FORM C

**SECURITIES AND EXCHANGE BOARD OF INDIA
(PORTFOLIO MANAGERS) REGULATIONS, 2020**

(Regulation 22)

(Aditya Birla Money Limited)
SAI SAGAR, 2nd & 3rd Floor,
Plot No. M7, Thiru-Vi-Ka (SIDCO) Industrial Estate, Guindy, Chennai – 600 032
Ph: 044-49490000, Fax: 044 22501095 , Email: care.stocksandsecurities@adityabirlacapital.com)

We confirm that:

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

ii) the disclosures made in the document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of the portfolio to us ***/*** investment in the Portfolio Management;

iii) the Disclosure Document has been duly certified by an independent chartered accountant Ms. S. Usha, Membership Number 211785, Partner, M/s Sundaram and Srinivasan Chartered Accountants, 23, CP Ramaswamy Iyer Rd, Sriram Colony, Abiramapuram, Chennai, Tamil Nadu 600018, Ph no., 044 2498 8762 on 16th June 2021 (copy of the certificate enclosed).

SANGEETA
MUKESH
SHETTY

Digitally signed by
SANGEETA MUKESH
SHETTY
Date: 2021.06.16 20:22:50
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Signature of the Principal Officer

Ms. Sangeeta Shetty
Principal Officer

Date : 16.06.2021
Place: Mumbai

ADITYA BIRLA MONEY LIMITED

DISCLOSURE DOCUMENT

i. This document has been filed with the Board along with a certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.

ii. The purpose of the document is to provide essential information about the portfolio services in a manner to assist and enable the investors in making informed decisions for engaging a Portfolio Manager.

iii. The necessary information about the Portfolio Manager required by an investor before investing is disclosed in the Disclosure document.

iv. Investors should carefully read the entire document before making a decision and should retain it for future reference.

v. Investors may also like to seek further clarifications or obtain further changes after the date of this document from the service provider.

vi. The name, phone number, email address of the Principal Officer designated by the Portfolio Manager along with the address of the Portfolio Manager and Custodians are:

Ms. Sangeeta Shetty
Tel: 022-43567841
Email: sangeeta.shetty@adityabirlacapital.com

Address of Portfolio Manager:

Aditya Birla Money Ltd. SAI SAGAR, 2nd & 3rd Floor, Plot No. M7, Thiru-Vi-Ka (SIDCO) Industrial Estate, Guindy, Chennai – 600 032
Ph: 044-49490000, Fax: 044-22501095

Address of the Fund Management Desk:

Aditya Birla Money Ltd, R-Tech Park, 10th Floor, Nirlon Complex, Off Western Express Highway, Goregaon (East), Mumbai – 400063. Ph: 022-62257220/7208/7274 Fax: 022-61802849

Address of Custodians

Orbis Financial Corporation Limited,4A, Ocus Technopolis, Sector 54,Golf Club Road, Gurgaon-122002
India

Edelweiss Custodial Services Limited , Edelweiss House, 6th Floor, Off CST Road, Kalina, Mumbai 400098

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1. Disclaimer

This document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 and filed with Securities and Exchange Board of India (SEBI). This document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the document. This document is not for public distribution and has been furnished to you solely for your information and shall not be reproduced or redistributed to any other person.

2. Definitions

In this Agreement, unless repugnant to or inconsistent with the subject of the context thereof:

"Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992) as amended from time to time.

"Agreement" or "Portfolio Management Services Agreement" or "PMS Agreement" means the agreement between the Client and the Portfolio Manager for providing portfolio management services to that Client and stating therein the terms and conditions on which the Portfolio Manager shall provide such services to the Client, executed in accordance with Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.

"Assets" means the Portfolio and/or the Funds.

"Board" means the Securities and Exchange Board of India.

"Client" or **"Investor"** means any person who registers with the Portfolio Manager for availing of Portfolio Management Services.

"Client's Account" means the Client's Portfolio and the Client's Funds.

"Custodian"means any entity acting as a Custodian to the Portfolio Manager, or any other Custodian with whom the Portfolio Manager enters into an agreement for availing Custodial Services.

"Depository Account" means any account of the Client or for the Client with an entity registered as a depository participant as per the relevant regulations in which the Securities comprising part of the Portfolio of the Client are kept by the Portfolio Manager.

"Disclosure Document" means this Document issued by the Portfolio Manager – Aditya Birla Money Limited.

"Discretionary Portfolio Management services" means a portfolio management service where Portfolio Manager who exercises or may exercise, under a contract relating to portfolio management entered into with the client / investor, any degree of discretion, as to the investments or management of the portfolio of securities or the funds of the client / investor, as the case may be.

"Financial year" means the year starting from 1 April and ending on 31 March of the following year.

"Funds" or **"Client's Funds"** means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies given by the Client to the Portfolio Manager at the time of signing the Agreement, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the agreement and accretion to such monies, the proceeds of the sale or other realization of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the Portfolio Manager manages the same.

"Initial Corpus" means the monies and the market value of Securities given by the Client to the Portfolio Manager at the time of signing the Agreement and accepted by the Portfolio Manager for being managed pursuant to the agreement or in respect of which advice is given by the Portfolio Manager to the Client. The Securities brought in by the Client shall be taken at the last available closing price on the day of transfer of Securities in the Depository Account. The Portfolio Manager shall not accept from the client, initial corpus of less than Rupees **Fifty Lakhs**.

"Investment Advisory Services" refers to the Advice by the Portfolio Manager with regard to the Client's Portfolio under Management;

"Multi Manager Portfolios" Is an investment solution that brings together a set of Portfolio Managers, with the objective of providing Consistent and Superior long term returns; Fund Manager may construct the portfolio for the client after taking the advice from third party Investment Advisor (Third party Portfolio Managers registered with SEBI); Client has the option to choose the asset allocation with respect to the Investment Advisor, and based on the Client's preference, his portfolio can be allocated accordingly

"Non-Discretionary Portfolio Management Services" means a portfolio management service where a Portfolio Manager acts on the instructions received from the Client with regard to investment of funds of the Client under a contract relating to portfolio management and will exercise no discretion as to the investment or management of the portfolio of securities or the funds of the client, as the case may be.

"Net Asset Value" (NAV) is the market value of assets in portfolio consisting of equity, debt, cash & cash equivalents.

"NRI" means a person who is not resident in India, as defined under Foreign Exchange Management Act, 1999.

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

"Person" includes any individual, partners in partnership, central or state government, company, body corporate, cooperative society, corporation, trust, society, Hindu Undivided Family or any other body of persons, whether incorporated or not.

"Portfolio" or **"Client's Portfolio"** means the funds / Securities managed by the Portfolio Manager on behalf of the Client pursuant to the agreement and includes any Securities mentioned in the Application, any further Securities placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, Securities acquired by the Portfolio Manager through investment of funds and bonus and rights shares or otherwise in respect of Securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.

"Portfolio Manager" means ADITYA BIRLA MONEY LIMITED (ABML) a company incorporated under the Companies Act, 1956 and having its registered office at Indian Rayon Compound, Veraval Gujarat - 362266 and registered with Securities and Exchange Board of India as a Portfolio Manager vide registration certificate no. PM/INP000003757, under the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020

"Portfolio Management Services" means the Discretionary Portfolio Management Services and / or Non-Discretionary Portfolio Management Services or Investment Advisory Services -Portfolio Manager Process, as the context may require;

"Principal Officer" means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager.

"Private Equity Fund" means an Alternative Investment Fund or a fund incorporated under SEBI (Venture Capital Funds) Regulations, 1996 which invests primarily in equity or equity linked instruments or partnership interests of investee companies according to the stated objective of the fund

"Product" means Portfolio Management Product launched by the Portfolio Manager from time to time.

"Regulations" means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 as amended from time to time.

"Securities" includes Securities as defined under the Securities Contracts (Regulation) Act, 1956 as amended from time to time and includes but not limited to-

a. Shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature in or of any incorporated company or other body corporate;
b. Derivative;
c. Units or any other instrument issued by any collective investment scheme to investors in such schemes;
d. Security receipt as defined in clause (zg) of section 2 of the Securitization and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002;
e. Units or any other such instrument issued to the investors under any mutual fund scheme;
f. Government securities;
g. Such other instruments as may be declared by the Central Government to be securities;

h. Rights or interest in securities;
i. Exchange Traded funds; and
j. Liquid Funds.

"Structured Products or Structured Securities" means securities whose cash flow characteristics depend upon one or more indices or that have embedded forwards or options or securities where an investor's investment return and the issuer's payment obligations are contingent on, or highly sensitive to, changes in the value of underlying assets, indices, interest rates or cash flows."

"Venture Capital Funds" means an Alternative Investment Fund or a fund incorporated under SEBI (Venture Capital Funds) Regulations, 1996 which invests primarily in unlisted securities of start-ups, emerging or early-stage venture capital undertakings mainly involved in new products, new services, technology or intellectual property right based activities or a new business model

Words and expressions used in this disclosure document and not expressly defined shall be interpreted according to their general meaning and usage. The definitions are not exhaustive. They have been included only for the purpose of clarity and shall in addition be interpreted according to its general meaning and usage and shall also carry meanings assigned to them in regulations governing Portfolio Management Services.

3. Description

(i) History, present business and background of the Portfolio Manager

Aditya Birla Money Limited ("ABML") formerly known as Apollo Sindhoori Capital Investments is a leading player in the broking space with nearly 20 years of experience. It became a part of Aditya Birla Group in March 2009, when the group acquired Apollo Sindhoori Capital Investments.

Aditya Birla Money Limited ("ABML"), a subsidiary of Aditya Birla Capital Limited, is listed on BSE Limited ("BSE") and National Stock Exchange of India Limited ("NSE") since 2008. ABML is currently engaged in the business of securities and commodities broking and is registered as a Stock Broker with SEBI. It is a member of BSE, NSE, Multi Commodity Exchange of India Limited and National Commodity & Derivatives Exchange Limited and offers equity and derivatives trading through NSE and BSE and commodity derivatives trading through MCX and NCDEX. It holds PMS license from SEBI and offers portfolio management services.

ABML is also registered as a Depository Participant with National Securities Depository Limited ("NSDL") and the Central Depository Services (India) Limited ("CDSL"). It also holds SEBI license as a Research Analyst and an Investment Adviser. ABML also holds an ARN code issued by AMFI and is registered with CDSL and NSDL as an e-Repository for holding insurance policies in electronic form.

ABML renewed Certificate of Registration No: PM/INP000003757, dated 19th July 2016, to undertake the business of offering portfolio management services to Clients / Investors.

ABML envisions providing integrated financial care driven by the relationship of trust. The growing list of financial institutions with whom Aditya Birla Money Limited is empanelled, as an approved broker, is a reflection of the high levels of services rendered by the company. ABML has an all India reach at around 800 locations and it is presently catering to institutional clients and a large number of retail & high net worth clients.

Under the portfolio management services offered by Aditya Birla Money Limited, the funds of investors are managed by a team of professionals having long experience in Research, Fund Management, Dealing and Institutional sales and securities markets.

(ii) Promoters of the Portfolio Manager

Aditya Birla Money Limited is promoted by Aditya Birla Capital Limited, a subsidiary of Grasim Industries Limited. ABCL has a strong presence across Protecting, Investing and Financing solutions, ABCL is a universal financial solution provider catering to diverse needs of its customers across their life stages. Anchored by more than 18,000 employees, ABCL has a nationwide reach with 850+ branches and more than 2,00,000 agents / channel partners and several bank partners

The Aditya Birla Group

Aditya Birla Capital is a part of the Aditya Birla Group, a US$ 48.3 billion Indian multinational, in the league of Fortune 500. Anchored by an extraordinary force of over 120,000 employees, belonging to 42 nationalities, the Aditya Birla Group operates in 34 countries across the globe. About 50 per cent of its revenues flow from its overseas operations.

