

**COURSER PARK ADVISORS LLP**  
**(ACA-0170)**  
**SEBI Registration Number: INP000008303**

**DISCLOSURE DOCUMENT**  
**As required under Regulation 22 of Securities and Exchange Board of India**  
**(Portfolio Managers) Regulations, 2020**

---

**Declaration:**

- a) The Disclosure Document (hereinafter referred as the “**Document**”) has been filed with the Securities and Exchange Board of India (“**SEBI**”) along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020 (“**Regulations**”).
- b) 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 decision for engaging “**Courser Park Advisors LLP**” (hereinafter referred as the “**Portfolio Manager**”) as the portfolio manager.
- c) The Document contains the necessary information about the Portfolio Manager required by an investor before investing and the investor may also be advised to retain the Document for future reference.
- d) The Disclosure Document is updated on 02<sup>nd</sup> February 2026
- e) The name, phone number, e-mail address of the principal officer as designated by the Portfolio Manager along with the address of the Portfolio Manager is as follows:

<b>PRINCIPAL OFFICER</b>	<b>PORTFOLIO MANAGER</b>
<b>Name:</b> Mr. Jagarlapudi Srirama Krishna Chaitanya	<b>Name:</b> <b>Courser Park Advisors LLP</b>
<b>Phone:</b> +91 080-41735687	<b>Registered Address:</b> C 1402, G Crop Residencies, 115 ST Bed Layout, Opp. Nirguna Mandir, Koramangala I Block, Bangalore– 560034, KARNATAKA, India
<b>E-Mail:</b> <a href="mailto:chaitanya@courserpark.com">chaitanya@courserpark.com</a>	<b>Correspondence Address:</b> “Jai Ganesh” Situated at No 633, IVth Cross 100 Road III Block Koramangala, Bangalore – 560034, KARNATAKA, India.

## INDEX

1. Disclaimer .....	3
2. Definitions.....	4
3. Description .....	8
4. Penalties, pending litigation or proceedings, findings of inspection or investigations for which action may have been taken or initiated by any regulatory authority:.....	11
5. Services Offered .....	12
6. Risk factors.....	13
7. Nature of expenses.....	17
8. Taxation.....	20
9. Accounting policies .....	27
10. Investors services.....	29
11. Details of the diversification policy of the portfolio manager .....	32
12. Custody of Securities.....	33
13. General .....	33
14. Client Representation: .....	35
15. The Financial Performance of Portfolio Manager.....	36
16. Performance of the Portfolio Manager .....	37
17. Audit Observations for preceding three years.....	38
18. Details of investments in the securities of related parties of the Portfolio Manager:....	39
Annexure I.....	53
Investment Approach.....	55
FORM C .....	59

## **PART-I- Static Section:**

### **1.Disclaimer**

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

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

## 2. Definitions

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

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

8. **“Associate”** means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager.
9. **“Benchmark”** means an index selected by the Portfolio Manager in accordance with the Regulations, in respect of each Investment Approach to enable the Clients to evaluate the relative performance of the Portfolio Manager.
10. **“Board”** or **“SEBI”** means the Securities and Exchange Board of India established under section 3 of the Securities and Exchange Board of India Act, 1992.
11. **“Business Day”** means any day, which is not a Saturday, Sunday, or a day on which the banks or stock exchanges in India are authorized or required by Applicable Laws to remain closed or such other events as the Portfolio Manager may specify from time to time.
12. **“Client(s)”** / **“Investor(s)”** means any person who enters into an Agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.
13. **“Custodian(s)”** means an entity registered with the SEBI as a custodian under the Applicable Laws and appointed by the Portfolio Manager, from time to time, primarily for custody of Securities of the Client.
14. **“Depository”** means the depository as defined in the Depositories Act, 1996 (22 of 1996).
15. **“Depository Account”** means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.
16. **“Direct on-boarding”** means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.
17. **“Disclosure Document”** or **“Document”** means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.
18. **“Distributor”** means a person/entity who may refer a Client to avail services of Portfolio Manager in lieu of commission/charges (whether known as channel partners, agents, referral interfaces or by any other name).
19. **“Eligible Investors”** means a Person who: (i) complies with the Applicable Laws, and (ii) is willing to execute necessary documentation as stipulated by the Portfolio Manager.
20. **“Fair Market Value”** means the price that the Security would ordinarily fetch on sale in the open market on the particular date.
21. **“Foreign Portfolio Investors”** or **“FPI”** means a person registered with SEBI as a foreign portfolio investor under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time.
22. **“Financial Year”** means the year starting from April 1 and ending on March 31 in the following year.

23. **“Funds”** or **“Capital Contribution”** means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies mentioned in the account opening form, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of sale or other realization of the portfolio and interest, dividend or other monies arising from the assets, so long as the same is managed by the Portfolio Manager.
24. **“Group Company”** shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary.
25. **“HUF”** means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.
26. **“Investment Approach”** is a broad outlay of the type of Securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and Securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.
27. **“IT Act”** means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.
28. **“Large Value Accredited Investor”** means an Accredited Investor who has entered into an Agreement with the Portfolio Manager for a minimum investment amount of ten crore rupees.
29. **“Non-resident Investors”** or **“NRI(s)”** shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.
30. **“NAV”** shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.
31. **“NISM”** means the National Institute of Securities Markets, established by the Board.
32. **“Person”** includes an individual, a HUF, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.
33. **“Portfolio”** means the total holdings of all investments, Securities and Funds belonging to the Client.
34. **“Portfolio Manager”** means **Courser Park Advisors LLP**, a limited liability partnership incorporated under the Limited Liability Partnership Act, 2008, registered with SEBI as a portfolio manager bearing registration number INP000008303 and having its registered office at C 1402, G Crop Residencies, 115 ST bed Layout, Opp. Nirguna Mandir, Koramangala I Block, Bangalore – 560034, Karnataka, India.
35. **“Principal Officer”** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:
  - (i) the decisions made by the Portfolio Manager for the management or administration of Portfolio of Securities or the Funds of the Client, as the case may be; and
  - (ii) all other operations of the Portfolio Manager.

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

37. **“Related Party”** means –

- (i) a director, partner or his relative;
- (ii) a key managerial personnel or his relative;
- (iii) a firm, in which a director, partner, manager or his relative is a partner;
- (iv) a private company in which a director, partner or manager or his relative is a member or director;
- (v) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two percent of its paid-up share capital;
- (vi) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
- (vii) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:  
  
(provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity);
- (viii) any body corporate which is— (A) a holding, subsidiary or an associate company of the Portfolio Manager; or (B) a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary; (C) an investing company or the venturer of the Portfolio Manager (The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the Portfolio Manager would result in the Portfolio Manager becoming an associate of the body corporate);
- (ix) a related party as defined under the applicable accounting standards;
- (x) such other person as may be specified by the Board:  
Provided that,
  - (a) any person or entity forming a part of the promoter or promoter group of the listed entity; or
  - (b) any person or any entity, holding equity shares:
    - (i) of twenty percent or more; or
    - (ii) of ten percent or more, with effect from April 1, 2023; in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediate preceding Financial Year; shall be deemed to be a related party.

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

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

### 3. Description

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

**Courser Park Advisors LLP** was incorporated on 20<sup>th</sup> February 2023 as Limited Liability Partnership (LLP) under the Limited Liability Partnership Act 2008. Partners in the LLP are Mr Jagarlapudi Srirama Krishna Chaitanya (here in after referred to as “Chaitanya”) , Ms Gayathri Vittal Rao and Mr Mohit Bajaj.

Chaitanya comes with an experience of 21+ years across a variety of roles – with about 17 years of experience in capital markets including investing public and private markets. Since 2016, he was earlier associated with RW Investment Advisors LLP, a SEBI registered Investment Advisor as its Principal Officer for 7 years till 31<sup>st</sup> May 2023.

#### (ii) Promoters of the Portfolio Manager, Designated Partners and their background

##### 1. Promoters and Designated Partners of the Portfolio Manager

Sr.No.	Name of the director	Age	Qualification	Background in brief / Functions. Experience.
1	Jagarlapudi Srirama Krishna Chaitanya	45 years	Bachelor of Technology (B.Tech), IIT Madras PGPM - MBA, Indian School of Business (ISB), Hyderabad, 2004 CFA - Level II NISM-Series - XXI-B: Portfolio Managers Certification Examination NISM- Series - X-A: Investment Adviser(Level 1) Certification Examination NISM- Series - X-B: Investment Adviser(Level 2) Certification Examination	21+ years' experience in Finance & Investment field

Sr.No.	Name of the director	Age	Qualification	Background in brief / Functions. Experience.
2	Ms Gayathri Vittal Rao	40 years	Bachelor of Corporate Secretaryship (B.C.S), M.O.P Vaishnav College for Women, Chennai, 2004 - Madras University PGDBM - MPE, Narsee Monjee Institute of Management, Bangalore NISM-Series-V-A: Mutual Fund Distributors Certification Examination	Experience in Investment Research, Regulatory Compliance for around 10 years
3	Mr Mohit Bajaj	35 years	Bachelor of Commerce (B.Com), Christ College, Bangalore University, Chartered Accountant	12+ years' experience in Finance & Investment field

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

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

**Courser Park Advisors LLP** shall provide the above services to the following category of clients:

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

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

**(a) Discretionary Services:**

“Discretionary Portfolio Manager” means a portfolio manager who under a contract relating to portfolio management, exercises or may exercise, any degree of discretion as to the investment of funds or management of the portfolio of securities of the client, as the case may be. Under these services, the client gives the authority to the Portfolio Manager to take Buy\Sell decisions at his\her discretion for managing the portfolio. The portfolio Manager is responsible for the execution of the orders, holding safely the assets & funds and the management of accounts. Custodian will be appointed in respect of securities managed or administered under DPMS.

**(b) Non - Discretionary Services:**

NDPMS means the portfolio manager manages the funds in accordance with the directions of the client. The client retains with himself the authority to take Buy\Sell decisions, whereas the Portfolio Manager’s responsibility is to manage the funds in accordance with the directions of the client. Under this the Portfolio Manager manages execution of the orders, holding safely the assets & funds and the management of accounts at client’s risk. Custodian will be appointed in respect of securities managed or administered under NDPMS.

**(c) Advisory Services:**

Under these services, the Portfolio Manager advises the Client on investments in general or any specific advice required by the Clients and agreed upon in the Client agreement. The Portfolio Manager will render the best possible advice to the client having regard to the client’s needs and the investment requirement, and his own professional skills. The same can be binding or non - binding in nature or in such terms as mentioned in the Client agreement. For such services, the Portfolio Manager charges the Client a fee for services rendered mentioned in the Client agreement. The advice may be either general or specific in nature and may pertain to a particular portfolio. Entry / exit timing, execution and settlement are solely the Client's responsibility. Custodian will not be appointed in respect of securities managed or administered under Advisory Service.

3. Penalties, pending litigation or proceedings, findings of inspection or investigations for which action may have been taken or initiated by any regulatory authority:
- i. **All cases of penalties imposed by SEBI or the directions issued by SEBI under the SEBI Act or rules or regulations made thereunder.**  
None.
  - ii. **The nature of the penalty/direction.**  
None.
  - iii. **Penalties/fines imposed for any economic offence and/ or for violation of any securities laws.**  
None.
  - iv. **Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.**  
None.
  - v. **Any deficiency in the systems and operations of the Portfolio Manager observed by the SEBI or any regulatory agency.**  
None.
  - vi. **Any enquiry/ adjudication proceedings initiated by SEBI against the Portfolio Manager or its partners, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its partners, principal officer or employee, under the SEBI Act or rules or regulations made thereunder.**  
None.

