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Date: August 11, 2023

To,  
The Manager,  
Investment Management Department,  
Division of Funds -1, SEBI Bhavan 3<sup>rd</sup> Floor A Wing,  
Plot No. C4- A, 'G' Block, Bandra - Kurla Complex,  
Bandra ( E) Mumbai - 400 051.



Respected Sir,

**Ref: Marathon Trends Advisory Pvt Ltd, Reg No. INP000005722**

**Sub: Submission of Disclosure Document**

With reference to the above-captioned subject, please find enclosed the following documents dated 11.August.2023 for your perusal.

1. Disclosure Document Certification from Chartered Accountants.
2. Disclosure Document
3. Form C

Hope you will find the above in order, please do let us know for any further documents/information are required. We shall be glad to submit the same.

You may contact Mr. Atul Suri at - 8169871990/9136909479 or Email at [atul@marathontrends.com](mailto:atul@marathontrends.com) for any further requirements.

Please acknowledge the receipt of the same.

Thanking you,

Yours faithfully  
For Marathon Trends Advisory Pvt Ltd

Mr. Atul Suri  
Director  
Encl: As Above

**CERTIFICATE**

We hereby certify that we have reviewed the Disclosure Document dated 11<sup>th</sup> August 2023, prepared by **M/s. Marathon Trends Advisory Private Limited (SEBI Registered Portfolio Manager – INP000005722)** having corporate address as **Office no.602, 6th Floor, Landmark Platinum plot no 337/338, Corner of S.V. Road & 34th Road, Khar West, Mumbai - 400052, Maharashtra** in accordance with Disclosure Document as stated in Schedule V of Regulation 22(3) of Securities and Exchange Board of India (“SEBI”) (Portfolio Managers) Regulations, 2020, (‘the Regulations’).

**Management Responsibility:**

The Management of the Company is responsible for preparation of the attached Disclosure Document in accordance with the Regulations.

**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 March 31, 2021, March 31, 2022 and March 31, 2023 and previous disclosure document submitted to SEBI, other relevant records, the information, explanations and representations furnished by the Management.

We have relied on the representation given by the Management about the penalties or litigations, group companies, performance calculation of the Portfolio Manager and audit observations (if any) against the Portfolio Manager mentioned in the Disclosure Document.

**Opinion:**

Further to our comments, we certify that the disclosures made in the Disclosure Document dated 11<sup>th</sup> August 2023 are true, fair and adequate to enable the investors to make well informed decisions.

**Restrictions on Use:**

This Certificate has been issued pursuant to Schedule V of Regulation 22 (3) of Securities and Exchange Board of India ("SEBI") (Portfolio Managers) Regulations, 2020, ('the Regulations') and at the request of M/s. Marathon Trends Advisory Private Limited for the purpose of submitting the same to SEBI and the Portfolio Management Service Clients. The same should not be used or referred to for any other purpose without our prior written consent.

**Place: Mumbai**

**Date: 11<sup>th</sup> August 2023**

**For B Y & Associates  
Chartered Accountants  
Firm Reg. No. 123423W**

**CA Kirit Jain  
Partner  
M. No: 179354  
UDIN: 23179354BGXNFE9575**

**PORTFOLIO MANAGEMENT SERVICES****DISCLOSURE DOCUMENT****OF****MARATHON TRENDS ADVISORY PRIVATE LIMITED.****(SEBI Registration No. INP000005722)**

*(As per the requirement of the Fifth Schedule under Regulation - 22(3) of SEBI (Portfolio Managers) Regulations, 2020)*

- (i) The Document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended from time to time and filed with SEBI.
- (ii) The Document has been filed with the Board (SEBI) along with the certificate in the prescribed format in terms of regulation 22 of SEBI (Portfolio Managers) Regulation 2020.
- (iii) The purpose of the Document is to provide essential information about the Portfolio Management Services (PMS) in a manner to assist and enable the investors in making an informed decision for engaging a Portfolio Manager.
- (iv) The document contains 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.
- (v) This Disclosure Document is dated 11. August 2023 **(financial data considered up to 31<sup>st</sup> March, 2023).**

**Details of the Portfolio Manager**

Name of Portfolio Manager : Marathon Trends Advisory Private Limited  
 SEBI Registration Number : INP000005722  
 Corporate Office Address : Office no.602, 6<sup>th</sup> Floor, Landmark Platinum plot no 337/338, Corner of S.V. Road & 34<sup>th</sup> Road, Khar West, Mumbai - 400052  
 Phone No(s) : +91-9136909479 / +91-8169871990  
 E-mail address : [contacts@marathontrends.com](mailto:contacts@marathontrends.com) / [atul@marathontrends.com](mailto:atul@marathontrends.com)  
 Website : <http://www.marathontrends.com>

**Details of Principal Officer**

Name of Principal Officer : Mr. Atul Suri  
 Corporate Office Address : Office no.602, 6<sup>th</sup> Floor, Landmark Platinum plot no 337/338, Corner of S.V. Road & 34<sup>th</sup> Road, Khar West, Mumbai - 400052  
 Phone No(s) : +91-9136909479 / +91-8169871990  
 E-mail address : [atul@marathontrends.com](mailto:atul@marathontrends.com)





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## Contents of Disclosure Document

### 1) Disclaimer clause:

The particulars given in this Document have been prepared in accordance with the SEBI (Portfolio Managers) Regulations 2020 and filed with SEBI. This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the document. You are requested to retain the document for future reference. This document is not for public distribution and has been furnished to you solely for your information and may not be reproduced or redistributed to any other person.

Notwithstanding anything contained in the Disclosure Document, the provisions of SEBI (Portfolio Managers) Regulations, 2020 and as amended from time to time and the circulars/guidelines issues from time to time thereunder shall be applicable.

This Disclosure Document and a certificate in Form C must be provided to the Client, at least before entering into an agreement with the Client.

### 2) Definitions:

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

- (a) "Act" means the Securities and Exchange Board of India, Act 1992 (15 of 1992) as amended from time to time.
- (b) "Accreditation Agency" means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by the Board from time to time.
- (c) "Accredited Investor" means any person who has been granted a certificate by the accreditation agency who:
- i. in the case of an individual, HUF, family trust, or sole proprietorship has:
    - the annual income of at least two crore rupees; or
    - the net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees are in the form of financial assets; or
    - the annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crores fifty lakh rupees are in the form of financial assets.
  - ii. in the case of a body corporate, has a net worth of at least fifty crore rupees;
  - iii. in case of a trust other than a family trust, has a net worth of at least fifty crore rupees;
  - iv. in the case of a partnership firm set up under the Indian Partnership Act, 1932, each partner independently meets the eligibility criteria for accreditation.

Provided that the Central Government and the State Governments, developmental agencies set up under the aegis of the Central Government or the State Governments, funds set up by the Central Government or the State Governments, qualified institutional buyers as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category I foreign portfolio investors, sovereign wealth funds and multilateral agencies and any other entity as may be specified by the Board from time to time, shall be deemed to be an accredited investor and may not be required to obtain a certificate of accreditation.