(iii) Directors and their background:

Name of the Director	Qualification	Experience in years
Gopi Krishna Tulsian	B.Sc., F.C.A. , MBIM (London)	Mr. Tulsian has work experience of more than 50 years. He has handled several manufacturing and service industry businesses in his career. He has been associated with Aditya Birla Group since 1977 and currently he is chairing the position of Executive President in Grasim Industries Limited (Chemical Division). He is also on the Board of various Indian and International companies of the Group.
G. Vijayaraghavan	B.Tech. (Honours) from IIT, PGDM-IIMA	Mr. Vijayaraghavan has work experience of over 30 years in various sectors like Oil & Gas Manufacturing, Management, Consulting, Agro inputs, Investment Banking and ITES. He has been associated with ONGC, Alfa Laval, A.F. Ferguson & Co. and Standard Chartered Bank. He ventured on his own in 1999.
P. Sudhir Rao	B.Com (Hons), C.A., C.M.A.	Mr. Rao is the Managing Partner of – India of Celesta Capital, a leading Silicon Valley-based technology venture firm that focuses on investing in and scaling companies with disruptive technologies and the founding Managing Partner of IndusAge Partners, an India and US focused venture fund. He has been a leading industry pioneer in the capital markets in India. He was one of the founding directors of Karvy Investor Services Ltd. and Karvy Stockbroking Ltd.
Tushar Shah	C.A., LLB	Mr. Shah is the CEO for the Infrastructure Finance business of Aditya Birla Finance Limited since November 2011, which encompasses project-linked lending, lending to large corporates, Debt Capital Markets, Debt Syndication and setting up an Infrastructure PE Fund. He mentors the Equity and Debt Stock Broking business of Aditya Birla Money Ltd. Prior to ABFL, he was associated with IL&FS group for 16 years and has worked in the areas of Capital Markets, Investment Banking and Corporate Banking.
Pinky Mehta	B. Com, C.A.	Ms. Mehta has a diversified experience of 27 years and has been a part of the Aditya Birla Group since 1991. She is the Chief Financial Officer of Aditya Birla Capital Limited and is experienced in Finance, Accounts, Banking, Secretarial, Taxation and MIS.
Shriram Jagetiya	B.Sc., C.A., Cost Accountant	Mr. Jagetiya has been associated with the Aditya Birla Group since 1992 and has played a key role in fund mobilization, investments, evaluation of mergers and acquisitions, strategic planning and capital structuring. He is currently Senior President – Corporate Finance at Aditya Birla Group.

(iv) Top 10 Group Companies on basis of turnover(as on March 31, 2020)

Rank	Name of the Company
1	Vodafone Idea Limited
2	UltraTech Cement Limited
3	Hindalco Industries Limited
4	Grasim Industries Limited
5	Aditya Birla Fashion & Retail Limited
6	Aditya Birla Sun Life Insurance Company Limited
7	Aditya Birla Finance Limited
8	Essel Mining & Industries Limited
9	Aditya Birla Housing Finance Limited
10	Aditya Birla Sun Life AMC Limited

*****Criteria for selection is restricted only to Indian Companies of Aditya Birla Group.

(v) Details of services being offered by the portfolio manager

Aditya Birla Money Ltd. offers Portfolio Management Services on three platforms – Discretionary, Non-Discretionary and Advisory services.

The Company also intends to avail the services of Independent Research/Investment Advisory firms/person/entity on non-binding terms for its PMS activities and such services shall be placed before the members of Internal Investment Committee for their review and approvals as required time to time.

a) <u>Discretionary Portfolio Management Services</u>

Under these services, the Portfolio Manager will exercise sole and absolute discretion as to investment and/or management of the portfolio of the securities or the funds of the Clients as he deems fit and within terms of the PMS Agreement executed with each Client.

The Portfolio Manager shall have the sole and absolute discretion to make such changes in the investments and to the portfolio, and invest some or all of the Client's monies in such manner, and in such markets as he deems fit. The Client may give informal guidance to customize the model portfolio; however, the final decision rests with the Portfolio Manager. The securities invested / disinvested by the Portfolio Manager for Clients in the same Model portfolio may differ from one Client to another Client. The Portfolio Manager's decision in deployment of the Client's account is absolute and final and can never be called in question or be open to review at any time during the currency of this Agreement or at any time thereafter, except, on the ground of malafide, fraud, conflict of interest or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the relevant Acts, Rules, and Regulations, guidelines and notifications issued by SEBI and in force from time to time.

Under these services, the Client may authorize the Portfolio Manager to invest their Funds in specific financial instruments or a variety of specific financial instruments or restrict the Portfolio Manager from investing in specific financial instruments or securities. A periodical statement in respect of Client's Portfolio generated from our end shall be sent to the respective Clients.

Based on the client's profile, overall investment objective and other relevant factors, the company has the following strategies under discretionary Services:

1. Crown Jewels Portfolio Strategy (Yet to be launched)
2. Core and Satellite Portfolio Scheme
3. ABM India Consumption Portfolio (earlier known as ABM Next India Portfolio)
4. ABM India Liquid Strategy (Systematic Transfer Plan) (Currently active with Nil clients)
5. ABM India Opportunities Fund(Yet to be launched)
6. ABM India Leadership Fund (Yet to be launched)
7. ABM R.B.P
8. Multi-Manager Scheme (Currently Inactive)
9. Structured Products/ Portfolios (Yet to be launched)

b) <u>Non - Discretionary Portfolio Management Services</u>

Under the Non-Discretionary Portfolio Management Services, the portfolio of the client shall be managed in consultation with the client. The Client will have complete discretion to decide on the investment (Stock Quality 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, directly or by a custodian. The deployment of the Client's Funds by the Portfolio Manager on the instructions of the Client is absolute and final and can never be called in question or shall not be open to review at any time during the currency of the Agreement or at any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the Act, Rules and/or Regulations, guidelines and notifications issued by SEBI and in force from time to time. A periodical statement in respect of Client's Portfolio generated from the portfolio manager/ custodian shall be sent to the respective Clients.

Based on the client's profile, overall investment objective and other relevant factors, the company has the following strategies under Non-discretionary Services:

1. ABM Hub-N-Spoke Strategy (Yet to be launched)

c) <u>Advisory Services</u>

The Portfolio Manager will provide investment advisory services, which shall include the responsibility of advising on the portfolio strategy and investment / divestment of individual securities in the Client's Portfolio. In such case, the Portfolio Manager does not make any investment on behalf of the Client. 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. Under this service, the Portfolio Manager will provide the client a comprehensive advisory package designed to help the client in his investment decisions. Such research reports will provide independent recommendations, corporate details and reasons to invest in equity, debt and mutual funds. Moreover, the Portfolio Manager's investment professionals will help the client to reconstruct his/her portfolio as per his/her investment objectives.

4. Penalties, pending litigations or proceedings etc.

Particulars	Remarks
All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made there under.	None
The nature of penalty / direction.	None
Penalties imposed for any economic offence and/or for violation of any securities laws.	None
Any pending material litigation/legal proceedings against the portfolio manager / key personnel with separate disclosure regarding pending criminal cases, if any.	None
Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory authority.	None
Any enquiry/adjudication proceedings initiated by the Board against the Portfolio Manager or its directors, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its directors, principal officer or employee, under the Act or Rules or Regulations made there under.	None

These details have been disclosed in good faith, on the basis of information available with the Portfolio Manager.

Services Offered

The Portfolio Manager offers Discretionary Portfolio Management Services, Advisory Services, Non-Discretionary Portfolio Management Services, as per the PMS Agreement executed with each client.

The Portfolio Manager under its Portfolio Management Services offers Portfolios with different investment objectives and policies to cater to requirements of each Client. The Portfolio Manager shall deploy the Securities and/or funds of the Client in accordance with the investment objectives in the Portfolio selected by the Client. At present the Portfolio Manager is offering the following Portfolios

i) Product Categorization: Discretionary Portfolio Management Services:

The Portfolio Manager offers/ propose to offer the following Product:

1. Crown Jewels Portfolio Strategy (Open-ended Discretionary Portfolio) – (This scheme has not been launched yet)

Fund Manager: Mr. Vivek Mahajan

• Type of Portfolio	• Open-ended Discretionary Portfolio
• Investment Objective	• Co-own quality businesses that are central to India growth story. Identify and participate in growth of these businesses over short,medium to long term. Practice Value Investing while making investment decisions.
• Investment Strategy	• Co-own quality businesses that are core to India Growth Story and create the most value • Portfolio of companies in industries with favorable operating dynamics – using value investing approach • Stock selection and industry allocation independent of benchmark weights • Concentrated portfolio of ~25-30 companies • Managing risk through a cap of 20% on individual stock at cost & controlling losses through methodical review and exit process • Active asset allocation calls between cash and equity with cash being deployed in Liquid Mutual Funds, Short term debt funds, money market funds • Derivatives exposures if any in the portfolio will be in line with SEBI guidelines and will be taken only for hedging purposes.
• Benchmark	• CNX 500.
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

2. Core & Satellite Portfolio Scheme

Fund Manager: Mr. Vivek Mahajan

• Type of Portfolio	• Open ended Discretionary Portfolio
• Investment Objective	• The Strategy aims to deliver returns in short, medium to long term by investing in fundamentally sound stocks coupled with active profit booking. • **Core Strategy**: will comprise of 15-20 stocks of well established and predominantly large

	cap companies that offer consistent return potential over long term. • **Satellite Strategy**: will comprise of predominantly Large cap as well as large mid cap companies that offer higher potential returns in the short term. The 'Satellite' group will complement the 'Core' group.
• Investment Strategy	• Actively managed Multicap strategy • Capitalizing on short, medium to long term market opportunities • Regular profit booking based on stock and market movements • Exposure in any sector shall not exceed 40% of the overall portfolio at initiation. • **Risk Mitigation** • Cap of 20% on individual stock at cost & controlling losses through methodical review and exit process • Active asset allocation calls between cash and equity with cash being deployed in Liquid Mutual Funds, Short term debt funds, money market funds. • Derivatives exposures if any in the portfolio will be in line with SEBI guidelines and will be taken only for hedging purposes
• Benchmark	• CNX 100
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

3. **ABM India Consumption Portfolio**

Fund Manager: Mr. Vivek Mahajan

• **Type of Portfolio**	• **Open ended Discretionary Portfolio**
• Investment Objective	• The Strategy aims to deliver returns in short to medium term by investing in fundamentally sound stocks coupled with active profit booking. • The Long Term component of the portfolio will comprise of 15 to 18 stocks of strong Leadership companies with growth potential and superior management. • The tactical component of the portfolio will comprise of 2 to 4 stocks in large/mid Cap space in companies with strong earnings potential and management capability coupled with higher return potential in the short to medium term
• Investment Strategy	• Actively managed multi cap strategy • Invest in companies which are directly or indirectly related or servicing Indian consumers • Invest in Companies offering sectoral and structural growth potential • Invest in company or stock offering attractive near to medium term risk reward • Exposure in any sector shall not exceed 40% of the overall portfolio at initiation • **Risk Mitigation** • Cap of 20% on individual stock at cost and controlling losses through methodical review and exit process • Active asset allocation calls between cash and Equity with cash being deployed in Liquid mutual funds, Short term Debt funds, Money Market Funds • Derivatives exposures, if any, in the portfolio will be in line with the SEBI guidelines and will be taken only for hedging purpose
• Benchmark	• BSE 200
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2

	year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

4. ABM India Liquid Strategy (Systematic Transfer Plan) (Currently active with Nil Clients)

Fund Manager: Mr. Vivek Mahajan

• Type of Portfolio	• Open ended Discretionary Portfolio
• Investment Objective	• The objective of this scheme is:- • To provide flexibility to the client to invest the Initial/Incremental funds in the liquid strategy of mutual funds. Subsequently as per the client instructions, these funds would then be redeemed from the liquid strategy and invested in any of the other PMS schemes (As per the agreement with the Client).
• Investment Strategy	• ABML will create a ABM liquid strategy. • The Clients who wish to invest through this mode will provide the Initial/top up funds in this scheme. • These funds would then be invested in a Liquid mutual fund Scheme (Sole discretion of the fund Manager to select the fund house and Scheme) by creating a common folio in the name of ABML.
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