#### 4. Services Offered

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

##### Investment Objective of **Growth at Reasonable Price (GARP) – Large and mid-cap strategy**

The Investment objective is to Maximize returns for investors at minimum cost by determining an optimal portfolio mix based on their risk tolerance and time horizon.

##### Investment Objective of **FOCUS – Small and micro-cap strategy**

The primary objective is to generate superior returns by investing in a focused portfolio of high-quality Small-cap and Micro-cap stocks with strong growth potential.

#### **(ii) Investment Approach of the Portfolio Manager**

Please refer to **Annexure I** for more details

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

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

#### **(iv) Distributors:** The Portfolio Manager may

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

## 5. Risk factors

### A. General Risks Factors

- (1) Investment in Securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc.
- (2) The Portfolio Manager does not assure that the objectives of any of the Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
- (3) [Past performance of the Portfolio Manager does not indicate the future performance of the same or any other Investment Approach in future or any other future Investment Approach of the Portfolio Manager. [OR] The Portfolio Manager has no previous experience/track record in the field of portfolio management services. However, the Principal Officer, directors and other key management personnel of the Portfolio Manager have rich individual experience.]
- (4) The names of the Investment Approach do not in any manner indicate their prospects or returns.
- (5) Appreciation in any of the Investment Approach can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any Investment Approach may also be affected due to any other asset allocation factors.
- (6) When investments are restricted to a particular or few sector(s) under any Investment Approach; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the Portfolio value will be adversely affected.
- (7) Each Portfolio will be exposed to various risks depending on the investment objective, Investment Approach and the asset allocation. The investment objective, Investment Approach and the asset allocation may differ from Client to Client. However, generally, highly concentrated Portfolios with lesser number of stocks will be more volatile than a Portfolio with a larger number of stocks.
- (8) The values of the Portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.
- (9) The Portfolio Manager shall act in fiduciary capacity in relation to the Client's Funds and shall endeavor to mitigate any potential conflict of interest that could arise while dealing in a manner which is not detrimental to the Client.

### B. Risk associated with equity and equity related instruments

- (10) Equity and equity related instruments by nature are volatile and prone to price fluctuations on a daily basis due to macro and micro economic factors. The value of equity and equity related instruments may fluctuate due to factors affecting the securities markets such as volume and volatility in the capital markets, interest rates, currency exchange rates, changes in law/policies of the government, taxation laws, political, economic or other

developments, which may have an adverse impact on individual Securities, a specific sector or all sectors. Consequently, the value of the Client's Portfolio may be adversely affected.

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

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

#### C. Risk associated with debt and money market securities

(13) Interest Rate Risk

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

(14) Liquidity or Marketability Risk

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

(15) Credit Risk

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

(16) Reinvestment Risk

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

the proceeds may get invested at a lower rate.

#### D. Risk associated with derivatives instruments

- (17) The use of derivative requires an understanding not only of the underlying instrument but of the derivative itself. Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the Portfolio Manager to identify such opportunities. Identification and execution of the strategies to be pursued by the Portfolio Manager involve uncertainty and decision of Portfolio Manager may not always be profitable. No assurance can be given that the Portfolio Manager will be able to identify or execute such strategies.
- (18) Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price of interest rate movements correctly. The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments. Other risks include settlement risk, risk of mispricing or improper valuation and the inability of the derivative to correlate perfectly with underlying assets, rates and indices, illiquidity risk whereby the Portfolio Manager may not be able to sell or purchase derivative quickly enough at a fair price.

#### E. Risk associated with investments in mutual fund schemes

- (19) Mutual funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the schemes will be achieved. The various factors which impact the value of the scheme's investments include, but are not limited to, fluctuations in markets, interest rates, prevailing political and economic environment, changes in government policy, tax laws in various countries, liquidity of the underlying instruments, settlement periods, trading volumes, etc.
- (20) As with any securities investment, the NAV of the units issued under the schemes can go up or down, depending on the factors and forces affecting the capital markets.
- (21) Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.
- (22) The Portfolio Manager shall not be responsible for liquidity of the scheme's investments which at times, be restricted by trading volumes and settlement periods. The time taken by the scheme for redemption of units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the schemes.
- (23) The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes in the offer document(s)/scheme information document(s) of the scheme(s), which may vary substantially depending on the market risks, general economic and political conditions in India and other countries globally, the monetary and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.

- (24) The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.
- (25) While it would be the endeavor of the Portfolio Manager to invest in the schemes in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of this portfolio being adversely impacted.
- (26) The scheme specific risk factors of each of the underlying schemes become applicable where the Portfolio Manager invests in any underlying scheme. Investors who intend to invest in this portfolio are required to and are deemed to have read and understood the risk factors of the underlying schemes.

#### F. Risk arising out of non-diversification

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

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

- (28) All transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations shall be disclosed if found having conflict of interest with the transactions in any of the client's portfolio.
- (29) The Portfolio Manager may utilize the services of its group companies or associates for managing the portfolios of the client. In such scenarios, the Portfolio Manager shall endeavor to mitigate any potential conflict of interest that could arise while dealing with such group companies/associates by ensuring that such dealings are at arm's length basis.
- (30) The Portfolios may invest in its Associates/ Related Parties relating to portfolio management services and thus conflict of interest may arise while investing in securities of the Associates/Related Parties of the Portfolio Manager. Portfolio Manager shall ensure that such transactions shall be purely on arms' length basis and to the extent and limits permitted under the Regulations. Accordingly, all market risk and investment risk as applicable to securities may also be applicable while investing in securities of the Associates/Related Parties of the Portfolio Manager.

## 6. Nature of expenses

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

### i. Investment Management fee (Fixed Fee):

Fixed Management Fees up to 2.5 % p.a. on daily average AUM (with NAV calculated based on average daily NAV over the course of the calendar quarter) shall be charged to the client.

### ii. Performance fee:

A performance-based fee of up to 20% shall be charged exclusively on returns exceeding a 8% hurdle rate calculated on high watermark principle (no catch up) in accordance with the regulations on an annual basis, each anniversary. This ensures that the applicant is compensated solely on the alpha generated over and above the predetermined threshold.

### iii. Combination of fixed and variable / performance fee:

A combination of fixed and variable fee is offered to clients where Fixed fee of upto 1% p.a. of the Net Asset Value (with NAV calculated based on average daily NAV over the course of the calendar quarter) and Variable fee of up to 15% of all returns in excess of the hurdle rate of 12% p.a. (No Catch up) subject to a high watermark principle on an annual basis, each anniversary will be charged.

In all three scenarios, in case of withdrawals before computation date, all fees shall be charged on pro-rata basis for the relevant period

### iv. Advisory fees:

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

### v. Exit Load:

The Portfolio Manager may charge early withdrawal fee as a percentage of the value of the Portfolio /withdrawn Portfolio as per the terms and conditions of a particular Product as agreed in the Agreement. Indicative rates are: Within 1 year of Investment –up to 3%; Within 2 years of Investment– up to 2%; Within 3 years of Investment–up to 1 %

### vi. Custodian Fee

The charges relate to opening and operation of Depository accounts, custody and transfer charges for Securities, dematerialization and re-materialization and other charges in

connection with the operation and management of the Depository accounts.

Indicative custodial fee for discretionary clients is: Up to 0.05 % p.a. on the Average Assets under Management Transaction/Demat Charges -Up to Rs. 100 per debit and / or credit transaction. Charges levied by SEBI on the ~~cost~~ which the custodians seek from its clients – Actual amount is allocated to clients proportionately to the AUC or custody charges levied. Other Service Charges - Up to Rs.500 per client accounts.

Demat Charges - Up to 0.04% or Rs 40/- whichever is higher per debit transaction. Additionally, Charges levied by SEBI on the custodian which the custodians seek from its clients - Actual amount is allocated to discretionary clients proportionately to the AUC or Demat charges levied.

#### vii. Registrar and Transfer Agent Fees

Charges payable to registrars and transfer agents in connection with transfer of Securities including stamp charges, cost of affidavits, notary fees, postage, courier and other related charges. Similarly, charges payable to registrars and transfer agents in connection with services such as collection of applications together with payments from clients, redemption of investments, maintenance of client accounts, preparation & mailing statements of accounts and other client reports, responding to enquiries made by clients etc.

#### viii. Brokerage and transaction cost.

The investments under the strategies of the portfolio manager would be done through the registered members of the stock exchanges who charge brokerage at a percentage per transaction which are subject to change from time to time. Indicative rate includes up to 0.25% of the trade value. In addition to the brokerage, there are demat transaction charges and other charges like GST, stamp duty, transaction costs including bank charges, turnover tax, securities transaction tax or any other tax levied by statutory authorities on the purchase and sale of securities and entry or exit loads (if any) on units of mutual funds.

#### ix. Other fees and expenses:

- a) Securities lending related expenses: The charges pertaining to lending of Securities and costs associated with transfers of Securities connected with the lending operations would be recovered.
- b) Certification and professional charges: Charges payable for outsourced 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 would be recovered. Audit fees of upto Rs 2500 p.a per client strategy code maybe chargeable.
- c) Services related expenses: Charges in connection with day-to-day operations like courier expenses, stamp duty, service tax, postal, telegraphic and any other out of pocket expenses as may be incurred by the portfolio manager would be recovered.

- d) Direct Clients: Clients can get onboarded and opt for services of Portfolio Manager, without any intermediation of persons engaged in distribution services. Prospective investors may directly contact us at given coordinates (email & number).
- e) Any other incidental and ancillary charges: All incidental and ancillary expenses not covered above but incurred by the Portfolio Manager on behalf of the Client for the Services and expenses incurred by the Portfolio Manager in terms of the Agreement shall be charged to the Client.

## 7. Taxation

### A. General

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

### B. Tax deducted at source

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

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

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

### C. Long term capital gains

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

#### Period of Holding

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

Securities	Position upto 22 July 2024	Period of Holding	Position on or after 23 July 2024	Period of Holding	Characterization
Listed Securities (other than unit) and units of equity oriented mutual	More than twelve (12)	More than twelve (12)	Long-term capital	Twelve (12) months or	Short-term capital asset

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

- **Definition of Specified Mutual Fund:**

Before 1st April 2025:

**“Specified Mutual Fund”** means a Mutual Fund by whatever name called, where not more than thirty-five per cent of its total proceeds is invested in the equity shares of domestic companies.

On and after 1st April 2025:

**“Specified Mutual Fund”** means, —

(a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent. of its total proceeds in debt and money market instruments; or

(b) a fund which invests sixty-five per cent. or more of its total proceeds in units of a fund referred to in sub-clause (a).

- **Definition of debt and money market instruments:**

**“debt and money market instruments”** shall include any securities, by whatever name called, classified or regulated as debt and money market instruments by the Securities and Exchange Board of India.

- **Definition of Market Linked Debenture:**

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

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

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

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

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

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

Specifically in case of long term capital gains arising on sale of shares or units acquired originally as unlisted shares/units up to 31 January 2018, COA is substituted with the “indexed COA” (instead of FMV) where sale consideration is higher than the indexed COA. Where sale value is higher than the COA but not higher than the indexed COA, the sale value is deemed as the COA. This benefit is available only in the case where the shares or units, not listed on a recognised stock exchange as on the 31 January 2018, or which became the property of the assessee in consideration of share which is not listed on such exchange as on the 31 January 2018 by way of transaction not regarded as transfer under section 47 (e.g. amalgamation, demerger), but listed on such exchange subsequent to the date of transfer, where such transfer is in respect of sale of unlisted equity shares under an offer for sale to the public included in an initial public offer.