- (d) **"Agreement"** means the agreement between Portfolio Manager and its Clients in terms of Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020 issued by the Securities and Exchange Board of India and shall include all recitals, schedules, exhibits and Annexure attached thereto and any amendments made to this Agreement by the Parties in writing.
- (e) **"Assets"** means (i) the Portfolio and/or (ii) the Funds and includes all accruals, benefits, allotments, calls, refunds, returns, privileges, entitlements, substitutions and/or replacements or any other beneficial interest, including dividend, interest, rights, bonus as well as residual cash balances, if any (represented both by quantity and in monetary value), in relation to or arising out of Assets.
- (f) **"Bank Account"** means one or more accounts opened, maintained and operated by the Portfolio Manager with any of the Scheduled Commercial Banks in the name of the Client or a pool account in the name of Portfolio Manager to keep the Funds of all clients.
- (g) **"Benchmark"** means the Benchmark selected by the Portfolio Manager pursuant to the SEBI circular dated 16th December 2022, to indicate performance of the portfolio vis a vis markets, which enables investors to evaluate relative performance of portfolio managers
- (h) **"Board" or "SEBI"** 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, 1992 as amended from time to time.
- (i) **"Body corporate"** shall have the meaning assigned to it under clause (11) of section 2 of the Companies Act, 2013 (18 of 2013) as amended from time to time;
- (j) **"Business Day"** means days other than:
- Saturday and Sunday,
  - a day on which the Banks in Mumbai and/or RBI are closed for business/clearing,
  - a day on which the Bombay Stock Exchange and the National Stock Exchange are closed,
  - a day on which normal business could not be transacted due to storms, floods, bands, strikes, etc.
- (k) **"Certificate"** means a certificate of registration issued by the Board;
- (l) **"Change of status or constitution"** in relation to a portfolio manager-
- (i) means any change in its status or constitution of whatsoever nature; and
  - (ii) without prejudice to generality of sub-clause (i), includes-
    - (A) amalgamation, demerger, consolidation or any other kind of corporate restructuring falling within the scope of section 230 of the Companies Act, 2013 (18 of 2013) or the corresponding provision of any other law for the time being in force;
    - (B) change in its managing director or whole-time director; and
    - (C) any change in control over the body corporate;
- (m) **"Change in control"**, in relation to a portfolio manager being a body corporate: –
- (i) if its shares are listed on any recognized stock exchange, shall be construed with reference to the definition of control in terms of Regulation 2(e) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended from time to time;
  - (ii) in any other case, change in the controlling interest in the body corporate; Explanation. – For the purpose of sub-clause (ii), the expression "controlling interest" means,
    - (A) an interest, whether direct or indirect, to the extent of at least fifty one percent of voting rights in the body corporate;
    - (B) right to appoint majority of the directors or to control the management directly or indirectly;



- (n) **"Chartered Accountant"** means a Chartered Accountant as defined in clause (b) of sub-section (1) of section 2 of the Chartered Accountants Act, 1949 (38 to 1949) and who has obtained a certificate of practice under sub-section (1) of section 6 of that Act;
- (o) **"Client"** means the person who enters into an Agreement with the Portfolio Manager for managing its portfolio/funds.
- (p) **"Custodian"** means a custodian registered under the SEBI (Custodian of Securities) Regulations, 1996 appointed by the Portfolio Manager for maintaining custody of funds and securities of the client.
- (q) **"Discretionary Portfolio Management Services"** means the portfolio management services rendered to the Client, by the Portfolio Manager on the terms and conditions contained in this Agreement, where under the Portfolio Manager exercises any degree of discretion in investments or management of assets of the Client;
- (r) **"Direct on-boarding"** means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.
- (s) **"Document"** means Disclosure Document
- (t) **"Disclosure Document"** shall mean the Disclosure Document issued by the Portfolio Manager and as specified in Regulations 22(3) of the Regulations and Schedule V of the Regulations and made available to the Client in accordance with the Regulations;
- (u) **"Financial year"** means the year starting from 1<sup>st</sup> April and ending on 31<sup>st</sup> March of the following year
- (v) **"Funds"** means the monies placed by the Client with the Portfolio Manager and any accretions thereto.
- (w) **"Goods"** means the goods notified by the Central Government under clause (bc) of section 2 of the Securities Contracts (Regulation) Act, 1956 and forming the underlying of any commodity derivative;
- (x) **"High Water Mark"** means the value of the highest Closing NAV achieved by the Portfolio in any year during the subsistence of this Agreement (adjusted for any additional funds/withdrawals by the Client in that year) and net of Portfolio Management Fees, for that year.
- (y) **"Investment Advice"** means advice relating to investing in, purchasing, selling or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral or through any other means of communication for the benefit of the client and shall include financial planning.
- (z) **"Investment Approach"** shall mean a broad outlay of the type of securities and permissible instruments to be invested in by the portfolio manager for the customer, taking into account factors specific to clients and securities;
- (aa) **"Investment Management Fees"** shall have the meaning attributed thereto in Clause [10] of this Document under the head Fees & Services Charged (To be charged on Actuals)
- (bb) **"Large Value Accredited Investor"** means an accredited investor who has entered into an agreement with the portfolio manager for a minimum investment amount of ten crore rupees.
- (cc) **"Net Asset Value" (NAV):** Net Asset Value is the market value of assets in a portfolio consisting of equity, derivative, debt, mutual funds units, cash, cash equivalents, accrued interest or benefits, receivables, if any etc. less payable if any



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- (dd) **"Non-Discretionary Portfolio Management Services"** means the portfolio management services rendered to the client, by the Portfolio Manager on the terms and conditions contained in the Agreement with respect to the Assets (including the Portfolio and Funds) of the Client, where the Portfolio Manager shall provide advice in relation to assets but does not exercise any discretion with respect to investments or management of the Assets of the Client, and invests and manage the Assets only after seeking and taking approval from the Client, entirely at the Client's risk.
- (ee) **"NRI"** means a Non-Resident Indian as defined under the Foreign Exchange Management Act, 1999.
- (ff) **"NRO"** means Non-Resident Ordinary Account.
- (gg) **"Parties"** means the Portfolio Manager and the Client, and **"Party"** shall be construed accordingly.
- (hh) **"Person"** includes any individual, partners in a partnership, limited liability 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.
- (ii) **"Portfolio"** means the total holdings of securities and goods belonging to any person.
- (jj) **"Portfolio Manager"** means **"Marathon Trends Advisory Private Limited"** who has obtained a certificate of registration from SEBI to act as a Portfolio Manager under Securities and Exchange Board of India (Portfolio Managers) Rules and Regulations, 2020 vide Registration No. INP000005722.
- (kk) **"Principal Officer"** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:-
- The decisions made by the portfolio manager for the management or administration of portfolio of securities or the funds of the client, as the case may be;
  - All the other operations of the portfolio managers
- (ll) **"Related party"** in relation to a portfolio manager, means -
- (a) a director, partner or his relative;
  - (b) key managerial personnel or his relative;
  - (c) a firm, in which a director, partner, manager or his relative is a partner;
  - (d) a private company in which a director, partner or manager or his relative is a member or director;
  - (e) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two per cent. of its paid-up share capital;
  - (f) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
  - (g) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:  
Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
  - (h) any body corporate which is—
    1. a holding, subsidiary or an associate company of the portfolio manager; or
    2. a subsidiary of a holding company to which the portfolio manager is also a subsidiary;
    3. an investing company or the venturer of the portfolio manager;
 Explanation. —For the purpose of this clause, "investing company or the venturer of a portfolio manager" means a body corporate whose investment in the portfolio manager would result in the portfolio manager becoming an associate of the body corporate.
  - (i) a related party as defined under the applicable accounting standards;
  - (j) such other person as may be specified by the Board.
- Provided that,





- a. any person or entity forming a part of the promoter or promoter group of the listed entity; or
- b. any person or any entity, holding equity shares:
  - i. of twenty per cent or more; or
  - ii. of ten per cent or more, with effect from April 1, 2023;in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediate preceding financial year; shall be deemed to be a related party

(mm) **"Regulations"** means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended from time to time;

(nn) **"Scheduled Commercial Bank"** means any bank included in the Second Schedule to the Reserve Bank of India Act, 1934(2 of 1934).

(oo) **"Securities"** shall mean and include "Securities" as defined under the Securities Contracts (Regulation) Act, 1956; Shares, scripts, stocks, bonds, warrants, convertible and non-convertible debentures, fixed return investments, equity linked instruments, negotiable instruments, deposits, money market instruments, commercial paper, certificates of deposit, units issued by the Unit Trust of India and/or by any mutual funds, exchange traded funds, mortgage backed or other asset backed securities, derivatives, derivative instruments, options, futures, foreign currency commitments, hedges, swaps or netting off and any other securities issued by any company or other body corporate, any trust, any entity, the Central Government, any State Government or any local or statutory authority and all money rights or property that may at any time be offered or accrue (whether by rights, bonus, redemption, preference, option or otherwise) and whether in physical or dematerialized form in respect of any of the foregoing or evidencing or representing rights or interest therein; and any other instruments or investments (including borrowing or lending of securities) as may be permitted by applicable law from time to time.

(pp) **"Strategy"** means an additional layer of broadly defined investment themes adopted by the Portfolio Managers in addition to Investment Approach pursuant to SEBI Circular dated 16<sup>th</sup> December 2022.