5. ABM INDIA OPPORTUNITIES FUND (Yet to be launched)

Fund Manager: Mr. Vivek Mahajan

• Type of Portfolio	• Open ended Discretionary Portfolio
• Investment Objective	• The Strategy aims to deliver returns by investing on companies that offer consistent risk adjusted return potential over long term , under-researched, high growth quality companies with visible competitive advantage and with vibrant management leadership.
• Investment Strategy	• **Mid Caps (50% - 70%)** · Focus on companies b/w 2000 and 20000 crores of m-cap · Focus on under-researched, high growth quality companies with visible competitive advantage · Invest in 10-20 companies • **Large Caps (30% - 50%)** · Focus on sector leaders with established track record · Focus on companies that offer consistent risk adjusted return potential over long term · Have well established economic moats · Invest in 5-10 companies
• Benchmark	• BSE 500
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

6. **ABM INDIA LEADERSHIP FUND (Yet to be launched)**

Fund Manager: Mr. Vivek Mahajan

• Type of Portfolio	• Open ended Discretionary Portfolio
• Investment Objective	• The Strategy aims to deliver returns by investing in companies that offer consistent risk adjusted return potential over long term , under-researched, high growth quality companies with visible competitive advantage and with vibrant management leadership.
• Investment Strategy	• **Large Caps (70% - 90%)** · Focus on sector leaders with established track record · Focus on companies that offer consistent risk adjusted return potential over long term · Have well established economic moats · Invest in 10-20 companies • **Mid Caps (10% - 30%)** · Focus on companies b/w 2000 and 20000 crores of m-cap · Focus on under-researched, high growth quality companies with visible competitive advantage · Invest in 5-10 companies
• Benchmark	• CNX 100
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

7. **ABM R.B.P**

Fund Manager: Mr. Vivek Mahajan / Mr. Varun Mittal

• Type of Portfolio	• Open ended Discretionary Portfolio
• Investment Objective	• To select market opportunities based on pre defined rules with a target of achieving excess returns over the benchmark in the medium to Long term
• Investment Strategy	• Rule Based- System driven Investment Strategy • Based on two primary factors Momentum and volatility • Concentrated portfolio of ~15-25 companies selected from a universe of BSE 200 • Managing risk through a cap of 15% on individual stock at cost • Portfolio is rebalanced on a monthly basis • Strategy will be sector agnostic • Derivatives exposures if any in the portfolio will be in line with SEBI guidelines and will be taken only for hedging purposes
• Benchmark	• BSE 200
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

8. **Structured Products/ Portfolios (Yet to be launched)**

Fund Manager: Mr. Vivek Mahajan

Under the Discretionary Portfolio Management Services offered to the Clients, the Portfolio Manager may, from time to time, launch portfolios which are built/ constructed using structured products/ securities, units /

shares of - private equity funds , venture capital funds , Alternative Investment Funds (AIF), Real Estate Investment Trust (REIT) etc.

9. Multi-Manager Scheme (Currently Inactive)

Fund Manager: Mr. Vivek Mahajan

The Portfolio Manager shall define the risk and return objectives for the portfolio of the Client. Client has the option to choose the asset allocation with respect to Mutual Fund Schemes, Private Equity Fund Schemes, and Venture Capital scheme/s, AIF schemes managed by third party Asset Managers registered with SEBI or others.

The Portfolio Manager shall determine the various asset classes, which are investible as per the Regulations. The Portfolio Manager may introduce new asset classes when available. The Portfolio Manager shall then allocate the Client's funds to various investible asset classes. The key input in the strategic asset allocation process is the forecast investment performance of various asset classes, based on a deep understanding of the market dynamics by Aditya Birla Money.

The Portfolio Manager may select Third Party Investment Advisors by adopting any of the following methods:

The Portfolio Manager may select a panel of third party Investment Advisors in each asset class. Each such Investment Advisor shall have a distinct investment style, a proven investment process and a strong track record of performance. Once selected, the Portfolio Manager shall closely monitor and evaluate the third party Investment Advisors/investment managers of portfolio management services with their respective model portfolio on their ongoing performance. In this method, the Portfolio Manager shall take advice from the third party Investment Advisors in construction of the portfolio and selection of securities / instruments.

The Portfolio Manager may also select mutual fund portfolios managed by third party Investment Managers of Mutual Funds. Each such portfolio managed by the respective Investment Manager, shall have a distinct investment style, a proven investment process and a strong track record of performance. Once the portfolios are selected, the Portfolio Manager shall closely monitor and evaluate the third party investment managers of mutual funds with their respective model portfolio on their ongoing performance. In this method, the Portfolio Manager shall aim to reduce the overall portfolio risk by combining different investment approaches used by third party investment managers of mutual fund portfolios, thereby taking advantage of the correlation between the selected underlying portfolios.

The Portfolio Manager may also directly invest the Client's funds in money market instruments, exchange traded derivative instruments and mutual fund portfolios, including exchange traded funds in accordance with SEBI Regulations; instead of taking advice from third party Investment Advisors.

It is clarified that the Client's assets always remain in the name of the Portfolio Manager and are held by the Custodian appointed by the Portfolio Manager. At no time are the funds transferred to the third party Investment Advisors. The third party Investment Advisors simply advice the Portfolio Manager on the portion of the Client's funds allocated to them by the Portfolio Manager

Benchmarks for Multi- Manager portfolios

<table>
<tr><th>Asset/s Exposure in Multi-Manager Portfolio</th><th>%tage exposure</th><th></th><th>Equity Exposure in Portfolio Multi-Manager Portfolio</th><th>Benchmark</th></tr>
<tr><td>Mutual Fund Liquid Plans</td><td>>90%</td><td rowspan="7">Equity Exposure in Multi-Manager Portfolio</td><td>0%</td><td>CRISIL Liquid Fund Index</td></tr>
<tr><td>Mutual Funds Ultra / Short Term Funds</td><td>> 90%</td><td>0%</td><td>CRISIL Liquid Fund Index</td></tr>
<tr><td>Income Funds</td><td>> 90%</td><td>0%</td><td>CRISIL Composite Bond Fund Index</td></tr>
<tr><td>Gilt Funds</td><td>>90%</td><td>0%</td><td>I-Sec Composite Gilt Index</td></tr>
<tr><td>Debt Plans</td><td>=>80%</td><td>=<20%</td><td>CRISIL MIP Index</td></tr>
<tr><td>Debt Plans</td><td>=< 35%</td><td><=65%</td><td>CRISIL Balance Fund Index</td></tr>
<tr><td>Debt Plans</td><td><=20%</td><td>>=80%</td><td>CNX 500 or NIFTY</td></tr>
<tr><td colspan="5">Debt Plans = Liquid , Gilt , Short Term , Income , CP , CD , Bonds , Debentures , FDs</td></tr>
</table>

ii) Non - Discretionary Portfolio Management Services

Under the Non-Discretionary Portfolio Management Services, the portfolio of the client shall be managed in consultation with the client. The Client will have complete discretion to decide on the investment (Stock Quality 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, directly or by a custodian. The deployment of the Client's Funds by the Portfolio Manager on the instructions of the Client is absolute and final and can never be called in question nor shall it be open to review at any time during the currency of the Agreement or at any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the Act, Rules and/or Regulations, guidelines and notifications issued by SEBI and in force from time to time. A periodical statement in respect of Client's Portfolio generated from the portfolio manager/ custodian shall be sent to the respective Clients.

1. ABM HUB-N-SPOKE STRATEGY(Yet to be launched)

• Type of Portfolio	• Non - Discretionary Portfolio
• Investment Objective	• Strive to beat the benchmark (CNX500) using superior stock selection (for Hub component) and tactical positioning (for Spoke component
• Investment Strategy	• ABM Hub-n-Spoke strategy follows a dual approach towards investment/stock selection, i.e. **Buy-n-Hold (Hub) & Tactical (Spoke).** The *Hub* component of the strategy aims to benefit from secular earnings growth story, while the *Spoke* component aims to benefit from irrational (but transient) market behavior, sectoral rotation & special situations driven opportunities
• Benchmark	• CNX 500.
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

2. Non - Discretionary Portfolio Management Services

Fund Manager: Mr. Vivek Mahajan

• Type of Portfolio	• Non - Discretionary Portfolio
• Investment Objective	• Strive to beat the benchmark (CNX500) using superior stock selection in consultation with the client. The Client will have complete discretion to decide on the investment subject to risk tolerance level as discussed with the individual client.
• Investment Strategy	• This being a tailor made portfolio, the strategy is in alignment of one's own investment objectives & actions.
• Benchmark	• CNX 500.
• Exit Load	• Maximum of 3% will be charged on redemption of investment in the 1 year • Maximum of 2% will be charged on redemption of investment in the 2 year • Maximum of 1% will be charged on redemption of investment in the 3 year • Nil Exit load after a period of three years
• Tenure	• Till Perpetuity

6. Risk Factors

General Risk:

- Investments in Securities including Equities, derivatives, Mutual Funds and Exchange traded Index funds are subject to market risks & there is no assurance or guarantee that the objective of the investments/product will be achieved. The past performance of the Portfolio Manager in any product is not indicative of the future performance in the same product or in any other product either existing or that may be offered. There is no assurance that past performances in earlier product will be repeated. Actual results may differ materially from those suggested by the forward looking statements due to Key Risks or uncertainties associated with our expectations with respect to, but not limited to, exposure to market risks, general economic and political conditions in India and other countries globally, which have an impact on our services and / or investments, the monetary and interest policies of India, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices etc. Risk arising from the investment objective, investment strategy, asset allocation and quant model risk: Market risk, political and geopolitical risk and risk arising from changing business dynamics, which may affect portfolio returns. At times, portfolios of individual clients may be concentrated in certain companies/industries. The performance of the portfolios would depend on the performance of such companies / industries / sectors of the economy. The names of the portfolio do not in any manner indicate their prospects or returns.

- While utmost care has been exercised, Aditya Birla Money Limited, its sponsors or any of its officers, employees, personnel, directors make no representation as to the accuracy, completeness or reliability of the content and hereby disclaim any liability with regard to the same. Recipients of this material should exercise due care and read the disclosure document (including if necessary, obtaining the advice of tax / legal / accounting / financial / other professionals) prior to taking of any decision, acting or omitting to act. The document is solely for the information and understanding of intended recipients only. Further, the recipient shall not copy / circulate contents of this presentation, in part or in whole, or in any other manner whatsoever without prior and explicit approval of Aditya Birla Money Ltd.

- Each portfolio will be exposed to various risks depending on the investment objective, investment strategy and the asset allocation. The investment objective, investment strategy and the asset allocation may differ from client to client. However, generally, highly concentrated portfolios with lesser number of stocks, generally, will be more volatile than a portfolio with a larger number of stocks. Portfolios with higher allocation to equities will be subject to higher volatility than portfolios with low allocation to equities.

