

## DISCLOSURES BY THE INVESTMENT ADVISER

The particulars given in this Disclosure Document have been prepared in accordance with SEBI (Investment Advisers) Regulations, 2013 and SEBI (Investment Advisers) (Amendment) Regulations, 2020

### Purpose

This document serves to provide essential information about the Investment Advisory Services offered by DRChoksey FinServ Private Limited (DCFPL) in order to assist prospective clients in making informed decisions before investing. It is advised that investors carefully read the entire document before making any decisions and retain it for future reference. Updated versions of this document can be accessed on the DCFPL website. (<https://devenchoksey.com/>)

**Disclaimer:** This document has been prepared in pursuant to Regulation 15 and 18 of the SEBI (Investment Advisers) Regulations, 2013 and SEBI (Investment Advisers) (Amendment) Regulations, 2020. This document has neither been approved nor disapproved by SEBI, nor does SEBI certify the accuracy or adequacy of the contents of this Document.

### 1. Business Overview

DCFPL, incorporated on December 31, 2020, under the Company Act 2013, is a SEBI registered Investment Advisor with registration No. INA000017903, Investment Adviser Administration and Supervisory Body (IAASB) 1982.

### 2. Disciplinary History

There is no pending regulatory matter against DCFPL as on date. No disciplinary action has been taken against the Company by any regulatory/statutory authority.

### 3. Terms and Conditions

- a. DCFPL shall provide non-binding investment advisory services to the Client, including but not limited to advice relating to investing, purchasing, selling or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral or through any other means of communication for the benefit of the client.
- b. The advisory services offered include Equity Advisory and Portfolio Advisory.
- c. While DCFPL will provide investment advisory services, the discretion to execute transactions and the responsibility for the execution and settlement of transactions shall lie solely with the Client
- d. The investment advisory services are provided by the Investment Advisory division of DCFPL, maintaining Client Level Segregation of Advisory and Distribution activities and an arm's length relationship from other activities within the company or its associate companies.
- e. DCFPL will not disclose any confidential information about the Client obtained during the course of preparing a financial plan to any third party without the prior consent of the Client.

### DRChoksey FinServ Pvt Ltd

**4. Affiliations with Other Intermediaries: This point pertains to affiliation with DCFPL and its group companies, if any**

DRChoksey FinServ Private Limited (hereinafter referred to as DCFPL) maintains affiliations with several regulatory bodies and intermediaries, ensuring compliance and credibility within the financial services sector.

**1. Securities and Exchange Board of India (SEBI):**

- **Research Entity:** DCFPL is a registered member under the SEBI (Research Analyst) Regulations, 2014, with Registration No. INH000011246.
- **Portfolio Managers Entity:** DCFPL is also registered under the SEBI (Portfolio Managers) Regulations with Registration No. INP000007906.

**2. Association of Mutual Funds in India (AMFI):**

- **Mutual Fund Distributor:** DCFPL is registered as an AMFI Mutual Fund distributor with Registration No. 256167.

3. Additionally, DCFPL is authorized to distribute various third-party financial products.

**5. Conflict of Interest**

DRChoksey FinServ Private Limited will maintain appropriate Chinese walls for investment advisory activities with other activities as required under SEBI Investment Advisor Regulation.

DCFPL for its own proprietary purposes may invest / divest in various securities / investments, from time to time at its own discretion which will be undertaken by a separate and dedicated team. The said segregation will ensure avoidance of conflict of interest with regard to the investment advisory and related business of the Company. Such proprietary investment transactions may at times be contrary to the investment advice.

DCFPL does not have Actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services.

**6. Disclosures with respect to own holding position in financial products / securities**

DCFPL or its Associates (Group Companies or individuals) for its / their own proprietary purposes may invest/ divest in various securities / investments, from time to time at its / their own discretion which will be undertaken by a separate and dedicated team. The said segregation will ensure avoidance of conflict of interest with regard to the investment advisory and related business of the Company. Such proprietary investment transactions may at times be contrary to the investment advice or other related business or actions.

**7. Actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services:**

- a. Investment Advisers or his/ her relatives or DCFPL or its associates may have financial interest in the subject company in ordinary course of business.
- b. Investment Advisers or his/ her relatives may have actual/ beneficial ownership of 1% or more securities of the subject company at the end of the month immediately preceding the date of issue of investment advice.
- c. DCFPL or its associates may have actual/ beneficial ownership of 1% or more securities of the subject company/ securities/ mutual funds/ other investment products at the end of the month immediately preceding the date of investment advice.
- d. Investment Advisers or his/ her relatives or its associates may have other potential/ material conflict of interest with respect to any recommendation and related information and opinions at the time of issue of investment advisee

**8. Disclosure Of All Material Facts Relating To The Key Features Of The Products Or Securities, Particularly, Performance Track Record, Warnings, Disclaimers Etc.**

Clients are requested to go through the detailed key features, performance track record of the product, or security including warnings, disclaimers etc. before investing as and when provided by the Investment Advisor.

