



SHAH KAPADIA & ASSOCIATES

CHARTERED ACCOUNTANTS

Office No. 328, 3rd floor, Champaklal Industrial Estate, Plot No. 105,
Sion Koliwada Road, Sion East, Mumbai 400022.

Tel No: 022-49741224 | Web: www.theSKA.in | Email: SKA@theSKA.in

CERTIFICATE FOR DISCLOSURE DOCUMENT

1. Introduction:

This certificate is issued pursuant to Regulations 22 of the Securities and Exchange Board of India (“SEBI”) (Portfolio Managers) Regulations, 2020, (‘the Regulations’) and at the specific request of A C Choksi Share Brokers Private Limited (SEBI Reg. No. INP000004730) having its registered office at “2nd Floor, I.T.T.S House, 33 Shree SaiBaba Marg, Kalaghoda, Fort, Mumbai 400 001”. As informed by the company, this certificate needs to be submitted to SEBI and the Portfolio Management Service Clients.

2. Management’s Responsibility:

The management of the Company is responsible for preparation of the attached Disclosure document in accordance with the Regulations.

3. Our Responsibility:

Our responsibility is to issue the certificate based on our review which is primarily limited to inquiries of the Company’s personnel, tracing the financial information from the audited financial statements for the year ended 31st March 2020, 31st March 2021 and 31st March 2022, previous disclosure document submitted to SEBI, other relevant records, the information, explanations and representations furnished by the Management. We have relied upon the representation given by the Management about the penalties or litigations against the Portfolio Manager mentioned in the Disclosure Document.

The Disclosure made in the document is made on the model disclosure document as stated in Schedule V of Regulation 22 of the Securities and Exchange Board of India (“SEBI”) (Portfolio Managers) Regulations, 2020.

We have conducted our examination of the Statement in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

We have complied with the relevant applicable requirements of the standards on Quality Control (SQC) 1, Quality Control for Firms that Performs Audits and Reviews of Historical Financial Information, and Other Assurance and Related Services Engagements.



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4. Opinion:

Based on the review of the attached Disclosure Document, we hereby certify that the disclosures made in the disclosure document dated 25.08.2023 are true, fair and adequate to provide essential information about the portfolio services in a manner to assist and enable the investors in making informed decision for engaging a Portfolio Manager.

Restriction on use:

The certificate is addressed to and provided to SEBI and the Portfolio Management Service Clients solely for the purpose of providing essential information about the portfolio services in a manner to assist and enable the investors in making informed decision for engaging a Portfolio Manager and should not be used by any other person or for any other purpose.

Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come without our prior consent in writing.

Place: Mumbai

Date: 25-08-2023

UDIN: 23123349BGULPU2119

For Shah Kapadia & Associates
Chartered Accountants



S. J. Kapadia

CA Samir Kapadia

Partner

Membership No: 123349

FRN: 132378W



A C Choksi

DISCLOSURE DOCUMENT

Updated up August 2023

Portfolio Manger
A. C. Choksi Share Brokers Private Limited

2nd Floor, I.T.T.S House, 33 Shree Saibaba Marg, Kalaghoda, Fort. Mumbai 400 001
Tel.: (022) 6159 5100 CIN: U67120MH1997PTC112510
Email: pms@acchoksi.com Website: www.acchoksi.com

DISCLOSURE DOCUMENT FOR PORTFOLIO MANAGEMENT SERVICES

(As per the requirement of Schedule V of Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulation, 2020)

(i) The Document is 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.

(ii) The purpose of this 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 A. C. Choksi Share Brokers Private Limited as a Portfolio Manager.

(iii) 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. Clients may also wish to seek further clarifications after the date of this Document from the Portfolio Manager.

The latest Disclosure Document is placed on the below Link –

http://www.acchoksi.com/PMS_Services.asp

(iv) All the intermediaries like Stock Broker and Depository Participants involved in the scheme are registered with SEBI (v) A. C. Choksi Share Brokers Private Limited is permitted to provide Portfolio Management Services pursuant to its registration as a portfolio manager with SEBI vide Registration No.: **INP 000004730** dated **July 07, 2015** under the Regulations.

(vi) Details of Principal Officer is as follows:–

Name of the Principal Officer: Mr. Ashvin C Choksi
Phone number: (022) 6159 5100
E-mail address: pms@acchoksi.com

(vii) The disclosure document is dated **25 August 2023**.