- Risks may also arise out of non-diversification, if any, as the diversified portfolios (allocated across companies and broad sectors), generally, tend to be less volatile than non-diversified portfolios.

- Tax Laws may change, which may, in turn, affect the return on investment.

- Upon a sharp downturn in the market during the defined period, the portfolio manager might at his own discretion invest the whole value of the portfolio in money-market and/or in the debt securities market for more stable returns on the portfolio. Subsequently, the portfolio will not be exposed to equities for the rest of the duration of the portfolio.

- The Client understands and accepts the risk of total loss of value of its Assets or recovery thereof only through an expensive legal process due to factors which by way of illustration include default or non -performance of a third party, a company's refusal to register a Security due to legal stay or otherwise, disputes raised by third parties etc.

Risk Factors associated with investments in Equity & Equity related securities and Mutual Fund:

- The portfolio proposes to invest in equity, equity related securities and Mutual Funds. Equity and Equity related securities and Mutual Funds by nature are volatile and prone to price fluctuations on a daily basis due to both macro and micro factors.

- The value of the portfolio will fluctuate as the daily prices of the individual securities in which they invest fluctuate and may be worth more or less than its original cost, at a given point in time.

- In respect of investments in equity and equity-related instruments, there may be risks associated with trading volumes, settlement periods and transfer procedures that may restrict liquidity of investments in equity and equity related securities.

- The value of the portfolio may be affected generally by factors affecting securities markets, such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in policies of the Government, taxation laws or policies of any appropriate authority and other political and economic developments and closure of stock exchanges which may have an adverse bearing on individual securities, a specific sector or all sectors including equity and debt markets.

- Technology stocks and some other investments in niche sectors run the risk of volatility, high valuation, obsolescence and low liquidity

- Within the regulatory limits applicable at any point in time, the Portfolio Manager may choose to invest in unlisted securities that offer attractive yields. Securities, which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges or offer other exit options to the investor, including a put option. This may however increase the risk of the portfolio. The liquidity and valuation of the portfolio's investments due to their holdings of unlisted securities may be affected if they have to be sold prior to their target date of disinvestments

- Investment made in unlisted equity or equity-related securities may only be realizable upon listing of these securities. Settlement problems could cause the portfolio to miss certain investment opportunities.

- Investors may note that Portfolio Manager's investment decisions may not always be profitable, as actual market movements may be at variance with anticipated trends.

- Though the constituent stocks of most indices are typically liquid, liquidity differs across stocks. Due to the heterogeneity in liquidity in the capital market segment, trades on this segment may not get implemented instantly.

- The portfolio may have higher concentration towards a particular stock or sector, at a given point in time. Any change in government policy or any other adverse development with respect to such a stock or the sector, may adversely affect the value of the portfolio.

Risks associated with investing in liquid portfolios, debt investments and other fixed income securities:

- Any and all risks which are already inherent and pertain to underlying liquid portfolios, debt investments and other fixed income securities, and which include, but are not limited to, changes in credit rating, trading volumes, settlement periods and transfer procedures, price/interest-rate risk and credit risk, volatility and liquidity in the money markets, pressure on the exchange rate of the rupee, basis risk, spread risk and reinvestment risk, offshore investments, derivative investments and security lending

Risks associated with Investing in Foreign Securities:

- The Portfolio Manager does not intend to invest in Foreign Securities.

Risk associated with Short Selling or Stock Lending:

- The Portfolio Manager does not intend to engage in Short selling or Stock Lending.

Risk Factors associated with investments in Derivatives:

- The Portfolio manager intends to use exchange traded derivatives as a hedging tool & does not intend to take any naked positions. Nevertheless, trading in derivatives market has risks and issues concerning the use of derivatives that investor should understand. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds.

- The use of a derivative requires an understanding not only of the underlying instrument but also of the derivative itself. Derivatives require the maintenance of adequate controls to monitor transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price or interest rate movements correctly.

- Other risks in using derivatives include the risk of mispricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices. Derivatives are highly leveraged instruments. Even a small price movement in the underlying security could have a large impact on their value. 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.

- Derivative trades involve execution risks, whereby the rates seen on the screen may not be the rate at which ultimate execution takes place.

- The options buyer’s risk is limited to the premium paid, while the risk of an options writer is unlimited. However, the portfolio manager does not intend to write options.

- Risk of loss in trading futures contracts can be substantial, because of the low margin deposits required, the extremely high degree of leverage involved in futures pricing and potential high volatility of the futures markets.

‘Schedule I’ may be referred to proper understanding of use of derivatives by the Portfolio Manager of its various Portfolio Management Strategies.

Risk Factors associated with investments in Liquid Funds:

- The Portfolio Manager may, from time to time, invest any un-deployed funds in liquid schemes of Mutual Funds or in money market instruments. Though the portfolio of liquid funds comprises of short-term deposits, government securities and money market instruments, they cannot be considered as totally risk free. This is because liquidity patterns and short term interest rates of the government change, sometimes on a daily basis, thereby making the fund susceptible. Any change in the investment policies or fundamental attributes of underlying portfolios, could affect performance of portfolios.

- Liquid fund returns are not guaranteed and it entirely depends on market movements.

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 may invest in listed securities of the associate/group companies. These investments will be carried out to achieve the investment objectives and strategies and in the normal course of investment activity subject to the applicable laws/regulations. The portfolio manager, its employees may purchase/ sell securities in ordinary course of business and in that manner, there may arise conflict of interest with transactions in any of the client’s portfolio. Such conflict of interest shall be dealt with in accordance of the Conflict of Interest Policy of the Company

7. Client Representation

Category of Clients	No. of Clients	Funds Managed (Rs in Crores)	Discretionary / Non Discretionary Services
Associates/Group Co.			
As on March 31, 2019	NIL	NIL	NIL
As on March 31, 2020	NIL	NIL	NIL
As on March 31, 2021	NIL	NIL	NIL
Others			
As on March 31, 2019	812	392.40	Discretionary Services
As on March 31, 2019	76	80.80	Non-Discretionary Services
As on March 31, 2020	699	258.93	Discretionary Services
As on March 31, 2020	68	59.88	Non-Discretionary Services
As on March 31, 2021	420	224.39	Discretionary Services
As on March 31, 2021	53	75.3	Non-Discretionary Services

ii) Disclosures in respect of transactions with related parties as per the standards specified by Institute of Chartered Accountants of India on the basis of audited financial results as at 31st March, 2021.

In accordance with the requirements of Accounting Standard 18 “Related Party Disclosure” issued by Institute of Chartered Accountant of India, we hereby submit that all related party transaction have been reported in the Financial Year 2020-21

The portfolio manager uses the broking services of Aditya Birla Money Limited who is a member of BSE and NSE in cash and derivative segment.

(a) List of Related Parties

Ultimate Holding Company	Grasim Industries Limited
Holding Company	Aditya Birla Capital Limited
Related parties under Ind AS 24 with whom transactions have taken place during the year	
Fellow subsidiary	Aditya Birla Finance Limited
	Aditya Birla Financial Shared Services Limited
	Aditya Birla Sun Life Insurance Company Limited
	Aditya Birla Insurance Brokers Limited
	Aditya Birla Capital Technology Services Limited(ABMU)
	Aditya Birla Housing Finance Limited
	Aditya Birla ARC Ltd
	Aditya Birla Health Insurance company Limited
	Aditya Birla Stressed Asset AMC Private Limited
	Aditya Birla Idea Payment Banking Ltd
	Aditya Birla Sun Life AMC Limited
	Aditya Birla Wellness Private Limited

Sr. No.	Particulars	Closing balance as on March 31, 2021	Transactions 2020 - 21*	Closing balance as on March 31, 2020	Transactions 2019 - 20*
A	Holding Company / Ultimate Holding Company **Brief description Company & item wise:**	-	-		
I	**Grasim Industries**				
1	Brokerage Income		-		36,28,980
2	Custodian Fee - recoverable		555		
3	Outstanding balances				
	- Payable(Trade Payable)	(656)		(21)	
	Grasim Industries Limited Employees Gratuity Trust				
	- Gratuity Fund paid	72,04,443			
	- Gratuity fund valuation	8,38,54,192		6,66,88,766	
II	**Aditya Birla Capital Limited**				

1	Reimbursement of cost- Rent & other expenses		-		62,862
2	IndAS - Interest on Preference shares		3,91,00,728		3,55,47,395
3	ESOP expenses		9,38,024		76,33,150
4	ESOP CREDIT Note against exit employee				(57,88,322)
5	Recovery of DP AMC Charges		-		10,500
6	Custodian Fee - recoverable		-		4,372
7	Outstanding balances				
	- IND AS - Interest Payable on Preference shares	(24,62,37,010)		(20,71,36,278)	
	- Payables	(5,62,605)		(12,41,257)	
III	**Aditya Birla Finance Limited**				
1	Recovery of Manpower cost		1,92,47,420		2,41,10,722
2	Recovery of Cost - Rent & other expenses		61,180		3,78,900
3	Custodian - Fee recoverable		5,81,358		11,46,855
4	Brokerage Income (Trading)		29,76,280		98,90,758
5	Reimbursement of cost - Salary expenses		28,62,671		-
6	Referral Fee expense		17,50,114		45,45,368
7	Referral Fee income		12,678		21,41,260
8	Expenses - Commission, - Management fees		3,83,65,744		2,20,34,060
9	Other transaction - Liability transfer In		1,73,896		5,032
10	IT Support recovery		37,836		9,459
11	KRA Service charges		2,085		1,535
12	Client balance transfer		7,63,163		
13	Recovery of cost – LTIP		19,31,400		
14	Outstanding balances				
	- Payables (Trade Payable)	(2,67,03,572)		(48,29,069)	
	- Payables (Advances from customer)	(10,000)		(9,335)	
	- Receivables (Advances from customer)	2,01,486		4,19,097	
IV	**Aditya Birla Financial Shared Services Limited**				
1	Reimbursement of Cost - Manpower expenses		60,86,307		86,63,829
2	Reimbursement of Cost - Electricity, Staff welfare and other expenses		1,16,45,864		2,03,07,119

3	Prepaid Expenses		31,94,433		57,77,539
4	Contribution to Fund - Expenses Recognise in income Statement		6,20,399		5,91,904
	- Other comprehensive income		(8,48,999)		1,72,273
5	Recovery of Cost - Other expenses		-		5,11,575
6	Recovery of Cost - Manpower expenses		-		35,20,500
7	Liability transfer		19,81,299		2,68,695
8	Recovery of cost – Bonus		9,23,931		
9	Provision for expenses		40,26,121		
10	Outstanding balances				
	- Payables	(40,43,595)		(28,52,286)	
	- Prepaid expense balance	(5,95,156)		6,18,025	
V	**Aditya Birla Sun Life Insurance Company Limited**				
1	Brokerage income		70,97,006		43,76,858
2	Other Transaction- Liability transfer in		-		24,35,902
3	Other Transaction- Liability transfer		-		20,441
4	Other transaction – WDM		10,07,60,416		9,97,27,366
5	Recovery of Rent & other expenses		1,77,704		13,93,742
6	Reimbursement of Rent expenses		5,80,122		-
7	Asset transfer in		2,335		-
8	Outstanding balances				
	- Receivables	-		2,01,260	
	- Payables	(1,75,894)		-	
VI	**Aditya Birla Insurance Brokers Limited**				
1	Recovery of Cost - Rent & other expenses		1,35,319		3,46,440
2	Reimbursement of Rent expenses & other expenses		9,08,175		
3	Outstanding balances				
	- Payables	(6,89,508)		-	
	- Receivables	-		3,37,589	
VII	**Aditya Birla Capital Technology Services Ltd(formerly known as**				

