Pararthya Capital Management LLP

LLPIN: ACN-8809

Add: 1301, Varun CHS, Pantnagar, Ghatkopar East, Mumbai – 400075

E-mail: nikunj@pararthya.in Contact: +91 9082765273

Disclosures

- The advisor may have holding or position in the securities advised herein.
- The advisor has no connection or association of any sort with any issuer of products/ securities advised herein.
- The advisor has no actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services.
- To access the key features of the securities, particularly, performance track record please go to the below links:
  www.bseindia.com
  www.nseindia.com
  www.moneycontrol.com

SEBI Registered Investment Adviser Name	Pararthya Capital Management LLP
Trade Name	Pararthya Capital
BSE Enlistment No.	2365
CIN of the IA	ACN-8809
Type of Registration	Non-Individual
SEBI Registration Number	INA000021340
Validity of Registration	Nov 7, 2025 - Perpetual
Office Address	1301, Varun CHS, Pantnagar, Ghatkopar East, Mumbai - 400075
Principal Officer	Nikunj Kishor Gala 9082765273 nikunj@pararthya.in
Compliance Officer	Ronak Deepak Gala 9082765273 team@pararthya.in
SEBI Local Office Address	Plot No. C 4-A , G Block, Near Bank of India, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051

Standard warning:

"Investment in securities market are subject to market risks. Read all the related documents carefully before investing."

Disclaimer:

"Registration granted by SEBI, Enlistment with BSE and certification from NISM in no way guarantee."

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Advisory Guidelines

1. **MISSION:**

   As an Investment Adviser, we are passionate about making a difference to the society and help them enrich through our expertise in capital markets.

2. **VISION:**

   Our vision is to build an exemplary Investment advisory practice that can be trusted and unbiased, that is driven by strong values and ethics, providing outstanding investment solutions. To truly partner with our clients in their investment journey and help them realize their financial goals through long term, conservative and responsible non-speculative financial instruments.

3. **VALUES:**

   All our actions as an Investment adviser are governed by 3 core values:

   - Being transparent,
   - Putting clients first,
   - Doing the right thing.

   The objective will be to help clients make informed decisions regarding their personal finance and enhance their chances of achieving their financial goals in a disciplined way.

4. **CODE OF CONDUCT**

   a) Honesty and Good Faith

      Investment Adviser, its employees and associates shall act honestly and in good faith.

   b) Diligence

      Investment Adviser, its employees and associates shall act with due skill, care and diligence and shall ensure that the advice is offered after thorough analysis.

   c) Conflict of Interest

      Investment Adviser, its employees and associates shall effectively address conflict of interest which may affect the impartiality of its advisory shall make appropriate disclosures to address the same.

   d) Insider Trading or front running

      Investment Adviser, its employees and associates shall not engage in insider trading or front running of our own advice.

   e) Confidentiality

      Investment Adviser, its employees and associates shall maintain confidentiality of information.

f) Professional Standard

Investment Adviser, its employees and associates engaged in advisory shall observe high professional standard while offering advice.

g) Compliance

Investment Adviser, its employees and associates shall comply with all regulatory requirements applicable to the conduct of its business activities.

h) Responsibility of senior management

The senior management of Investment Adviser, its employees and associates engaged in advisory shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures by the body corporate.

5. NO FRONT-RUNNING

Front-running is prohibited. There are two ways in which front-running can arise:

a) Through use of client order information, i.e. utilizing the advantage of advance knowledge of pending orders of clients; or

b) Through information about the timing or contents of advice prior to offering it to the clients.

We, **Pararthya Capital Management LLP** ("Investment Advisor"), a registered investment advisor, with SEBI Registration No. INA000021340, are implementing above guidelines as a guiding principle for our investment advisory activities. The guidelines would be applicable to us along with our employees and associates.