PORTFOLIO MANAGER**A. C. Choksi Share Brokers Private Limited**

2nd Floor, I.T. T.S House,
33 Shree SaiBaba ,marg, Kalaghoda, Fort.
Mumbai 400 001
Tel.: + 91 22 6159 5100
Web: www.acchoksi.com
Email: pms@acchoksi.com

PRINCIPAL OFFICER**Mr. Ashvin Chimanlal Choksi**

2nd Floor, I.T. T.S House,
33 Shree SaiBaba Marg, Kalaghoda, Fort. Mumbai 400 001
Tel.: + 91 22 6159 5101
Email: acchoksi@acchoksi.com

AUDITORS**J. K. Shah & Co.**

505 AMAN CHAMBERS
OPERA HOUSE
NEAR TEA VILLA
MUMBAI 400 004
TEL. : 4022 5581
4022 5582
Email: info@jkshah.co.in

Form C

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

Name of Portfolio Manager: A. C. Choksi Share Brokers Private Limited

Address: 2nd Floor, I.T.T.S House, 33 Shree SaiBaba Marg, Kalaghoda, Fort.
Mumbai 400 001
Tel.No.: +91 22 6159 5100
Email: pms@acchoksi.com

We confirm that:

1. The Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
2. The disclosures made in the document are true, fair and adequate to enable the investor to make a well informed decision regarding entrusting the management of the portfolio to us/investment in the Product of Portfolio Management Services;
3. The Disclosure Document has been duly certified by Shah Kapadia & Associates, Chartered Accountants, Partner: CA. Samir Kapadia, Membership No. 122349, Firm Reg. No. 132378W having its office at 328, Champaklal Industrial Estate, Plot No. 105, Sion Koliwada Road, Sion (East), Mumbai 400022.

For A. C. Choksi Share Brokers Private Limited

Ashvin Chimanlal Choksi
Principal Officer
**2nd Floor, I.T.T.S House,
33 Shree SaiBaba Marg, Kalaghoda, Fort. Mumbai 400 001**

**Date: 25 August 2023
Place: Mumbai**

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Date: 25 August 2023

Place: Mumbai

1. Disclaimer

The particulars disclosed in disclosure documents have been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and filed with Securities Exchange board of India (SEBI). This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the Document.

2. Definitions

Unless the context or meaning thereof requires otherwise, the following expressions shall have the meaning assigned to them hereunder respectively: -

- **"Act"** means the Securities and Exchange Board of India, Act, 1992 (Act No. 15 of 1992).
- **"ACCSBPL"** means A C Choksi Share Brokers Private Limited a private limited company incorporated under the provisions of the Companies Act, 1956 and having its registered office at 2nd Floor, I.T.T.S House, 33 Shree SaiBaba Marg, Kalaghoda, Fort. Mumbai 400 001 (India).
- **"Agreement"** means the Discretionary Portfolio Management Services Agreement, or the Non- Discretionary Portfolio Management Services Agreement, or the Investment Advisory Services Agreement, or the Portfolio Management Services Agreement, as the case may be, entered into between the Portfolio Manager and the Client in terms of Regulation 14 and schedule IV of SEBI (Portfolio Managers) Regulations, 1993 and SEBI (Portfolio Managers) Amendment Regulations, 2002 issued by the Securities and Exchange Board of India and shall include all schedules and annexures attached thereto and shall also include all modifications, alterations, additions or deletions made thereto in accordance with the terms thereof.
- **"AML Laws"** shall mean Prevention of Money Laundering Act, 2002, the Rules issued there under and the guidelines/circulars issued by SEBI thereto, as amended from time to time.
- **"Application"** means the application made by the Client to the Portfolio Manager to avail of the Portfolio Management Services from the Portfolio Manager. Upon execution of an Agreement between the Portfolio Manager and the Client, the Application shall be deemed to form an integral part of the Agreement. Provided that, in case of any conflict between the contents of the Application and the provisions of the Agreement, the provisions of the Agreement shall prevail.
- **"Assets"** means (i) the Portfolio and / or (ii) the Funds, details of which are set forth in the respective Agreements.
- **"Asset under Management (AUM)"** for each individual client on the date of valuation shall mean sum of market value of all Investments including equities, mutual fund units and other investments, bank balance and other receivables as reduced by sum total of accrued liabilities.
- **"Board"** means the Securities and Exchange Board of India established under sub-section (1) of Section 3 of the Securities and Exchange Board of India Act.
- **"Bank"** means scheduled commercial bank, with which the Portfolio Manager will open and operate the Bank Accounts for the purposes of the Portfolio Management Services.
- **"Client"** or **"Investor"** means anybody corporate, partnership firm, individual, HUF, association of person, body of individuals, trust, statutory authority, or any other person who registers with the Portfolio Manager for availing the services of portfolio management.
- **"Custodian"** means Custodian/Depository Participant as may be appointed by the Portfolio Manager, from time to time, for custody of securities of the Client and to perform such other functions like keeping track of corporate benefits associated with the securities etc.
- **"Discretionary portfolio manager"** means a portfolio manager who exercises or may, under a contract relating to portfolio management, exercise any degree of discretion as to the investments or management of the portfolio of securities or the funds of the client, as the case may be;
- **"Depository Account"** means any account of the Client or for the Client with an entity registered as a depository participant as per the relevant regulations. .
- **"Depository Participant"** shall mean any person with whom the Securities of the Client in dematerialized form may be held in an account opened for that purpose pursuant to the

Communication given by the Client from time to time and pursuant to such agreement, understanding or writing as may be executed between the Client and the Depository Participant or executed between Client and the Depository Participant.

