

**T.RAM FINANCIAL SERVICES PRIVATE LIMITED**

**DISCLOSURE DOCUMENT FOR PORTFOLIO MANAGEMENT SERVICES**

**(As required Under Regulations 22 of SEBI (Portfolio Managers) Regulations,2020)**

1. This Disclosure Document has been filed with the Securities and Exchange Board of India along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.
2. The purpose of the Disclosure Document is to provide essential information about the Portfolio Services in a manner meant to assist and enable the investor in making an informed decision for engaging T. Ram Financial Services Pvt Ltd as a Portfolio Manager.
3. 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.
4. Please read this document carefully prior to making an investment decision and retain it for future references.
5. T. Ram Financial Services Private Limited is registered with SEBI (Reg Date 16.07.2018, the current registration is valid till 15.07.2027.) as on the date of this document and holds a Portfolio Management Service License vide Registration No. INP000006068 with SEBI, and also as a Mutual Fund AMFI Regn - ARN 98218.
6. The details of Principal Officer are as follows:

Principal Officer: **Mr. R. Subash**

Address - **T.Ram Financial Services Private Limited**

# 15, Sixth Street,  
Nandanam Extn.,  
Chennai - 600 035.

Email – [subashr@tramfsl.com](mailto:subashr@tramfsl.com)

Telephone - +91 44 24335067

**For T. Ram Financial Services Pvt. Ltd.**

**R Subash**

**(MD & Principal Officer)**

**Place: Chennai**

**FORM C**

**Securities and Exchange Board of India (Portfolio Managers) Regulation 2020**

**(Regulation 22)**

**Name of the Portfolio Manager: T.Ram Financial Services Private Limited**

**Registered office Address: # 15, Sixth Street, Nandanam Extension**

**Chennai - 600 035.**

**Phone Number: 044 – 24335067 / 9884639935**

**Email: [tramfsl@gmail.com](mailto:tramfsl@gmail.com)**

**SEBI Registration No. INP000006068**

We confirm that,

- (i) The disclosure document forwarded to Board is in accordance with SEBI (Portfolio Manager) Regulation, 2020 and the guidelines and directives issued by the Board from time to time.
- (ii) The purpose of the Document is to provide essential information about the portfolio services in a manner to assist and enable the investors in making informed decision for engaging T. Ram Financial Services Private Limited as a Portfolio Manager.
- (iii) 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,
- (iv) The Disclosure Document has been duly verified by an independent chartered accountant whose details are given below.

Name of the firm: Ramanujam & Boovarahan., Chartered Accountants

Address: 4/56, Kalpataru, Flat I-A, K.B. Dasan Road, Alwarpet

Chennai - 600018

Membership No: 027801

Phone No: 044 35654005 / 9600031713

- (v) The name, phone number, email address of the Principal officer designated by the Portfolio Manager is:

<b>Name of Principal Officer</b>	<b>R. Subash</b>
<b>Phone Number</b>	<b>044- 24335067</b>
<b>Email id</b>	<a href="mailto:tramfsl@gmail.com"><u>tramfsl@gmail.com</u></a>
<b>Address - Corporate Office</b>	<b>T.Ram Financial Services Private Limited</b> # 15, Sixth Street, Nandanam Extn., Chennai - 600 035
<b>Address - Head Office</b>	<b>T.Ram Financial Services Private Limited</b> # 15, Sixth Street, Nandanam Extn., Chennai - 600 035

## Contents

1. Disclaimer	4
2. Definitions	4
3. Description:	6
i. History, present Business and Background of the Portfolio Manager	6
ii. Promoters of the Portfolio Manager and their background:	7
iii. Details of services being offered:	7
4. Penalties, pending litigation or proceeding findings of inspection or investigations for which action have been taken or initiated by any regulatory authority:	8
5. Services Offered	8
6. Declarations	9
7. Risk Factors	9
8. Client Representation and Related Party Transactions	10
9. The Financial Performance of the Portfolio Manager	10
10. Portfolio Management Performance	
11. Nature of Expenses	10
12. Taxation	11
13. Accounting Policies	12
14. Investors Services	13
General	
Form C	14
PMS Fee Structure	15
Disclosure on Derivative	15

## 1. Disclaimer:

The contents of this Document have been prepared in accordance with the SEBI (Portfolio Manager) Regulations, 2020 as amended from time to time 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 the document.