For, **Pararthya Capital Management LLP**

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Nikunj Kishor Gala
SEBI Registered Investment Advisers
Registration No. INA000021340
Date: 10.11.2025

Pararthya Capital Management LLP

LLPIN: ACN-8809

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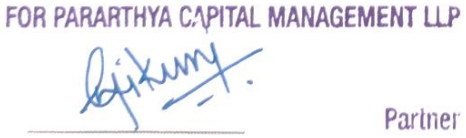
Privacy Policy:

Your privacy is prioritised and protected to the greatest extent possible. Before submitting any sensitive personal information or data, please read this Privacy Policy.

- It is our policy to respect your privacy regarding any information we may collect during our advisory service. Accordingly, we have developed this privacy policy in order for you to understand how we collect, use, communicate, disclose and otherwise make use of personal information.
- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use personal information solely for fulfilling those purposes specified by us and for other ancillary purposes, unless we obtain the consent of the individual concerned or as required by law.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
- We will protect personal information by using reasonable security safeguards against loss or theft, as well as unauthorized access, disclosure, copying, use or modification.
- We will make readily available to customers information about our policies and practices relating to the management of personal information.
- We will only retain personal information for as long as necessary for the fulfilment of those purposes.
- We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained. We may change this privacy policy from time to time at our sole discretion.

For, **Pararthya Capital Management LLP**



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AML Policy

Prevention of Money Laundering Act, 2002 (PMLA) forms the core of legal framework put in place by India to combat money laundering and related crimes. PMLA and the Rules notified there under came into force from 1st July, 2005. Under PMLA, all the entries registered with SEBI are required to furnish information of all the suspicious transactions whether or not made in cash to FIU-IND. Under Section 3 of PMLA, projecting of crime as untainted property is an offence of money laundering liable to be punishment under section 4 of the PMLA.

Money Laundering involves disguising financial assets so that they can be used without detection of the illegal activity that produced them. Through money laundering, the launderer transforms the monetary proceeds derived from criminal activity into funds with as apparently legal source.

Financial Intelligence Unit-India (FIU-IND) is the central national agency of India responsible for receiving, processing, analyzing and disseminating information of suspect financial transactions. FIU-IND is also responsible for coordinating and strengthening efforts of national and international intelligence, investigation and enforcement agencies in combating money laundering and related crimes.

Section 2 (1) (g) of PMLA Rules defines suspicious transaction whether or not made in cash which, to a person acting in good faith:

- Gives rise to a reasonable ground of suspicious that it may involve the proceeds of crime: or
- Appears to be made in circumstances of unusual or unjustified complexity; or
- Appears to have no economic rationale or bonafied purpose; or
- Gives rise to a reasonable ground of suspicious that it may involve facing of the activities relating to terrorism

Policy and Procedures for Anti Money Laundering Measures

The policy and procedures as outlined below provides a general background on the subjects of money laundering and terrorist financing summarizes the main provisions of the applicable anti-money laundering and anti-terrorist financing legislation in India and provides guidance on the practical implications of the Act. The same also sets out the steps that a registered intermediary and any of its representatives, should implement to discourage and identify any money laundering or terrorist financing activities.

The Prevention of Money Laundering Act, 2002 has come into effect from 1st July 2005. Necessary Notifications / Rules under the said Act have been published in the Gazette of India on 1st July 2005 by the Department of Revenue, Ministry of Finance, Government of India.

As per the provisions of the Act, every banking company, financial institution (which includes chit fund company, a co-operative bank, a housing finance institution and a non-banking financial company) and intermediary (which Includes a stock-broker, sub-broker, share transfer agent, banker to an issue, trustee to a trust deed, registrar to an issue, merchant banker, underwriter, portfolio manager, investment adviser and any other intermediary associated with securities market and registered under section 12 of the Securities and Exchange Board of India Act, 1992) shall have to maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules under the PMLA. Such transactions include:

- All cash transactions of the value of more than Rs 10 lacs or its equivalent in foreign currency.
- All series of cash transactions integrally connected to each other which have been valued below Rs 10 lakhs or its equivalent in foreign currency where such series of transactions take place within one calendar month.
- All suspicious transactions whether or not made in cash and including, inter-alia, credits or debits into from any non-monetary account such as demat account, security account maintained by the registered intermediary.

The objective of the policy is to –

1. To have a proper Client Due Diligence Process thru KYC process before registering clients.
2. To monitor/maintain records of all cash transactions of the value of more than Rs.10 lacs.
3. To maintain records of all series of integrally connected cash transactions within one calendar month.
4. To monitor and report suspicious transactions.
5. To discourage and identify money laundering or terrorist financing activities.
6. To take adequate and appropriate measures to follow the spirit of the PMLA.

We should adopt written procedures to implement the anti-money laundering provisions as envisaged under the Anti Money Laundering Act, 2002. Such procedures should include inter alia, the following three specific parameters which are related to the overall '**Client Due Diligence Process'**:

a. Policy for acceptance of clients
b. Procedure for identifying the clients
c. Transaction monitoring and reporting especially Suspicious Transactions Reporting (STR)

<u>Client Due Diligence Process</u>

The customer due diligence ("CDD") measures comprise the following:

a. Obtaining sufficient information in order to identify persons who beneficially own or control securities account.

The KYC information to be collected in the specified format 'KYC Details' which contains all information required as per SEBI KYC requirements including 'In Person Verification' (IPV). In addition, the information about FATCA declaration also to be collected. All original PAN Cards/ Address Proof/ Aadhar Cards to be signed and self-attested copies to be taken. For NRIs, additional details and copies of Passport / PIO Card/ OCI Card and their address in overseas country along with their Tax Identification No. in that country to be collected.

b. Verify the customer's identity

Investment adviser shall not take a client on-board where Investment adviser is unable to apply appropriate customer due diligence measures i.e. it is unable to verify the identity and / or obtain documents required due to non-cooperation of the customer or non-reliability of the data / information furnished to Investment adviser.

c. Identify beneficial ownership and control, i.e. determine which individual(s) ultimately own(s) or control(s) the customer and/or the person on whose behalf a transaction is being conducted

Transaction data is not handled by us as the client doesn't share the such data with us as part of our Advisory services. We provide non-discretionary advisory service, execution of which is on the discretion of the client, and execution is handled by client themselves. Client don't share any executional or transactional data with us. Accordingly, identifying the beneficial owner or controlling party of the securities account of the client is the responsibility of the broker or distributor handling the security account of the client.

As part of client due diligence process below guidelines are to be adhered to-

a. Policy for acceptance of clients

Following safeguards are to be followed while accepting the clients:

- No account is opened in a fictitious / benami name or on an anonymous basis.
- Ensure that an account is not opened where the you are unable to apply appropriate client's due diligence measures / collect basic KYC documents.
- Ensure that the client identification documents are not found to be forged.
- The client should not be permitted to act on behalf of another person / entity for service delivery
- Do not accept clients with identity matching with banned person/ entity as per SEBI/ Stock Exchanges in capital market: -check whether the client 's identity matched with persons debarred/ banned by SEBI before opening of account. If you find them in that list then do no open the account. List may be verified using below link-
  https://www.bseindia.com/investors/debent.aspx?expandable=4
  https://www.nseindia.com/regulations/member-sebi-debarred-entities
- Conduct Risk assessment which takes into account any country specific information using the updated list of individuals and entities who are subjected to sanction measures as required under the various United Nations' Security Council Resolutions. Do not on-board a client who is present in the list. These can be accessed at the URL
  http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml
  http://www.un.org/sc/committees/1988/list.shtml

b. Procedure for identifying the clients

The client identification procedure to be carried out at the time of establishing the client relationship i.e., onboarding the client using KYC procedure as detailed above.

Failure by prospective client to provide satisfactory evidence of identity should be noted and reported to the higher authority and service should not be started for the said client.

c. Maintenance of record

Investment Adviser shall have a system of maintaining proper record of all transactions including records of all transactions prescribed under Rule 3 of the Rules, as mentioned below:

- all cash transactions of the value of more than Rupees Ten Lakh or its equivalent in foreign currency.
- all series of cash transactions integrally connected to each other which have been valued below Rupees Ten Lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds Rupees Ten Lakh;
- Investment Adviser shall maintain and preserve the records of all transactions referred to above for a period of 5 years as required by PMLA & SEBI Act.
- Investment Adviser shall ensure that records pertaining to the identification of the customer and his address (e.g. copies of documents like passports, identity cards, driving licenses, PAN, card, utility bills etc.) obtained while opening the account and during the course of business relationship, are properly preserved for 5 years as would be required under the PMLA and SEBI Act even after the business relationship is ended.

d. Audit

Audit of IA activities to be done by an independent professional as allowed by the regulation. Any observations of audit to be taken on priority basis and corrective actions to be initiated.

e. Transaction monitoring and reporting especially Suspicious Transactions Reporting (STR)

The nature and value of transactions, which has been prescribed in the Rules under the PMLA to maintain and record includes:

- All cash transactions of the value of more than Rs 10 lacs or its equivalent in foreign currency.
- All series of cash transactions integrally connected to each other which have been valued below Rs 10 lakhs or its equivalent in foreign currency where such series of transactions take place within one calendar month.
- All suspicious transactions whether or not made in cash and including, inter-alia, credits or debits into from any non-monetary account such as demat account, security account maintained by the registered intermediary.

Any suspicious transactions will be immediately notified to the Compliance Officer. The notifications may be done in the form of a detailed report with specific references to the clients, transactions and the nature/reason of suspicion. The compliance staff members will have timely access to customer identification data and other CDD information, transaction records and other relevant information.

Compliance Officer will carefully go through all the reporting requirements and formats as per the provision of PMLA

- The Principal Officer will be responsible for timely submission of CTR and STR to FIU-IND
- Utmost confidentially will be maintained in filling of CTR and STR to FIU- IND. The reports will be transmitted by speed/registered post/fax at the notified address.
- No nil reporting will be made to FIU-IND in case there are no cash/suspicious transaction to be reported.

Reporting to FIU – India

In terms of the PMLA rules, PO will report information relating to cash and suspicious transactions to The Director, Financial Intelligence Unit India (FIU – IND) at the following address:
Director, FIU – IND
Financial Intelligence Unit India 6th
floor, Hotel Samrat Chanakyapuri
New Delhi – 110021

Role of staff

Principal Officer

The Principal Officer is responsible for the following:

- Communicating the policy on prevention of Money laundering to the employees.
- Receiving reports from employees for any suspicious dealing noticed by them.
- Clarification of any queries from employees on this matter.
- Ensuring that the employees dealing with the clients/prospective clients are aware of the guidelines and are advised to follow the same strictly.
- Report any suspicious transactions to appropriate authorities.
- Handle compliance function and to ensure compliance with the policies, procedures, and controls relating to the prevention of ML and TF
- Evaluate the process in case any gaps are identified

On-Boarding Staff

For staff members dealing with customers or handling customer-facing processes, it is essential to be sensitive to the AML requirements and obligations

- Primary responsibility of compliance is on the on-boarding staff since they deal face-to-face with customers.
- On-boarding staff to carry out KYC process/ customer due diligence process / any further checks required as per our process during new business and renewal
- Default on carrying out obligation under AML law can attract action as per set company policies
- If you come to know of any suspicious activity, you have to bring that to our notice

Communication of policy

Copy of above policy is to be provided to all the management and relevant staff that handle account information, securities transactions, money and client records etc. whether in branches, departments or subsidiaries; An internal session on awareness of the above policy is to b conducted on a yearly basis in 1st week of April to spread awareness of the same among all the relevant person(s).

Compliance with relevant statutory and regulatory requirements

It is to be ensured that the activities are in compliance with all the relevant statutory and regulatory requirements.

Co-operation with the relevant law enforcement authorities, including the timely disclosure of information

As and when sought appropriate information's of the clients as maintained are to be shared with the relevant law enforcement authorities and timely disclosures of the information's to be made as per the requirement.

Review of Policy and Procedures

Management of the Investment Adviser is to review the policies and procedures on the prevention of ML and TF to ensure their effectiveness as and when there is change in regulatory guidelines with respect to prevention of ML and TF.

We, Pararthya Capital Management LLP ("Investment Advisor"), a registered investment advisor, with SEBI Registration No. INA000021340, are implementing above AML guidelines as a guiding principle for our investment advisory activities. The guidelines would be applicable to us along with our employees and associates.

For, **Pararthya Capital Management LLP**

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Nikunj Kishor Gala
SEBI Registered Investment Advisers
Registration No. INA000021340
Date: 10.11.2025

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Grievance Redressal Process

We believe that Investor service is a vital element for sustained business growth and we want to ensure that our Investors receive exemplary service across different touch points. Prompt and efficient service is essential for retaining existing relationships and therefore Investor satisfaction becomes critical to us, especially since we follow the Direct-to-Investor model. Investor queries and complaints constitute an important voice of Investor, and this policy details grievance handling through a structured grievance redressal framework. Grievance redressal is supported by a review mechanism, to minimize the recurrence of similar issues in future.

The Grievance Redressal policy follows the following principles:

- Investors will be treated fairly at all times
- Complaints raised by Investors will be dealt with courtesy and in a timely manner
- Queries and Complaints will be treated efficiently and fairly.

The Investment advisor and employees work in good faith and without prejudice, towards the interests of the Investors.

The Investment Advisor has a dedicated Client Servicing Team which is responsible for timely and prompt communication with our clients, while having an open attitude towards service recovery, and providing alternate solutions to investors, thus ensuring healthy relationships with our clients.

Grievance Redressal Mechanism

Client's queries / complaints may arise due to lack of understanding or a deficiency of service experienced by clients. Deficiency of service may include lack of explanation, clarifications, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards client.

Please contact our compliance officer Mr. Gala Ronak, email id: team@pararthya.in and phone no: +91-9082765273

You may also approach CEO/ partner/ IA- Mr. Nikunj Kishor Gala, email id: nikunj@pararthya.in and phone No: 9082765273

In case you are not satisfied with our response you can lodge your grievance with SEBI at http://scores.sebi.gov.in or you may also write to any of the offices of SEBI. For any queries, feedback or assistance, please contact SEBI office on Toll Free Helpline at 1800 22 7575/ 1800 266 7575. SCORES may be accessed thorough SCORES mobile application as well, same can be downloaded from below link: https://play.google.com/store/apps/details?id=com.sebi&hl=en

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

For, **Pararthya Capital Management LLP**

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Refund and Termination Policy

At **Pararthya Capital Management LLP (RIA)**, a SEBI-registered Investment Advisor, we are committed to maintaining the highest standards of transparency, compliance, and client satisfaction. Our refund and termination policy is designed in accordance with the guidelines prescribed by the SEBI.

It is our established practice to issue invoices for investment advisory services at the conclusion of the financial year, subsequent to the complete rendition of such services. As no advance fees are solicited or received, the issue of fee refunds does not arise. This methodology ensures full compliance with applicable SEBI (Investment Advisers) Regulations, 2013, as amended, which proscribe the collection of fees prior to service delivery absent explicit client authorization for limited advance billing, thereby obviating any necessity for pro-rata refunds or breakage fee computations under Regulation 26.

The Investor may terminate the service at any time by providing written notice to Pararthya Capital at least thirty (30) days prior to the intended termination date.

In the event of the Investor's death, insolvency, dissolution, or winding-up during the subsistence of this Agreement, upon receipt by Pararthya Capital of written notice of such event, Pararthya Capital shall forthwith cease all operations in respect of the Investor's Portfolio and the service shall stand terminated with effect from the date of such notice.

Notwithstanding anything contained herein, Pararthya Capital reserves the absolute right to terminate the service at its sole discretion at any time by giving not less than thirty (30) days' prior written notice to the Investor, without assigning any reason therefor.

No refund of advisory fees accrued or charged up to the date of termination shall be made in any circumstance.

For, **Pararthya Capital Management LLP**

FOR PARARTHYA CAPITAL MANAGEMENT LLP

Partner

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