- **“Disclosure Document”** means this Disclosure Document prepared and issued by ACCSBPL in accordance with the terms laid under Regulation 14 (2) (a) and Schedule V of the SEBI (Portfolio Managers) Regulation, 1993
- **”Financial year”** means the year starting from 1st April and ending on 31st March the following year.
- **Funds”** means the monies placed by the Client with the Portfolio Manager and managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the proceeds of the sale or other realisation of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the same is managed by the Portfolio Manager.
- **“Funds managed”** means the market value of the Portfolio of the Client as on date.
- **“NAV” or “Net Asset Value” or “Net Asset Value of the Portfolio”** shall mean the Market Value of the assets in the Portfolio consisting of the aggregate of (a) the amount of Cash in the Bank Account; and (b) the market value of Client Securities.
- **‘Non-Discretionary Portfolio Management Services’** means a Portfolio management Services under which the Portfolio Manager, subject to express prior instructions issued by the Client from time to time in writing, for an agreed fee structure and for a definite described period, invests in respect of the Client’s account in any type of security entirely at the Client’s risk and to ensure that all benefits accrue to the Client’s Portfolio.
- **‘NRI’** means a non-resident Indian as defined under the Foreign Exchange management Act, 1999.
- **‘Portfolio’** means the holdings of securities managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes any further securities placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, securities acquired by the Portfolio Manager through investment of Funds and bonus and rights shares in respect of securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.
- **“Portfolio Manager” (PM)** means A C Choksi Share Brokers Private Limited (ACCSBPL), who has obtained certificate from SEBI to act as a Portfolio Manager under Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993, vide registration no. INP 000004730.
- **“Principal Officer”** means a person who has been designated as Principal Officer by the Portfolio Manager as required under the SEBI (Portfolio Managers) Regulations, 1993 and who will be responsible for the activities of Portfolio Manager.
- **“Regulations”** means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993 and shall also mean to refer to Clause 18 of Chapter III of SEBI (Investment Advisers) Regulations 2013, where applicable.
- **“Foreign Institutional Investor (FII)”** shall have the meaning defined under SEBI (Foreign Institutional Investor) Regulations, 1995.
- **“SEBI”** mean the Securities and Exchange Board of India set up under the Securities and Exchange Board of India Act, 1992.
- **“Securities”** includes: “Securities” as defined under the Securities Contracts (Regulation) Act, 1956 as amended from time to time and includes:
 - Shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature in or of any incorporated company or other body corporate;
 - derivative;
 - units or any other instrument issued by any collective investment scheme to the investors in such schemes;
 - security receipt as defined in clause (zg) of section 2 of the Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act,2002;

- Units or any other such instrument issued to the investors under any mutual fund scheme;
- (vi) Government securities;
- such other instruments as may be declared by the Central Government to be securities; (viii) rights or interest in securities;
- Exchange Traded Funds; and
- Liquid Funds.

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

3. Description

i) History, Present Business and Background of Portfolio Manager

A C Choksi Share Brokers Private Limited (ACCSBPL) is a company registered under the Companies Act, 1956 vide Corporate Identity Number: U67120MH1997PTC112510 dated December 17, 1997 having its Registered Office at 2nd Floor, I.T.T.S House, 33 Shree SaiBaba Marg, Kalaghoda, Fort. Mumbai 400 001 (India).

ACCSBPL operates in the Equity, Cash and Derivatives segments of both NSE and BSE. We are a member of the National Stock Exchange of India Ltd (NSE), Bombay Stock Exchange Ltd (BSE) segment. We are Depository Participant at Central Depository Services (India) Ltd.(CDSL).ACCSBPL is also AMFI registered Mutual Fund Distribution House. We also provide Internet Trading and offer IPO opportunities.

ACCSBPL had obtained a certificate from SEBI dated July 07,2015 to act as a Portfolio Manager under Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993 vide registration no. **INP 000004730** and are complied with the renewal procedure as regulated by SEBI

In addition ACCSBPL conducts research activities related to economic research, result expectations, derivative strategies etc It is well-respected Stock Broking House with strong position in Institutional Broking. The transparent business practices and research based investing and state of the art technology have enabled us to serve Institutional clients with full expertise. It is highly capitalized Organization in terms of net worth to suit its institutional client's needs. Our Institutional Business Desk has relationships with all leading Financial Institutions and is regarded as a house with a "Strong Market Research Capabilities". Our retail business desk provides investment solutions to all investors through its Branches & Network Partners. We find our strength in team of talented and confident individuals from diversified backgrounds. Qualified professionals under the able leadership of Promoters carry outcore functions. We believe in continuous training and adoption of best management practices.

ii) Promoters of Portfolio Manager, Director and their Background:

The details of the promoters and directors of ACCBPL are given below:

1) **Mr. Ashvin C Choksi** (Director - A. C. Choksi Share Brokers Private Limited MS (EE) Cleveland State University, U.S.A. Chairman. Mr. Ashvin Choksi is Promoter of ACC. He has experience of more than 32 years. He started the business in 1984 along with Co-Promoter Dipika Choksi. Strategy, Systems, IT & Business administration are his forte. Honesty, transparency, integrity, client goodwill form the core of his business practice. His strong belief of service to the client is not only practiced by him but one can see his continuous efforts to inculcate similar values in employees of the organization.