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

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

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

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

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

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

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

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

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

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

#### **D. Short term capital gains**

Section 111A of the IT Act provides that short-term capital gains arising on sale of listed equity shares of a company or units of equity-oriented fund or units of a business trust are chargeable to income tax at a concessional rate of 15%, plus applicable surcharge and cess, provided such transactions are entered on a recognized stock exchange and are chargeable to Securities Transaction Tax (STT). This tax rate has been increased from 15% to 20% with effect from 23

July 2024. However, the above shall not be applicable to transactions undertaken on a recognized stock exchange located in any International Financial Services Centre and where the consideration for such transaction is paid or payable in foreign currency. Further, Section 48 provides that no deduction shall be allowed in respect of STT paid for the purpose of computing Capital Gains.

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

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

### **E. Profits and gains of business or profession**

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

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

### **F. Losses under the head capital gains/business income**

In terms of section 70 read with section 74 of the IT Act, short term capital loss arising during a year can be set-off against short term as well as long term capital gains. Balance loss, if any, shall be carried forward and set-off against any capital gains arising during the subsequent 8 assessment years. A long-term capital loss arising during a year is allowed to be set-off only against long term capital gains. Balance loss, if any, shall be carried forward and set-off against long term capital gains arising during the subsequent 8 assessment years.

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

### **G. General Anti Avoidance Rules (GAAR)**

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

- The arrangement creates rights or obligations which are ordinarily not created between parties dealing at arm's length;
- It results in directly / indirectly misuse or abuse of the IT Act;

- It lacks commercial substance or is deemed to lack commercial substance in whole or in part;
- It is entered into, or carried out, by means, or in a manner, which is not normally employed for bona fide purposes.

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

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

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

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

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

## **H. FATCA Guidelines**

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

- (a) the name, address, taxpayer identification number and date and place of birth;
- (b) where an entity has one or more controlling persons that are reportable persons:

- (i) the name and address of the entity, TIN assigned to the entity by the country of its residence; and
- (ii) the name, address, date of birth, place of birth of each such controlling person and TIN assigned to such controlling person by the country of his residence.
- (c) account number (or functional equivalent in the absence of an account number);
- (d) account balance or value (including, in the case of a cash value insurance contract or annuity contract, the cash value or surrender value) at the end of the relevant calendar year; and
- (e) the total gross amount paid or credited to the account holder with respect to the account during the relevant calendar year.

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

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

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

## 8. Accounting policies

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

### **A. Client Accounting**

- (1) The Portfolio Manager shall maintain a separate Portfolio record in the name of the Client in its book for accounting the assets of the Client and any receipt, income in connection therewith as provided under Regulations. Proper books of accounts, records, and documents shall be maintained to explain transactions and disclose the financial position of the Client's Portfolio at any time.
- (2) The books of account of the Client shall be maintained on an historical cost basis.
- (3) Transactions for purchase or sale of investments shall be recognized as of the trade date and not as of the settlement date, so that the effect of all investments traded during a Financial Year are recorded and reflected in the financial statements for that year.
- (4) All expenses will be accounted on due or payment basis, whichever is earlier.
- (5) The cost of investments acquired or purchased shall include brokerage, stamp charges and any charges customarily included in the broker's contract note. In respect of privately placed debt instruments any front-end discount offered shall be reduced from the cost of the investment. Sales are accounted based on proceeds net of brokerage, stamp duty, transaction charges and exit loads in case of units of mutual fund. Securities transaction tax, demat charges and Custodian fees on purchase/ sale transaction would be accounted as expense on receipt of bills. Transaction fees on unsettled trades are accounted for as and when debited by the Custodian.
- (6) Tax deducted at source (TDS) shall be considered as withdrawal of portfolio and debited accordingly.

### **B. Recognition of portfolio investments and accrual of income**

- (7) In determining the holding cost of investments and the gains or loss on sale of investments, the "first in first out" (FIFO) method will be followed.
- (8) Unrealized gains/losses are the differences, between the current market value/NAV and the historical cost of the Securities. For derivatives and futures and options, unrealized gains and losses will be calculated by marking to market the open positions.
- (9) Dividend on equity shares and interest on debt instruments shall be accounted on accrual basis. Further, mutual fund dividend shall be accounted on receipt basis.
- (10) Bonus shares/units to which the security/scrip in the portfolio becomes entitled will be recognized only when the original share/scrip on which bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.
- (11) Similarly, right entitlements will be recognized only when the original shares/security on which the right entitlement accrues is traded on the stock exchange on the ex-right basis.
- (12) In respect of all interest-bearing Securities, income shall be accrued on a day-to-day basis as it is earned.

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

### **C. Valuation of portfolio investments**

- (14) Investments in listed equity shall be valued at the last quoted closing price on the stock exchange. When the Securities are traded on more than one recognized stock exchange, the Securities shall be valued at the last quoted closing price on the stock exchange where the security is principally traded. It would be left to the portfolio manager to select the appropriate stock exchange, but the reasons for the selection should be recorded in writing. There should, however, be no objection for all scrips being valued at the prices quoted on the stock exchange where a majority in value of the investments are principally traded. When on a particular valuation day, a security has not been traded on the selected stock exchange, the value at which it was traded on another stock exchange may be used. When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than thirty days prior to the valuation date.
- (15) Investments in units of a mutual fund are valued at NAV of the relevant scheme. Provided investments in mutual funds shall be through direct plans only.
- (16) Debt Securities and money market Securities shall be valued as per the prices given by third party valuation agencies or in accordance with guidelines prescribed by Association of Portfolio Managers in India (APMI) from time to time.
- (17) Unlisted equities are valued at prices provided by independent valuer appointed by the Portfolio Manager basis the International Private Equity and Venture Capital Valuation (IPEV) Guidelines on a semi-annual basis.
- (18) In case of any other Securities, the same are valued as per the standard valuation norms applicable to the mutual funds.

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

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

## 9. Investors services

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

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

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

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

Name	Mr. Ashok Danesh
Designation	Operations Head - Back-office & Investor Relations Officer
Address	C 1402, G Crop Residencies, 115 ST bed Layout, Opp. Nirguna Mandir, Koramangala I Block, Bangalore, KARNATAKA – 560034
Telephone No	+91 9538221367
Email id	ashok@courserpark.com

### **Grievance redressal and dispute settlement mechanism:**

The aforesaid personnel of the Portfolio Manager shall attend to and address any Client query/concern/grievance at the earliest. The Portfolio Manager will ensure that this official is vested with the necessary authority and independence to handle Client complaints. The aforesaid official will immediately identify the grievance and take appropriate steps to eliminate the causes of such grievances to the satisfaction of the Client. Effective grievance management would be an essential element of the Portfolio Manager's portfolio management services and the aforesaid official may adopt the following approach to manage grievance effectively and expeditiously:

- (1) **Quick action-** As soon as any grievance comes to the knowledge of the aforesaid personnel, it would be identified and resolved. This will lower the detrimental effects of the grievance.
- (2) **Acknowledging grievance-** The aforesaid officer shall acknowledge the grievance put forward by the Client and look into the complaint impartially and without any bias.
- (3) **Gathering facts-** The aforesaid official shall gather appropriate and sufficient facts explaining the grievance's nature. A record of such facts shall be maintained so that these can be used in later stage of grievance redressal.
- (4) **Examining the causes of grievance-** The actual cause of grievance would be identified. Accordingly, remedial actions would be taken to prevent repetition of the grievance.
- (5) **Decision making** - After identifying the causes of grievance, alternative course of actions would be thought of to manage the grievance. The effect of each course of action on the existing and future management policies and procedure would be analyzed and accordingly decision should be taken by the aforesaid official. The aforesaid official would execute the decision quickly.
- (6) **Review** - After implementing the decision, a follow-up would be there to ensure that the grievance has been resolved completely and adequately.

Grievances/concerns, if any, which may not be resolved/satisfactorily addressed in aforesaid manner shall be redressed through the administrative mechanism by the designated Compliance Officer, namely **Mrs. Gayathri Vittal Rao** and subject to the Regulations. The Compliance Officer will endeavor to address such grievance in a reasonable manner and time. The coordinates of the Compliance Officer are provided as under:

Name	Mrs.Gayathri Vittal Rao
Designation	Compliance Officer
Address	C 1402, G Crop Residencies, 115 ST bed Layout, Opp. Nirguna Mandir, Koramangala I Block, Bangalore, KARNATAKA, 560034
Telephone No	+91 8041735687
Email id	<a href="mailto:gayathri@courserpark.com">gayathri@courserpark.com</a>

If the Client still remains dissatisfied with the remedies offered or the stand taken by the Compliance Officer, the Client and the Portfolio Manager shall abide by the following mechanisms:

Any dispute unresolved by the above internal grievance redressal mechanism of the Portfolio Manager, can be submitted to arbitration under the Arbitration and Conciliation Act, 1996. The arbitration shall be before three arbitrators, with each party entitled to appoint an arbitrator and the third arbitrator being the presiding arbitrator appointed by the two arbitrators. Each party will bear the expenses / costs incurred by it in appointing the arbitrator and for the arbitration proceedings. Further, the cost of appointing the presiding arbitrator will be borne equally by both the parties. Such arbitration proceedings shall be held at Bengaluru and the language of the arbitration shall be English. The courts of Bengaluru shall have the exclusive

jurisdiction to adjudicate upon the claims of the parties.

Without prejudice to anything stated above, the Client can also register its grievance/complaint through SCORES (SEBI Complaints Redress System), post which SEBI may forward the complaint to the Portfolio Manager and the Portfolio Manager will suitably address the same. SCORES is available at <http://scores.sebi.gov.in>.

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

## **10. Details of the diversification policy of the portfolio manager**

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

## 11. Custody of Securities

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

<b>Sr</b>	<b>Service Provider</b>	<b>SEBI Registration #</b>	<b>Nature of Service Provided</b>
1	KOTAK MAHINDRA BANK LTD	IN/CUS/017	Custodian and safe keeping services

## 12. General

### **Prevention of Money Laundering**

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

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

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

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

The Portfolio Manager, and its directors, shareholders, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Client's account/rejection of any application or mandatory repayment/returning of funds due to non-compliance with the provisions of the PML Laws and KYC policy. If the Portfolio Manager believes that transaction is suspicious in nature within the purview of the PML Laws, then it will report the same to FIU-IND.

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

**PART-II- Dynamic Section:****13. Client Representation:**

- (i) The Portfolio Manager has obtained a certificate of registration to function as a portfolio manager on September 22, 2023 and therefore has no record of representing any persons/entities in the capacity of a portfolio manager before registration.