	Aditya Birla My Universe Services Limited)				
1	Reimbursement of Cost - IT other expenses		28,55,157		28,377
2	Expenses - IT Support Charges,Management fees		-		22,09,559
3	Recovery of Cost - IT Support recovery		-		
4	KRA service recovery		-		13,890
5	Prepaid expense		9,63,657		-
6	Recovery of cost – Bonus		50,374		-
7	Outstanding balances				
	- Payables (Trade payable)	2,17,895		-	
	- Prepaid expense balance	(36,127)		-	
VIII	**Aditya Birla Housing Finance Limited**				
1	Asset transfer		8,38,961		-
2	Referral fee income		21,939		74,248
3	Liability transfer		-		3,40,805
4	Recovery of expenses		15,772		
5	Outstanding Balances				
	- Receivables	25,063		3,40,805	
IX	**Aditya Birla ARC Limited**				
1	Liability transfer		-		41,711
2	Custodian - Fee recoverable		2,076		1,450
3	Other transaction - NDC request		-		5,61,092
4	Outstanding balances				
	- Trade payable	-		(41,530)	
	- Receivable (Advances from Customer)	-		-	
X	**Aditya Birla Health Insurance company Limited**				
1	Reimbursement of Electricity charges		23,161		2,85,320
2	Outstanding Balances				
	- Payable	-	-	(84,521)	
XI	**Aditya Birla Stressed Asset AMC Private Limited**				
1	Custodian - Fee recoverable		-		98,747

2	Liability transfer		-		
3	Outstanding balances				
	- Trade Payable	-		-	
	- Payable (Advances from Customer)	-		-	
XII	**Aditya Birla Idea Payment Banking Limited**				
1	Other transaction - Purchase of Computers		-		3,40,139
2	Outstanding balances				
	- Trade Payable	-	-	(4,01,363)	
XIII	**Aditya Birla Sunlife AMC Limited**				
1	Liability transfer		7,49,832		-
2	Outstanding balances				
	- Trade Payable	-		-	
XIV	**Aditya Birla Wellness Private Limited**				
1	Reimbursement of Electricity charges		20,230		-
2	Outstanding balances				
	- Trade Payable	23,872		-	
XV	**Mr.P.Sudhir Rao**				
1	Director Sitting fee	-	3,60,000	-	3,80,000
2	Reimbursement of cost	-	-	-	
XVI	**Mr.G.Vijayaraghavan**				
1	Director Sitting fee	-	3,60,000	-	3,40,000
2	Reimbursement of cost	-	-	-	
XVII	**Mr.Tushar Harendra Shah**				
1	PMS Management fees	-	1,29,631	-	40,751
2	Brokerage income	-	480	-	
XVIII	**Mr.Ajay Srinivasan**				
1	PMS Management fees	-	-	-	30,663
2	Brokerage income	-	-	-	-

* Amounts excluding GST

8. . Financial Performance of the Portfolio Manager

Summarized Financial Statement – Balance Sheet

	As at	As at	As at
	31st March 2021	**31st March, 2020**	**31st March, 2019**
ASSETS			
Financial Assets			
(a) Cash and Cash Equivalents	9,54,49,943	37,64,21,110	5,95,16,833
(b) Bank Balance other than (a) above	395,58,81,545	245,23,10,801	235,23,39,307
(c) Stock of Securities	256,49,00,890	90,47,79,343	280,57,66,372
(d) Trade and Other Receivables	153,93,86,781	64,67,74,442	112,65,71,684
(e) Loans	5,54,16,939	52,36,11,920	23,30,88,484
(f) Investments			
- Other Investments		0	0
(g) Other Financial Assets	15,62,81,716	12,37,92,039	6,50,15,110
	836,73,17,814	**502,76,89,655**	**664,22,97,790**
Non-Financial Assets			
(a) Current Tax Assets (Net)	2,14,05,709	3,29,86,804	2,47,31,098
(b) Deferred tax assets (Net)	5,31,58,183	4,29,44,113	3,34,64,006
(c) Property, Plant and Equipment	3,15,47,066	4,82,46,136	4,46,94,645
(d) Right-of-use Assets	18,43,60,201	18,77,71,383	-
(e) Capital work-in-progress		-	55,00,000
(f) Other Intangible assets	1,98,89,869	1,99,83,326	2,51,10,751
(g) Intangible assets under development	68,37,050	41,14,000	12,79,000
(h) Other Non-Financial assets	14,97,30,532	11,83,63,241	15,97,80,677
	46,69,28,610	45,44,09,003	**29,45,60,177**
	883,42,46,424	**548,20,98,658**	**693,68,57,967**
LIABILITIES AND EQUITY			
LIABILITIES			
Financial Liabilities			
(a) Trade Payables			
(i) total outstanding dues of micro enterprises and small enterprises	22,52,670	21,81,033	4,02,472
(ii) total outstanding dues of creditors other than micro enterprises and small enterprises	41,17,78,522	30,50,62,908	27,06,88,831
(b) Debt Securities	322,07,94,575	173,05,73,604	346,52,90,519
(c) Borrowings (Other than Debt Securities)		-	23,73,31,049

(d) Subordinated Liabilities	54,62,43,868	50,71,43,135	47,15,95,740
(e) Lease Liability	19,86,91,888	20,05,41,558	-
(f) Other Financial Liabilities	361,75,72,897	211,92,04,467	19,27,33,782
	799,73,34,420	**486,47,06,705**	**463,80,42,393**
Non Financial Liabilities			
(a) Provisions	9,15,90,659	9,28,14,360	7,06,54,396
(b) Other Non Financial Liabilities	26,64,93,332	21,18,42,248	201,33,79,550
	35,80,83,991	30,46,56,608	**208,40,33,946**
Equity			
(a) Equity Share capital	5,63,01,357	5,63,01,357	5,63,01,357
(b) Other Equity	42,25,26,656	25,64,33,988	15,84,80,271
	47,88,28,013	**31,27,35,345**	**21,47,81,628**
	883,42,46,424	**548,20,98,658**	**693,68,57,967**

Statement of Profit and Loss for the Year ended 31st March, 2021

(All amount are in Indian Rupees, unless otherwise stated)				
Particulars	**Year Ended 31st March, 2021**	**Year Ended 31st March, 2020**	**Year Ended31st March, 2019**	
Revenue from operations				
(i) Interest Income	43,38,20,027	50,03,31,726	51,79,32,986	
(ii) Fees and Commission Income	136,34,70,496	107,63,18,497	10,22,81,956	
(iii) Net Gain on Fair Value Changes	10,87,89,508	8,99,70,924	4,52,59,383	
(iv) Sale of Service		-	101,50,14,108	
Total Revenue from Operations	**190,60,80,031**	**166,66,21,147**	**168,04,88,433**	
Other Income	2,78,06,451	7,07,45,502	3,61,48,647	
Total Income	**193,38,86,482**	**173,73,66,649**	**171,66,37,080**	
Expenses				
(i) Finance Costs	22,06,44,135	28,01,73,274	30,43,94,218	
(ii) Business Partners Payout	50,54,58,616	37,70,54,877	38,16,58,062	
(iii) Impairment on Financial Instruments	92,70,816	(18,20,303)	28,55,625	
(iv) Employee benefits expense	59,99,15,863	55,88,45,118	53,57,74,282	
(v) Depreciation and amortisation expenses	7,02,23,637	6,45,79,409	2,08,71,481	
(vi) Other expenses	30,43,76,759	29,35,19,438	33,10,54,739	
Total Expenses	**170,98,89,826**	**157,23,51,813**	**157,66,08,407**	

Profit before exceptional items and tax	**22,39,96,656**	16,50,14,836	14,00,28,673	
Exceptional Items		-	-	
Profit Before Tax	**22,39,96,656**	**16,50,14,836**	**14,00,28,673**	
Tax Expenses				
Deferred Tax		-	-	
Tax Expenses				
Current Tax	7,63,72,843	5,46,30,076	6,41,84,669	
Deferred Tax	(1,02,14,070)	(94,80,107)	(2,40,66,904)	
Total Tax Expenses	**6,61,58,773**	**4,51,49,969**	**4,01,17,765**	
Profit for the Year	**15,78,37,883**	**11,98,64,867**	**9,99,10,908**	

9. 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.

The Portfolio Manager has commenced its operations from April 2015 and the performance of the Portfolio Manager for the last three years

		FY 20-21		FY 19-20		FY 19-18	
Investment Approach	**Bench Mark**	**Portfolio**	**Benchmark**	**Portfolio**	**Benchmark**	**Portfolio**	**Benchmark**
ABM India Consumption Portfolio*	BSE200	49.54%	74.25%	-19.47%	-26.44%	NA	NA
Core and Satellite Portfolio Scheme 1**	CNX100	56.99%	69.59%	NA	NA	NA	NA
Core and Satellite Equity Portfolio	CNX 100	55.35%	69.59%	-22.39%	-25.94%	-9.23%	12.50%
Core and Satellite Equity Portfolio1***	CNX100	55.64%	69.59%	-21.00%	-25.94%	NA	NA

* ABM India Consumption Portfolio was launched on 15/01/2019
**Core and Satellite Portfolio Scheme 1 was launched on 31/12/2019
*** Core and Satellite Equity Portfolio1 was launched on 07/06/2018

Non- Discretionary Services:

In the non-discretionary services, the final decision of investment rests with the client. The clients determine which securities to invest into as well as the asset allocation within the overall investment amount under the PMS. The performance of the Portfolio Managers does not depend merely on the Portfolio Manager but also on the decision by the client in this regard. Considering the nature of services, the performance record of the Portfolio Manager has not been computed.

Direct on-boarding of clients

Investors may also avail the portfolio services of Aditya Birla money limited directly, without intermediation of persons engaged in distribution services by registering their details in the website of the portfolio manager.

10. Audit Observations for preceeding 3 years: No Major Observations

11. Nature of expenses

The following are the broad types of costs and expenses chargeable to Clients availing the Portfolio Management Services. The exact quantum of the fees / expenses relating to each of the services shall be annexed to the Agreement executed between the Client and the Portfolio Manager. The expense charged may vary from Client to Client. The expenses incurred shall be directly debited on actual expense incurred basis to the Client's Portfolio as and when the same becomes due for payment or on a monthly basis. The fees relate to portfolio management services offered to Clients.

(i) Portfolio Management Fees

Investment Management Fee:

Pursuant to SEBI Cir./IMD/DF/13/2010 dated October 10, 2010 for charging of performance/profit sharing fee, high water mark principle will be followed.

High Water Mark Principle: High Water Mark shall be the highest value that the portfolio/account has reached. Value of the portfolio for computation of high watermark shall be taken to be the value on the date when performance fees are charged. For the purpose of charging performance fee, the frequency shall not be less than quarterly. The portfolio manager shall charge performance based fee only on increase in portfolio value in excess of the previously achieved high water mark.

Subject to a specific agreement with a portfolio client, the client can choose following fee payment options:

Fixed Management Fee Option: Management Fee: upto 3 % per annum (charged monthly on the daily average of the portfolio account value) (excluding GST).

Part Fixed Plus Variable Option:

a. Management Fee: upto 2.00% per annum (charged quarterly on the daily average of the portfolio account value) (excluding GST).
b. Performance Fee: upto 30% (charged on High Water Mark Basis) (excluding GST)

(ii) Exit Load or Redemption Terms:

In case client portfolio is redeemed in part or full, the exit load charged shall be as under:

a) In the first year of investment, maximum of 3% of the amount redeemed.

b) In the second year of investment, maximum of 2% of the amount redeemed.

c) In the third year of investment, maximum of 1% of the amount redeemed.

d) After a period of three years from the date of investment, no exit load.