## 2. Definitions:

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

- a. Act means the Securities and Exchange Board of India Act 1992 (15 of 1992)
- b. Agreement means agreement between Portfolio Manager and its Client and shall include all schedules and Annexures attached thereto
- c. Application means the application made by the client to the Portfolio Manager for Portfolio Management Services. Upon execution of the Agreement by the Portfolio Manager, 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 shall prevail.
- d. Assets means (i) the Portfolio and/or (ii) the Funds.
- e. Body Corporate shall have the meaning assigned to it in or under clause (11) of section 2 of the Companies Act, 2013.
- f. Bank Account means one or more accounts opened, maintained and operated by the Portfolio Manager with any of the Scheduled Commercial Banks in accordance with the agreement entered into with the Client.
- g. 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.
- h. Client/Investor means the person who enters into an Agreement with the Portfolio Manager for managing its portfolio and/ or funds.
- i. Custodian means any person who carries on or proposed to carry on the business of providing custodial services in accordance with the regulations issued by SEBI from time to time.
- j. Depository Account means one or more account or accounts opened, maintained and operated by the Portfolio Manager with any depository participant registered under the SEBI (Depositories and Participants) Regulations, 1996 in accordance with the agreement entered with the client.
- k. Discretionary Portfolio management services mean 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.
- l. Non-discretionary portfolio management services mean a service rendered to the client by the portfolio manager in accordance with the direction of the client with respect to investments or management of assets of the client.
- m. Advisory services mean a pure investment advisory service rendered to the client by the port folio manager in accordance with the requirements of the client.
- n. Disclosure Document means this document, which has been prepared with the objective of providing essential information about Portfolio Management Services of T. Ram, to enable investors in making informed decision to engage T. Ram to manage their portfolio.

- o. Financial Year means the year starting from 1<sup>st</sup> April and ending on 31<sup>st</sup> March of the following year.
- p. Funds means the monies managed by the Portfolio Manager on behalf of the Client pursuant to Portfolio Investment Management Agreement and includes the monies mentioned in the Application, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to Portfolio Investment Management Agreement, the proceeds of the sale or other realization of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the same is managed by the Portfolio Manager.
- q. Net Asset Value means the market value of assets in the portfolio including equity, debt and cash and cash equivalents.
- r. Parties mean the Portfolio Manager and the Client; and Party shall be construed accordingly.
- s. Person includes any individual; partners in partnership, central or state government company, body corporate, cooperative society, corporation, trust, society, Hindu Undivided Family or any other body of persons, whether incorporated or not
- t. Portfolio means the Securities managed by the Portfolio Manager on behalf of the Client pursuant to the Portfolio Investment Management Agreement and includes any Securities mentioned in the Application, any further Securities placed by the Client with the Portfolio Manager for being managed pursuant to the Portfolio Investment Management Agreement, Securities acquired by the Portfolio Manager through investment of Funds and bonus and rights shares or otherwise in respect of Securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.
- u. Portfolio Manager shall have the same meaning as given in regulation 2 (cb) of SEBI (Portfolio Managers) Regulations, 1993 as amended from time to time. Any person who pursuant to a contract or arrangement with a client, advises or directs or undertakes on behalf of the client (whether as a discretionary portfolio manager or otherwise) the management or administration of a portfolio of securities or the funds of the clients, as the case may be is a portfolio manager.
- v. Principal Officer means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager.
- w. Regulations mean that of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as may be amended from time to time.
- x. Scheduled Commercial Bank means any bank included in the second schedule to the Reserve Bank of India Act, 1934 (2 of 1934).
- y. SEBI means the Securities and Exchange Board of India established under sub-section(1) of Section 3 of the SEBI Act.
- z. Securities include: Securities as defined under the Securities Contracts (Regulation)
  - i. Shares, scrip, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature in or of any incorporated company or other body corporate;
  - ii. Derivatives;
  - iii. Units or any other instruments issued by any collective investment scheme to the investors in such schemes

- iv. Security receipt as defined section 2 of the Securitization and reconstruction of Financial Assets and Enforcement of Securities Interest Act, 2002;
- v. Units or any other such instrument issued to the investors under any mutual fund scheme
- vi. Government Securities
- vii. Such other instruments as may be declared by the Central Government to be securities
- viii. Rights or interest in securities
- ix. Exchange Trade Funds; and Liquid Fund.
- x. Initial Corpus means the value of the funds and the market value of securities brought in by the client and accepted by the Portfolio Manager at the time of entering into an agreement with the Portfolio Manager to avail its Portfolio Management Services.

