given for RAS – within 24
		hours of pay-out
10.	'Statement of Accounts' for Funds,	Weekly basis (Within four trading days of
	Securities and Commodities	following week)
11.	Issuance of retention statement of	5 days from the date of settlement
	funds/commodities	
12.	Issuance of Annual Global	30 days from the end of the financial year
	Statement	
13.	Investor grievances redressal	30 days from the receipt of the complaint

#### DOs and DON'Ts for Investors

DOs	DON'Ts			
1. Read all documents and conditions being agreed before signing the account opening	<ol> <li>Do not deal with unregistered stock broker.</li> </ol>			
form.	2. Do not forget to strike off			
<ol> <li>Receive a copy of KYC, copy of account opening documents and Unique Client Code.</li> <li>Read the product / operational framework / timelines related to various Trading and Clearing &amp; Settlement processes.</li> </ol>	blanks in your account opening and KYC.  3. Do not submit an incomplete account opening and KYC form.			

B-709, Express Zone, Western Express Highway, Opp. Adani Electricity, Malad (East), Mumbai – 400097

- 4. Receive all information about brokerage, fees and other charges levied.
- 5. Register your mobile number and email ID in your trading, demat and bank accounts to get regular alerts on your transactions.
- 6. If executed, receive a copy of Power of Attorney. However, Power of Attorney is not a mandatory requirement as per SEBI / Stock Exchanges. Before granting Power of Attorney, carefully examine the scope and implications of powers being granted.
- 7. Receive contract notes for trades executed, showing transaction price, brokerage, GST and STT etc. as applicable, separately, within 24 hours of execution of trades.
- 8. Receive funds and securities / commodities on time within 24 hours from pay-out.
- 9. Verify details of trades, contract notes and statement of account and approach relevant authority for any discrepancies. Verify trade details on the Exchange websites from the trade verification facility provided by the Exchanges.
- 10. Receive statement of accounts periodically. If opted for running account settlement, account has to be settled by the stock broker as per the option given by the client (30 or 90 days).
- 11. In case of any grievances, approach stock broker or Stock Exchange or SEBI for getting the same resolved within prescribed timelines.

- 4. Do not forget to inform any change in information linked to trading account and obtain confirmation of updation in the system.
- 5. Do not transfer funds, for the purposes of trading to anyone other than a stock broker. No payment should be made in name of employee of stock broker.
- 6. Do not ignore any emails / SMSs received with regards to trades done, from the Stock Exchange and raise a concern, if discrepancy is observed.
- 7. Do not opt for digital contracts, if not familiar with computers.
- 8. Do not share trading password.
- 9. Do not fall prey to fixed / guaranteed returns schemes.
- 10. Do not fall prey to fraudsters sending emails and SMSs luring to trade in stocks / securities promising huge profits.
- 11. Do not follow herd mentality for investments. Seek expert and professional advice for your investments.

#### Grievance Redressal Mechanism

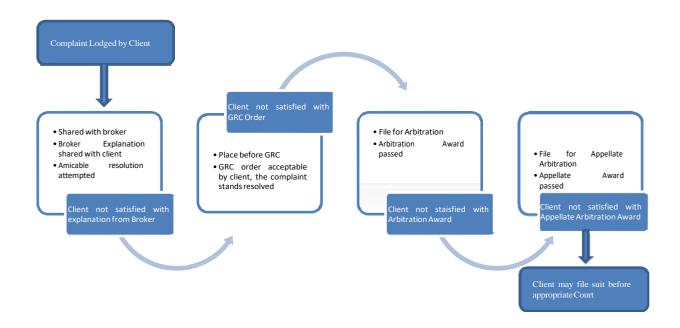
Level 1 – Approach the Stock Broker at the designated Investor Grievance e-mail ID of the stock broker. The Stock Broker will strive to redress the grievance immediately, but not later than 30 days of the receipt of the grievance.

Level 2 – Approach the Stock Exchange using the grievance mechanism mentioned at the website of the respective exchange.