Details of clients as on December 31st, 2025

<b>Category of Clients</b>	<b>As on</b>	<b>No. of Clients</b>	<b>Fund Managed (Rs. Cr.)</b>	<b>Discretionary/ Non-Discretionary (if available)</b>
<b>Associates / group companies (last 3 Years)</b>	31/12/2025	0	0	<b>Discretionary</b>
<b>Associates / group companies (last 3 Years)</b>	31/12/2025	0	0	<b>Non-Discretionary</b>
<b>Associates / group companies (last 3 Years)</b>	31/12/2025	0	0	<b>Advisory</b>
<b>Others (last 3 years)</b>	31/12/2025	146	180.5 cr	<b>Discretionary</b>
<b>Others (last 3 years)</b>	31/12/2025	0	0	<b>Non-Discretionary</b>
<b>Others (last 3 years)</b>	31/12/2025	28	176.35 cr	<b>Advisory</b>
<b>Total</b>	-	174	356.85 cr	

- (ii) **Complete disclosure in respect of transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India- No Such Transaction.**

#### **14. The Financial Performance of Portfolio Manager**

(based on audited financial statements)

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

## 15. Performance of the Portfolio Manager

Portfolio manager shall ensure compliance with computation of performance of portfolio in terms of SEBI (PMS) Regulations, 2020 and SEBI Circular no. SEBI/HO/IMD/DF1/P/2020/26 dated February 13, 2020.

<b>INVESTMENT APPROACH WISE RETURNS IN (TWRR Returns%) as on 31<sup>st</sup> December 2025</b>							
<b>Investment Approach Name</b>	<b>AUM IN CRORE</b>	<b>1 Month</b>	<b>3 Months</b>	<b>6 Months</b>	<b>1 Year</b>	<b>2 Years</b>	<b>Since Inception</b>
Courser Park Advisors LLP - GARP	180.50	-1.23	4.31	0.25	-0.69		7.82
Nifty 50 TRI		-0.28	6.33	2.92	11.88		10.79

**16. Audit Observations for preceding three years**

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

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

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

**For and on behalf of Courser Park Advisors LLP**

<b>Mr. Jagarlapudi Srirama Krishna Chaitanya DPIN: 06621972 Designated Partner</b>	:	
<b>Mrs. Gayathri Vittal Rao DPIN: 06620259 Designated Partner</b>	:	

Place: Bangalore

Date: 02<sup>nd</sup> February 2026

Annexure J

**Courser Park Advisors LLP**  
 23, Shaktikunj, 31st Main, 6th Phase, J P Nagar, Bengaluru 560078  
 LLPIN: ACA-0170


**Balance Sheet as on 31-03-2025**

Particulars	Note No.	Amount in(Rs. 000's)	
		For Financial Year ended 31-03-2025	For Financial Year ended 31-03-2024
<b>CONTRIBUTION AND LIABILITIES</b>			
<b>Capital Contribution</b>			
(a) Capital Contribution	III	52,500.00	52,501.00
(b) Partners Current Capital Account	IV	4,939.21	1,755.20
(c) Reserves and Surplus	V	1,295.68	(207.00)
<b>Non-current liabilities</b>			
(a) Long-term Borrowings			
<b>Current Liabilities</b>			
(a) Trade Payables	VI	2,094.47	697.06
(b) Other Current Liabilities	VII	1,267.34	728.83
<b>Non Current Liabilities</b>			
(a) Short-Term Provisions	VIII	668.00	-
<b>Total</b>		<b>63,564.70</b>	<b>55,475.88</b>
<b>ASSETS</b>			
<b>Non-Current Assets</b>			
(a) Property, Plant and Equipment	IX	44.52	-
(b) Deferred Tax Asset	IX	1.48	-
(c) Long-Term Loans and Advances		-	-
<b>Current Assets</b>			
(a) Trade receivables	X	4,142.35	-
(b) Investments	XI	22,847.01	23,099.85
(c) Cash and Cash Equivalents	XII	33,122.80	30,474.69
(d) Other Current Assets	XIII	3,406.54	1,901.34
<b>Total</b>		<b>63,564.70</b>	<b>55,475.88</b>

The Notes referred to above form an integral part of the Financial Statements

As per our report of even date attached

**For S W A N & Associates**  
**Chartered Accountants**  
 Firm Reg. No : 015128S  
 UDIN: 25241554BMOLML9743

  
**Narasimhan Sri Ganeshan**  
 Partner  
 Membership No: 241554



**For and on behalf of Courser Park Advisors LLP**

   
**JSRK Chaitanya** **Gayathri Vittal Rao**  
 Designated Partner Designated Partner  
 DIN:6621972 DIN:6620259



Place: Bangalore  
 Date: 20-08-2025

**Text equivalent for Image 1: Balance Sheet as on 31 March 2025**

Courser Park Advisors LLP. Address: 23, Shaktikunj, 31st Main, 6th Phase, J P Nagar, Bengaluru 560078.

LLPIN: ACA-0170.

Balance Sheet as on 31 March 2025. All amounts in Rs. thousands.

**CONTRIBUTION AND LIABILITIES (Note references in parentheses):**

- Capital Contribution (Note III): Rs. 52,500.00 (previous year Rs. 52,501.00).
- Partners Current Capital Account (Note IV): Rs. 4,939.21 (previous year Rs. 1,755.20).
- Reserves and Surplus (Note V): Rs. 1,295.68 (previous year minus Rs. 207.00).
- Long-term Borrowings: nil for both years.
- Trade Payables (Note VI): Rs. 2,094.47 (previous year Rs. 697.06).
- Other Current Liabilities (Note VII): Rs. 1,267.34 (previous year Rs. 728.83).
- Short-Term Provisions (Note VIII): Rs. 668.00 (previous year nil).
- Total Contribution and Liabilities: Rs. 63,564.70 (previous year Rs. 55,475.88).

**ASSETS:**

- Property, Plant and Equipment (Note IX): Rs. 44.52 (previous year nil).
- Deferred Tax Asset (Note IX): Rs. 1.48 (previous year nil).
- Long-Term Loans and Advances: nil for both years.
- Trade receivables (Note X): Rs. 4,142.35 (previous year nil).
- Investments (Note XI): Rs. 22,847.01 (previous year Rs. 23,099.85).
- Cash and Cash Equivalents (Note XII): Rs. 33,122.80 (previous year Rs. 30,474.69).
- Other Current Assets (Note XIII): Rs. 3,406.54 (previous year Rs. 1,901.34).
- Total Assets: Rs. 63,564.70 (previous year Rs. 55,475.88).

*The Notes referred to above form an integral part of the Financial Statements. Per our report of even date attached, for S W A N & Associates, Chartered Accountants, Firm Registration Number 015128S, UDIN 25241554BMOLML9743, signed by Narasimhan Sri Ganeshan, Partner, Membership Number 241554. For and on behalf of Courser Park Advisors LLP, signed by JSRK Chaitanya, Designated Partner, DIN 6621972, and Gayathri Vittal Rao, Designated Partner, DIN 6620259. Place: Bangalore. Date: 20 August 2025.*

**Courser Park Advisors LLP**  
23, Shaktikunj, 31st Main, 6th Phase, J P Nagar, Bengaluru 560078  
LLPIN: ACA-0170

**Statement of Profit and Loss as on 31-03-2025**

Particulars	Note No.	Amount in(Rs. 000's)	
		FY 2024-25	20-02-2023 to 31-03-2024
<b>INCOME</b>			
Revenue from Operations	XIV	8,857.21	-
Other Income	XV	1,573.79	2,693.35
<b>Total Income</b>		<b>10,431.00</b>	<b>2,693.35</b>
<b>EXPENSES</b>			
Employee Benefits Expenses	XVI	4,783.65	718.34
Depreciation and Amortization Expenses		12.17	-
Finance Costs	XVII	0.65	0.61
Other Expenses	XVIII	3,465.33	2,181.40
<b>Total Expenses</b>		<b>8,261.80</b>	<b>2,900.35</b>
<b>Profit Before Tax</b>		<b>2,169.21</b>	<b>(207.00)</b>
<b>Tax Expense</b>			
Current Tax		668.00	-
Deferred Tax		(1.48)	-
<b>Net Tax Expense</b>		<b>666.52</b>	<b>-</b>
<b>Profit(Loss) for the Year</b>		<b>1,502.69</b>	<b>(207.00)</b>

The Notes referred to above form an integral part of the Financial Statements

As per our report of even date attached  
For **S W A N & Associates**  
Chartered Accountants  
Firm Reg. No : 015128S  
UDIN: 25241554BMOLML9743

  
**Narasimhan Sri Ganeshan**  
Partner  
Membership No: 241554



For and on behalf of Courser Park Advisors LLP

  
**JSRK Chaitanya**  
Designated Partner  
DIN:6621972



  
**Gayathri Vittal Rao**  
Designated Partner  
DIN:6620259

Place: Bangalore  
Date: 20-08-2025

## Text equivalent for Image 2: Statement of Profit and Loss for the year ended 31 March 2025

Courser Park Advisors LLP. Statement of Profit and Loss as on 31 March 2025. All amounts in Rs. thousands.

Comparative period for previous year is 20 February 2023 to 31 March 2024.

### INCOME:

- Revenue from Operations (Note XIV): Rs. 8,857.21 (previous year nil).
- Other Income (Note XV): Rs. 1,573.79 (previous year Rs. 2,693.35).
- Total Income: Rs. 10,431.00 (previous year Rs. 2,693.35).

### EXPENSES:

- Employee Benefits Expenses (Note XVI): Rs. 4,783.65 (previous year Rs. 718.34).

- Depreciation and Amortization Expenses: Rs. 12.17 (previous year nil).
- Finance Costs (Note XVII): Rs. 0.65 (previous year Rs. 0.61).
- Other Expenses (Note XVIII): Rs. 3,465.33 (previous year Rs. 2,181.40).
- Total Expenses: Rs. 8,261.80 (previous year Rs. 2,900.35).

**PROFIT BEFORE TAX: Rs. 2,169.21 (previous year minus Rs. 207.00).**

**Tax Expense:**

- Current Tax: Rs. 668.00 (previous year nil).
- Deferred Tax: minus Rs. 1.48 (previous year nil).
- Net Tax Expense: Rs. 666.52 (previous year nil).

**PROFIT/(LOSS) FOR THE YEAR: Rs. 1,502.69 (previous year minus Rs. 207.00).**

*The Notes referred to above form an integral part of the Financial Statements. Per our report of even date attached, for S W A N & Associates, Chartered Accountants, Firm Registration Number 015128S, UDIN 25241554BMOLML9743, signed by Narasimhan Sri Ganeshan, Partner, Membership Number 241554. For and on behalf of Courser Park Advisors LLP, signed by JSRK Chaitanya, Designated Partner, DIN 6621972, and Gayathri Vittal Rao, Designated Partner, DIN 6620259. Place: Bangalore. Date: 20 August 2025.*

**Courser Park Advisors LLP**  
22, Shaktikunj, 21st Main, 6th Phase, J P Nagar, Bengaluru 560078  
LLPIN: ACA-0170

**Notes to Accounts**

**1. LLP Incorporation**

Courser Park Advisors LLP (the "LLP") was incorporated as a LLP dated on 20th February 2023, under the provision of the LLP Act 2008. The LLP is in the business of providing Portfolio Management and other financial and advisory services activities such as Investment counselling, financial consultancy, advisory and consultants to investment in securities and to carry out such other activities related to saving and investment advisory services and to manage the funds of the investors by investment in various avenues.

**2. Statement of Significant Accounting Policies:**

**a) Basis of Preparation:**

The financial statements, which have been prepared under the historical cost convention on the accrual basis of accounting, are in accordance with the generally accepted accounting principles in India (Indian GAAP) and the Accounting Standards

**b) Use of estimates:**

The presentation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accounting notes. Although these estimates are based on management's best knowledge of current events and actions the LLP may undertake in future, actual results ultimately may differ from the estimates.