**9. Drawing client's attention to warnings, disclaimers in documents, advertising materials relating to investment products.**

DCFPL and the Investment Advisers of DCFPL who provide the investment advice to the clients, shall draw the client's attention to the warnings, disclaimers in documents, advertising materials relating to an investment product/s which he/she/they is/are recommending to the client/s.

**10. Standard Risk Factors**

- a. Investments in equities, derivatives and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the investment will be achieved.
- b. The past performance does not indicate its future performance. There is no assurance that past performances will be repeated. Clients are not being offered any guaranteed or indicative returns.
- c. As with any investment in securities, the NAV of the portfolio can go up or down depending upon the factors and forces affecting the capital market.
- d. The performance of the investments may be affected by changes in Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- e. Investments in the products which the Clients have opted are subject to wide range of risks which inter alia also include but not limited to economic slowdown, volatility & illiquidity of the stocks,

poor corporate performance, economic policies, changes of Government and its policies, acts of God, acts of war, civil disturbance, sovereign action and /or such other acts/ circumstance beyond the control of AWA or any of its fellow subsidiaries.

- f. The Investment Advisor may, considering the overall level of risk of the portfolio, advice for investment in lower rated/unrated securities offering higher yield. This may increase the risk of the portfolio. Such investments shall be subject to the scope of investments as laid down in the Agreement

## 11. Other disclosures

"We trust that, prior to acting upon the advice provided by the Investment Adviser, your Relationship Manager at DCFPL has furnished you with comprehensive details regarding the products, associated risk factors, etc. It is assumed that you have thoroughly reviewed all pertinent information concerning the recommended product and have sought necessary clarification if needed. DCFPL is committed to maintaining strict confidentiality regarding any information shared by you and shall not disclose such information without your explicit consent, except as mandated by applicable laws or regulatory requirements. DCFPL will collect necessary information related to your orders, transactions, portfolio, fund availability, securities, etc., from the respective Investment Adviser to facilitate the provision of well-informed and suitable advice.

## 12. Details of Principal Officer

**Principal Officer** of the Investment Adviser as per below mention details

- Name of the Principal Officer Vishal Shinde
- Address 5th Floor Abhishek Building Behind Monginis Cake Factory Off New Link Road, Andheri West Mumbai-400058
- email-id [vishal.shinde@devenchoksey.com](mailto:vishal.shinde@devenchoksey.com)
- Phone No. - 91- 2266965555.

## 13. Investor Services:

Please contact **Compliance Officer** of the Investment Adviser as per below mention details

- Name of the Compliance Officer Maulik Trivedi
- Address 5th Floor Abhishek Building Behind Monginis Cake Factory Off New Link Road, Andheri West Mumbai-400058
- email-id [compliance@devenchoksey.com](mailto:compliance@devenchoksey.com)
- Phone No. - 91- 2266965555.
- In case of any grievances the investors may email to [grievance@devenchoksey.com](mailto:grievance@devenchoksey.com)

### DRChoksey FinServ Pvt Ltd

## 14. Disclosure Document

This disclosure document has been prepared by DRChoksey FinServ Private Limited (“DCFPL”/ “Investment Advisor”). This document is provided for assistance purposes only and does not constitute an offer or recommendation to buy or sell any products or services. Recipients should act and rely on the information/data contained in this document only after understanding all associated risk parameters. The information/data contained in this document is current as of the date hereof. DCFPL and its Directors, Key Managerial Personnel, Employees, and representatives do not undertake any obligation to update such information/data for any subsequent event(s) that may occur thereafter and do not explicitly or implicitly guarantee that the information/data provided herein is complete and accurate in all respects as of the date hereof or that it will continue to be complete and accurate in the future.

This document is not intended to provide, and should not be relied on for, tax, legal, or accounting advice. Recipients should consult their own tax, legal, and accounting advisors before engaging in any transaction. The Investment Advisor and its representatives disclaim any and all liability that may arise to any person/party from the use of the data/information contained herein.

Under no circumstance shall DCFPL have any liability to you for any loss or damage of any kind incurred as a result of the use of this document or reliance on any information provided herein. Financial products and instruments are subject to market risks, and yields may fluctuate depending on various factors affecting capital/debt markets. There is no assurance or guarantee that the objectives of the portfolio/Investment Advisory Services will be achieved. Please note that the past performance of the financial products, instruments, and the portfolio does not necessarily indicate the future prospects and performance thereof. Such past performance may or may not be sustained in the future. Investment Advisor's decisions may not always be profitable, as actual market movements may be at variance with anticipated trends. The investors are not being offered any guaranteed or assured returns. Investors are also advised to refer to the risk factors, disclaimers, and other disclosures associated with Investment Advisory Services and read the Issue Offer Document (including the latest credit rating and financial soundness) of the Issuer before making investment decisions.