Complaints Resolution Process at Stock Exchange explained graphically:



B-709, Express Zone, Western Express Highway, Opp. Adani Electricity, Malad (East), Mumbai – 400097



Timelines for complaint resolution process at Stock Exchanges against stock brokers

S. No.	Type of Activity	Timelines for activity
1.	Receipt of Complaint	Day of complaint (C Day).
2.	Additional information sought from the investor, if any, and provisionally forwarded to stock broker.	C + 7 Working days.
3.	Registration of the complaint and forwarding to the stock broker.	C+8 Working Days i.e. T day.
4.	Amicable Resolution.	T+15 Working Days.
5.	Refer to Grievance Redressal Committee (GRC), in case of no amicable resolution.	T+16 Working Days.
6.	Complete resolution process post GRC.	T + 30 Working Days.
7.	In case where the GRC Member requires additional information, GRC order shall be completed within.	T + 45 Working Days.
8.	Implementation of GRC Order.	On receipt of GRC Order, if the order is in favour of the investor, debit the funds of the stock broker. Order for debit is issued immediately or as per the directions given in GRC order.
9.	In case the stock broker is aggrieved by the GRC order, will provide intention to avail arbitration	Within 7 days from receipt of order

S. No.	Type of Activity	Timelines for activity
10.		Investor is eligible for interim relief from
		Investor Protection Fund (IPF). The interim
		relief will be 50% of the GRC order amount
	If intention from stock broker is	or Rs.2 lakhs whichever is less. The same
	received and the GRC order amount is	shall be provided after obtaining an
	upto Rs.20 lakhs	Undertaking from the investor.
11.		Within 6 months from the date of GRC
	Stock Broker shall file for arbitration	recommendation
12.		The GRC order amount shall be released to
	In case the stock broker does not file	the investor after adjusting the amount
	for arbitration within 6 months	released as interim relief, if any.

Handling of Investor's claims / complaints in case of default of a Trading Member / Clearing Member (TM/CM)

#### Default of TM/CM

Following steps are carried out by Stock Exchange for benefit of investor, in case stock broker defaults:

- Circular is issued to inform about declaration of Stock Broker as Defaulter.
- Information of defaulter stock broker is disseminated on Stock Exchange website.
- Public Notice is issued informing declaration of a stock broker as defaulter and inviting claims within specified period.
- Intimation to clients of defaulter stock brokers via emails and SMS for facilitating lodging of claims within the specified period.

Following information is available on Stock Exchange website for information of investors:

- Norms for eligibility of claims for compensation from IPF.
- Claim form for lodging claim against defaulter stock broker.
- FAQ on processing of investors' claims against Defaulter stock broker.
- Provision to check online status of client's claim.

Level 3 – The complaint not redressed at Stock Broker / Stock Exchange level, may be lodged with SEBI on SCORES (a web based centralized grievance redressal system of SEBI) @ https://scores.gov.in/scores/Welcome.html



Format for Investor Complaints Data to be displayed by Stock Brokers on their respective websites

## Data for every month ending - March- 2025

SN	Received from	Carried forward from previou s month	Received during the month	Total Pending	Resolved*	Pending at the end of the month**	Average Resolution time A (In days)
						Pending Pending for less for than 3 more months than 3 months	
1	2	3	4	5	6	7	8
1	Directly from Investors	NIL	NIL	NIL	NIL	NIL	NIL
2	SEBI (SCORES)	NIL	NIL	NIL	NIL	NIL	NIL
3	Stock Exchange	NIL	NIL	NIL	NIL	NIL	NIL
4	Other Sources ( Grand	NIL	NIL	NIL	NIL	NIL	NIL

End of monthly disposal of complaints

SN	Month	Carried forward from previous month	Received	Resolved*	Pending**
1	2	3	4	5	6
1	April 2024	0	0	0	0
2	May 2024	0	0	0	0
3	June 2024	0	0	0	0
4	July 2024	0	0	0	0
5	August 2024	0	0	0	0
6	September 2024	0	0	1	0
7	October 2024	0	0	0	0
8	November 2024	0	0	0	0
9	December-2024	0	0	0	0
10	January-2025	0	0	0	0
11	February-2025	0	0	0	0
12	March-2025	0	0	0	0

<sup>\*</sup>Should include complaints of previous months resolved in the current month, if any.\*\*

#### **Vikabh Securities Private Limited**



Should include total complaints pending as on the last day of the month, if any. Average resolution time is the sum total of time taken to resolve each complaint in the current month divided by total number of complaints resolved in the current month.

#### End of annual disposal of complaints

SN	Year	Carried forward	Received	Resolved	Pending at
		from previous	during the	during the	the end of the
		year	year	year	year
1	2017-18	0	0	0	0
2	2018-19	0	0	0	0
3	2019-20	0	0	0	0
4	2020-21	0	0	0	0
5	2021-22	0	0	0	0
6	2022-23	0	0	0	0
7	2023-24	0	0	0	0
8	2024-25	0	0	1	0
	Grand Total	0	0	0	0