

INVESTOR CHARTER FOR PORTFOLIO MANAGEMENT SERVICES

A) Vision and mission statements for investors

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

Mission: To provide a high-quality portfolio management service that enables wealth creation for investors by upholding high standards of skill, integrity, transparency and accountability.

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

The organization carries out the following activities for its investors:

- a) Conducting appropriate risk profiling of investors.
- b) Providing the Disclosure Document to investors.
- c) Executing the Portfolio Management Services (PMS) agreement with investors.
- d) Making investment decisions on behalf of investors (in discretionary PMS), or executing investment decisions under the instructions of the investor (in non-discretionary PMS), or providing investment advice to the investor (in advisory PMS), as the case may be.

C) Details of services provided to investors and estimated timelines

- i. Discretionary & Non-Discretionary Portfolio Management Services (PMS):
Under these services, an investor may hand over a portfolio in any form — liquid stocks, cash, or a combination of both. The minimum investment required under Discretionary and/or Non-Discretionary Portfolio Management Services is INR 50 lakhs (INR 5 million) as per the current SEBI Regulations. However, the PMS provider reserves the right to prescribe a higher threshold, product-wise or otherwise, at its sole discretion.

Eternity PMS will determine the investor's investment objectives and risk profile to pursue optimal returns. Under Discretionary PMS, investment decisions are taken solely at the discretion of the PMS provider, in sync with the investor's stated investment objectives. Under Non-Discretionary PMS, investment decisions are taken by the investor, and the PMS provider executes transactions based on the investor's instructions.

- ii. Investment Advisory Services:
Under these services, the client is advised on buy/sell decisions in accordance with their investment profile, without the PMS provider taking responsibilities relating to trade execution, custody of securities or accounting functions. The PMS provider acts solely as

an advisor to the client and is not responsible for the investment or divestment of securities and/or administrative activities relating to the client's portfolio.

The PMS provider shall act in a fiduciary capacity towards the client and shall maintain an arm's-length relationship with its other activities. Advisory services shall be provided in accordance with the guidelines and/or directives issued by regulatory authorities and/or instructions issued by the client from time to time.

iii. Client On-boarding:

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

iv. Ongoing activities:

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

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

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

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

| Sr. No. | Service / Activity | Timeline |
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| 1 | Opening of PMS account (including demat account) for residents | 7 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable. |
| 2 | Opening of PMS account (including demat account) for non-individual clients. | 14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable. |

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| 3 | Opening of PMS account (including demat account, bank account and trading account) for non-resident clients. | 14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable. |
| 4 | Registration of nominee in PMS account and demat account. | Registration of nominee should happen along with account opening; therefore, turnaround time should be same as account opening turnaround time. |
| 5 | Modification of nominee in PMS account and demat account. | 10 days from receipt of requisite nominee modification form, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable |
| 6 | Uploading of PMS account in KRA and CKYC database. | 10 days from date of account opening (Portfolio Manager may rely on the custodian for updating the same) |
| 7 | Whether portfolio manager is registered with SEBI, then SEBI registration number. | At the time of client signing the agreement; this information should be a part of the account opening form and disclosure document |
| 8 | Disclosure about latest net-worth of portfolio manager and total AUM. | Disclosure of portfolio manager's total AUM - monthly to SEBI Disclosure of latest net-worth should be done in the disclosure document whenever there are any material changes |
| 9 | Intimation of type of PMS account – discretionary | At the time of client signing the agreement; this information should be a part of the account opening form |
| 10 | Intimation of type of PMS account - non discretionary. | At the time of client signing the agreement; this information should be a part of the account opening form |
| 11 | Intimation to client what discretionary account entails and powers that can be exercised by portfolio manager. | At the time of client signing the agreement; this information should be a part of the account opening form |
| 12 | Intimation to client what nondiscretionary account entails and powers that can be exercised by portfolio manager | At the time of client signing the agreement; this information should be a part of the account opening form |
| 13 | Copy of executed PMS agreement sent to client | Within 3 days of client request |
| 14 | Frequency of disclosures of available eligible funds. | All details regarding client portfolios should be shared quarterly |
| 15 | Issuance of funds and securities balance statements held by client. | This data should be shared on a quarterly basis or upon client request |

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| 16 | Intimation of name and demat account number of custodian for PMS account | Within 3 days of PMS and demat account opening |
| 17 | Conditions of termination of contract | At the time of client signing the agreement; this information should be a part of the account opening form |
| 18 | Intimation regarding PMS fees and modes of payment or frequency of deduction. | At the time of client signing the agreement; this information should be a part of the account opening form |
| 19 | Providing a copy of POA taken to client | Within 3 days of client request |
| 20 | Intimation to client about what all transactions can portfolio manager do using the POA | At the time of client signing the agreement; this information should be a part of the account opening form |
| 21 | Frequency of providing audited reports to clients | Annual |
| 22 | Explanation of risks involved in investment | At the time of client signing the agreement; this information should be a part of the account opening form |
| 23 | Intimation of tenure of portfolio investments. | Indicative tenure should be disclosed at the time of client signing the agreement; this information should be a part of the account opening form |
| 24 | Intimation clearly providing restrictions imposed by the investor on portfolio manager. | Negative list of securities should be taken from the client at the time of client signing the agreement; this information should be a part of the account opening form |

Note: The number of days indicated above for each activity refers to clear working days.

D) Details of grievance redressal mechanism and how to access it

1. It is mandatory for every PMS provider to register itself on SEBI SCORES (SEBI Complaint Redress System). SCORES is a centralized online complaint resolution system through which a complainant can lodge a grievance against the PMS provider and subsequently track its status.
2. The details of the Investor Relations Officer of the PMS provider — including name, address, and telephone number — who attends to investor queries and complaints, should be provided in the PMS Disclosure Document.
3. The grievance redressal and dispute resolution mechanism should be clearly mentioned in the Disclosure Document.
4. Investors can approach SEBI for redressal of their complaints. Upon receipt of a complaint, SEBI takes up the matter with the concerned PMS provider and follows up until resolution.
5. Investors may send their complaints to:
Office of Investor Assistance and Education
Securities and Exchange Board of India

SEBI Bhavan, Plot No. C4-A, 'G' Block
Bandra-Kurla Complex, Bandra (E)
Mumbai – 400051

Important Note: Investors are encouraged to first contact the PMS provider for resolution of grievances before approaching SEBI.

E) Expectations from the investors (Responsibilities of investors)

1. Check the registration status of the intermediary on the SEBI website before availing its services.
2. Submit KYC documents and the application form in a timely manner, ensuring signatures are affixed in all required places and all necessary supporting documents are attached.
3. Read the terms and conditions of the agreement carefully before signing.
4. Study the Disclosure Document of the PMS thoroughly to fully understand the risks associated with investing in the PMS.
5. Provide accurate and sincere responses to the questions in the Risk Questionnaire to enable the PMS provider to properly assess the investor's risk profile.
6. Review the quarterly statements sent by the PMS provider to understand the portfolio's absolute and relative performance, its constituents, and its risk profile.
7. Ensure that complete details of the negative list of securities are provided as part of freeze instructions at the time of entering into the PMS agreement and subsequently for any changes, in a timely manner.
8. Inform the PMS provider of any change in KYC documents or personal details and provide updated KYC documents along with the required proofs.