Exit loads as applicable on underlying securities will be on actual basis.

(iii) Custodian Fees :

As may be decided between the client and the portfolio manager.

(iv) Registrar & Transfer Agent Fees:

Charges payable to registrars and transfer agents in connection with effecting transfer of securities and bonds including stamp charges cost of affidavits, notary charges, postage stamp and courier charges

(v) Brokerage & Transaction Cost:

The Investments under Portfolio Management would be done through registered members of the Stock Exchange(s) who charge brokerage upto a maximum of 2.5% of contract value. In addition to the brokerage, transaction cost like turnover charges, stamp duty, transaction costs, turnover tax, securities transaction tax or any other tax levied by statutory (ies), foreign transaction charges (if any) and other charges on the purchase and sale of shares, stocks, bonds, debt, deposits, other financial instruments would also be levied by the broker (including Aditya Birla Money Ltd.). Entry or exit loads (if any) on units of Mutual Funds will also be charged from clients.

(vi) **Goods & Service Tax**: As applicable from time to time.

(vii) **Depository Charges**: As may be applicable from time to time and charged by Depository Participant.

(viii) **Certification and Professional charges**: Charges payable for out sourced professional services like accounting, auditing, taxation and legal services etc. for documentation, notarizations certifications, attestations, required by bankers or regulatory authorities including legal fees etc.

(ix) **Incidental expenses**: Charges in connection with day-to-day operations like courier expenses, stamp duty, service tax, postal, opening and operation of bank account, distribution charges or any other out of pocket expenses as may be incurred by the Portfolio Manager.

The Portfolio Manager shall deduct directly from the cash account of the client all the fees/costs as specified above and shall send a statement to the client for the same. The fees charged to the client for PMS come under the ambit of “fees for technical services” under Section 194J of the Income Tax Act, 1961(“the Act”). As the section calls for withholding tax, the client is required to withhold tax @ 10 % (plus applicable surcharge and education cess) on the fees that the client pays to the Portfolio Manager, if he / she fall under the following two categories:

a) Individual / HUF client is required to deduct TDS if their accounts were subject to audit u/s 44AB in the previous year;
b) Corporates- This implies the client while making payment of the fees would deduct tax at source.

12. Taxation:

12.1: General:

The information given hereinafter is only for general information purpose and is based on the law and practice currently in force in India and the Investors should be aware that the relevant fiscal rules or their interpretation may change from time to time.

The portfolio gains in an account could be in the nature of capital gains (either short- term or long-term depending upon the holding period) or business income depending on the status and intent of the client at the time of entering into agreement for portfolio management.

In view of the above, and since the Individual nature of tax consequences may differ in each case on its merits and facts, each investor is advised to consult his/ her or its own professional tax advisor with respect to the specific tax implication arising out of its participation in the PMS Strategy/ option as an investor. The portfolio manager shall not be responsible for assisting in or completing the fulfillment of the Client’s tax obligations.

The following are the tax provisions applicable to Clients investing in the Portfolio Management Services under the taxation laws as on the date herewith. The information set forth is based on the Portfolio Manager’s understanding of the tax laws as of this date of Disclosure Document.

Income Tax:

RATES OF TAX FOR AY 2022-23 (FY 2021-2022)

Individual resident aged below 60 years (i.e. born on or after 1st April 1962)

OLD INCOME TAX SLAB REGIME

Income Slabs		Tax Rates
i.	Where the taxable income does not exceed Rs. 2,50,000/-.	NIL
ii.	Where the taxable income exceeds Rs. 2,50,000/- but does not exceed Rs. 5,00,000/-.	5% of amount by which the taxable income exceeds Rs. 2,50,000/-. **Tax Relief u/s 87A** - In case of tax payers, having total income not exceeding Rs. 5,00,000/-, income tax chargeable on the income or Rs. 12,500/-, whichever is less.
iii.	Where the taxable income exceeds Rs. 5,00,000/- but does not exceed Rs. 10,00,000/-.	Rs. 12,500/- + 20% of the amount by which the taxable income exceeds Rs. 5,00,000/-.
iv.	Where the taxable income exceeds Rs. 10,00,000/-.	Rs. 112,500/- + 30% of the amount by which the taxable income exceeds Rs. 10,00,000/-.

Surcharge:

- 10% of the Income Tax, where taxable income is more than Rs. 50 lacs and upto Rs. 1 crore.
- 15% of the Income Tax, where taxable income is more than Rs 1 crore and upto Rs. 2 crore.
- 25% of the Income Tax, where taxable income is more than Rs 2 crore and upto Rs. 5 crore.
- 37% of the Income Tax, where taxable income is more than Rs. 5 crore.

Increased surcharge rates of 25% and 37% shall not be applicable to capital gains arising on the sale of listed equity shares and gains made on the sale of units of equity-oriented funds and business trusts etc on which securities transaction tax has been paid.

Education Cess: 4% of the total of Income Tax and Surcharge.

Senior Citizen (Individual resident who is of the age of 60 years or more but below the age of 80 years i.e. born on or after 1st April 1942 but before 1st April 1962)

Income Tax:

Income Slabs		Tax Rates
i.	Where the taxable income does not exceed Rs. 3,00,000/-	NIL
ii.	Where the taxable income exceeds Rs. 3,00,000/- but does not exceed Rs. 5,00,000/-	5% of the amount by which the taxable income exceeds Rs. 3,00,000/-. **Tax Relief u/s 87A** - In case of taxpayers, having total income not exceeding Rs. 5,00,000/-, income tax chargeable on the income or Rs. 12,500/-, whichever is less.
iii.	Where the taxable income exceeds Rs. 5,00,000/- but does not exceed Rs. 10,00,000/-	Rs. 10,000/- + 20% of the amount by which the taxable income exceeds Rs. 5,00,000/-.
iv.	Where the taxable income exceeds Rs. 10,00,000/-	Rs. 110,000/- + 30% of the amount by which the taxable income exceeds Rs. 10,00,000/-.

Surcharge:

- 10% of the Income Tax, where taxable income is more than Rs. 50 lacs and upto Rs. 1 crore.
- 15% of the Income Tax, where taxable income is more than Rs 1 crore and upto Rs. 2 crore.
- 25% of the Income Tax, where taxable income is more than Rs 2 crore and upto Rs. 5 crore.

37% of the Income Tax, where taxable income is more than Rs. 5 crore. **Increased surcharge rates of 25% and 37% shall not be applicable to capital gains arising on the sale of listed equity shares and gains made on the sale of units of equity-oriented funds and business trusts etc on which securities transaction tax has been paid.**

Education Cess: 4% of the total of Income Tax and Surcharge.

Super Senior Citizen (Individual resident who is of the age of 80 years or more i.e. born before 1st April 1942)

Income Tax:

	Income Slabs	Tax Rates
i.	Where the taxable income does not exceed Rs. 5,00,000/-.	NIL
ii.	Where the taxable income exceeds Rs. 5,00,000/- but does not exceed Rs. 10,00,000/-	20% of the amount by which the taxable income exceeds Rs. 5,00,000/-.
iii.	Where the taxable income exceeds Rs. 10,00,000/-	Rs. 100,000/- + 30% of the amount by which the taxable income exceeds Rs. 10,00,000/-.

Surcharge:

- 10% of the Income Tax, where taxable income is more than Rs. 50 lacs and upto Rs. 1 crore.
- 15% of the Income Tax, where taxable income is more than Rs 1 crore and upto Rs. 2 crore.
- 25% of the Income Tax, where taxable income is more than Rs 2 crore and upto Rs. 5 crore.
- 37% of the Income Tax, where taxable income is more than Rs. 5 crore.

Increased surcharge rates of 25% and 37% shall not be applicable to capital gains arising on the sale of listed equity shares and gains made on the sale of units of equity-oriented funds and business trusts etc on which securities transaction tax has been paid.

Education Cess: 4% of the total of Income Tax and Surcharge.

NEW INCOME TAX SLAB REGIME FOR INDIVIDUALS & HUF:

	Income Slabs	Tax Rates
i.	Where the taxable income does not exceed Rs. 2,50,000/-.	NIL
ii.	Where the taxable income exceeds Rs. 2,50,000/- but does not exceed Rs. 5,00,000/-.	5% of amount by which the taxable income exceeds Rs. 2,50,000/-. **Tax Relief u/s 87A** - In case of tax payers, having total income not exceeding Rs. 5,00,000/-, income tax chargeable on the income or Rs. 12,500/-, whichever is less.
iii.	Where the taxable income exceeds Rs. 5,00,000/- but does not exceed Rs. 7,50,000/-.	Rs. 12,500/- + 10% of the amount by which the taxable income exceeds Rs. 5,00,000/-.
iv.	Where the taxable income exceeds Rs. 7,50,000/- but does not exceed Rs.10,00,000/-.	Rs. 37,500/- + 15% of the amount by which the taxable income exceeds Rs. 7,50,000/-.
v.	Where the taxable income exceeds Rs. 10,00,000/- but does not exceed Rs.12,50,000/-	Rs. 75,000/- + 20% of the amount by which the taxable income exceeds Rs. 10,00,000/-
vi.	Where the taxable income exceeds Rs.	Rs. 1,25,000/- + 25% of the amount by which the taxable income

	12,50,000/- but does not exceed Rs.15,00,000/-	exceeds Rs. 12,50,000/-
vii.	Where the taxable income exceeds Rs. 15,00,000/-	Rs.1,87,500/- + 30% of the amount by which taxable income exceeds Rs.15,00,000

Note : If you opt in for the new regime with slashed Income Tax rates , you need to forego certain tax exemptions.

Any NRI or HUF or AOP or BOI or AJP

Income Tax:

Income Slabs		Tax Rates
i.	Where the taxable income does not exceed Rs. 2,50,000/-.	NIL
ii.	Where the taxable income exceeds Rs. 2,50,000/- but does not exceed Rs. 5,00,000/-.	5% of amount by which the taxable income exceeds Rs. 2,50,000/-.
iii.	Where the taxable income exceeds Rs. 5,00,000/- but does not exceed Rs. 10,00,000/-.	Rs. 12,500/- + 20% of the amount by which the taxable income exceeds Rs. 5,00,000/-.
iv.	Where the taxable income exceeds Rs. 10,00,000/-.	Rs. 112,500/- + 30% of the amount by which the taxable income exceeds Rs. 10,00,000/-.

Surcharge:

- 10% of the Income Tax, where taxable income is more than Rs. 50 lacs and upto Rs. 1 crore.
- 15% of the Income Tax, where taxable income is more than Rs 1 crore and upto Rs. 2 crore.
- 25% of the Income Tax, where taxable income is more than Rs 2 crore and upto Rs. 5 crore.
- 37% of the Income Tax, where taxable income is more than Rs. 5 crore.

Increased surcharge rates of 25% and 37% shall not be applicable to capital gains arising on the sale of listed equity shares and gains made on the sale of units of equity-oriented funds and business trusts etc on which securities transaction tax has been paid.

Education Cess: 4% of the total of Income Tax and Surcharge.

* **Abbreviations used :**
NRI - Non Resident Individual; HUF - Hindu Undivided Family; AOP - Association of Persons; BOI - Body of Individuals; AJP - Artificial Judicial Person

Co-operative Society

Income Tax:

Income Slabs		Tax Rates
i.	Where the taxable income does not exceed Rs. 10,000/-.	10% of the income.
ii.	Where the taxable income exceeds Rs. 10,000/- but does not exceed Rs. 20,000/-.	Rs. 1,000/- + 20% of income in excess of Rs. 10,000/-.
iii.	Where the taxable income exceeds Rs. 20,000/-	Rs. 3.000/- + 30% of the amount by which the taxable income exceeds Rs. 20,000/-.