2) **Mrs. Dipika A Choksi** (Director - A. C. Choksi Share Brokers Private Limited BA (Economics) Bombay University, 2 yrs (child psychology) Miami U.S.A, Director Mrs. Choksi is the Co- Promoter of ACC. Business administration, Institutional Sales, HR is her forte. Under her able guidance, ACC has achieved a strong Institutional Focus and footing. She is well respected for her balanced judgments and valuable insights to management & HR issues. She strongly believes in teamwork.

iii) Details of group Companies “ NA”

(iv) Details of Services being offered

The nature of services offered by A. C. Choksi Share Brokers Private Limited includes discretionary as per the Portfolio Manager - Client Agreement.

4. Product Offered

i) Type of Services being offered: Discretionary

Under the portfolio management services offered by A. C. Choksi Share Brokers Private Limited the funds of the Client is Managed by a team of experienced professionals comprising of strategists, technical analysts, specialists in derivative products, etc. The Portfolio Manager's Investment philosophy underlines maximizing the risk adjusted returns depending on the client's risk tolerance. In order to achieve the same, a disciplined investment approach, with adequate risk controls, has been adopted. The PMS team is assisted by equity research team whose Sole objective is to undertake bottoms -up research and identify stock ideas to be included in our model portfolio. For Discretionary Portfolio Management Services means Portfolio management Services where a Portfolio Manager exercises or may, under a contract relating to Portfolio Management, exercise any degree of discretion as to investment or management of the portfolio of securities or the funds of the Client, as the case may be.

STRATEGY NAME : - “MONEY MULTIPLIER”

Type of portfolio	Open Ended Discretionary Portfolio
Investment Objective	The objective of portfolio management is to create wealth for clients by prudently investing in quality stocks for long term. The portfolio will invest in mix of large cap and mid -cap companies. In large cap stocks the focus will be to invest in value companies. In mid and small cap companies the intent is to capitalize on the growth opportunity company provides over long term.
Investment Strategy	Active monitoring of multi-cap stocks with a passive approach to investment. Focus will be on business outlook of companies invested and profit booking call will be taken accordingly. In the small and mid-cap stocks the focus is to identify emerging trends and companies which stand to benefit from such opportunities. In large cap focus is to invest on principles of value investing for long term. Risk Mitigation: Portfolio will be balanced with not more than 22-25 companies at any point of time. It will have prudent balance between large cap, Small Cap and mid-cap stocks. Cash not deployed will be parked in liquid funds or any other similar asset for immediate investments.
Benchmark	BSE-500

Investor Profile

Ideally suited for long-term equity investors who seek the comfort of high safety margin with an investment horizon of 36 Months.

ii) Minimum amount of Investment

The minimum investment amount shall be as decided between the client and ACCSBPL subject to minimum of ` 50,00,000.00/-

iii) Policies for investments in associates / group companies & Transactions with Associate group Company

The Portfolio Manager may utilize the services of the Sponsor, Group Companies and / or any other subsidiary or Associate company of the Sponsor established or to be established at a later date, incase such a company is in a position to provide requisite services to the Portfolio Manager. The Portfolio Manager will conduct its business with the aforesaid companies (including their employees or relatives) on commercial terms and on arms length basis and at mutually agreed terms and conditions and to the extent permitted under SEBI Regulations after evaluation of the competitiveness of the pricing offered and the services to be provided by them.

5. Penalties & Pending litigation

There have been no instances of penalties imposed or directions issued by the Board or any regulatory agency under the Act, Rules or Regulations for any economic offence or for violation of any securities laws or for any deficiency in the systems and operations of the Portfolio Manager. There are no material legal proceedings, civil or criminal initiated against the Portfolio Manager, its directors, principal officer or employee under the Act, Rules or Regulations.

Sr. No.	Particulars	Status
1	All Cases of penalties imposed by the board or the directions issued by the Board under the Act or Rules or Regulations made there under	NIL
2	The nature of penalty/ direction	Not Applicable
3	Penalties imposed for economic offence and / or for violation of any securities laws	NIL
4	Any pending material litigation / legal proceedings against Manager / key personnel with separate disclosure regarding pending criminal cases, if any	NIL
5	Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory agency	NIL
6	Any enquiry / adjudication proceedings initiated by the Board against the Portfolio Manager or its directors, Principal Officer or employee or any person directly or indirectly connected with the Portfolio Manager or its directors, Principal Officer or employee, under the act or rules or regulations made there under	NIL