**c) Property, plant and machinery:**

Property, plant and machinery are carried at cost less accumulated depreciation / amortisation and impairment losses, if any. The cost of Property, plant and machinery comprises its purchase price net of any trade discounts and rebates, any import duties and other taxes (other than those subsequently recoverable from the tax authorities), any directly attributable expenditure on making the asset ready for its intended use, other incidental expenses and interest on borrowings attributable to acquisition of qualifying Property, plant and machinery up to the date the asset is ready for its intended use.

**d) Revenue recognition**

Income from service is recognised on completed service contract method when the rendering of service under a contract is completed or substantially completed.

**e) Income taxes**

Tax expense comprises current and deferred tax. Current income-tax is measured at the amount expected to be paid to the tax authorities in accordance with the Income-tax Act, 1961, enacted in India. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted, at the reporting date.

Deferred Tax effect shall be created for the timing differences that arises during the year. Deferred Tax asset shall be created when the management is reasonable certain of its recoverability.

**f) Provisions and Contingencies**

A contingent liability is a possible obligation that arises from past events whose existence will be confirmed by the occurrence or non-occurrence of one or more uncertain future events beyond the control of the LLP or a present obligation is not recognized because it is not probable that an outflow of resources will be required to settle the obligation. A contingent liability also arises in extremely rare cases where there is a liability that cannot be recognized because it cannot be measured reliably. The LLP does not recognize a contingent liability but discloses its existence in the financial statements.



**Text equivalent for Image 3: Notes to Accounts — LLP Incorporation and Significant Accounting Policies**

*Courser Park Advisors LLP. Notes to Accounts.*

**Note 1 — LLP Incorporation:**

- Courser Park Advisors LLP (the LLP) was incorporated as an LLP dated 20 February 2023, under the provision of the LLP Act 2008. The LLP is in the business of providing Portfolio Management and

other financial and advisory services activities such as Investment counselling, financial consultancy, advisory and consultants to investment in securities, and to carry out such other activities related to saving and investment advisory services and to manage the funds of the investors by investment in various avenues.

## **Note 2 — Statement of Significant Accounting Policies:**

### **(a) Basis of Preparation:**

- The financial statements, which have been prepared under the historical cost convention on the accrual basis of accounting, are in accordance with the generally accepted accounting principles in India (Indian GAAP) and the Accounting Standards.

### **(b) Use of estimates:**

- The presentation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Although these estimates are based on management's best knowledge of current events and actions the LLP may undertake in future, actual results ultimately may differ from the estimates.

### **(c) Property, plant and machinery:**

- Property, plant and machinery are carried at cost less accumulated depreciation, amortisation and impairment losses, if any. The cost of Property, plant and machinery comprises its purchase price net of any trade discounts and rebates, any import duties and other taxes (other than those subsequently recoverable from the tax authorities), any directly attributable expenditure on making the asset ready for its intended use, other incidental expenses, and interest on borrowings attributable to acquisition of qualifying Property, plant and machinery up to the date the asset is ready for its intended use.

### **(d) Revenue recognition:**

- Income from service is recognised on completed service contract method when the rendering of service under a contract is completed or substantially completed.

### **(e) Income taxes:**

- Tax expense comprises current and deferred tax. Current income-tax is measured at the amount expected to be paid to the tax authorities in accordance with the Income-tax Act, 1961, enacted in India. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted, at the reporting date.
- Deferred Tax effect shall be created for the timing differences that arise during the year. Deferred Tax asset shall be created when the management is reasonable certain of its recoverability.

### **(f) Provisions and Contingencies:**

- A contingent liability is a possible obligation that arises from past events whose existence will be confirmed by the occurrence or non-occurrence of one or more uncertain future events beyond the control of the LLP or a present obligation is not recognized because it is not probable that an outflow of resources will be required to settle the obligation. A contingent liability also arises in extremely rare cases where there is a liability that cannot be recognized because it cannot be measured reliably. The LLP does not recognize a contingent liability but discloses its existence in the financial statements.

*The image is signed and stamped by the auditors and partners as detailed in the text equivalent for Image 1.*

**III. Partners Capital**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
<b>Gayathri Vittal Rao</b>		
Opening Balance	12,500.00	-
Add: Additional Capital Introduced	-	12,500.00
Less: Drawings during the year	-	-
<b>Closing Balance</b>	<b>12,500.00</b>	<b>12,500.00</b>
<b>JSRK Chaitanya</b>		
Opening Balance	36,063.50	-
Add: Additional Capital Introduced	-	36,063.50
Less: Drawings during the year	(1.00)	-
<b>Closing Balance</b>	<b>36,062.50</b>	<b>36,063.50</b>
<b>Mohit Bajaj</b>		
Opening Balance	3,937.50	-
Add: Additional Capital Introduced	-	3,937.50
Less: Drawings during the year	-	-
<b>Closing Balance</b>	<b>3,937.50</b>	<b>3,937.50</b>
<b>Total</b>	<b>52,500.00</b>	<b>52,501.00</b>

**IV. Partners Current Capital Account**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
<b>JSRK Chaitanya</b>		
Opening Balance	1,755.20	-
Add: Additional Capital Introduced	3,184.01	1,755.20
Less: Drawings during the year	-	-
<b>Closing Balance</b>	<b>4,939.21</b>	<b>1,755.20</b>
<b>Total</b>	<b>4,939.21</b>	<b>1,755.20</b>

**V. Reserves and Surplus**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
Balance as per last financial statements	(207.00)	-
Add/ (less) : loss during the year	1,502.69	(207.00)
<b>Total</b>	<b>1,295.69</b>	<b>(207.00)</b>

**Text equivalent for Image 4: Notes III, IV, V — Partners Capital, Partners Current Capital Account, Reserves and Surplus**

All amounts in Rs. thousands. Comparative figures in parentheses are previous year (PY) ending 31 March 2024.

**Note III — Partners Capital:**

- Gayathri Vittal Rao: Opening Balance Rs. 12,500.00; Additional Capital Introduced nil; Drawings during the year nil; Closing Balance Rs. 12,500.00 (PY Rs. 12,500.00).
- JSRK Chaitanya: Opening Balance Rs. 36,063.50; Additional Capital Introduced nil; Drawings during the year minus Rs. 1.00; Closing Balance Rs. 36,062.50 (PY Rs. 36,063.50).
- Mohit Bajaj: Opening Balance Rs. 3,937.50; Additional Capital Introduced nil; Drawings during the year nil; Closing Balance Rs. 3,937.50 (PY Rs. 3,937.50).
- Total Partners Capital: Rs. 52,500.00 (PY Rs. 52,501.00).

**Note IV — Partners Current Capital Account:**

- JSRK Chaitanya: Opening Balance Rs. 1,755.20; Additional Capital Introduced Rs. 3,184.01;

Drawings during the year nil; Closing Balance Rs. 4,939.21 (PY Rs. 1,755.20).

- Total Partners Current Capital Account: Rs. 4,939.21 (PY Rs. 1,755.20).

**Note V — Reserves and Surplus:**

- Balance as per last financial statements: minus Rs. 207.00 (PY nil).
- Add or less: profit/(loss) during the year: Rs. 1,502.69 (PY minus Rs. 207.00).
- Total Reserves and Surplus: Rs. 1,295.68 (PY minus Rs. 207.00).

The image is signed and stamped as detailed in the text equivalent for Image 1.

VII. Other Current Liabilities		
Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2024	As at 31-03-2024
Bank Payable	74.74	74.09
Salary Payable	121.06	86.43
Professional Tax Payable	0.60	-
Professional fees	5.00	0.40
TDS Payable	449.58	18.00
Audit Fee Payable	25.00	40.00
Statutory Filings Fees Payable	10.00	20.00
<b>Output GST Payable</b>		
Output IGST	154.91	-
Output CGST	228.39	-
Output SGST	228.39	-
<b>Total</b>	<b>1,267.34</b>	<b>728.83</b>

VIII. Short Term Provisions		
Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2024	As at 31-03-2024
Provision for Income Tax	668.00	-
<b>Total</b>	<b>668.00</b>	<b>-</b>

XI. Investments		
Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2024	As at 31-03-2024
Investments	22,847.01	23,099.85
<b>Total</b>	<b>22,847.01</b>	<b>23,099.85</b>

XII. Cash & Bank Balances		
Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2024	As at 31-03-2024
HDFC Bank	51.00	51.00
State Bank of India	10.87	10.69
Fixed Deposits	33,060.93	30,413.00
<b>Total</b>	<b>33,122.80</b>	<b>30,474.69</b>

XIII. Other Current Assets		
Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2024	As at 31-03-2024
TDS Receivable	242.95	204.16
Rental Deposits	350.00	350.00
GST ITC	302.60	234.78
Unclaimed GST ITC	-	8.16
Interest Receivable	-	1,103.16
Dividend Receivables	-	1.08
Advance Tax	2,511.00	-
<b>Total</b>	<b>3,406.54</b>	<b>1,901.34</b>



**Text equivalent for Image 5: Notes VII, VIII, XI, XII, XIII**

All amounts in Rs. thousands. PY refers to figures as at 31 March 2024.

**Note VII — Other Current Liabilities:**

- Rent Payable: values partially obscured at top edge of source scan. Calculated from column totals as approximately Rs. 44.41 (FY 2024-25) and Rs. 582.00 (FY 2023-24). Please verify against the audited original.
- Salary Payable: Rs. 121.06 (PY Rs. 86.43).
- Professional Tax Payable: Rs. 0.60 (PY nil).
- Professional fees: Rs. 5.00 (PY Rs. 0.40).
- TDS Payable: Rs. 449.58 (PY nil).
- Audit Fee Payable: Rs. 25.00 (PY Rs. 40.00).
- Statutory Filings Fees Payable: Rs. 10.00 (PY Rs. 20.00).
- Output IGST: Rs. 154.91 (PY nil).
- Output CGST: Rs. 228.39 (PY nil).
- Output SGST: Rs. 228.39 (PY nil).
- Total Other Current Liabilities: Rs. 1,267.34 (PY Rs. 728.83).

**Note VIII — Short Term Provisions:**

- Provision for Income Tax: Rs. 668.00 (PY nil).
- Total Short Term Provisions: Rs. 668.00 (PY nil).

**Note XI — Investments:**

- Investments: Rs. 22,847.01 (PY Rs. 23,099.85).
- Total Investments: Rs. 22,847.01 (PY Rs. 23,099.85).

**Note XII — Cash and Bank Balances:**

- HDFC Bank: Rs. 51.00 (PY Rs. 51.00).
- State Bank of India: Rs. 10.87 (PY Rs. 10.69).
- Fixed Deposits: Rs. 33,060.93 (PY Rs. 30,413.00).
- Total Cash and Bank Balances: Rs. 33,122.80 (PY Rs. 30,474.69).

**Note XIII — Other Current Assets:**

- TDS Receivable: Rs. 242.95 (PY Rs. 204.16).
- Rental Deposits: Rs. 350.00 (PY Rs. 350.00).
- GST ITC: Rs. 302.60 (PY Rs. 234.78).
- Unclaimed GST ITC: nil (PY Rs. 8.16).
- Interest Receivable: nil (PY Rs. 1,103.16).
- Dividend Receivables: nil (PY Rs. 1.08).
- Advance Tax: Rs. 2,511.00 (PY nil).
- Total Other Current Assets: Rs. 3,406.54 (PY Rs. 1,901.34).