As per **SEBI Regulations**, the minimum investment amount is **Rs. 50 Lakhs**. The client may withdraw partial amounts from his portfolio, in accordance with the terms of the agreement between the client and the Portfolio Manager. However, the value of investment in the portfolio after such withdrawal shall not be less than the applicable minimum investment amount.

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 the regulations governing Portfolio Management Services.

### **3. Description:**

#### **i. History, present Business and Background of the Portfolio Manager**

T. Ram Financial Services Private Limited was established in 2011 by Sri. T. Ramabhadran, former MD of Sundaram Finance limited and retired GM, SBI. Sri. T. Ramabhadran was a doyen of Indian Banking Industry. He, in 1999, set up Shri Rama Investment Advisory & Support Services, a firm which was empanelled as a Sub Broker with Navia Markets Limited, Mr. R. Subash, an alumnus of IIM B, joined the firm in 2009. Mr. T. Ramabhadran passed away in June 2011. His son Mr. Mukund S Raghavan and Subash R decided to take his legacy forward. With a view to emerge as a leading financial service company, T. Ram Financial Services Pvt Ltd was floated in 2011. The firm took up a stock broking license with Madras Stock Exchange in March 2012 and commenced operation in April 2012.

The Mutual Fund Distribution license was acquired by T. Ram Financial Services Pvt Ltd in Sep 2014 and new avenue for client servicing and growth for the company started. Over the last ten years, the company had managed to build an AUM of 173 crore in its mutual fund distribution business.

As MSE ceased to operate, TRFSL registered itself as the Authorised Person for Paterson Securities Pvt Ltd in 2014 in Bombay Stock Exchange-Cash Segment and continued operations. The firm took care Portfolio Manager license from SEBI in 2018. The firm currently offers discretionary portfolio management services to 126 clients and manages Rs. 249 crores.

Mr. R Subash, who is currently the MD, is well networked as he is an alumnus of IIM B. The firm is confident of growing the business through leveraging this network as well as existing clients.

The firm aims to evolve as India's leading portfolio management firm through superior research, transparent operations and flawless execution of trades.

## ii Directors of the Portfolio Manager and their background

Name of Director	Designation	Background
Mr. R Subash	Managing Director	BE College of Engineering Anna University 2007 PGDM IIM Bangalore 2009
Mr. Mukund S Raghavan	Director	B.Sc Mathematics
Mrs. Kalpana Raghavan	Director	M.A

## Key Management Personnel (Portfolio Management Services)

Mr. R Subash : Managing Director

Mrs. P Vedalakshmi : Compliance Officer

Mr. R Subash : Fund manager

## iii. Details of services being offered:

(a) Discretionary: The discretion pertaining to investment - starting from planning of portfolio, buying and selling of securities to reshuffling and safe custody of securities, strategies and investment securities and related percentage distribution of the portfolio. The decision of the Portfolio Manager towards deployment of the Clients' account is absolute & final and never be called in for question or be open to review at any time during the tenure of the Client agreement or any time thereafter except on the ground of intent, fraud, conflict of interest or gross negligence. This right of the Portfolio manager shall be exercised strictly in accordance with the Regulations. All decisions of the Portfolio Manager are taken in good faith and based on the client's risk profiling. Periodical statement in respect of the Clients' Portfolio shall be sent in softcopy to the clients' registered email id and hard copy will be given on demand.

## The Key Features of the Service would constitute:

\* Individually constructed portfolio determined by an investor's specific and unique needs.

- \* Continuous attention to changing investment conditions.
- \* The funds are placed in a separate account of a Scheduled Banks as per SEBI guidelines.
- \* Monthly or quarterly comprehensive valuations and performance reports.
- \* Minimum investments as applicable to the scheme selected.
- \* The funds are entrusted to the care of the portfolio manager for such periods as mutually agreed upon by the Investor and Portfolio Manager keeping in mind the nature of each scheme, with reviews being conducted periodically.

(b) **Non-Discretionary:** Under this portfolio services, the clients' portfolio account shall be managed in consultation with the Client. The Portfolio Manager would facilitate with required inputs on the Security -buying, selling & reshuffling and inputs on the various securities, the decision and deployment of the investment would be Client decision. The Portfolio Manager inter alia manages transaction execution, accounting, recording or corporate benefits, valuation and reporting aspects on behalf of the Client.