6. Risk Factor Involved

- i. Securities investments are subject to market risk and there is no assurance or guarantee that the objectives of the investment will be achieved.
- ii. The investment, value of the Portfolio may go up or down depending upon the factors and forces affecting stock markets.
- iii. The past performance of the portfolio manager/fund manager does not indicate the future performance.
- iv. The portfolio manager is neither responsible nor liable for any losses resulting from the operations of the Portfolio Schemes.
- v. The decision is on investments by the Portfolio Manager may not always result in profits.
- vi. The investments made by the Portfolio Manager are subject to risks arising from the investment approach, the investment objective, investment strategy and asset allocation.
- vii. The investment made by the Portfolio Manager is subject to risk arising out of non-diversification if any.
- viii. The Portfolio manager may invest in non-publicly offered debt securities and or unlisted equities. This may expose the portfolio to liquidity risks.
- ix. The investments of the fund and resultant investment are subject to a very wide range of risks which include amongst others and by one way of illustration loss in value of investments due to, inter alia:
 - a. Overall economic slowdown, unanticipated bad corporate performance, environmental or political problems, changes in monetary or fiscal policies (including changes in tax laws and rates), changes in government policies and regulations with regards to industry and exports.
 - b. Act of state, sovereign action, Acts of God, Acts of war, civil disturbance.
 - c. Delisting or market closure, relatively small number of scrip's accounting for a large proportion of trading volume.
- x. The liquidity of the investments is guided and inherently restricted by trading volumes in the securities in which the Portfolio Manager may invest. This may /limit the Portfolio Manager's ability to freely deal with securities in the Portfolio.
- xi. Reinvestment Risk: Since interest rates are vary from time to time, interim cash flows from interest-bearing debt instruments may be reinvested at a lower yield than the original yield,
- xii. The Portfolio Manager may, considering the overall level of risk of the portfolio, invest in lower rated/unrated securities that offer higher yield, which may increase the risk to the portfolio. Such investments shall be subject to the scope of investments laid down in the executed Agreement.
- xiii. In any Plan which may invest predominantly in schemes of Mutual Funds - Debt and/or equity and other instruments, its performance may depend on that of the underlying schemes of Mutual Funds. Any change in investment policies or fundamental attributes of underlying schemes could adversely affect performance of the portfolio. Also, for a sharp increase in the stock market during the period of investment, the return of the portfolio might be less than that given by direct investment of similar amounts in equities.
- xiv. While securities that are listed on the stock exchange carry lower liquidity risk, the ability to sell these investments is limited by the overall trading volume on the stock exchanges. Money market / debt securities while fairly liquid, lack a well-developed secondary market, which may restrict the selling ability of the Portfolio Manager and may lead to investments incurring losses till the security is finally sold.
- xv. Limited liquidity in the market, settlement risk, impeding readjustment of portfolio composition, highly volatile stocks markets in India. There is also risk of total loss of value of an Asset, possibilities of recovery of loss in investments only through expensive legal process. Such loss

could arise due to factors which by way of illustration, include, default or non-performance of a third party, company's refusal to register a security due to legal stay or otherwise, disputes raised by third parties. Misjudgment by the portfolio manager or his incapacitation due to any reason however remote is also a risk. Thus the investment in Indian Capital Market involves above average risk for investors compared with other types of investment opportunities. Investments will be of a longer duration compared to trading in securities. There is a possibility of the value of investment and the income there from falling as well as rising depending upon the market situation.

- xvi. The portfolio manager shall take all reasonable steps to invest the funds in a prudent manner such decision shall not always prove to be profitable or correct. Consequently, any loss arising from such decision shall be a risk assumed by the client.
- xvii. The Portfolio Manager may appoint advisors and consultants for the purpose of investment advice/recommendation. The advice rendered by the advisor or consultant may or may not be followed by the Portfolio Manager. The appointment of such an advisor or consultant and the advice received, whether followed or not, may or may not give the desired result sought to be achieved. If the advice rendered by the consultant is not appropriate or is not executed in time or even if the advice is satisfactory and successfully implemented but due to market conditions, the desired results may not be achieved.
- xviii. The Portfolio Manager is not guaranteeing or assuring any return on investment.

7. Client Representation

(i)

Financial Year	No. of Clients	Category of Clients		Funds managed	Discretionary/ (if available)
		Associ	Others		
		Compa			
Ended March 31, 2023	32	0	32	29.93	Discretionary
Ended March 31, 2022	59	0	59	61.35	Discretionary
Ended March 31, 2021	67	0	67	55.15	Discretionary
Ended March 31, 2020	76	0	76	36.49	Discretionary

7.(ii) Disclosure In Respect Of Transactions with Related Parties for Portfolio Management Services.

Disclosure in respect of transactions with related parties as per Accounting Standard 18 Issued by the Institute of Chartered Accountants of India are not made as the same is not applicable to the Portfolio Manager.

The Portfolio manager is a member of the BSE (BSE), National Stock of India Limited (NSE). The Portfolio manager is also a registered depository participant with CDSL. For the purpose of executing transactions of purchase and sale of securities the Portfolio manager would transact through the membership held by the Portfolio Manager in NSE and BSE as mentioned above. Brokerage and other statutory charges and Exchange transaction charges etc... will be charged for such transactions as per clause 11.