**VI. Trade Payable** Amount in (Rs. 000's)

Particulars	Outstanding for the following periods from the due date of payment						Total
	Not Due	Less than six months	Six months to one year	1 - 2 years (*)	2 - 3 years (*)	More than 3 years (*)	
Total outstanding dues of Micro enterprises and Small enterprises	-	-	-	-	-	-	-
Total outstanding dues of creditors other than Micro enterprises and Small enterprises	-	677.91	2,216.56	-	-	-	2,894.47
Disputed dues of Micro enterprises and Small enterprises	-	-	-	-	-	-	-
Disputed dues of creditors other than Micro enterprises and Small enterprises	-	-	-	-	-	-	-
	-	<b>677.91</b>	<b>2,216.56</b>	-	-	-	<b>2,894.47</b>

Particulars	Outstanding for the following periods from the due date of payment						Total
	Not Due	Less than six months	Six months to one year	1 - 2 years	2 - 3 years	More than 3 years	
Total outstanding dues of Micro enterprises and Small enterprises	-	-	-	-	-	-	-
Total outstanding dues of creditors other than Micro enterprises and Small enterprises	-	697.86	-	-	-	-	697.86
Disputed dues of Micro enterprises and Small enterprises	-	-	-	-	-	-	-
Disputed dues of creditors other than Micro enterprises and Small enterprises	-	-	-	-	-	-	-
	-	<b>697.86</b>	-	-	-	-	<b>697.86</b>

**X. Trade Receivables** Amount in (Rs. 000's)

Particulars	Outstanding for the following periods from the due date of Receipt						Total
	Current But not due	Less than six months	6 months - 1 years	1 - 2 years	2 - 3 years	More than 3 years	
Undisputed Trade Receivables considered good	-	4,142.35	-	-	-	-	4,142.35
Undisputed Trade Receivables considered doubtful	-	-	-	-	-	-	-
Disputed Trade receivables considered good	-	-	-	-	-	-	-
Disputed Trade receivables considered doubtful	-	-	-	-	-	-	-
	-	<b>4,142.35</b>	-	-	-	-	<b>4,142.35</b>

Particulars	Outstanding for the following periods from the due date of Receipt						Total
	Current But not due	Less than six months	6 months - 1 years	1 - 2 years	2 - 3 years	More than 3 years	
Undisputed Trade Receivables considered good	-	-	-	-	-	-	-
Undisputed Trade Receivables considered doubtful	-	-	-	-	-	-	-
Disputed Trade receivables considered good	-	-	-	-	-	-	-
Disputed Trade receivables considered doubtful	-	-	-	-	-	-	-
	-	-	-	-	-	-	-



**Text equivalent for Image 6: Notes VI and X — Trade Payables and Trade Receivables ageing analysis**

All amounts in Rs. thousands. Ageing buckets: Not Due, Less than six months, Six months to one year, 1–2 years, 2–3 years, More than 3 years.

**Note VI — Trade Payable ageing as at 31 March 2025:**

- Total outstanding dues of Micro enterprises and Small enterprises: nil across all ageing buckets.

- Total outstanding dues of creditors other than Micro enterprises and Small enterprises: Less than six months Rs. 677.91; Six months to one year Rs. 2,216.56; other buckets nil. Total Rs. 2,894.47.
- Disputed dues of Micro enterprises and Small enterprises: nil.
- Disputed dues of creditors other than Micro enterprises and Small enterprises: nil.
- Total Trade Payables as at 31 March 2025: Rs. 2,894.47 thousand.

**Trade Payable ageing as at 31 March 2024:**

- Total outstanding dues of Micro enterprises and Small enterprises: nil.
- Total outstanding dues of creditors other than Micro enterprises and Small enterprises: Less than six months Rs. 697.86. Total Rs. 697.86.
- Disputed dues of Micro enterprises and Small enterprises: nil.
- Disputed dues of creditors other than Micro enterprises and Small enterprises: nil.
- Total Trade Payables as at 31 March 2024: Rs. 697.86 thousand.

**Note X — Trade Receivables ageing as at 31 March 2025:**

- Undisputed Trade Receivables — considered good: Less than six months Rs. 4,142.35; other buckets nil. Total Rs. 4,142.35.
- Undisputed Trade Receivables — considered doubtful: nil.
- Disputed Trade receivables — considered good: nil.
- Disputed Trade receivables — considered doubtful: nil.
- Total Trade Receivables as at 31 March 2025: Rs. 4,142.35 thousand.

**Trade Receivables ageing as at 31 March 2024:**

- All categories and ageing buckets: nil.
- Total Trade Receivables as at 31 March 2024: nil.

*The image is signed and stamped as detailed in the text equivalent for Image 1.*

IX. Fixed Assets Schedule as at 31st March 2025

Assets	Rate	Gross Block			Accumulated Depreciation			Net Block		
		As at 01.04.2024	Additions	Deletions	As at 31.03.2025	As at 01.04.2024	Provided during the year	As at 31.03.2025	As at 31.03.2024	As at 31.03.2025
<b>A) Tangible Assets</b>										
Computer and Electronic Devices	33.33%	-	43,134	-	43,134	-	11,206	11,206	-	31,929
Furniture	20.00%	-	13,555	-	13,555	-	967	967	-	12,588
<b>Total as on 31.03.2024</b>		-	<b>56,689</b>	-	<b>56,689</b>	-	<b>12,172</b>	<b>12,172</b>	-	<b>44,517</b>

Fixed assets	Date of Purchase	Date of use	No. of Days		Cost of asset	Depreciable amount (assessed at 99% of cost)	FY 2024-25
			No. of Days in Usage	No. of Years			
<b>Computer and Electronic Devices</b>							
Laptop - 1 - Dell Laptop 2460	24/05/2024	24/05/2024	311.00	3	27,342	26,165	7,831
Laptop - 2 - Dell Monitor E2423D	25/05/2024	25/05/2024	279.00	3	15,592	14,813	3,774
<b>Total</b>					<b>43,134</b>		<b>11,206</b>
<b>Furniture</b>							
	14/11/2024	14/11/2024	137.00	5	13,555	12,877	967
<b>Total</b>					<b>13,555</b>		<b>967</b>

Depreciation as per Income Tax Act

Particulars	Rate	Opening 01-04-2024	Additions		Deletions	Total	Depreciation as per IT	WDV as on 31-03-2025
			> 180 Days	< 180 days				
Computer and Electronic Devices	40%	-	43,134	-	-	41,134	17,254	25,881
Furniture	10%	-	-	13,555	-	13,555	678	12,877
<b>Total</b>			<b>43,134</b>	<b>13,555</b>	-	<b>56,689</b>	<b>17,932</b>	<b>38,758</b>

Deferred Tax calculations:

Particulars	Tax Rate	Closing WDV as per Income Tax Act	Closing WDV as per Companies Act	Temporary Difference	Closing Deferred Tax assets/(Liabilities)	Opening Deferred Tax assets/(Liabilities)	Current year transferred to P&L
Arising on Fixed Assets	31.20%	38,757.97	44,517.28	(5,759.31)	(1,796.90)	-	(1,796.90)
Arising on Disallowance of Sec 45(a)(ii)	31.20%	-	10,500.00	10,500.00	3,276.00	-	3,276.00
<b>Total</b>				<b>4,740.70</b>	<b>1,479.10</b>	-	<b>1,479.10</b>



## Text equivalent for Image 7: Note IX — Fixed Assets Schedule, Income Tax Depreciation, and Deferred Tax

### Note IX — Fixed Assets Schedule as at 31 March 2025 (Tangible Assets):

#### Computer and Electronic Devices (depreciation rate 33.33%):

- Gross Block: Opening as at 1 April 2024 nil; Additions Rs. 43,134; Deletions nil; Closing as at 31 March 2025 Rs. 43,134.
- Accumulated Depreciation: Opening nil; Provided during the year Rs. 11,206; Closing Rs. 11,206.
- Net Block: as at 31 March 2025 Rs. 31,929; as at 31 March 2024 nil.

#### Furniture (depreciation rate 20.00%):

- Gross Block: Opening nil; Additions Rs. 13,555; Deletions nil; Closing Rs. 13,555.
- Accumulated Depreciation: Opening nil; Provided during the year Rs. 967; Closing Rs. 967.
- Net Block: as at 31 March 2025 Rs. 12,588; as at 31 March 2024 nil.

**Total Tangible Assets:**

- Gross Block as at 31 March 2025: Rs. 56,689 (PY nil).
- Accumulated Depreciation as at 31 March 2025: Rs. 12,172 (PY nil).
- Net Block as at 31 March 2025: Rs. 44,517 (PY nil).

**Depreciation per Income Tax Act calculations:**

- Computer and Electronic Devices: Rate 40%. Opening 1 April 2024 nil; Additions over 180 days nil; Additions less than 180 days Rs. 43,134; Deletions nil; Total Rs. 43,134; Depreciation as per IT Rs. 17,254; WDV as on 31 March 2025 Rs. 25,881.
- Furniture: Rate 10%. Opening nil; Additions over 180 days nil; Additions less than 180 days Rs. 13,555; Deletions nil; Total Rs. 13,555; Depreciation as per IT Rs. 678; WDV as on 31 March 2025 Rs. 12,877.
- Total: Additions less than 180 days Rs. 43,134 (with Rs. 13,555 furniture); Total Rs. 56,689; Depreciation Rs. 17,932; WDV Rs. 38,758.

**Computer and Electronic Devices — additions detail:**

- Laptop 1, Dell Laptop 7400: Date of Purchase 24 May 2024; Date of use 24 May 2024; Number of Days 311; Number of Years not specified; Cost of Asset Rs. 27,942; Depreciable amount (assumed at 95% of cost) Rs. 26,165; FY 2024-25 figure Rs. 7,431.
- Laptop 2, Dell Monitor B2423D: Date of Purchase 25 May 2024; Date of use 25 May 2024; Number of Days 279; Cost of Asset Rs. 15,592; Depreciable amount Rs. 14,811; FY 2024-25 Rs. 3,794.
- Total Computer and Electronic Devices additions: Rs. 43,134; depreciable amount totals; FY 2024-25 figure Rs. 11,206.
- Furniture: Date of Purchase 14 November 2024; Number of Days 137; Cost of Asset Rs. 13,555; Depreciable amount Rs. 12,877; FY 2024-25 Rs. 967.

**Deferred Tax calculations:**

- Arising on Fixed Assets: Tax Rate 31.20%. Closing WDV as per Income Tax Act Rs. 38,757.97; Closing WDV as per Companies Act Rs. 44,517.28; Temporary Difference Rs. 5,759.30; Opening Deferred Tax asset/(liability) nil; Closing Deferred Tax asset/(liability) minus Rs. 1,796.90; Current year transferred to P&L minus Rs. 1,796.90.
- Arising on Disallowance of Sec 40(a)(ia): Tax Rate 31.20%. Temporary Difference Rs. 10,500.00; Closing Deferred Tax asset/(liability) Rs. 3,276.00; Current year transferred to P&L Rs. 3,276.00.
- Total Deferred Tax: Temporary Difference Rs. 4,740.70; Closing Rs. 1,479.10; Current year transferred to P&L Rs. 1,479.10.