Surcharge: 12% of the Income Tax, where taxable income is more than Rs. 1 crore.

Education Cess: 4% of the total of Income Tax and Surcharge.

Firm

Income Tax: 30% of taxable income.

Surcharge: 12% of the Income Tax, where taxable income is more than Rs. 1 crore.

Education Cess: 4% of the total of Income Tax and Surcharge.

Local Authority

Income Tax: 30% of taxable income.

Surcharge: 12% of the Income Tax, where taxable income is more than Rs. 1 crore.

Education Cess: 4% of the total of Income Tax and Surcharge.

Domestic Company – Where the Turnover does not exceed Rs.400 crores in Previous year 2019-20

Income Tax: 25% of taxable income.

Surcharge: The amount of income tax as computed in accordance with above rates, shall be increased by a surcharge.

- At the rate of 7% of such income tax, provided that the taxable income exceeds Rs. 1 crore.
- At the rate of 12% of such income tax, provided that the taxable income exceeds Rs. 10 crores.

Education Cess: 4% of the total of Income Tax and Surcharge.

Domestic Company- opted for Sec 115BA

Income Tax: 25% of taxable income

Surcharge: The amount of income tax as computed in accordance with above rates, shall be increased by a surcharge.

- At the rate of 7% of such income tax, provided that the taxable income exceeds Rs. 1 crore.
- At the rate of 12% of such income tax, provided that the taxable income exceeds Rs. 10 crores.

Education Cess: 4% of the total of Income Tax and Surcharge.

Domestic Company- opted for Sec 115BAA

Income Tax: 22% of taxable income

Surcharge: The amount of income tax as computed in accordance with above rates, shall be increased by a surcharge.

- At the rate of 10% of such income tax,

Education Cess: 4% of the total of Income Tax and Surcharge.

Domestic Company- opted for Sec 115BAB

Income Tax: 15% of taxable income

Surcharge: The amount of income tax as computed in accordance with above rates, shall be increased by a surcharge.

- At the rate of 10% of such income tax,

Education Cess: 4% of the total of Income Tax and Surcharge.

<u>Domestic Company – Any other domestic company</u>

Income Tax: 30% of taxable income.

Surcharge: The amount of income tax as computed in accordance with above rates, and after being reduced by the amount of tax rebate shall be increased by a surcharge.

- At the rate of 7% of such income tax, provided that the taxable income exceeds Rs. 1 crore.
- At the rate of 12% of such income tax, provided that the taxable income exceeds Rs. 10 crores.

Education Cess: 4% of the total of Income Tax and Surcharge.

<u>Company other than a Domestic Company</u>

Income Tax:

- @ 50% of on so much of the taxable income as consist of (a) royalties received from Government or an Indian concern in pursuance of an agreement made by it with the Government or the Indian concern after the 31st day of March, 1961 but before the 1st day of April, 1976; or (b) fees for rendering technical services received from Government or an Indian concern in pursuance of an agreement made by it with the Government or the Indian concern after the 29th day of February, 1964 but before the 1st day of April, 1976, and where such agreement has, in either case, been approved by the Central Government.
- @ 40% of the balance

Surcharge:

The amount of income tax as computed in accordance with above rates, and after being reduced by the amount of tax rebate shall be increased by a surcharge as under

- At the rate of 2% of such income tax, provided that the taxable income exceeds Rs. 1 crore.
- At the rate of 5% of such income tax, provided that the taxable income exceeds Rs. 10 crores.

Education Cess: 4% of the total of Income Tax and Surcharge

12.2: Dividend

The domestic companies shall not be liable to pay DDT on dividend distributed to shareholders on or after 01-04-2020. However, domestic companies shall be liable to deduct tax under Section 194.

As per the Section 194, which shall be applicable to dividend distributed, declared or paid on or after 01-04-2020, an Indian company shall deduct tax at the rate of 10% from dividend distributed to the resident shareholders if the aggregate amount of dividend distributed or paid during the financial year to a shareholder exceeds Rs. 5,000. However, no tax shall be required to be deducted from the dividend paid or payable to Life Insurance Corporation of India (LIC), General Insurance Corporation of India (GIC) or any other insurer in respect of any shares owned by it or in which it has full beneficial interest. However, where the dividend is payable to a non-resident or a foreign company, the tax shall be deducted under Section 195 in accordance with relevant DTAA

Note: The above provisions are subject to change as per applicable Finance Act from time to time.

Dividend stripping

According to the provisions of Section 94(7) of the Act, the loss arising out of sale of securities/units in the schemes (where dividend is tax free) will not be available for set off to the extent of the tax free dividend declared; if securities/units are: (A) bought within three months prior to the record date fixed for dividend declaration; and (B) sold within three months (securities) / nine months (Units) after the record date fixed for dividend declaration

Bonus stripping

Under section 94(8) of the Act, for units purchased within a period of three months prior to the record date of entitlement of bonus and sold within a period of nine months after this date the loss arising on the transfer of the original units (while continuing to hold the additional bonus units) shall be ignored for the purpose of computing the income chargeable to tax. The amount of loss so ignored shall be deemed to be the cost of purchase / acquisition of the additional units as are held by the Assessee on the date of such sale or transfer

Income Distributed by Mutual Funds

The Finance Act 2020 abolished the dividend distribution tax payable by the mutual funds. With effect from 1st April 2020, any income distributed or paid by domestic mutual funds to its unitholders are also taxable in the hands of the investors at their normal tax slabs. . However tax will be deducted at source from the dividend payouts as under: Type of the Investor Withholding tax Section Resident 10%@ 194K Non-Resident Indian 20%** 196A @ tax is not deductible, if dividend income in respect of units is below `5000/- in a financial year;

** the rate is subject to applicable surcharge and cess.

12.3: Capital Gains Tax

Profit on sale of investments, (being shares in a company or any other securities listed on a recognized stock exchange in India or units of the Unit Trust of India established under the Unit Trust of India Act, 1963 (52 of 1963) or units of a Mutual Fund specified under Section 10(23D)) held for a period of more than 12 months (36 months/24 months as applicable in case of any other investments.) immediately preceding the date of transfer, will be treated as long-term capital gains; in all other cases, it would be treated as short-term capital gains. The taxability of long-term and short-term capital gains is discussed below:

12.3.1 Transactions in securities on recognized stock exchange or in units of an equity oriented fund or units of business trust:

As per sec 112A Long term capital gains on sale of listed securities and on units of an equity oriented fund or business trust are taxable @ 10% (plus applicable surcharge and Cess) on such long term capital gains exceeding one Lakh Rupees when the transactions for sale take place on recognized stock exchanges and are subject to the Securities Transactions Tax (“STT”). However, such long Term Capital Gains arising to a company shall be taken into account in computing the book profit and income tax payable u/s 115JB.

Grand fathering clause

For an equity share in a company or a unit of an equity-oriented fund or a unit of a business trust acquired before the 1st day of February, 2018 the cost of acquisition to compute Capital gains shall be higher of – (i) the cost of acquisition of such asset; and (ii) lower of — (A)the fair market value of such asset as on January 31, 2018; and (B)the full value of consideration received or accruing as a result of the transfer of the capital asset.

As per sec 111A Short term capital gains on sale of listed securities or units of an equity oriented or unit of a business trust fund are taxable @15% (plus applicable surcharge and Cess) when the transactions for sale take place on recognized stock exchanges and are subject to the STT.

12.3.2 Transactions in other securities or transactions not on recognized stock exchanges

a) Tax on Long Term Gain

For Individuals, HUF, partnerships Firm and Indian Companies:

Long term capital gain in respect of other unlisted securities or units would be subject to tax at 20% (plus surcharge and education cess) of the gains computed after cost indexation.

(b) Tax on Short Term Capital Gain:

For Individuals, HUF, Partnerships Firm and Indian Companies Short term Capital Gains is added to the total income. Total Income including short term capital gain is chargeable to tax as per the relevant slab rates.

12.3.3 Transaction in Debt Oriented Mutual Fund:

Long-term capital gains: For Residents, the long term capital gains from debt funds are taxed at 20% with indexation. In case of Non-Resident, it is taxed at 20% with indexation for Listed securities and in case of Unlisted securities it is 10% without indexation.

Short-term capital gains: Short term capital gains (if the units are sold before three years) from debt mutual funds are taxed as per applicable tax slab rate of the investor. Therefore, if you are in the 30% tax slab then short term capital gains tax on debt fund is 30% (plus applicable surcharge and health and education cess).

12.3.4 Capital loss can be set off against any capital gains as follows:

Long-term capital loss of a tax year, which is chargeable to tax, cannot be set off against short-term capital gains arising in that year. On the other hand, short-term capital loss in a year can be set off against both short-term and chargeable long-term capital gains of the same year. Unabsorbed short term and long-term capital loss of prior years shall be separately carried forward. However, short-term capital loss shall be eligible for set off against the chargeable long term capital gains.

Note: The above provisions are subject to change as per applicable Finance Act from time to time.

13: Accounting Policies

The following accounting policy/ valuation will be applied for the portfolio investment of clients:

a) Investments in Equities / other traded securities and instruments (including debt and money market instruments) will be valued at the closing market prices of the National Stock Exchange of India Limited. If these Securities / instruments are not listed on National Stock Exchange then the closing market prices on Bombay Stock Exchange Limited or any other exchange where the Securities are listed, will be considered for the purpose of valuations. In case the Securities are not traded on the valuation date, the last available traded price shall be used for the valuation of Securities.

The Portfolio Manager shall endeavor to be consistent in applying the policy adopted by it.

Investment in the units of mutual funds will be valued at latest repurchase Net Assets Value (NAV) declared for the relevant Scheme on the date of valuation of portfolio investment. Valuation of products where daily valuation is not available, value shall be taken as of last available valuation date. Products for which valuation is not done within public domain shall be taken at cost price.

b) Realized gains / losses will be calculated by applying the First In First Out (FIFO) method. For example, the earliest purchased quantity will be reckoned for the current / most recent sale at the respective prices at both points in time.

c) For derivative transactions (if any), unrealized gains and losses on open position will be calculated by mark to market method.

d) Unrealized gains/ losses are the differences between the current market values or NAV of even date and the historical cost of the securities.

e) Dividend on equity shares and interest on debt instrument shall be accounted on accrual basis. Further Mutual Fund dividend shall be accounted on receipt basis. Other income like bank interest on FD etc that can be ascertained with adequate certainty shall also be accounted on accrual basis.

f) Bonus shares shall be recognized only when the original shares on which the bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.

g) Right entitlement shall be recognized only when the original shares on which the right entitlement accrues are traded on the stock exchange in an ex-rights basis.

h) The cost of investment acquired or purchased shall include brokerage, stamp duty and any charge customarily included in the brokers cost note/bought note.

i) The portfolio manager and the client can adopt any specific norms or methodology for valuation of investments or accounting the same as may be mutually agreed between them on a case specific basis

The accounting policies and standards as outlined above are subject to changes made from time to time by Portfolio Manager. However, such changes would be in conformity with the Regulations and / or standard accepted accounting practices.

14: Investor Services

Aditya Birla Money seeks to provide the portfolio clients a high standard of service. It has outsourced custody, trade settlement, portfolio accounting, reporting and allied services to **Orbis Financial Corporation Ltd and Edelweiss Custodial Services Limited** under a comprehensive arrangement with a view to extend a high standard of service to portfolio clients.