8. Financial Performance of Portfolio Manager (Based on audited financial statements)

	FY – 2022 (Amount in Rupees)	FY–2021 (Amount in Rupees)	FY–2020 (Amount in Rupees)
Gross Income	38,568,040	31,103,056	25,751,203
Expenses	28,966,990	23,166,144	29,573,553
Profit / (Loss) before Tax	9,601,050	7,937,611	-3,822,350
Provision for Taxation	3,830,230	-138,169	584,905
Profit / (Loss) after Tax	5,770,830	7,799,442	-3,237,445
Equity Capital	6,00,00,000	6,00,00,000	6,00,00,000
Free Reserves	60,026,340	54,255,506	46,456,064.

9. Portfolio Management Performance

Performance of the portfolio manager for the last three years, Regulations

In case of Discretionary Portfolio Manager disclosure of performance indicators calculated using “Time weighted Rate of Return “method. In terms of 22 of the SEBI (Portfolio Managers) Regulation 2020.

A C Choksi has been managing the investment of portfolio keeping Benchmark

MONEY MULTIPLIER	Period#	Portfolio Performance (%), Net of all fees and expenses and taxes (if any)	Benchmark Performance (%)
(Portfolio Inception Date: July 07, 2015) Benchmark Index: BSE 500	2022-2023	-16.42	-2.26
	2021-2022	25.09	20.88
	2020-2021	69.06	76.62

The portfolio manager shall receive Fees for its Services and reimbursement of all costs and expenses. A portfolio Management Fess as is more particularly described in the Scheduled attached herewith shall be paid by the Client to the Portfolio Manager.

10. Audit Observation:

Audit Observations by the statutory auditors of the Company for the preceding 3 years are as below:

Financial Year	Audit Observation
2022-2023	NIL
2021-2022	NIL
2020-2021	NIL

11. Nature of Cost & Expenses Include

The following are indicative types of expenses. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Services Agreement and the agreements in respect of each of the services availed at the time of execution of such agreements.

- i. **Management Fees:**
Management Fees relate to the portfolio management services offered to Clients. The fee may be a fixed charge or a percentage of the quantum of funds managed or linked to portfolio on return achieved or a combination of any of these.
- ii. **High Water Mark Principle:**
High Water Mark shall be the highest value that the portfolio/account has reached. Value of the portfolio for computation of high watermark shall be taken to be the value on the date when performance fees are charged. For the purpose of charging performance fee, the frequency shall not be less than quarterly. The portfolio manager shall charge performance based fee only on increase in portfolio value in excess of the previously achieved high water mark.
- iii. **Custodian/Depository Fees:**
The charges pertaining to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization, rematerialization and other charges in connection with the operation and management of the depository accounts.
- iv. **Registrar and Transfer Agent Fee:**
Charges/Fees payable to registrar and transfer agents in connection with effecting transfer of securities, including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges, etc.
- v. **Brokerage and transaction costs:**
The brokerage charges and other charges like service tax, securities transaction tax, service charges, stamp duty, transaction costs, turnover tax, exit and entry loads on the purchase and sale of shares, stocks, bonds, debt, deposits, units and other financial instruments as may be imposed from time to time.
- vi. **Certification and Professional Charges:**
Charges payable for outsourced professional services like accounting, taxation and legal services, notari zation, etc. for certification, attestation required by bankers, intermediaries and regulatory authorities.
- vii. **Fund Admin charges:**
The charges pertaining to administration of the client's portfolio
- viii. **Profit Sharing:**
The Portfolio manager may have a profit sharing arrangement with the clients based on the High Water Mark principle.
- ix. **Incidental Expenses:**
Courier charges, stamp duty, service tax, postal stamps, opening and operation of bank accounts, etc.
- x. **Exit Charges:**
Portfolio Manager may Charge exit Charges / Early withdrawal fee as may be agreed upon between Portfolio Manager and Clients as per the terms and conditions of a particular portfolio product.

- xi. Any other incidental and ancillary charges:
All incidental and ancillary expenses not recovered above but incurred by the Portfolio Manager on behalf of the client shall be charged to the Client.

All fees and charges shall be levied on the actual amount of clients' assets under management. In case of interim contributions/ withdrawals by clients, performance fees may be charged after appropriately adjusting the high water mark on proportionate basis.

The fees charged to the client for PMS come under the ambit of "fees for technical services" under Section 194J of the Income Tax Act, 1961("the Act"). As the section calls for withholding tax, the client deposits with the competent authority the tax plus applicable surcharge and education cess on the fees that the client pays to the Portfolio Manager. The same is then reimbursed to the client by the AMC by way of cheque / RTGS.