(All amounts in Rupees Thousands, unless otherwise stated)

**XIV. Revenue from Operations**

	Amount in	Amount in
	As at 31-03-2025	As at 31-03-2024
Sale of Services	8,857.21	-
<b>Total</b>	<b>8,857.21</b>	<b>-</b>

**XV. Other Income**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
Dividend Received	133.19	28.22
Interest on deposits	1,059.19	2,013.27
Net Gain/Loss from Sale of Investments	374.26	651.86
Interest on Income tax Refund	7.15	-
<b>Total</b>	<b>1,573.79</b>	<b>2,693.35</b>

**XVI. Employee Benefit Expenses**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
Salary to the Employees	2,383.65	718.34
Partners Remuneration	-	-
SRK Chaitanya	-	-
Gayathri Vittal Rao	2,400.00	-
<b>Total</b>	<b>4,783.65</b>	<b>718.34</b>

**XVII. Finance Costs**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
Bank Charges	0.65	0.61
<b>Total</b>	<b>0.65</b>	<b>0.61</b>

**XVIII. Other Expenses**

Particulars	Amount in (Rs. 000's)	Amount in (Rs. 000's)
	As at 31-03-2025	As at 31-03-2024
Audit Fees	25.00	40.00
Statutory Filing Fees	10.00	20.00
Rent - Building	592.20	564.00
Brokerage Charges	35.78	68.21
Electricity Charges	38.82	-
PMS Commission Charges	1,841.07	120.00
Building Maintenance	20.87	-
Business Promotion	55.10	-
Courier Charges	18.95	-
Interest on Late Filing	2.95	-
Internet and Broadband Charges	8.09	-
Membership Fees	13.50	-
Office Expenses	55.10	41.64
Professional Fees	292.50	290.00
SEBI Registration Fee	-	1,000.00
Rates & Taxes	154.98	10.38
Software Expenses	64.40	27.18
Staff Welfare Expenses	5.18	-
Subscription	226.38	-
Travelling Charges	4.47	-
<b>Total</b>	<b>3,465.33</b>	<b>2,181.40</b>

For S W A N & Associates  
Chartered Accountants  
Firm Reg. No : 0151285  
UDIN: 25241554BMOLML9743

For and on behalf of Courser Park Advisors LLP

  
Narasimhan Sri Ganeshan  
Partner  
Membership No: 241554

  
SRK Chaitanya  
Designated Partner  
DIN:6621972

  
Gayathri Vittal Rao  
Designated Partner  
DIN:6620259





Place: Bangalore  
Date: 20-08-2025

**Text equivalent for Image 8: Notes XIV to XVIII — Revenue, Other Income, Employee Benefits, Finance Costs, Other Expenses**

All amounts in Rs. thousands. CY refers to year ended 31 March 2025; PY refers to period 20 February 2023 to 31 March 2024.

**Note XIV — Revenue from Operations:**

- Sale of Services: Rs. 8,857.21 (PY nil).
- Total Revenue from Operations: Rs. 8,857.21 (PY nil).

**Note XV — Other Income:**

- Dividend Received: Rs. 133.19 (PY Rs. 28.22).
- Interest on deposits: Rs. 1,059.19 (PY Rs. 2,013.27).
- Net Gain or Loss from Sale of Investments: Rs. 374.25 (PY Rs. 651.86).
- Interest on Income tax Refund: Rs. 7.15 (PY nil).
- Total Other Income: Rs. 1,573.79 (PY Rs. 2,693.35).

**Note XVI — Employee Benefit Expenses:**

- Salary to the Employees: Rs. 2,383.65 (PY Rs. 718.34).
- Partners Remuneration — JSRK Chaitanya: nil (PY nil).
- Partners Remuneration — Gayathri Vittal Rao: Rs. 2,400.00 (PY nil).
- Total Employee Benefit Expenses: Rs. 4,783.65 (PY Rs. 718.34).

**Note XVII — Finance Costs:**

- Bank Charges: Rs. 0.65 (PY Rs. 0.61).
- Total Finance Costs: Rs. 0.65 (PY Rs. 0.61).

**Note XVIII — Other Expenses:**

- Audit Fees: Rs. 25.00 (PY Rs. 40.00).
- Statutory Filing Fees: Rs. 10.00 (PY Rs. 20.00).
- Rent — Building: Rs. 592.20 (PY Rs. 564.00).
- Brokerage Charges: Rs. 35.78 (PY Rs. 68.21).
- Electricity Charges: Rs. 38.82 (PY nil).
- PMS Commission Charges: Rs. 1,841.07 (PY Rs. 120.00).
- Building Maintenance: Rs. 20.87 (PY nil).
- Business Promotion: Rs. 55.10 (PY nil).
- Courier Charges: Rs. 18.95 (PY nil).
- Interest on Late Filing: Rs. 2.95 (PY nil).
- Internet and Broadband Charges: Rs. 8.09 (PY nil).
- Membership Fees: Rs. 13.50 (PY nil).
- Office Expenses: Rs. 55.10 (PY Rs. 41.64).
- Professional Fees: Rs. 292.50 (PY Rs. 290.00).
- SEBI Registration Fee: nil (PY Rs. 1,000.00).
- Rates and Taxes: Rs. 154.98 (PY Rs. 10.38).
- Software Expenses: Rs. 64.40 (PY Rs. 27.18).
- Staff Welfare Expenses: Rs. 5.18 (PY nil).
- Subscription: Rs. 226.38 (PY nil).
- Travelling Charges: Rs. 4.47 (PY nil).
- Total Other Expenses: Rs. 3,465.33 (PY Rs. 2,181.40).

*The image is signed and stamped as detailed in the text equivalent for Image 1.*

Annexure I  
Investment Approach

**Investment Approach: Courser Park Advisors LLP – GARP**

<b>Name of Investment Approach</b>	<b>Courser Park Advisors LLP – GARP (Growth at Reasonable Price)</b>
<b>Strategy</b>	Equity
<b>Investment Objective</b>	Maximize returns for investors at minimum cost by determining an optimal portfolio mix based on their risk tolerance and time Horizon
<b>Investment Strategy &amp; Philosophy</b>	<p>Protecting capital is of paramount importance. We believe there is no greater buying opportunity than in bear markets - for those few investors who are able to control emotions, delay gratification, and go against the crowd, a bear market is where lasting wealth is made. We believe we are the flag bearers of this philosophy and would accumulate stocks when the news is bitter, future looks bleak and there is relentless selling by most other investors. Our singular goal and focus - invest only in those companies which have the lowest odds of permanent loss</p> <p>Our guiding philosophy is protection of capital and compounding of value over longer periods, Strategy is:</p> <p>a. Investing in high quality large cap (50 to 60% weightage) and mid cap/small cap (remaining 40 to 50% weightage) companies with durable business models that can generate higher returns on capital for longer periods of time.</p> <p>b. We will also invest a portion of the capital in arbitrage positions which are mispriced and provide opportunities to make good (15 to 20%) returns in the short-run</p>
<b>Description of types of securities for Investment Approach</b>	Equities - Large-cap, mid-cap and small cap securities listed and traded publicly on Indian stock exchanges - BSE and NSE; Govt Securities: Excess cash will be invested in Govt securities or liquid Bees

**Basis of selection of such types of securities as part of the Investment Approach**

Three pillars of outperformance - Growth, Research and Risk management. Combine Fundamental Research with Technical indicators. Our process for performing Fundamental Research as follows:

**a. Idea Generation**

- i. Screens: Proprietary screens that combine capital efficiency and growth
- ii. Other fund portfolios: Monitor funds with similar philosophy for new ideas
- iii. Scuttle Butt approach: e.g., DMart, Page Industries (Jockey) – brands that are far too apparent

**b. Research Process**

Resources include: Annual and quarterly reports, management interviews, conference-call transcripts and sell-side research

- i. Digest all publicly available information including annual reports, sell-side research etc.
- ii. Work with the best analyst on the Street for a company
- iii. Follow it up with a call with a management for midcaps; participate in earnings calls for large caps
- iv. Focus on customer/channel checks to understand customer feedback

**c. Working Style**

- i. Operating analyst: Work with a part time industry expert for better commercial diligence e.g. Pharma with an operating expert
- ii. Research access: Identify the best analyst for a stock
- iii. Strong focus on channel checks
- iv. Overlay quant techniques to enhance alpha

**d. Buying and Selling Strategy**

Macro environment drives the mix between Core and Tactical Book. High growth environment means more tactical.

**1. Buying Strategy:**

- a. Core Book: Maximum weight in a single security - 15%
- b. Tactical Book: Max position of 5% in any single company.

**2. Selling Strategy:**

- a. Core: when there is any disruption occurs in the business model, unforeseen events (regulatory or otherwise)
- b. Tactical Book: Sell when earnings growth tapers below 15%

<p><b>Allocation of portfolio across types of securities</b></p>	<p>a. Strategic: Predominantly an equity strategy, with excess cash being invested in fixed income securities  b. Tactical: Move to fixed income in absence of opportunities</p> <p><b>Portfolio construction:</b>  Invest in market leaders showing: - sound earnings  - higher FCF yield – higher than average in terms of longevity, predictability, profit margins, return on operating capital, conversion of profits to cash  - high return on capital employed  - show resilience through business cycles</p> <p><b>Timing:</b> - Bias for buying during maximum pessimism/ early stages of recovery. - Slower deployment of capital – typically takes 6 months -1 year</p> <p><b>Fundamental filters:</b> Every company has a lifecycle. Understanding a company’s high profit-growth phase and its longevity is key to maximizing returns. Earnings is the most important variable for increasing its value. Our stock selection process must fulfil the following criteria: • Positive Revenue, EBITDA &amp; PAT CAGR over the last 5 Years. • Stable/improving margins during this period.</p> <ul style="list-style-type: none"> <li>• Return of Equity &gt; 20%</li> <li>• Return on Capital Employed &gt; 15%</li> <li>• Debt-to-Equity &lt; 0.5</li> <li>• Healthy FCFF generation; CFO generation in case of fast-growers</li> <li>• Short(er) cash conversion cycle</li> </ul> <p>The above filters are absolutely necessary. If they are not met or are not likely to be met in near future, in our opinion, we would stay away and monitor the story, no matter how exciting it is.</p> <p><b>Research Approach:</b></p> <ul style="list-style-type: none"> <li>- Industry Analysis (Porter 5 / PESTLE Analysis)</li> <li>- Company Analysis (About the management)</li> <li>- Company Analysis (Timeline - Historical and forward-looking questions)</li> <li>- Company Analysis (Valuation metrics)</li> </ul>
<p><b>Appropriate benchmark to compare performance and basis for choice of</b></p>	<p>Nifty 50 TRI. Basis for selection - Our Portfolio will consist largely of companies - large-cap (50-60% weightage) and mid-cap/small-cap (40- 50% weightage). Hence Nifty 50 TRI will be the benchmark used.</p>

<b>benchmark</b>	
<b>Indicative Tenure or investment horizon</b>	Short-term bucket - 3 - 6 months Long-term holdings - 2-3 years
<b>Risks associated with the Investment Approach</b>	<p>Risks include market risk, company-specific risk, liquidity risk. Any risk associated with the investment approach will be identified and minimized in the following manner:</p> <ul style="list-style-type: none"> <li>a. Minimum market capitalization for stocks invested: \$ 125 MM (~INR 1000 crores)</li> <li>b. Maximum allowable positions: 35</li> <li>c. Maximum allowable position in a stock: 20%;</li> <li>d. Cash position could be as high as 50% if there are no opportunities</li> <li>e. Purchase put options for hedging when the market becomes very expensive</li> </ul>
<b>Other salient features</b>	<p>Maximum wealth compounders</p> <p>We advise our clients on investing in stable businesses with a track record of excellence in capital allocation, governance, management bandwidth and ethical conduct. We focus on companies with a steady business growth, high capital efficiency and cash generation. We follow a disciplined and a patient approach to investing irrespective of market cycles and complete alignment of interests with our partners and stakeholders.</p> <p>Defensive strategy for capital protection</p> <p>Invest in defensive sectors: Sectors that have shown resilience during down turns e.g. Consumer</p> <ul style="list-style-type: none"> <li>- A defensive portfolio is likely to outperform during bad times and underperform during good times.</li> </ul> <p>Diverse clientele</p> <ul style="list-style-type: none"> <li>- A majority of our clients come through references only</li> <li>- Very low client attrition due to defensiveness of the portfolio</li> </ul>