(i) Contact information

Name, Address and Telephone number of the Investor Relation Officer who shall attend to the Investor queries and complaints are as under:

Mr. Muralikrishnan LR
Compliance Ofiicer
SAI SAGAR, 2nd & 3rd Floor,
Plot No. M7, Thiru-Vi-Ka (SIDCO) Industrial Estate,
Guindy, Chennai – 600032
Ph : 044 -49490014
Email : murali.lr@adityabirlacapital.com

Investor may also forward their grievances/queries to care.stocksandsecurities@adityabirlacapital.com

The officer mentioned above will ensure prompt investor services. The portfolio manager will ensure that this official is vested with necessary authority, independence and the means to handle investor complaints.

Investor may also register/lodge complaints online on SCORES (SEBI COMPLAINTS REDRESS SYSTEM) portal i.e. http://scores.gov.in/ by clicking on “Complaint Registration” under “Investor Corner”.

(ii) Grievance redressal and dispute settlement mechanism

The portfolio manager will endeavor to address all complaints regarding service deficiencies or causes for grievances, 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 be 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 and subject to the provisions of the Arbitration and Conciliation Act, 1996, or any statutory requirement, modification or re-enactment thereof. Such arbitration proceeding shall be held at Chennai or such other place as the Portfolio Manager thinks fit.

15. GENERAL

The portfolio manager and the client can mutually agree to be bound by specified terms through a written two- way agreement between themselves in addition to the standard agreement.

16. Signatories

Name of the Director	Signature
Mr. Tushar Shah	TUSHAR HARENDRA SHAH Digitally signed by TUSHAR HARENDRA SHAH Date: 2021.06.21 18:57:33 +05'30'
Mr. Shriram Jagetiya	SHRIRAM JAGETIYA Digitally signed by SHRIRAM JAGETIYA Date: 2021.06.21 14:02:51 +05'30'

Date:

Place : Mumbai

Schedule-I
(Referred to Clause 6 of the Disclosure Document)

USE OF DERIVATIVES

SEBI in terms of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2003, has permitted all the Portfolio Managers to invest in derivatives, including transactions for the purpose of hedging and portfolio rebalancing, provided leveraging of portfolio is not permitted in respect of trading in derivatives.

Accordingly, the Portfolio Manager may use derivatives instruments like Stock, Index Futures, Options on Stocks and Stock Indices, Interest Rate Swaps, Forward Rate Agreements or other such derivative instruments as may be introduced and for such purposes, as may be permitted from time to time, as permitted by SEBI.

The following information provides a basic idea as to the nature of the derivative instruments proposed to be used by the Portfolio Manager and the benefits and risks attached there with.
Illustrations on Use of derivatives:

A. Index Future

Benefits

(a) Investment in Stock Index Futures can give exposure to the Index without directly buying the individual stocks. Appreciation in Index stocks can be effectively captured through investment in Stock Index Futures.

(b) The Portfolio Manager can sell futures to hedge against market movements effectively without actually selling the stocks it holds.

Illustration:

Every portfolio has exposure to the market index. Hence the portfolio manager may choose to sell index futures, or buy index put options, in order to reduce the losses that would take place in the event that the market index drops.

For e.g. A Rs. 1 crore equity portfolio with an average beta of 1.1 can be hedged against Rs. 1.1 crore short position in index futures. Thus any fall in portfolio value on account on fall in market rates would be offset by gains in settlement of index futures.

B. Stock Futures:

Benefits

a) Investment in stock futures can give exposure to the stock without directly buying the stocks. Appreciation in stocks can be effectively captured through investment in stock futures.

b) The Portfolio Manager can sell stock futures to hedge against adverse movements effectively without actually selling the stocks in holds.

The risk and return payoff of the stock futures is similar to that of an index future as mentioned above.

C. Buying Options:

Benefits of buying a call option:

Buying a call option on a stock or index gives the owner the right; but not the obligation, to buy the underlying stock / index at the designated strike price. Here the downside risks are limited to the premium paid to purchase the option.

Illustration

For example, if the Portfolio Manager buys a one-month call option on State Bank of India (SBI) at a strike of Rs. 1260, the current market price being say Rs. 1270. The Portfolio Manager will have to pay a premium of say Rs15 to buy this call. If the stock price goes below Rs. 1260 during the tenure of the call, the Portfolio Manager avoids the loss it would have incurred had it straightway bought the stock instead of the call option. The Portfolio Manager gives up the premium of Rs.15 that has to be paid in order to protect the Portfolio from this probable downside. If the stock goes above Rs.1260, it can exercise its right and own SBI at a cost price of Rs. 1260, thereby participating in the upside of the stock for such a transaction, the breakeven price will be the sum of strike price and the premium paid, in this case it would be Rs. 1260 + Rs 15 = Rs 1275

Benefits of buying a put option

Buying a put option on a stock originally held by the buyer gives him / her right, but not the obligation, to sell the underlying stock at the designated strike price. Here the downside risks are limited to the premium paid to purchase the option.

Illustration

For example, if the portfolio manager owns SBI and also buys a one month put option on SBI at a strike of Rs. 1260, the current market price being say Rs.1270. The Portfolio Manager will have to pay a premium of say Rs. 15 to buy this put. If the stock price goes below Rs. 1260 during the tenure of the put, the Portfolio Manager can still exercise the put and sell the stock at Rs. 1260, avoiding therefore any downside on the stock below Rs. 1260. The Portfolio Manager gives up the fixed premium of Rs. 15 that has to be paid in order to protect the Portfolio from this probable downside. If the stock goes above Rs. 1260, say to Rs. 1400, it will not exercise its option. The Portfolio Manager will participate in the upside of the stock, since it can now sell the stock at the prevailing market price of Rs. 1400.

D. Writing Options

Benefits of writing call option with underlying stock holding (Covered call writing)

Covered call writing is a strategy where a writer (say the Portfolio Manager) will hold a particular stock, and sell in the market a call option on the stock. Here the buyer of the call option now has the right to buy this stock from the writer (the Portfolio Manager) at a particular price, which is fixed by the contract (the strike price). The writer receives a premium for selling a call, but if the call option is exercised, he has to sell the underlying stock at the strike price. This is advantageous if the strike price is the level at which the writer wants to exit his holding / book profits. The writer effectively gains a fixed premium in exchange for the probable opportunity loss that comes from giving up any upside if the stock goes up beyond the strike price.

Illustration

Let us take for example SBI, where the Portfolio Manager holds stock, the current market price being Rs. 1270. The Portfolio Manager holds the view that the stock should be sold when it reaches Rs. 1350. Currently the one-month Rs. 1350 call option can be sold at say Rs.20. Selling this call gives the call owner the right to buy from the portfolio, SBI at Rs.1350.

Now the Portfolio Manager by buying/ holding the stock and selling the call is effectively agreeing to sell SBI at Rs. 1350 when it crosses this price. So the Portfolio Manager is giving up any possible upside beyond Rs. 1350. However, the returns on the Portfolio are higher than what it would have got if it just held the stock and decided to sell it at Rs. 1350. This is because the Portfolio Manager by writing the covered call gets an additional Rs.20 per share of SBI. In case the price is below Rs.1350 during the tenure of the call, then it will not be exercised and the Portfolio Manager will continue to hold the shares. Even in this case the returns are higher than if the Portfolio had just held the stock waiting to sell it at Rs.1350.

Benefits of writing put options with adequate cash holding:

Writing put options with adequate cash holding is a strategy where the writer (say, the Portfolio Manager) will have an amount of cash and will sell put options on a stock. This will give the buyer of this put option the right to sell stock to the writer (the Portfolio Manager) at a pre-designated price (the strike price). This strategy gives the put writer a premium, but if the put is exercised, he has to buy the underlying stock at the designated strike price. In this case the writer will have to accept any downside if the stock goes below the exercise price. The writer effectively gains a fixed premium in exchange for giving up the opportunity to buy the stock at levels below the strike price. This is advantageous if the strike price is the level at which the writer wants to buy the stock.

Illustration

Let us take, for example, that the Portfolio Manager wants to buy SBI at Rs. 1200, the current price being Rs.1270. Currently the one-month 1200 puts can be sold at say Rs.20. Writing this put gives the put owner the right to sell to the portfolio manager, SBI at Rs.1200. Now the Portfolio Manager by holding cash and selling the put is agreeing to buy SBI at Rs.1200 when it goes below this price. The Portfolio Manager will take on itself any downside if the price goes below Rs.1200. But the returns on the Portfolio are higher than what it would have got if it just waited till the price reached this level and bought the stock at Rs.1200, as per its original view. This is because the Portfolio Manager by writing the put gets an additional Rs.20 per share of SBI. In case the price stays above Rs.1200 during the tenure of the put, then it will not be exercised and the Portfolio Manager will continue to hold cash. Even in this case the returns are higher than if the Portfolio had just held cash waiting to buy SBI at Rs.1200.

E. Cash Future Arbitrage:

The cash future arbitrage strategy can be employed when the prices of the future exceeds the price of the underlying stocks. Two simultaneous transactions are undertaken:-

a) Buying the underlying stock
b) Selling the futures

Consider an example of stock trading at Rs.100 while the near-month future is at Rs. 101.50.

Additionally assume that the closing price of stock on expiry is Rs. 110.

How will this fund work?

Transaction	**Stock**	**Future**	**Difference**
Initiation Arbitrage (Buy Stock – Sell Future)	100	101.5	1.50
Closing Arbitrage (Sell Stock – Buy Future)	110	110	0
Total Gain / Loss	10	-8.5	1.50

Index Arbitrage:

Here one buys futures on an Index and sells corresponding stock futures constituting the index or vice versa to take advantage of the price – difference or the spread between them.

Let's say current value of Nifty is 3000 and Nifty Futures is currently being traded at 2970 i.e. at a discount of 30. However on the other hand cumulative value of all stock futures constituting Nifty is 3050 i.e. at a premium of say Rs. 50. Thus an arbitrage opportunity arises in locking the above difference of Rs. 80, by buying Nifty Futures and selling corresponding Stock Futures

Name of the Director	Signature
Mr. Tushar Shah	TUSHAR HARENDRA SHAH Digitally signed by TUSHAR HARENDRA SHAH Date: 2021.06.16 20:23:49 +05'30'
Mr. Shriram Jagetiya	SHRIRAM JAGETIYA Digitally signed by SHRIRAM JAGETIYA Date: 2021.06.21 14:03:51 +05'30'

Date:
Place: Mumbai

SUNDARAM & SRINIVASAN
CHARTERED ACCOUNTANTS
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Telephone 2498 8762
2498 8463
4210 6952
E-Mail: sundaramandsrinivasan1948@gmail.com
Website: www.sundaramandsrinivasan.com

CERTIFICATE

We have reviewed the Disclosure Document dated 16/06/2021 pertaining to Portfolio Management Services of Aditya Birla Money Limited, Chennai with reference to the contents of Disclosure Document as stipulated in Schedule V to the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 (the Regulations). Based on our review and the information and explanations given to us, we hereby certify that the items to be stated in the Disclosure Document in terms of the Regulations have been stated.

This certificate is being issued to enable the Company to comply with the requirements of Securities and Exchange Board of India

For Sundaram &Srinivasan
Chartered Accountants

USHA
Digitally signed by USHA
Location: Chennai, India
Date: 2021.06.17 09:39:44+05'30'

SUNDARAM & SRINIVASAN
No: 23, CPR ROAD
CHENNAI
600 018
FRN : 004207S
CHARTERED ACCOUNTANTS

S. Usha
Partner
Membership No.: 211785
Firm Registration No.: 004207S
UDIN: 21211785AAAAEN3387

Place: Chennai
Date: 16th June 2021