Manner of payment:

Client shall pay by way of cheque/ DD/ Debit to the client portfolio account, as per the respective fee schedule applicable to the portfolio services opted by the client.⁴¹

Schedule of Fees

A. Portfolio Manger Services Charges:

Particulars	Charges
Entry Load	NIL
Management Fee	"0 to 1% " per annum charged at 25bps every quarter on Assets under Management (AUM)
Profit Sharing	Portfolio Manager shall take 15% of Profits earned in the Portfolio as his fee. At time of fees being raised from Profit in portfolio, the residual portfolio shall always be MTM positive
Exit Load	5%, 3%, 1% respectively in Years 1, 2 and 3
Brokerage Cost (Addition of this details)	0.20% and other statutory charges and Exchange transaction charges etc...

B. Custody Services:

Particulars	Charges
Annual Custody Charges (On average monthly Assets Under Custody)	0.06% per annum on Average AUC
Clearing, Settlement & Subscription Charges: <input type="checkbox"/> Equity (cash markets) <input type="checkbox"/> Mutual funds <input type="checkbox"/> Debt <input type="checkbox"/> Derivatives (Futures) <input type="checkbox"/> Derivatives (Options)	ALL INR 20 per transaction for All Transaction
Taxes, Regulatory Levies	Actual, as applicable
SEBI Fee	0.0005% on AUC P.A.
Depository Charges	As per Section C
Out of Pocket Expenses (viz charges for CA certificate, stamp paper costs consultant fee, courier charges, etc.)	To be reimbursed on actual basis
Billing Cycle	At quarterly intervals, to be started from date of Agreement with the Client
Payments	Legitimate Payments (Under PMLA Regulations)
Validity	Good until mutually agreed for revised terms

C. Depository Charges:

Particulars	Charges
A/c Opening Charges	NIL
Agreement & Stamp Paper charges	At Actual
Annual Maintenance Charges	INR 1000 P.A
Transaction Charges Market/ Off Market instructions	INR 20 Per debit transaction
All statutory charges levied by regulators, including Service Tax	At Actual
Out of Pocket (viz stamp papers, courier Charges, etc.)	At Actual
Validity	Good until mutually agreed for revised terms

Exchange Charges	
Securities Transactions Tax (0.1%)	0.10%
GST on Brokerage & transaction Charges 18 % (CGST 9% SGST 9% IGST 18%)	18%
Exchange Transactions Charges (Per Lac Rs.3.45)	0.00345%
Stamp Duty (0.015%) on Buy Transaction	0.015%
SEBI TOT charges (Par crore Rs 20 (0.0002%)	0.0002%

12. Tax Implication

The Client shall be liable for all tax liabilities on income arising out of his investments in the portfolio management services or advisory services. The Client is best advised to consult his / her / their tax advisor / consultant for appropriate advice on tax treatment arising on such income.

With effect from April 1, 2020, dividend income from units of mutual funds and equity shares of domestic companies is subject to deduction of tax at source under Section 194 and 194K of the Income Tax Act. The Company records the tax deducted at source on dividend accruals in client accounts based on the information received from the respective custodians.

Tax deducted at source ('TDS') on interest / TDS on dividend received on equity shares and TDS on capital gain (for Non resident Indian clients) is shown as withdrawal from corpus. For clarification, no TDS is deducted on capital gains for resident clients and is the responsibility of the Client to pay such taxes to the authorities.

13. Accounting Policies

The following Accounting policy will be applied for the portfolio investments of Clients:

- i. In investments in Equities, Mutual funds, Exchange Traded Funds and Debt instruments will be valued at closing market prices of the exchanges (BSE or NSE as the case may be) or the Repurchase Net Asset Value declared for the relevant scheme on the date of the report or any cutoff date or the market value of the debt instrument at the cutoff date. Alternatively, the last available prices on the exchange or the most recent NAV will be reckoned. In case of structured products, the portfolio will be valued at the face value of the product until the expiry of the tenure.
- ii. Realized gains/ losses will be calculated by applying the first in / first out principle (FIFO). The Portfolio Manager and the Client can adopt any specific norms or methodology for valuation of investments or accounting the same as may be mutually agreed between them on a case specific basis.
- iii. Unrealized gains/losses are the differences in between the current market values/NAV and the historical cost of the securities.
- iv. 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. Other income like bank interest, interest on FD etc shall also be accounted on receipt basis.

- v. Bonus shares shall be recognised only when the original shares on which the bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.
- vi. Right entitlement shall be recognised only when the original shares on which the right entitlement accrues are traded on the stock exchange on an ex-rights basis.
- vii. The cost of investment acquired or purchased shall include brokerage, stamp duty and any charge customarily included in the brokers cost note/bought note.
- viii. All Expenses will be accounted on due basis whichever

The Accounting Policies and Standards as outlined above are subject to changes made from time to time by Portfolio Manager. However, such changes would be in conformity with the Regulations.