Annexure I...continued

Investment Approach

**Investment Approach: Courser Park Advisors LLP - FOCUS**

Name of Investment Approach	Courser Park Advisors LLP – FOCUS
Strategy	Equity
Investment Objective	The primary objective is to generate superior returns by investing in a focused portfolio of high-quality Small-cap and Micro-cap stocks with strong growth potential.
Investment Strategy & Philosophy	<p>This approach is to invest in companies that exhibit a high competitive advantage built around strong brands, superior earnings growth, robust business processes, impeccable governance record and capital allocation / efficiency.</p> <p>We achieve this by:</p> <ul style="list-style-type: none"> <li>● <b>Focusing on Fundamentals:</b> We conduct in-depth, proprietary research to identify companies with robust business models, credible management teams, and strong financials.</li> <li>● <b>Active Monitoring &amp; Tactical Management:</b> This portfolio will be a focused tactical book allowing us to take <b>higher conviction calls</b> on small-cap/ microcap stocks with higher growth characteristics.</li> </ul>
Description of type of Securities for Investment Approach	The portfolio will primarily consist of equity securities of small-cap and micro-cap companies (with market cap of upto INR 30,000 crores) that are listed and are publicly traded on Indian stock exchanges (BSE and NSE). In the absence of attractive investment opportunities, a portion of the capital may be held in government securities or liquid bees or other ETFs.

<p>Basis of Selection of such types of securities as a part of Investment Approach</p>	<p>Our stock selection process is rigorous and focuses on identifying businesses with a strong "economic moat" and sustainable growth potential. Our research process includes:</p> <ul style="list-style-type: none"> <li>● <b>Qualitative Analysis:</b> This involves evaluating the management's track record, corporate governance standards, business model, and competitive landscape. We look for companies with transparent and ethical leadership.</li> <li>● <b>Quantitative Analysis (Investment Filters):</b> We apply a series of rigorous fundamental and quantitative filters to ensure financial health and growth prospects. A company must meet the majority of these criteria to be considered for investment: <ul style="list-style-type: none"> <li>○ <b>Growth:</b> Consistently positive and above-average revenue, EBITDA, and PAT Compound Annual Growth Rate (CAGR) over the last 3-5 years.</li> <li>○ <b>Profitability:</b> A high and consistent Return on Equity (ROE) of over 18% and Return on Capital Employed (ROCE) of over 15%. We favor companies with stable or improving margins.</li> <li>○ <b>Cash Flow:</b> Healthy and consistent Free Cash Flow (FCF) generation, which is a strong indicator of a company's ability to self-fund its growth.</li> <li>○ <b>Balance Sheet Health:</b> A low to moderate debt-to-equity ratio (D/E) below 0.75, which demonstrates financial prudence and resilience.</li> <li>○ <b>Capital Allocation:</b> The management's track record of efficiently allocating capital to generate higher returns for shareholders.</li> </ul> </li> <li>● <b>Valuation:</b> We only invest when the company's valuation metrics, such as Price-to-Earnings (P/E) or Price-to-Book (P/B), are at a significant discount to its intrinsic value and provide a substantial margin of safety. We also consider the Price-to-Earnings-to-Growth (PEG) ratio to ensure we are not overpaying for expected growth.</li> </ul> <p>Three pillars of outperformance - Growth, Research and Risk management. Combine Fundamental Research with Technical indicators. Our process for performing Fundamental Research as follows:</p> <p><b>a. Idea Generation</b></p> <ul style="list-style-type: none"> <li>● Screens: Proprietary screens that combine capital efficiency and growth</li> <li>● Other fund portfolios: Monitor funds with similar philosophy for new ideas</li> </ul>
--	---

- Scuttle Butt approach: e.g. Thyrocare, CCL Products – brands that are far too apparent

**b. Research Process**

- Resources include: Annual and quarterly reports, management interviews, conference-call transcripts and sell-side research
- Digest all publicly available information including annual reports, sell-side research etc.
- Work with the best analyst on the Street for a company
- Follow it up with a call with management
- Focus on customer/channel checks to understand customer feedback

**c. Working Style**

- Operating analyst: Work with a part time industry expert for better commercial diligence e.g. Pharma with an operating expert
- Research access: Identify the best analyst for a stock
- Strong focus on channel checks
- Overlay quant techniques to enhance alpha

**d. Buying and Selling Strategy**

We believe that significant wealth is created during market downturns. We use market volatility to our advantage by accumulating exceptional small-cap stocks when they are undiscovered or undervalued due to market-wide pessimism.

Buying Strategy: Maximum weight in a single security - 10%

Selling Strategy: 1. Sell when any disruption occurs in the business model or 2. Sell due to unforeseen events (regulatory or otherwise) or 3. Sell when earnings growth tapers below 15%. or 4. Sell due to extreme valuations

Allocation of portfolio across types of securities	<ul style="list-style-type: none"> <li>● <b>Strategic Allocation:</b> The portfolio will be an equity-focused strategy, with a flexible cash position to capitalize on opportunities.</li> <li>● <b>Timing:</b> Capital deployment will be patient and gradual, typically taking upto 6 months for a full allocation to be made, given the nature of the small-cap market.</li> <li>● <b>Benchmark:</b> The scheme will be benchmarked against the <b>S&amp;P BSE 500 TRI Index</b></li> </ul>
Portfolio construction	<p>Invest in market leaders showing:</p> <ul style="list-style-type: none"> <li>- higher FCF yield – higher than average in terms of longevity, predictability, profit margins, return on operating capital, conversion of profits to cash</li> <li>- high return on capital employed</li> <li>- show resilience through business cycles</li> </ul>
Timing	<p>Bias for buying during maximum pessimism/ early stages of recovery. - Slower deployment of capital – typically takes upto 6 months</p>
Fundamental filters	<p>Every company has a lifecycle. Understanding a company’s high profit-growth phase and its longevity is key to maximizing returns. Earnings is the most important variable for increasing its value. Our stock selection process must fulfil the following criteria:</p> <ul style="list-style-type: none"> <li>● Positive Revenue, EBITDA &amp; PAT CAGR over the last 5 Years.</li> <li>● Stable/improving margins during this period.</li> <li>● Return of Equity &gt; 18%</li> <li>● Return on Capital Employed &gt; 15%</li> <li>● Debt-to-Equity &lt; 0.75</li> <li>● Healthy FCFF generation; CFO generation in case of fast-growers</li> <li>● Short(er) cash conversion cycle</li> </ul> <p>The above filters are absolutely necessary. If they are not met or are not likely to be met in near future, in our opinion, we would stay away and monitor the story, no matter how exciting it is.</p>
Research Approach	<ul style="list-style-type: none"> <li>● Industry Analysis (Porter 5 / PESTLE Analysis)</li> <li>● Company Analysis (About the management)</li> <li>● Company Analysis (Timeline – Historical and forward-looking questions)</li> <li>● Company Analysis (Valuation metrics)</li> </ul>

Appropriate Benchmark to compare performance and basis for choice of benchmark	S&B BSE 500 TRI. Basis for selection - Our Portfolio will consist largely of companies – small-cap and micro-cap (under market capitalization of INR 30,000 crores). We have chosen S&P BSE 500 TRI as the benchmark index among the given indices as it comprises top 500 stocks covering around 90% of total market capitalization and hence is more representative of overall market conditions.
Indicative Tenure or investment Horizon	Short-term bucket - 3 - 6 months Long-term holdings - 2-3 years
Risks associated with the Investment Approach	<p>Investing in small /micro-caps involves <b>higher risk</b> due to <b>volatility</b> and <b>lower liquidity</b> compared to large-cap stocks. Investing in small-cap companies involves higher risks, including market risk, liquidity risk, and company-specific risk. We manage these risks through the following measures:</p> <p><b>Liquidity Risk- Active monitoring and strategic position sizing</b> to ensure the ability to exit without significant price impact.</p> <p><b>Concentration Risk - Rigorous due diligence and continuous risk assessment</b> of management and business fundamentals.</p> <p><b>Company-Specific Risk - Portfolio diversification</b> across multiple sectors and business models within the small-cap universe.</p> <p>Additionally we manage these risks through the following measures:</p> <ol style="list-style-type: none"> <li>1. <b>Minimum Market Capitalization:</b> We will invest in companies with a minimum market capitalization of approximately \$10 MM (~INR 100 crores).</li> <li>2. <b>Portfolio Concentration:</b> The portfolio will be focused, with a maximum of 35 positions.</li> <li>3. <b>Position Sizing:</b> The maximum allowable position in a single stock will be capped at 10%.</li> <li>4. <b>Cash Allocation:</b> We will maintain the flexibility to hold up to 50% of the portfolio in cash if market conditions are unfavorable or a sufficient number of compelling opportunities are not available.</li> <li>5. <b>Diversification:</b> The portfolio will be diversified across various sectors to minimize concentration risk.</li> </ol>

Other Salient Features	<p>Maximum wealth compounders</p> <p>We advise our clients on investing in stable businesses with a track record of excellence in capital allocation, governance, management bandwidth and ethical conduct.</p> <p>We focus on companies with a steady business growth, high capital efficiency and cash generation.</p> <p>We follow a disciplined and a patient approach to investing irrespective of market cycles and complete alignment of interests with our partners and stakeholders.</p>
------------------------	---

### FORM C

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

<b>Name</b>	<b>Courser Park Advisors LLP</b>
<b>Address</b>	<p>Registered address - C 1402, G Crop Residencies, 115 ST bed Layout, Opp. Nirguna Mandir, Koramangala I Block, Bangalore - 560034, KARNATAKA, India</p> <p>Correspondence address – “Jai Ganesh” situated at No 633, IVth Cross 100 Road III Block Koramangala, BANGALORE- 560034, KARNATAKA India.</p>
<b>Phone</b>	+91 8041735687

<b>Email</b>	<a href="mailto:gayathri@courserpark.com">gayathri@courserpark.com</a>
--------------	--

We confirm that:

- (i) the Disclosure Document forwarded to SEBI is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by SEBI from time to time;
- (ii) the disclosures made in the Document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us / investment through the Portfolio Manager; Information updated in Part II Dynamic section of the Disclosure documents is true, fair and correct;
- (iii) the Disclosure Document has been duly certified by an independent Chartered Accountant, as on ..... The details of the Chartered Accountants are as follows:
  - Name of the Firm :
  - Registration Number :
  - Proprietor :
  - Membership Number :
  - Address :
  - Telephone Number :

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

**For and on behalf of Courser Park Advisors LLP**

Mr. Jagarlapudi Srirama Krishna Chaitanya  
 Designation: Principal Officer  
 Date: 02<sup>nd</sup> February 2026  
 Place: Bengaluru