**4. Penalties, pending litigation or proceeding findings of inspection or investigations for which action have been taken or initiated by any regulatory authority:**

- i. The applicant Company (T. Ram Financial Services Private Limited) or its whole-time directors has not been convicted by a Court for any offence involving moral turpitude, economic offence, securities laws or fraud;
- ii. No order for winding up has been passed against the company.
- iii. The company, or its whole-time directors, has not been declared insolvent;
- iv. No order of suspension of certificate of registration as an intermediary, restraining, prohibiting or debarring the certificate of registration as an intermediary, restraining, prohibiting or debarring the company, or its whole-time directors from dealing in securities in the capital market or from accessing the capital market has been passed by the Board or any other regulatory authority;
- v. No order cancelling the certificate of registration of the company has been passed by the Board on the ground of its indulging in insider trading, fraudulent and unfair trade practices or market manipulation;
- vi. No order withdrawing or refusing to grant any license / approval to the company, or its whole-time director which has a bearing on the capital market, has been passed by the Board or any other regulatory authority.
- vii. No penalties have been awarded by SEBI under the SEBI Act or any of its regulations against the company or its associate companies in any capacity, including the Board of Directors, or any of the directors or key personnel of the portfolio manager.
- viii. No penalties have been awarded by any financial regulatory body, including stock exchanges.

**5. Services Offered**

The portfolio Manager currently offers Discretionary (TRFSL BLUECHIP) service. Minimum investment amount / securities with a value of Rs.50,00,000/- per client shall be applicable.

**Investment Objective:**

The investment objective is to generate long-term capital growth from an actively managed portfolio. The portfolio may consist of Equities, Mutual Funds, Debt Market Investments & ETF.

**Investment Pattern:**

The corpus of the scheme will be invested primarily in equity and equity related investments. The scheme may invest in debt and money market instruments to manage its liquidity requirements, subject to the regulations and other prevailing laws as applicable, the corpus can be invested in any (but not exclusively) of the following securities:

Equity and Equity related instruments including convertible bonds, Mutual funds and debentures and warrants carrying the right to obtain equity shares.

Subject to the regulations, the asset allocation pattern indicated above for the schemes may change from time to time, keeping in view the customer preferred investment pattern, market conditions, market opportunities, applicable regulations and political and economic factors. It must be clearly understood that the percentage stated are only indicative and not absolute. However, they can vary substantially depending upon the perception of the Portfolio Manager, the intension being at all times to seek to protect the interests of the clients in all possible endeavours to meet their investment objective. The Portfolio Manager does not intend to make any specific investment in associate / group companies on its own account. Investment in associate / group companies of the Portfolio Manager on the Clients account shall be subject to the applicable laws / regulations / guidelines.

As per SEBI Circular no. SEBI/HO/IMD//IMD-PoD-2/P/CIR/2022/172 dated 16th Dec 2022 the tagging of strategies of T.Ram Financial Services investment approach and selection of benchmarks has been done as follows.

<b>INVESTMENT APPROACHES</b>	<b>TAGGED TO STRATEGY</b>	<b>BENCHMARK</b>
TRFSL BLUECHIP	Equity	NIFTY 50 TRI

**6. Declarations:**

The Trading & Depository accounts are opened with Paterson Securities Private Limited (Stock Broker Vide Regn No NSE: INB 231367195, BSE: Member ID – 3083 SEBI Regn – INB011367134, CDSL DP: SEBI Regn – IN-DP-CDSL-312-2005) or Integrated Enterprises (India) Pvt Ltd (Stock Broker Vide Regn No NSE: 12718, BSE: Member ID – 6168 SEBI Regn – INZ000095737, NSDL DP: SEBI Regn – IN-DP-NSDL-83-99).

The custodian account will be opened with ICICI BANK Limited (SEBI Custodian Regn no. IN/CUS/005) and Orbis Financial Corporation Limited (SEBI Custodian Regn no. IN/CUST/020).

**7. Risk Factors:**

\* The client confirms that he/she/they fully understand that the investment made in securities market is subject to market risk and there is no assurance or guarantee that the objectives of the investments will be achieved.

- \* The clients shall hold sole responsibility for all the risk and rewards made by the portfolio manager and can in no event hold the Portfolio Manager liable for any loss that may arise from investment decisions, provided within the scope of the agreement.
- \* The past performance of the investments made/recommended by the Portfolio Manager will not be construed as an indication of future results, which may prove to be better or worse than in the past.
- \* Investors are not being offered a guaranteed or assured rate of return either directly or indirectly.
- \* The investments made by the Portfolio Manager in securities, the Net Asset Value of the portfolio may go up or down in value, depending on the market conditions.
- \* The liability of the client shall not exceed his investments with the portfolio Manager.
- \* The performance of the portfolio may be affected by changes in Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- \* The Portfolio Manager shall not be held responsible for any loss or damage arising from, including but not limited to market conditions, force majeure circumstances, delay on the part of companies or other authorities (including government authorities) in registering transfer of shares and securities, errors of the judgment on the part of company or other factors beyond the control of the Portfolio Manager.
- \* The tax implications described in this disclosure document are available under the present taxation laws subjects to conditions. The information given is for general purpose only and based on advice received by the Portfolio Manager on the prevalent laws and practice in India. Such laws or their interpretation are subject to change. However, each individual investor/client is advised to consult his/her/ their own professional tax advisor. .
- \* Investment decisions made by the Portfolio Manager taken in good faith may not always be profitable.
- \* The Portfolio Manager may design and develop various series keeping in mind market conditions and may be customized for Client's specific need / profile. The portfolio in all cases will be guided strictly by the relevant guidelines, Acts, Rules, Regulations, and notifications prevailing in force from time to time. The instrument may be principal protected or non-protected, which may have fixed or variable pay-offs. The investment objective of the Portfolio Manager shall be preservation and growth of capital and at the same time endeavour to reduce the risk of capital loss. However, while the aforesaid is the objective, it needs to be reiterated that there can be no assurance and /or guarantee of such growth or even as regards preservation of capital or of there being no capital loss. The amount invested by the Clients in different instruments/ schemes may be subject to a lock in period.
- \* Prospective client should review/ study this disclosure document carefully in its entirety and shall not construe its contents hereof or regard the summaries contained herein as advice relating to legal, taxation, financial / investment matters and are advised to consult their own professional advisors on the various aspects of their investments/ holdings/ disposal along with its tax implications before making an investment decision.
- \* The investments made are subject to external risks such as war, natural calamities, technology updation / obsolescence, policy changes in local and international markets and the like.
- \* The investment in Indian capital market involves risk for the investor, the duration will be longer as well. There is a possibility of the value of investment and the income there from falling as well as rising depending on the market. There is also risk of total loss if value of an asset goes to zero and possibilities of recovery of loss in investments may be negligible.

- \* The client has perused and understood the disclosures made by the Portfolio Manager in the Disclosure document before entering into this Agreement.
- \* The Portfolio Manager is neither responsible nor liable for any losses resulting from the operations of the PMS products.

## 8. Client Representation:

<b>As on Dec 31st 2025</b>		
<b>Category of Clients</b>	<b>No. of Clients</b>	<b>Funds Managed (Rs. Cr)</b>
Individual – Resident	121	210.27
Individual - Non-Resident	22	27.96
Corporate – Resident	2	19.77

The following are the funds of related parties that are managed by the portfolio manager.

<b>S No</b>	<b>Investment Approach</b>	<b>Name of Associate/ Related Party</b>	<b>Value of Investment as of Dec'2025 (Rs. Cr)</b>	<b>Percentage of Total AUM as of Dec'2025(%)</b>
1	TRFSL Bluechip	KALPANA RAGHAVAN	0.94	0.37%
2	TRFSL Bluechip	KAVYA RAGHAVAN	0.54	0.21%
3	TRFSL Bluechip	Latha RAMASUBRAMANAIAM	2.06	0.80%
4	TRFSL Bluechip	G S RAMASUBRAMANAIAM	1.74	0.67%
5	TRFSL Bluechip	G S RAMASUBRAMANAIAM HUF	1.38	0.54%
6	TRFSL Bluechip	MUKUND SUNDARA RAGHAVAN	8.39	3.25%
7	TRFSL Bluechip	MUKUND SUNDARA RAGHAVAN HUF	19.26	7.47%
8	TRFSL Bluechip	R SUBASH	3.12	1.21%
9	TRFSL Bluechip	VEDALAKSHMI P	0.58	0.23%

## 9. The Financial Performance of the Portfolio Manager

(Based on audited Financial Statement): (In Rs.)

Particulars	FY 2022-2023	FY 2023-2024	FY 2024-2025
Gross Income	15202465	22710579	32724899
Profit Before Tax	3563641	9566798	16401690
Less: Tax	954494	2416227	4019590
Less: Deferred Tax	0	(6944)	(5826)
Profit After Tax	2609147	7157514	12387926

## 10. Portfolio Management Performance – Dec 31st, 2025

Period	TRFSL BLUECHIP – PMS	
	Scheme (%)	Benchmark – NIFTY 50 TRI (%)
1 month	0.52%	-0.28%
3 months	4.37%	6.33%
6 Months	2.05%	2.92%
1 Year	6.57%	11.88%
2 Years	8.30%	10.98%
3 Years	13.57%	14.32%
4 Years	10.20%	12.10%
5 Years	12.33%	14.68%
Since Inception	10.96%	13.21%
Inception Date	1 <sup>st</sup> Aug 2018	

## 11. Nature of Expenses:

- i) Investment Management and advisory fees will as applicable to the respective plan selected and entrusted for management.
- ii) Custodian fee, Fund Accounting fee, Registrar and transfer agent fee, Transaction fees shall be billed at actual.
- iii) Brokerage and transaction cost shall be charged to the client up to a maximum of 1% of the transaction value. It is currently 0.1% for Resident individuals and 0.2% for Non resident individuals
- iv) GST as applicable from time to time
- v) Depository Charges as per existing norms of our depository participant fees.
- vi) Portfolio Management Services fee will be charged as per the scheme chosen, and then on it will be payable on a Monthly basis proportionate to the annual fee.
- vii) Entry Load / Exit Load as may be mutually agreed to between the Client and the Portfolio Manager.
- viii) Certification and Professional charges payable for out sourced professional services like accounting, auditing, taxation and legal services, etc. for documentation, notarisations,

certifications, attestations required by bankers or regulatory authorities including legal fees etc.

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

## 12. Taxation:

The general information stated below is based on the general understanding of direct tax laws in force in India as on the date of the Disclosure Document and is provided only for general information to the Client only vis-à-vis the investments made through the Portfolio Management Services ('PMS') of T. Ram. This information gives the direct tax implications on the footing that the securities are/will be held for the purpose of investments. In case, the securities are held as stock-in-trade, the tax treatment will substantially vary and the issue whether the investments are held as capital assets or stock-in-trade needs to be examined on a case-to-case basis. There is no guarantee that the tax position prevailing as on the date of the Disclosure Document/the date of making investment shall endure indefinitely.

The Client should not treat the contents of this section of the Disclosure Document as advice relating to legal, taxation, investment or any other matter. In view of the individual nature of tax consequences, each Client is advised to consult his or her tax advisor with respect to the specific tax consequences arising to him/her from participation in any of the investments. It is the responsibility of all prospective clients to inform themselves as to any income tax or other tax consequences arising in the jurisdictions in which they are resident or domiciled or have any other presence for tax purposes, which are relevant to their particular circumstances in connection with the acquisition, holding or disposal of the units. The tax implications given below are based on the existing provisions of the Income Tax Act, 1961 ('the IT Act') and rules made thereunder as amended by Finance Act, 2018. The Portfolio Manager accepts no responsibility for any loss suffered by any Investor as a result of current taxation law and practice or any changes thereto.

The following are the tax provisions applicable to Clients investing in Portfolio Management

Services as per the prevailing tax laws:

1. Dividends
  - a. Dividend declared, distributed or paid on or after 01.04.2020 is taxable in the hands of recipient @ marginal tax rate
2. Capital Gains Tax
  - (i) Long term capital gains: On sale of listed securities (when the transactions for sale take place on recognized stock exchanges) and on units of any equity-oriented fund, which are subject to securities transactions tax (STT), Capital Gains are taxable @ 12.5%. % (plus, applicable surcharge and education cess and higher education cess.)
  - (ii) Short term capital gains: On sale of listed securities (when the transactions for sale take place on recognized stock exchanges) and on units of any equity-oriented fund, which are subject to securities transactions tax (STT), are taxable @ 20% (plus applicable surcharge and education cess and higher education cess.)
  - (iii) Additionally, STT and Stamp Duties are payable in respect of purchase of listed securities and units of any equity-oriented fund on recognized stock exchange ranging from 0.001% to 0.125% depending on the nature of securities transactions.
  - (iv) Transactions in other securities or transactions not on recognized stock exchanges as per prevailing tax laws.

(v) GST: Will be charged as applicable

Type of Instrument	Period of holding	Characterization
Listed Securities (other than Units), Units of equity oriented Mutual Funds and Units of Business Trust	More than twelve (12) months	Long-term Capital Asset
	Twelve (12) months or less	Short-term Capital Asset
Unlisted shares of a company and other securities	More than twenty-four (24) Months	Long-term Capital Asset
	Twenty-four (24) months or less	Short-term Capital Asset
Bonds / Debentures	Irrespective of Period of holding	Short-term Capital Asset

### Details under FATCA/Foreign Tax Laws

Foreign Account Tax Compliance provisions (commonly known as FATCA) are contained in the US Hire Act 2010. Applicants (Including Joint Holders, Guardian, POA holder) are required to refer and mandatorily fill/ sign off a separate" FATCA declaration form". Applications without this information/ declaration being filled/ signed off will be deemed as incomplete and are liable to be rejected. Investors are requested to note that the contents of the information to be provided / declaration in the application form may undergo a change on receipt of communication / guidelines from SEBI. Tax Regulations require us to collect information about each investor's tax residency. If you have any questions about your tax residency, please contact your tax advisor.

### Tax Deduction at Source

TDS is deductible on interest income and dividend income. TDS would be deducted by the issuer of such security. TDS is deducted at source for capital gains incurred by NRI investors.

### 13. Accounting Policies:

In accordance with the regulations stipulated by SEBI (Portfolio Managers) Regulations, 1993, as amended from time to time. Accounting under the respective portfolios will be done in accordance with generally accepted accounting principles followed in India. As SEBI (portfolio Management) Regulations, 1993, do not explicitly lay down detailed accounting policies, such policies which are laid down under SEBI Regulations would be followed, in so far as accounting and valuations for equities/ equity related instruments, Fixed Income Securities and other securities are concerned.

The following accounting policies and standards shall be followed:

- \* All investments will be marked to market and will be carried in the balance sheet at market value.
- \* Investments in Equities, Mutual funds and Debt instruments will be valued at closing market prices of the exchange (BSE or NSE as the case may be) or the repurchase Net Asset Value (NAV) 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.
- \* For the derivatives & futures and options, unrealized gains and losses will be calculated by mark to market for the open positions.

- \* 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.
- \* Bonus shares shall be recognized only when the original shares on which the bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.
- \* Split shares shall be recognized only when the original shares on which the split announced and the accrued are received to the Depositors' Participant account for trading.
- \* Right entitlement shall be recognized only when the original shares eligible for the right entitlement is processed on request for the allocated for right entitlement and received to the Depository Participant account for trading.
- \* In determining the holding cost of investments and the gains or loss on sale of investments, the "average cost" method shall be followed.
- \* Transactions for purchase or sale of investments would 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 statement for that year.
- \* The cost of investments acquired or purchased would include brokerage, stamp charge and any charged customarily included in the brokers contract note or levied by any statute except STT (Securities Transaction Tax). Similarly, in case of Sale transactions, the above-mentioned charges will be deducted from the sale price. Realized Gains/ Losses will be calculated by applying the FIFO (First In First Out) method. In respect of privately placed debt instruments, any front-end discount offered shall be reduced from the cost of investment. It may be noted that for Income Tax purposes. SIT is deductible only when the gains are treated as Income.

The accounting policies and standards outlined above are as per existing Regulations which are subject to change from time to time. However, such changes would be in conformity with the Regulations.

### **Reports to the Client:**

The portfolio manager shall furnish periodic reports to the client and when required by the client and such report shall contain the following details, namely:

- a) The composition and the value of the portfolio, description of security, number of securities, value of each security held in the portfolio, cash balance and aggregate value of the portfolio as on the date of report.
- b) Transactions undertaken during the period of report including date of transaction and details of purchase and sales.
- c) Beneficial interest received during the period in respect of interest, dividend, bonus shares, rights shares and debentures;
- d) Expenses incurred in managing the portfolio of the client;
- e) Details of risk foreseen by the portfolio manager and the risk relating to the securities recommended by the portfolio manager for investment or disinvestment.

## 14. Investors Services

(i) **Investor queries and complaints to be addressed to:**

**R. Subash**

T. Ram Financial Services Private Limited

# 15, Sixth Street, Nandanam Extn.,

Chennai - 600 035.

Phone Number 044- 24335067

Email id: tramfsl@gmail.com

(ii) **Grievance redressal:**

Service requests and grievance, if any, from the clients that may arise pursuant to the Portfolio Investment Management Agreement entered into shall as far as possible be redressed through the administrative mechanism, subject to SEBI (Portfolio Managers) Regulation 1993 and any amendments made from time to time. The Portfolio Manager shall ensure proper and timely handling of service requests and take appropriate action immediately. The Portfolio Manager will attend to and address any client query or concern regarding service deficiencies or cause for grievance, in a reasonable manner and time. In case the investor is not satisfied with the response provided by the Portfolio Manager, he/ she may approach SEBI which takes up complaints against the various intermediaries, including Portfolio Managers, registered with it. The complaint has to be filed in SEBI Complaints Redress System (SCORES) at <http://scores.gov.in/Default.aspx>

(iii) **Arbitration:**

All disputes, differences, claims and questions whatsoever which shall arise either during the agreement tenure with the client and the Portfolio Manager and/ or their respective representatives or afterwards with regard to the terms thereof or any clause or thing contained therein or otherwise in any way relating to or arising there from or the interpretation of any provision therein shall be in first place settled by mutual discussion, failing which the same shall be referred to and settled by arbitration in accordance with and subject to the provisions of the Arbitration and Conciliation Act, 1996 or any statutory modification or re-enactment thereof for the time being in force. The arbitration shall be held in Chennai and be conducted in English language.

The agreement with the Client shall be governed by, construed and enforced in accordance with the laws of India. However, all legal actions and proceedings are subject to the jurisdiction of court in Chennai only.

**FORM C**

**SECURITIES AND EXCHANGE BOARD OF INDIA  
(PORTFOLIO MANAGERS) REGULATIONS, 1993**

**(REGULATION 14)**

**T. Ram Financial Services Private Limited**

# 15, Sixth Street, Nandanam Extn.,

Chennai - 600 035.

We confirm that:

- i) The Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
- ii) The Disclosures made in the document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us for the investment in the Portfolio Management Scheme;
- iii) The Disclosure Document has been duly certified by an independent firm of chartered accountants, Ramanujam & Boovarahan, 4/56, Kalpataru, Flat I-A, K.B. Dasan Road, Alwarpet, Chennai - 600018 (M. No. 027801) on **XX.XX.XXXX**. A Copy of the chartered accountants' certificate to the effect that the disclosures made in the document are true, fair, & adequate to enable die investors to make well-informed decisions, is enclosed here with.

Date:

Place: Chennai

Name and Address of Principal Officer: **R. Subash**

**T.Ram Financial Services Private Limited**

# 15, Sixth Street, Nandanam Extn.,

Chennai - 600 035.

Name : \_\_\_\_\_ Strategy (s) \_\_\_\_\_

**Details of fees and expenses\***

**Nature of Fees**

Custodian Fee and Fund Accounting Fee + GST

Fixed Fee (P.A) + GST

Performance Fee

Profit sharing: > \_\_\_\_\_ % : \_\_\_\_\_ (AMC Fee %)

Brokerage/ DP charges/ any other similar charges

Purchase / Sales of securities On actuals

Management Fee

Exit Charges (FIFO Method)

If exited within 1 year

If exited within 1-2 years

If exited within 2-3 years

\*Fees and charges indicated are subject to annual review.

**Note:**

Management fees on any infusions and withdrawals between quarters will be charged on pro rata basis. All withdrawals will be with mutual consent between the portfolio manager and the Client. Withdrawals will be in form of cash or security at end of agreed period. The transfer of full withdrawal credit will be given on T + 3 working days subject to liquidity held in the portfolio. The transfer of partial withdrawal, as required by the client and agreed to by the Portfolio Manager, will be given credit is on T+3 working days subject to liquidity of stocks held in the portfolio.

The fee/ charges/expenses, including those charged by the service provider(s) in relation to managing the Client's portfolio account, shall be automatically debited to the Client's account within one month from the end of every quarter or at such frequency as may be decided by the Portfolio Manager from time to time.

All other franking and audit fee would be deducted on actual.

**DISCLOSURES ON DERIVATIVES**

T. Ram Financial Services Private Limited has taken a policy decision not to trade in derivatives.

**DISCLOSURES ON Investments in Related Parties**

T. Ram Financial Services Private Limited does not have any listed related parties or associates. Hence the Portfolio Manager does not invest in any of the client funds in any of the related parties or associates.