14. Client / Investor Services

- i) Details of Investor relation Officer who shall attend to the investor queries and complaints is mentioned herein below:

Name of Person	VarshaJoshi
Designation	PMS Back office Manger
Address	A C Choksi Share Brokers Private Limited 2nd Floor, I.T.T.S House, 33 Shree SaiBaba Marg, Kalaghoda, Fort. Mumbai 400 001 (India).
Telephone No.	022-6159 5100 / 022-6159 5170
E-mail	Pms@acchoksi.com

- ii) Reports available to the clients

Following are various reports will be available to the clients:

- a) Monthly reporting of holding (Includes transaction, holding value, AUM up/down)
- b) Quarterly reporting of portfolio holdings/transactions, Net-worth, ledgers etc.
- c) KYC kit including agreement & RDD will be available on website for easy access to Clients.

- iii) Grievance redressal and dispute settlement mechanism.

- a) Name, Address and telephone no. of investor relation officer who shall attend to investor queries and complaints:

Ms. Varsha Vichare

2nd Floor, I.T.T.S House, 33 Shree SaiBaba Marg, Kalaghoda, Fort.

Mumbai 400 001

Tel.: + 91 22 6159 5150

Email: pms@acchoksi.com

- b) Lodging Complaints against Intermediaries.

SEBI has launched an internet based utility called SCORES (SEBI COMPLAINTS REDRESS SYSTEM) portal to facilitate investors to lodge their complaints/grievances with SEBI against SEBI registered intermediaries. The same can be accessed by Clicking

on TAB " SEBI SCORES "on company portal <https://acchoksi.com/>

Link to access the SCORES utility is given below:

<https://www.scores.gov.in/scores/complaintRegister.html>

INVESTOR GRIEVANCE REDRESSAL MACHANISM

- i. The complaint received shall be recorded in the complaint register and the same shall be forwarded to the compliance officer with comment thereof.
- ii. The compliance officer and/ or Principle officer shall study / investigate the complaint and offer the reply to the compliant. This process shall be completed in one week.
- iii. Unresolved complaint for more than one week shall be forwarded to the whole time directors. The said complaint shall be resolved in one week of time. Hence the Complaint shall be resolved within 15 working days from the date of the receipt of the compliant.
- iv. All the complaint details along with date of receipt and date of resolution shall be recorded in separate Complaint Registered maintained for that purpose electronically or otherwise.
- v. The investor shall be advised to adopt appropriate remedy in case complaint is not resolved to his satisfaction.
- vi. The complaint registered shall be placed before the monthly meeting of the PMS department with the Whole time

Director to see whether all the complaints received are resolved or the complaints are advised to adopt appropriate remedy

The Agreement and this Document shall be governed by the laws and regulations of India. All disputes, differences, claims and questions whatsoever in relation to an agreement between a Client and the Portfolio Manager, with regards to the terms and conditions thereof, or otherwise arising in connection thereto, shall in the first place be sought to be settled by mutual discussions, failing which the same shall be referred to arbitration to be held in accordance with and subject to the provisions of the Arbitration and Conciliation Act, 1996 and any statutory modification or re-enactment thereof for the time to time. Such arbitration proceedings shall be held at Mumbai in the English language.

15) Details of investments in the securities of related parties of the portfolio manager

The details of investment of client's funds by the portfolio manager in the securities of its related parties or associates. NIL

16) Details of the diversification policy of the portfolio manager

The details of the diversification policy of the portfolio manager for the portfolio of the clients.]

Investment Objective	<p>The objective of portfolio management is to create wealth for clients by prudently investing in quality stocks for long term.</p> <p>The portfolio will invest in mix of large cap and mid-cap companies. In large cap stocks the focus will be to invest in value companies.</p> <p>In mid and small cap companies the intent is to capitalize on the growth opportunity the company provides over long term.</p>
Investment Strategy	<p>Active monitoring of multi-cap stocks with a passive approach to investment. Focus will be on business outlook of companies invested and profit booking call will be taken accordingly.</p> <p>In the small and mid-cap stocks the focus is to identify emerging trends and companies which stand to benefit from such opportunities.</p> <p>In large cap focus is to invest on principles of value investing for long term. Risk Mitigation:</p> <p>Portfolio will be balanced with not more than 22-25 companies at any point of time. It will have prudent balance between large cap, Small Cap and mid-cap stocks.</p> <p>Cash not deployed will be parked in liquid funds or any other similar asset immediate investments.</p>

Other Disclosure

We change our custodial Orbis Financial Corporation Limited to HDFC Bank.

Name and Signature of Directors

Sr. No.	Name of Director	Signature
1	Ashvin Chimanlal Choksi	<i>Ashvin C Choksi</i>
2	Dipika Ashvin Choksi	<i>Dipika A Choksi</i>

Date : 25 August 2023
Place: Mumbai

-----"I HAVE
READ AND UNDERSTOOD FEE STRUCTURE"
(To be written by the client in his own handwriting)

Signature of the Client: _____

Client Agreement & Confirmation

I/we hereby acknowledge the receipt of Disclosure Document 2 days prior to entering into an agreement with the Portfolio Manager. I also confirm my/our full understanding of Disclosure Document and Portfolio Manager – Client Agreement hereto pertaining to A C Choksi Share Brokers Private Limited.

Client Name: _____

Date: _____ Client Signature _____

For Office Use Only

Name of Official:

Signature: