



Date: 22/Dec/2022

WRITTEN-DOWN POLICY FOR SPECIFIC ACTIVITIES OF TEAMS INVOLVED IN THE PORTFOLIO MANAGEMENT SERVICES

This policy is made in accordance with the Clause 3.1 of the SEBI circular SEBI/HO/IMD/IMD-I DOF1/P/CIR/2022/133 dated September 2022.

This policy contains specific activities, role and responsibilities of various teams engaged in fund management, dealing, compliance, risk management, back office, etc., with regard to management of client funds and securities.

Roles and Responsibilities of various teams:

a) Team engaged in fund management:

- responsible for implementing a fund's investment strategy and managing its trading activities
- Primarily research and determine the best stocks, bonds, mutual funds, or other securities to fit the investment strategy of the fund as outlined in the disclosure document, then buy and sell them
- Preparing reports on how well the fund is performing for clients
- Developing reports for potential clients to know the risks and objectives of the fund

b) Team engaged in dealing with funds:

- Order placement and execution of all orders in accordance with the policies
- Dealing with broker(s) to ensure order execution
- Dealing with custodian ensuring allocation of securities to clients' accounts

c) Team engaged in compliance:

- Responsible for monitoring and compliance of the respective act, rules, and regulations
- Monitoring redressal of investors' grievances in line with SEBI regulations.
- Ensuring redressal of grievances of the investors within one month of the date of the receipt of the complaint
- Keeping SEBI informed about the number, nature and other particulars of the complaints received
- *Independent reporting to SEBI for any non-compliance observed in PMS*
- Conducts regular assessments to determine whether policies are compliant with the law
- Ensuring all employees of PMS are educated and qualified based on latest Securities and Exchange Board of India (Portfolio Managers) Regulations.
- Ensuring authenticity and comprehensiveness in information being filed with SEBI.





d) Team engaged in risk management:

- Responsible to identify, assess, measure, and manage risk within the portfolio
- Categorically listing down various risks accompanying particular investment strategies
- Making sure portfolio manager is in line with regulatory expectations
- Reporting to fund management team if pre-identified tolerances of portfolios risks are reached

e) Team engaged in back-office work:

- Responsible for on-boarding of clients with PMS
- Ensuring client has received and signed all onboarding documents including account opening form, disclosure document, client agreement, risk profiling questionnaire etc.
- Maintenance of all KYC and onboarding documents in line with SEBI regulations
- Uploading KYC data of clients with Central KYC Records Registry (CKYCR) in
- Opening of demat, custody accounts with custodian
- Regular reporting of portfolio performance to clients
- Addressing ad-hoc reporting reports of clients and regulator
- Maintaining records of all investment advises provided
- All back-end support to carry out routine operations of portfolio management services
- Responsible for carrying out administrative activities including but not limited to settlements, clearances, record maintenance, accounting, HR and IT services required to support business functioning.

For Valtrust Partners LLP

For VALTRUST PARTNERS LLP

Partner / Authorized Signatory

Arihant Bardia

Designated Partner