#### INTERPRETATION:

- 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.
- All references to the masculine shall include the feminine and all references, to the singular shall include the plural and vice-versa.
- All references "Rs." refer to Indian Rupees. A "crore" means "ten million" and a "lakh" means a "hundred thousand".



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### 3) Description about Portfolio Manager:

#### i) History, Present business and Background of the Portfolio Manager:

##### a) History of the Portfolio Manager:

Marathon Trends Advisory Private Limited is a company incorporated on 22<sup>nd</sup> March 2006. It is classified as a Non-Government company and is registered at Registrar of Companies, Mumbai. Mr. Atul Satish Chandra Suri and Ms. Deepshikha Dharmaraj are the Directors of the company. At the moment, Marathon Trends Advisory Private Limited is providing Portfolio Management Services

Mr. Atul Suri is an MBA, Specializing in Banking and Finance. He has done his masters from University of Technology Sydney, Australia. He has over 30 years of experience in Indian Capital markets.

Recently, the Company has also obtained a Certificate to act as Registered Investment Adviser from SEBI under the SEBI (Investment Advisers) Regulations, 2013 vide Registration No. INA00001831 effective from **01-August-2023** and from BASL vide Registration No. BASL2035 effective from **02-August-2023**, and the certificate shall be valid till it is suspended for catering to Retails Clients.

##### b) Present Business and Background:

The Company has obtained a Portfolio Manager Certificate of Registration No. INP000005722 from SEBI effective from **07<sup>th</sup> July 2017**, the certificate shall be valid till it is suspended.

The company is providing value-added services to the client which aligns with the client's long-term goals of wealth creation. The company also leverages its research capabilities to the fullest extent to generate long term returns for the clients.

#### ii) Directors and Promoters of the Portfolio Manager:

Mr. Atul Suri and Ms. Deepshikha Dharmaraj are the Directors and Promoters of Marathon Trends Advisory Private Limited.

##### Director's Background

###### ➤ Mr. Atul Suri

Mr. Atul Suri is a Master Specializing in Banking and Finance. He has done his masters from University of Technology Sydney, Australia. He has over 30 years of experience in Indian Capital markets.

Mr. Atul Suri has worked with Rakesh Jhunjunwala's family office, RARE Enterprises in 2008. He had worked at RARE for the 9 years. He was a Technical Advisor to Mr. Rakesh Jhunjunwala. He has also managed money with an independent book, which had an independent fund allocation. He had also developed trading systems, which were oriented to capture long term trends and manage large amounts of money.

###### ➤ Ms. Deepshikha Dharmaraj

Ms. Deepshikha Dharmaraj has over 27 Years of experience in corporate India. She is Chief Executive Officer of BCW India Group. She brings almost three decades of experience in public relations and her role encompasses the growth of clients and partnerships along with developing new services to deliver on the company's promise of integrated communication for global and Indian brands. She had managed new business development, marketing initiatives, all external communication and helps create an enabling environment with a strong backbone of processes for the company's next level of growth.





Leveraging this experience and insight, she has counseled clients across a variety of industries and brands.

**iii) Top 10 Group companies/firms of the portfolio manager on turnover basis:**

There are no group companies under the same management as explained in the SEBI Circular No. RPM Circular No. 1 (2002-03).

**iv) Details of the Services offered:**

The Portfolio Manager offers Portfolio Management services under Discretionary, Non-Discretionary, and Advisory categories to its prospective clients.

**a. Discretionary Portfolio Management -**

Under the Discretionary Portfolio Management Services, the Portfolio Manager will have the sole and absolute discretion with regard to the selection of the type of securities traded on behalf of the Client and held in the portfolio, based on the executed agreement. The Portfolio Manager has the discretion as regards the choice and timing of the investment decisions, to make changes in the investment and to invest some or all of the funds of the Client in such manner and in such industries/sectors/securities as the Portfolio manager discretion. The Securities invested/disinvested by the Portfolio Manager for Clients may differ from Client to Client. The Portfolio Manager's decision (taken in good faith) in deployment of the Clients' funds is absolute and final and cannot be called in question or be open for review at any time during the course of the Agreement or any time thereafter except on the ground of mala fide intent, fraud, conflict of interest or gross negligence. This right of the Portfolio Manager will be exercised strictly in accordance with the relevant acts, rules, regulations, guidelines, and notifications in force from time to time.

In the case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may invest up to 100% of the assets under management in unlisted securities.

**b. Non-discretionary Portfolio Management -**

In the case of non-discretionary services, the investment objectives and the securities to be invested would be entirely decided by the Client. The same could vary widely from client to client. However, the execution would be carried out only after getting approval from the Client.

Under the Non-Discretionary category, the investment decisions of the Portfolio Manager are guided by the instructions received from the client. The deployment of funds is the sole discretion of the client and is to be exercised by the portfolio manager in a manner strictly complies with the client's instruction. The decision of the client in the deployment of funds and the handling of his / her / its portfolio is absolute and final. The role of the Portfolio Manager apart from adhering to investments or divestments upon instructions of the client is restricted to providing market intelligence, research reports, trading strategies, trade statistics and such other material which will enable the client to take appropriate investment decisions. For the purpose of acting on the client's instructions, the Portfolio Manager shall take instructions in writing or through any other media mutually agreed such as email, fax, telephone or suitable and secured message and may include managing, renewing and reshuffling the portfolio, buying and selling of securities, keeping safe custody of the securities and monitoring book closures, dividend, bonus, rights, etc. so that all benefits accrue to the client's portfolio, for an agreed fee structure and for a definite described period, entirely at the client's risk.

However, for the client(s) other than those falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest only up to 25% of the assets under management in unlisted securities in addition to the securities for discretionary portfolio management services. In case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest up to 100% of the assets under management in unlisted securities.



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**c. Advisory Services -**

The Portfolio client is given purely advisory services as stipulated under SEBI PMS Regulations and in accordance with the requirement of the client. Portfolio Manager gives advice to the client regarding investment/disinvestment in Securities. However, discretion lies with the client whether to act upon it or to ignore the advice. The Portfolio Manager will provide advisory portfolio management services, in terms of the SEBI (Portfolio Manager) Regulations, 2020 and SEBI (Investment Advisers) Regulations, 2013, which shall be in the nature of Investment advice and may include advice relating to investing in, purchasing, selling or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral or through any other means of communication for the benefit of the client. Investment advice shall be for an agreed fee structure and for a period agreed and entirely at the client's risk. The Portfolio Manager shall act in a fiduciary capacity towards its client.

However, for Client(s) other than those falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest only up to 25% of the assets under management in unlisted securities in addition to the securities for discretionary portfolio management services. In case of client(s) falling under the category of Large Value Accredited Investors, the portfolio manager may advise to invest up to 100% of the assets under management in unlisted securities.

**Direct Onboarding:**

The Portfolio Manager provides the facility to the Client for Direct on-boarding with us without any involvement of a broker/distributor/agent engaged in distributor services. The Client can onboard by directly contacting us or sign up for our services by writing to us at [contact@marathontrends.com](mailto:contact@marathontrends.com).

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

Sr. No.	Particulars	Remarks
1	All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made thereunder	None
2	The nature of the penalty/direction	None
3	Any pending material litigation / legal proceedings against the portfolio manager / key personnel with separate disclosure regarding pending criminal cases, if any:	None
4	Any deficiency in the systems and operations of the portfolio manager observed by the Board or any regulatory agency:	None
5	Any inquiry/ 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 thereunder:	None
6	Penalties imposed for any economic offense and/or violation of any securities laws	None





## 5) Services Offered

### 1. Investment objective

The funds of the Clients shall be invested in such capital and money market instruments, including securities as defined under the Securities Contract (Regulation) Act, 1956, and shall include any securities, derivatives and other instruments which are tradable on any of Exchanges as well as such units of Unit Trust of India and / or other mutual funds, government securities, debt instruments, negotiable instruments, unlisted securities, certificates of deposit, participation certificates, commercial paper, securitized debt instruments, investments in company deposits, bank deposits, treasury bills and such other eligible modes of investment and/or forms of deployment within the meaning of the Regulation issued by SEBI as amended from time to time.

The Portfolio Manager may, however, enter into futures contracts, options in securities, options on indices and other similar types of investment, which may result in the Client having to provide initial margin payments and which would be deemed. The Portfolio Manager shall observe a high standard of integrity and fair dealing in all transactions involving the Client's Account. The investment in the securities mentioned in the above point will be in accordance with the objectives as given in the agreement and also any of the investment approaches accepted by the client.

The investment objectives would be one or more of the following or combination thereof:

- a. To provide investment flexibility to client across various market segments
- b. To generate a routine return on investments
- c. To generate short term and/ or long-term capital appreciation

The Portfolio Manager offers various investment strategies-based portfolios to allow for standardized customization in sync with investor profile and also customized portfolio as per suitability and specific requirements of the client. The general objective is to formulate and device the investment philosophy to achieve long term growth of capital.

**Objective of the Derivative Exposure:** The objective to use derivatives is purely to protect the portfolio in case of a severe market correction. We seek to use derivatives purely to protect the client's portfolio in case of sharp drawdowns of the aggregate market. The Derivatives will only be used for hedging and/or portfolio rebalancing.

### 2. Types of Securities

The portfolio manager/fund manager shall invest in all such types of securities as defined in above (Please refer to definitions) and in all such securities as permissible from time to time.

Consistent with the investment objective and subject to Regulations, the corpus will be invested in any of (but not exclusively) the following securities:

- i. Equity and equity-related securities including convertible bonds (including equity-linked debentures) and debentures and warrants carrying the right to obtain equity shares;
- ii. Securities issued/guaranteed by the Central, State Governments and local governments (including but not limited to coupon bearing bonds, zero coupon bonds, and treasury bills);
- iii. Obligations of Banks (both public and private sector) and Development Financial Institutions like Certificate of Deposits (CDs), Coupon bearing Bonds, Zero Coupon Bonds;
- iv. Money Market instruments permitted by SEBI/RBI;
- v. Certificate of Deposits (CDs);
- vi. Commercial Paper (CPs);
- vii. Mutual Fund units, Fixed Deposits, Bonds, debentures, etc.;
- viii. Derivatives including but not limited to Futures, Options, Arbitrage, etc. in accordance with SEBI Regulations;
- ix. Units of venture funds;





- x. Securitization instruments;
- xi. Foreign securities as permissible by Regulations from time to time;
- xii. Any other securities and instruments as permitted by the Regulations from time to time.

The securities may be acquired through Initial Public Offerings (IPOs), secondary market operations, rights offers, or negotiated deals.

### 3. **Terms of usage of Derivative products:**

- a) **Quantum of Exposure in Derivatives:** Up to 100% of the market value of Assets i.e., the total exposure of the client in derivatives shall not exceed the assets placed with the Portfolio Manager.
- b) **Manner & Purpose of using derivative Products:** For Hedging, Portfolio Rebalancing, Yield Enhancement or for the purpose of taking such positions as may be permitted by the SEBI rules, regulations and guidelines.
- c) **Type of Derivative Instrument:** Stock and Index Futures & Options and such other products as may be permissible from time to time.
- d) **Terms of Valuation of Derivative Products:** These products shall be valued at the settlement/closing value (as per accounting policy of the Portfolio Manager) of the concerned securities on the National Stock Exchange of India Limited or any other Exchange (as the Portfolio Manager may choose).
- e) **Terms of Liquidation/Settlement:** The Derivative Instrument will be liquidated at the prevailing market prices or will be allowed to expire / to be exercised at the price specified by the respective Exchange(s) on the expiry date/date of exercise.

Prior permission shall be required from the client in the event of any changes in the manner or terms of usage of derivative products by the Portfolio Manager.

### 4. **Minimum Investment Amount**

The Portfolio Manager will not accept a corpus of less than Rs. 50 lacs or such minimum amount as specified by SEBI from time to time. The client may on one or more instances or on a continual basis, make further placements of funds/securities under the services. However, the said minimum investment amount shall not be applicable to Accredited Investors.

### 5. **Investment Approach:** -

#### **a. Mega Trends: Multicap-Growth:**

##### **i. Strategy – Equity**

##### **ii. Investment Objective:**

Mega Trends: Multicap-Growth is a long only Equity investment plan, which aims to identify stocks which have the potential to be long term trends. These are companies which are experiencing a paradigm shift in their business model and this forms the basis of a steady long term move in their stock price. This long-term trend in the stock price is a function of steady EPS growth and PE expansion.

The plan is sector agnostic and has a bottom-up approach, the focus is on identifying Super long-term trends rather than predict the market moves.

The stocks targeted will mostly be from generally from the BSE500 TRI bucket, this is done so that we are invested in frontline and liquid stocks.



The aim is to allocate money in a concentrated way and have approximately around 20 stocks in the portfolio. Whatever cash may be available from time to time will be parked in debt instruments.

Once investments are made in stocks an attempt will be to patiently ride the trend through reasonable levels of volatility.

We believe that money is made by sitting on good investments rather than frequent entries and exits. This strategy will also help to keep brokerage costs low and make investments that are tax efficient. Low churn and Tax efficiency is our attempt.

The tools used by the analysts and CIO are qualitative and quantitative in nature. Research is deep and monitoring of investments is active.

The exit of investment positions is done when we feel the long-term trend has changed and the stock no longer possess special characteristics and possibilities of continuing to be a long-term trending stock. Exits are made without emotional attachment to the stock. We are very data-driven in our exits and make decisions logically rather than emotionally.

Our treatment of all our clients is even and attempts will be made to align everybody with our model portfolio. Complete transparency will be maintained with clients and reporting will be fast and regular.

iii. **Types of Securities:**

Please refer to Point 5.2 above for a detailed description of the type of securities.

iv. **Basis of Selection of Securities:**

1. Identify the liquid universe of stocks in the market
2. Find stocks that are in long term multiyear trends
3. Build a portfolio of stocks showing promise of good momentum
4. Exit when prices break longer term trend

v. **Portfolio Allocation across type of Securities:**

Asset allocation means spreading the portfolio across various asset classes. Broadly speaking, that means a mix of stocks, Index ETF'S, Liquid bees and Listed Mutual Funds

Asset allocation in our portfolio is an investment strategy in which portfolio is divided in their investment portfolios between different diverse assets classes to minimize investment risks. The assets classes in our strategy fall into three broad categories: Equities, Index ETF'S, Liquid bees and Listed Mutual Funds.

Most of the time portfolio is invested in equities up to 99 %

And as and when situation arises fund manager may take a call to hold some portion in Fixed income, or cash and equivalents.

vi. **Appropriate Benchmark to compare performance and basis for the choice of Benchmark:**

**BSE500TRI.** An attempt will be made to outperform the benchmark on the upside with controlled and reasonable volatility. We believe in the principal of cutting our losses soon and



A handwritten signature in blue ink, appearing to be "A. S.", written over a horizontal line.



letting our profits run. A benchmark is an index, or a market measurement indicator, that is used to assess the risk and performance of the investment.

Stock market benchmarks or indices - essentially a method of measuring the changing value of a group of securities over time.

Benchmark indices are useful tools for fund managers and investors to measure the performance of their investments against a common indicator of investment performance.

The selected benchmark is as prescribed by APMI and SEBI under equity strategy and also the prescribed benchmark covers a wide range of companies providing better results for performance comparison

Our selection of Benchmark is based on the universe that we track and it is also comprise of 95% of the market capitalization.

vii. **Indicative Investment horizon (tenure):**

The period over which investors stay invested in an investment option is referred to as the investment horizon. This investment horizon decides their desired exposure to risk and income needs, all of which contribute towards the selection of securities. Determining the investment horizon is one of the crucial steps an investor must take when creating a portfolio, and to get the optimal return from the strategies one should have a time horizon of minimum of 3-5 years.

viii. **Risks associated with the Investment Approach:**

Risk is defined in financial terms as the chance that an outcome or investment's actual gains will differ from an expected outcome or return. Risk includes the possibility of losing some o of an original investment.

Quantifiably, risk is usually assessed by considering historical behaviors and outcomes. In finance, standard deviation is a common metric associated with risk. Standard deviation provides a measure of the volatility of asset prices in comparison to their historical averages in a given time frame.

Overall, it is possible and prudent to manage investing risks by understanding the basics of risk and how it is measured. Learning the risks that can apply to different scenarios and some of the ways to manage them holistically will help all types of investors and business managers to avoid unnecessary and costly losses.

Also please refer to the below point 6 for further risk associated with the approach.

ix. **Other Salient features, if any:**

None

b. **Trend Following: Flexicap-Growth:**

i. **Strategy – Equity**

- ii. **Investment Objective:** Trend following is an investment style that aims to generate returns by identifying and riding market trends. The core principle of this approach is to buy stocks that are appreciating in value and sell those that are declining, based on the belief that prices tend to move in a particular direction over time. Our approach to investing using the principles of Trend following is unique and has been refined over 30 years of experience of the CIO.



1. **Market Trends:** Trend following is based on the belief that markets tend to move in trends, and that by following these trends, investors can generate returns.
2. **Risk Management:** Trend following strategies emphasize risk management, which helps to minimize losses and protect capital during market downturns.
3. **Diversification:** Trend following can be a diversifying investment strategy, as it may perform differently than other traditional investment strategies, such as buy and hold.
4. **Flexibility:** Trend following is a flexible investment approach, as it can be applied to various markets and asset classes, including stocks, Index ETF'S, Liquid bees and Listed Mutual Funds
5. **Empirical Evidence:** Trend following has been supported by empirical evidence, with numerous studies showing that trend-following strategies have generated positive returns over the long term.

To implement our strategy,

- We first narrow down the large number of stocks listed in Indian markets to a select list that is liquid and allows for low-impact cost entry and exit.
- We then scan for stocks that have trending earnings, meaning strong growth in sales, healthy operating profit, and increasing net profit. We also look at long-term numbers and short-term momentum to select the stocks that meet our liquidity and fundamental criteria.
- Once we have identified these stocks, we look for three qualities: longevity of the trend, momentum in the trend, and distance from the exit point. We then build an approximately 20-25 stock portfolio.
- Our exit process is just as process-driven as our entry process and is implemented with discipline.

In implementing a trend-following strategy, investors often use technical and fundamental analysis to identify trends and make investment decisions based on past market data such as prices and earnings.

Trend following has several salient features. It is based on the belief that markets tend to move in trends and can generate positive returns over the long term. Trend following strategies emphasizes risk management, which helps to minimize losses and protect capital during market downturns. It can also be a diversifying investment strategy and is flexible, as it can be applied to various markets and asset classes, including stocks, Index ETF'S, Liquid bees and Listed Mutual Funds.

In conclusion, trend following is a style of investing that requires skill, experience, patience, and discipline. It aims to generate returns by identifying and riding market trends, and has several advantages, including reduced risk and the potential for higher returns.

### iii. **Types of Securities:**

Please refer to Point 5.2 above for a detailed description of the type of securities.

### iv. **Basis of Selection of Securities:**

1. Identify the liquid universe of stocks in the market
2. Find stocks that are in long term multiyear trends
3. Build a portfolio of stocks showing promise of good momentum
4. Exit when prices break longer term trend

### v. **Portfolio Allocation across type of Securities:**





Asset allocation means spreading the portfolio across various asset classes. Broadly speaking, that means a mix of stocks, Index ETF'S, Liquid bees and Listed Mutual Funds.

Asset allocation in our portfolio is an investment strategy in which the portfolio is divided in their investment portfolios between different diverse assets classes to minimize investment risks. The assets classes in our strategy fall into three broad categories: Equities, Index ETF'S, Liquid bees and Listed Mutual Funds.

Most of the time portfolio is invested in equities up to 99 %

And as and when situation arises fund manager may take a call to hold some portion in Fixed income, or cash and equivalents.

vi. **Appropriate Benchmark to compare performance and basis for the choice of Benchmark:**

**BSE500TRI.** An attempt will be made to outperform the benchmark on the upside with controlled and reasonable volatility. We believe in the principal of cutting our losses soon and letting our profits run. A benchmark is an index, or a market measurement indicator, that is used to assess the risk and performance of the investment.

Stock market benchmarks or indices - essentially a method of measuring the changing value of a group of securities over time.

Benchmark indices are useful tools for fund managers and investors to measure the performance of their investments against a common indicator of investment performance.

The selected benchmark is as prescribed by APMI and SEBI under equity strategy and also the prescribed benchmark covers a wide range of companies providing better results for performance comparison.

Our selection of Benchmark is based on the universe that we track and it is also comprise of 95% of the market capitalization.

vii. **Indicative Investment horizon (tenure):**

The period over which investors stay invested in an investment option is referred to as the investment horizon. This investment horizon decides their desired exposure to risk and income needs, all of which contribute towards the selection of securities. Determining the investment horizon is one of the crucial steps an investor must take when creating a portfolio, and to get the optimal return from the strategies one should have a time horizon of minimum of 5 years.

viii. **Risks associated with the Investment Approach:**

Risk is defined in financial terms as the chance that an outcome or investment's actual gains will differ from an expected outcome or return. Risk includes the possibility of losing some o of an original investment.

Quantifiably, risk is usually assessed by considering historical behaviors and outcomes. In finance, standard deviation is a common metric associated with risk. Standard deviation provides a measure of the volatility of asset prices in comparison to their historical averages in a given time frame.

Overall, it is possible and prudent to manage investing risks by understanding the basics of risk and how it is measured. Learning the risks that can apply to different scenarios and some of the ways to manage them holistically will help all types of investors and business managers to avoid unnecessary and costly losses.





Also please refer to the below point 6 for further risk associated with the approach.

ix. **Other Salient features, if any:**

None

5. **Investments in Associate/Group Companies of the Portfolio Manager:**

Marathon Trends does not have any Associates/Group Companies.

6) **Risk Factors:**

The Portfolio Manager is not responsible for the loss if any, incurred or suffered by the Client. The risk factors, as perceived by management, in respect of the portfolio management services offered are enlisted below:

- 1) Investments in securities are subject to market risks and include price fluctuation risks. There are no assurances or guarantees that the objectives of investments in securities will be achieved. These investments may not be suited to all categories of investors.
- 2) The value of the Portfolio may increase or decrease depending upon various market forces and factors affecting the capital markets such as de-listing of Securities, market closure, a relatively small number of scrips accounting for a large proportion of trading volume. Consequently, the Portfolio Manager provides no assurance of any guaranteed returns on the Portfolio.
- 3) The past performance of the Portfolio Manager is not indicative of future performance. Investors are not being offered any guaranteed or indicative returns.
- 4) The Client stands a risk of loss due to lack of adequate external systems for transferring, pricing, accounting, and safekeeping or record keeping of Securities. Transfer risk may arise due to the process involved in registering the shares, physical and Demat, in the Portfolio Manager's name, while price risk may arise on account of availability of share price from stock exchanges during the day and at the close of the day.
- 5) Investment decisions made by the Portfolio Manager may not always be profitable.
- 6) Investments made by the Portfolio Manager are subject to risks arising from the investment objective, investment strategy, and asset allocation.
- 7) Not meeting the obligation to make Capital Contributions in terms of the Agreement may have implications as set out in the Agreement and may also impact the profitability of the Portfolio.
- 8) **Equity and Equity Related Risks:** Equity instruments carry both company specific and market risks and hence no assurance of returns can be made for these investments. While the Portfolio Manager shall take all reasonable steps to invest the Funds in a prudent manner in such instruments, such decisions may not always prove to be profitable or correct. Consequently, the Client shall assume any loss arising from such decisions made by the Portfolio Manager.
- 9) **Macro-Economic risks:** Overall economic slowdown, unanticipated corporate performance, environmental or political problems, changes to monetary or fiscal policies, changes in government policies and regulations with regard to industry and exports may have a direct or indirect impact on the investments, and consequently the growth of the Portfolio.
- 10) **Liquidity Risk:** Liquidity of investments in equity and equity-related securities are often restricted by factors such as trading volumes, settlement periods and transfer procedures. If particular security does not have a market at the time of sale, then the Portfolio may have to bear an impact depending on its exposure to that particular security. While Securities that are listed on a stock exchange generally carry



a lower liquidity risk, the ability to sell these investments is limited by overall trading volume on the stock exchange. Money market securities, while fairly liquid, lack a well developed secondary market, which may restrict the selling ability of such securities thereby resulting in a loss to the Portfolio until such securities are finally sold. Even upon termination of the Agreement, the Client may receive illiquid securities and finding a buyer for such Securities may be difficult. Further, different segments of the Indian financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances. Delays or other problems in settlement of transactions could result in temporary periods when the assets of the plan are un-invested and no return is earned thereon. The inability of the Portfolio Manager to make intended Securities purchases, due to settlement problems, could cause the Portfolio to miss certain investment opportunities.

- 11) Credit Risk: Debt securities are subject to the risk of the issuer's inability to meet the principal and interest payments on the obligations and may also be subject to the price volatility due to such factors as interest sensitivity, market perception, or the creditworthiness of the issuer and general market risk.
- 12) Interest Rate Risk: Is associated with movements in interest rates, which depend on various factors such as government borrowing, inflation, economic performance, etc. The value of investments will appreciate/ depreciate if the interest rates fall/rise. Fixed income investments are subject to the risk of interest rate fluctuations, which may accordingly increase or decrease the rate of return thereon. When interest rates decline, the value of a portfolio of fixed income securities can be expected to rise. Conversely, when the interest rate rises, the value of a portfolio of fixed income securities can be expected to decline.
- 13) Acts of State, or sovereign action, acts of nature, acts of war, civil disturbance are extraneous factors which can impact the Portfolio.
- 14) The Client stands the risk of total loss of value of an asset which forms part of the Portfolio or its recovery only through an expensive legal process due to various factors which by way of illustration include default or non-performance of a third party, investee company's refusal to register a Security due to legal stay or otherwise, disputes raised by third parties.
- 15) Reinvestment Risk: This risk arises from the uncertainty in the rate at which cash flows from an investment may be reinvested. This is because the bond will pay coupons, which will have to be reinvested. The rate at which the coupons will be reinvested will depend upon prevailing market rates at the time the coupons are received.
- 16) Non-Diversification Risk: This risk arises when the Portfolio is not sufficiently diversified by investing in a wide variety of instruments. As mentioned above, the Portfolio Manager will attempt to maintain a diversified Portfolio in order to minimize this risk.
- 17) Mutual Fund Risk: This risk arises from investing in units of Mutual funds. Risk factors inherent to equities and debt securities are also applicable to investments in mutual fund units. Further, scheme specific risk factors of each such underlying scheme, including the performance of their underlying stocks, derivatives instruments, stock lending, off-shore investments, etc., will be applicable in the case of investments in mutual fund units. In addition, events like change in fund manager of the scheme, take over, mergers and other changes in status and constitution of mutual funds, foreclosure of schemes or plans, change in government policies could affect the performance of the investment in mutual fund units.
- 18) The Portfolio Manager is neither responsible nor liable for any losses resulting from the Services.
- 19) Clients are not being offered any guaranteed/assured returns.





- 20) The investments under the Portfolio may be concentrated towards equity/equity related instruments of companies primarily belonging to a single or few sectors and hence shall be affected by risks associated with those sectors.
- 21) The Clients may not be able to avail of securities transaction tax credit benefit and/or tax deduction at source (TDS) credit and this may result in an increased incidence of tax on the Clients. The Client may incur a higher rate of TDS/ Dividend Distribution Tax in case the investments are aggregated in the name of the Portfolio Management Portfolio/Product.
- 22) The arrangement of pooling of funds from various Clients and investing them in Securities could be construed as an 'Association of Persons' (AOP) in India under the provisions of the Income-tax Act, 1961 and taxed accordingly.
- 23) In case of investments in Mutual Fund units, the Client shall bear the recurring expenses of the Portfolio Management Services in addition to the expenses of the underlying mutual fund schemes. Hence, the Client may receive lower pre-tax returns compared to what he may receive had he invested directly in the underlying mutual fund schemes in the same proportions.
- 24) After accepting the corpus for management, the Portfolio Manager may not get an opportunity to deploy the same or there may be a delay in deployment. In such a situation the Clients may suffer opportunity loss.
- 25) Clients will not be permitted to withdraw the funds/Portfolio (unless in accordance with the terms agreed with the Client). In addition, they are not allowed to transfer any of the interests, rights or obligations with regard to the Portfolio except as may be provided in the Agreement and in the Regulations.
- 26) In case of early termination of the Agreement, where Client Securities are reverted to the Client, additional rights available while the Securities were held as part of the Portfolio that were negotiated by the Portfolio Manager with an investee company or its shareholders may no longer be available to the Client.
- 27) Changes in Applicable Law may impact the performance of the Portfolio.
- 28) Derivative transactions may be prone to problems of liquidity, mispricing, lack of or improper correlation with assets or such other reasons.
- 29) Derivative transactions require maintenance of margins, adequate control mechanisms forecasting ability, etc.
- 30) Risks pertaining to stock lending: In the case of stock lending, risks relate to the defaults from counterparties with regard to securities lent and the corporate benefits accruing thereon, the inadequacy of the collateral and settlement risks.
- 31) Risk arising out of non-diversification, if any.
- 32) Specific Risk Disclosures associated with investments in Securitised Debt Instruments
- Presently, the secondary market for such securitized papers is not very liquid. This could limit the ability of the portfolio manager to resell them. Even if sales were to take place, these secondary transactions may be at a discount to the initial issue price due to changes in the interest rate structure.
  - Securitized transactions are normally backed by a pool of receivables and credit enhancement as stipulated by the rating agency, which differs from issue to issue. Delinquencies and credit losses may cause depletion of the amount available under the Credit Enhancement and thereby the



Investor Payouts may get affected if the amount available in the Credit Enhancement facility is not enough to cover the shortfall.

33) Specific risk and disclosures associated with an investment in Structured Products like Index Linked Debentures

- a) The Structured Products like Index linked - Non-Convertible Debentures may lead to a portion of the funds being deployed in the derivatives markets including in the purchase of options. These investments are high risk, high return as they may be highly leveraged. A small movement in the underlying index could have a large impact on their value and may result in a loss.
- b) The Issuer of Equity index-linked debentures or any of its Agents, from time to time may have long or short positions or make markets including in indices, futures, and options. The value of these Debentures invested into on behalf of clients could be adversely impacted by a price movement in the above securities.
- c) The Structured Products, even after being listed, may not have a market at all;
- d) The returns on the Structured Products, including those linked to them may be lower than prevailing market interest rates or even zero or negative depending entirely on the movement in the underlying index and futures values as also that over the life of the Debentures. Consequently, the Debenture holder may receive no income/return at all or negative income/return on the Debentures, or less income/return than the Debenture holder may have expected, or obtained by investing elsewhere or in similar investments.
- e) In the case of Equity Index-Linked Debentures, in the event of any discretions need to be exercised, in relation to method and manner of any of the computations including due to any disruptions in any of the financial markets or for any other reason, the calculations cannot be made as per the method and manner originally stipulated or referred to or implied, such alternative methods or approach may be at the discretion of the by the issuer and may include the use of estimates and approximations.
- f) At any time during the life of such Structured Products, the value of the Debentures may be substantially less than its redemption value. Further, the price of the Debentures may go down in case the credit rating of the Issuer goes down.
- g) The return and/or maturity proceeds hereon may not be guaranteed or insured in any manner by The Issuer of Structured Products.

7) **Client Representation:**

a) **Details of client's accounts active for the period:**

Category of clients	No. of clients	Funds managed (amt in Rs. Crores)	Discretionary/ Non-Discretionary (if available)
<b>Associates/group companies</b>			
As on June 30,2023	1	5.49	Discretionary
As on March 31,2023	1	4.70	Discretionary
As on March 31,2022	1	4.83	Discretionary
As on March 31, 2021	1	0.86	Discretionary
<b>Others</b>			
As on June 30,2023	164	214.00	Discretionary
As on March 31,2023	170	190.57	Discretionary
As on March 31,2022	204	221.91	Discretionary
As on March 31, 2021	204	194.11	Discretionary





b) Complete Disclosure in respect of transactions with related parties as per the Accounting standards specified by the Institute of Chartered Accountants of India:

Please refer Annexure 1 for related parties with whom transactions have taken place during the Financial Year Ended 2022-2023.

8) The Financial Performance of Portfolio Manager

8.1 Capital Structure (Rs. in lakhs)

Particulars	As on 31-Mar- 21	As on 31-Mar- 22	As on 31-Mar- 23
	(Audited)	(Audited)	(Audited)
a) Paid-up capital	250	250	250
b) Free reserves (Excluding re-valuation reserves)	100.47	469.58	482.31
<b>c) Total (a) + (b)</b>	<b>350.47</b>	<b>719.58</b>	<b>732.31</b>

8.2 Deployment of Resources (Rs. in lakhs)

Particulars	As on 31-Mar- 21	As on 31-Mar- 22	As on 31-Mar- 23
	(Audited)	(Audited)	(Audited)
(a) Fixed Assets (net of depreciation)	14.98	27.35	18.92
(b) Plant & Machinery and Office Equipment (net of depreciation)	0	0	0
(c) Investments	339.9	544.39	389.22
(d) Others	55.32	162.93	172.9
<b>(e) Total (a) + (b) + (c) + (d)</b>	<b>410.2</b>	<b>734.67</b>	<b>581.04</b>

8.3 Major Sources of Income: (Rs. in lakhs)

Particulars	As on 31-Mar- 21	As on 31-Mar- 22	As on 31-Mar- 23
	(Audited)	(Audited)	(Audited)
Revenue From Operations	288.08	1002.28	337.97
Other Income	34.7	-7.64	17.67
<b>Total</b>	<b>322.78</b>	<b>994.64</b>	<b>355.64</b>





## 8.4 Net Profit (Rs. In lakhs)

Particulars	As on 31-Mar- 21 (Audited)	As on 31-Mar- 22 (Audited)	As on 31-Mar- 23 (Audited)
Profit Before Tax	115.19	495.63	21.26
Profit After Tax	86.44	369.11	12.73

9) Performance of the Portfolio Manager for the last 3 years:

In the performance/returns table below, please note the following:

- Performance/returns are calculated using the "Time Weighted Rate of Return" method in terms of Regulation 22 of SEBI (Portfolio Managers) Regulations 2020.
- Returns are net of all fees and expenses.
- Performance related information is not verified by SEBI.
- Past performance may or may not sustain in future.
- Past performance is not a guarantee of future return.
- Please note that actual performance for a client portfolio may vary due to factors such as expenses charged, timing of additional flows and redemption, individual client mandate, specific portfolio construction characteristics or other structural parameters. These factors may have an impact on client portfolio performance and hence may vary significantly from the performance data depicted below.
- The table below outlines the returns of the specific Investment Approach versus the respective benchmark (benchmark up to 31st March 2023) and the revised Benchmark as S&P BSE 500 TRI-based (benchmark with effect from 1st April 2023) will be used as required by SEBI and APMI for All Clients

Particulars	01.04.2019	01.04.2020	01.04.2021	01.04.2022
	To 31.03.2020	To 31.03.2021	To 31.03.2022	To 31.03.2023
Portfolio Performance (%), Net of all fees and Charges levied by the Portfolio Manager				
<b>MEGATRENDS: MULTICAP - GROWTH</b>	-12.24%	47.04%	15.51%	-3.02%
Benchmark Performance (%) <b>NIFTY500</b>	-27.60%	75.99%	20.96%	-2.26%
Benchmark Performance (%) <b>BSE500TRI</b>	-26.46%	78.63%	22.26%	-0.91%



Particulars	01.04.2023 To 30.06.2023
Portfolio Performance (%), Net of all fees and Charges levied by the Portfolio Manager	
<b>MEGATRENDS: MULTICAP – GROWTH</b>	<b>15.20%</b>
Benchmark Performance (%) <b>BSE500TRI</b>	<b>13.18%</b>
<b>TREND FOLLOWING: FLEXICAP – GROWTH</b>	<b>19.83%</b>
Benchmark Performance (%) <b>BSE500TRI</b>	<b>13.18%</b>

**10) Audit Observation:**

There are no observations made by the Statutory Auditor of the Portfolio Manager for the preceding three financial years, FY 2019-2020, FY 2020-2021, FY 2021-2022, and FY 2022-2023

**11) Fees and Services Charged (To be based on actuals):**

- Investment management fee:** i.e., Fixed Fees charged as agreed with the client wide terms and conditions mentioned in the agreement relating to the Portfolio Management Services offered to the Clients.
- Performance management fee** i.e. A performance fee based on profit slabs provided in the portfolio agreement is charged as agreed with the client wide terms and conditions mentioned in the agreement. Performance fees will be charged on the performance over the hurdle rate, management fee and any costs of trading. It shall be computed on the basis of high-water mark principle over the life of the investment for charging of performance/profit sharing fees.

**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 a performance fee, the frequency shall not be less than quarterly.

The portfolio manager shall charge a performance-based fee only on the increase in portfolio value in excess of the previously achieved high water mark.

**3. Exit Load:**

Exit Load will be charged to the Client as per below mentioned slabs:

- o In the first year of investment, maximum of 3% of the amount redeemed;
- o In the second year of investment, maximum of 2% of the amount redeemed;
- o In the third year of investment, maximum of 1% of the amount redeemed;

After a period of three years from the date of the investment, no exit load will be charged to the Clients.

- The fees charged to the client for PMS Service comes under “Fees for technical services” under Sec 194J of the Income Tax Act 1961. This section calls for withholding tax on the fees that the client pays to the portfolio manager if he or she falls under





- An Individual / HUF whose total sales / gross receipt or turnover from business or profession carried on by him exceed the monetary limit specified under clause (a) or clause (b) of Sec. 44AB during the previous year immediately preceding the financial year.
  - Corporates.
5. **Custodian fee / Depository Charges & Fund Accounting Charges** -Charges relating to custody and transfer of shares, bonds, and units, opening and operation of Demat account, dematerialization and rematerialization, and/or any other charges in respect of the investment, etc. The actual fees levied by the custodian for custody and fund accounting shall be charged to the client as mentioned in the agreement with the client and as agreed between the Portfolio Manager and the Custodian from time to time.
  6. **Registration and transfer agents' fees:** Fees payable for the Registrars and Transfer Agents in connection with effecting the transfer of any or all of the securities and bonds including stamp duty, cost of affidavits, notary charges, postage stamps, and courier charges.
  7. **Brokerage, transaction costs, and other services:** The brokerage and other charges like stamp duty, transaction cost and statutory levies such as GST, securities transaction tax, turnover fees, and such other levies as may be imposed upon from time to time.
  8. **Fees and charges in respect of investment in mutual funds:** Mutual Funds shall be recovering expenses or management fees and other incidental expenses and such fees and charges shall be paid to the Asset Management Company of the Mutual Funds on behalf of the Client. Such fees and charges are in addition to the portfolio Management fees described above.
  9. **Certification charges or professional charges:** The charges payable to professional services like accounting, taxation, certification and any other legal services, etc.
  10. **Securities lending and borrowing charges:** The charges pertaining to the lending of securities, costs of borrowings and costs associated with the transfer of securities connected with the lending and borrowing transfer operations.
  11. **Any incidental and ancillary out of pocket expenses:** 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.
  12. The portfolio manager shall deduct directly from the cash account of the client all the fees/costs specified above. Other expenses, which could be attributable to the Portfolio Management, would also be directly deducted and the client would be sent a statement about the same.
  13. The fee so charged may be a fixed fee or a return-based fee or a combination of both as agreed in the agreement.

**Note: All the Operating expenses excluding brokerage, over and above the fees charged for Portfolio Management Service, shall not exceed 0.50% per annum of the client's average daily Assets under Management (AUM). It shall include charges payable for outsourced professional services like accounting, auditing, taxation and legal services, etc. for documentation, notarizations, certifications, and attestations required by Bankers or regulatory authorities including legal fees and day-to-day operations charges, etc. The portfolio manager shall ensure that any charges to self/associate shall not be at rates more than that paid to the non-associates providing the same service and a cap of 20% by value per associate (including self) per service shall be maintained by the portfolio manager in a financial year.**



**12) Taxation:**

The following information is based on the law in force in India at the date hereof. This information is neither a complete disclosure of every material fact of the Income-tax Act, 1961 nor does constitute tax or legal advice. This information is based on the Portfolio Manager's understanding of the Tax Laws as of this date of the Disclosure Document. Investors/clients should be aware that the fiscal rules/ tax laws may change and there can be no guarantee that the current tax position may continue indefinitely. In view of the individual nature of the tax consequences, each investor/client is advised to consult his/ her/its own professional tax advisor. The information/data herein alone is not sufficient and shouldn't be used for the development or implementation of an investment strategy and should not be construed as investment advice.

Income on Investment in Securities is subject to tax in the following manner:

- a) **Dividend** - All Dividends received are taxable in the hands of Investor/Shareholder at a rate applicable to the respective PMS client type.
- b) Interests on Investment are taxable except in certain cases where it is exempted from tax under Income Tax Act 1961.
- c) In case the securities are sold within one year (for listed securities except for units other than units of equity oriented mutual funds) or within two years (for unlisted securities) from the date of purchase, the resultant gains or losses are termed as short-term capital gains or losses. Short term gains arising out of transfer of equity shares if the securities are sold on a recognized stock exchange in India and on which securities transaction tax has been paid are taxed at a concessional rate of 15% (as increased by surcharge plus education cess), in other cases they would be taxed at the slab rate applicable to the respective PMS client type.

In case the securities are sold after one year (for listed securities) or two years (for unlisted securities) and three years for units other than units of equity oriented mutual funds from the date of purchase, the resultant gains or losses are termed as long term capital gains or losses and the gain is arising out of transfer of equity shares which are sold on a recognized stock exchange in India and on which securities transaction tax has been paid would be taxed at 10% (as increased by surcharge plus education cess) in case of listed securities and 20% (as increased by surcharge plus education cess) in case of unlisted securities and units other than units of equity oriented mutual funds.

From A.Y. 2019-20, Long Term capital gain (where STT is paid) in excess of Rs. 1 Lakh will be chargeable at the rate of 10% and on the balance amount of the total income, the tax will be computed as if it were the total income of the assessee.

Note: "Listed Securities" as defined under the explanation to section 112(1) of Income Tax Act, means the securities as defined in clause 2(h) of Securities Contract (Regulations) Act, 1956 and listed on any recognized stock exchange in India.

"Unlisted Securities" means securities other than listed securities.

"Units" shall have the meaning assigned to it in clause (b) of explanation to section 115AB of Income Tax Act, 1961.

The following are the tax provisions presently applicable to clients investing in the Portfolio Management Products under the Income Tax Act, 1961.



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**Tax on Long Term Capital Gain:**

If the capital asset, which is transferred, is equity share or units of equity oriented mutual funds and the transaction is subject to Securities Transaction Tax, the Long-Term Capital Gain in excess of Rs. 1 Lakh is chargeable to tax @ 10%. In other cases, the tax will be calculated as follows:

Capital Asset	If it is not subject to Securities Transaction Tax		
	Long Term		Short Term
	Without Indexation	With Indexation	
1. Debenture Listed	10 %	Not Applicable	Normal
2. Debenture non-Listed	20 %	Not Applicable	Normal
3. Government Securities	10 %	20 %	Normal
4. Bonds Listed	10%	Not Applicable	Normal
5. Bonds non-Listed	20%	Not Applicable	Normal

**TDS**

If any tax is required to be withheld on account of any future legislation, the portfolio manager shall be obliged to act in accordance with the regulatory requirements in this regard. Interest would be subject to tax as per prevailing provisions of the Income Tax Act, 1961.

**Advance Tax Obligations**

It shall be the client's responsibility to meet the advance tax obligations payable on the due dates as per the Income Tax Act, 1961.

Provisions of Income Tax Act 1961, undergoes change frequently and is also based on the status of the client, thus the client is advised to consult his/her tax consultant for appropriate advice on the tax treatment of income indicated herein.

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 is required to withhold tax @ 10 % excluding Goods & Services Tax, on the fees that the client pays to the Portfolio Manager if he/she falls under the following two categories:

- a) An Individual / HUF whose total sales / gross receipt or turnover from business or profession carried on by him exceed the monetary limit specified under clause (a) or clause (b) of Sec. 44AB during the previous year immediately preceding the financial year

In respect to the above TDS provision please note that in the Act No 23 of Finance Act, 2019 a new section i.e 194M has been inserted with effect from 01.09.2019 which specifies that:

Any Person being individual or a Hindu undivided family other those required to deduct income tax as per the provision of section 194J mentioned in (a) above shall at the time of credit of such sum or at the time of payment of such sum in cash or by issue of cheque or draft or by any other mode whichever is earlier, deduct an amount equal to five percent of such sum as income tax thereon if aggregate of sum, credited or paid to a resident during the financial year exceeds fifty lakh rupees.

- b) Corporate

This implies, the Client (as mentioned in point 'a' and 'b' above) while making payment of the fees would deduct tax at Source. The taxes payable on any transactions entered into or undertaken by the Portfolio Manager on behalf of the client, whether by way of deduction withholding, payment or other, shall be fully borne by the client. Payment of the tax shall be the personal responsibility and liability of the client. In case the client deducts and pay the withholding tax, the client shall provide Tax Deduction Certificate



in Form No. 16A as prescribed under the Income Tax Rules, 1962 to the Portfolio Manager within 30 days from the date of filing return or due date of filing TDS Return for the quarter whichever is earlier. The Portfolio Manager is not by law, contract or otherwise required to discharge any obligation on behalf of the client to pay any taxes payable by the clients.

### **13) Accounting Policies:**

#### **1. Basis of accounting**

- a. Books and Records for each product is separately maintained in the Back-office software in the name of the client to account for the assets and any additions, income, receipts, and disbursements in connection therewith, as provided by the SEBI (Portfolio Management) Regulations, 2020, and SEBI (Investment Advisers) Regulations, 2013 as amended from time to time.
- b. Accounting under the respective portfolios is done in accordance with Generally Accepted Accounting Principles except with Point (a) of Income/Expenses.
- c. Transactions for purchase and sale of investments are recognized as of the trade date. In determining the holding cost of investments and the gain or loss on sale of the investment, the first-in-first-out method is followed. The same is done at the product level. The cost of the investments acquired or purchased would include brokerage, stamp charges, and any charges customarily included in the broker's contract note or levy by any statute except STT (Securities Transaction Tax). Securities Transaction Tax incurred on buying and selling of securities is charged to revenue account.
- d. Realized Gains/Losses are calculated by applying the First in/ First Out method.
- e. Where eligible securities have been received from the client towards corpus, the closing market value of the previous day of activation of account/receipt of securities (in case of additional corpus) is considered as a capital contribution and deemed to be the cost of investments for the purpose of tracking performance.

#### **2. Income/expenses**

- a. All investment income and Expenses are accounted on accrual basis except Custodian, Fund Accounting & Depository charges which are on actual basis for the last month of the financial year.
- b. The dividend is accrued on the Ex-date of the securities and the same is reflected in the clients' books on the ex-date.
- c. Similarly, bonus shares are accrued on the ex-date of the securities and the same are reflected in the clients' books on ex-date.
- d. In case of fixed income instruments, purchased/sold at Cum-interest rates, the interest component up to the date of purchase/sale is taken to interest receivable/payable account.

3. Books of accounts would be separately maintained in the name of the client as are necessary to account for the assets and any additions, income, receipts and disbursements in connection therewith as provided under SEBI (Portfolio Managers) Regulations, 2020.

#### **4. Audit**

- a. The Portfolio accounts of the Portfolio Manager shall be audited annually by an independent chartered accountant and a copy of the certificate issued by the chartered accountant shall be given to the client.



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- b. The client may appoint a chartered accountant to audit the books and accounts of the Portfolio Manager relating to his transactions and the Portfolio Manager shall co-operate with such chartered accountant in the course of the audit.

**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) Agreement:**

1. The Portfolio Manager before taking up an assignment of management of funds or portfolio of securities on behalf of the client, enters into an agreement in writing with such client clearly defining the inter se relationship and setting out their mutual rights liabilities and obligations relating to the management of funds or portfolio of securities, containing such details as per the regulations.
2. The money or securities accepted by the portfolio Manager shall not be invested or managed by the Portfolio Manager except as mentioned in terms of the agreement between the Portfolio Manager and the client.
3. The Portfolio Manager shall not change any terms of the agreement without the prior written consent of the client.
4. Generally, the term of the PMS Agreement shall initially be for a period of one year from the Activation Date ("Term") and, unless terminated by either Party in accordance with the terms of the PMS Agreement, shall be deemed to be automatically renewed from the next day of date of expiry of the Term on the such terms and conditions as may be mutually agreed upon by the Parties in writing, till any further communication by either of the party to terminate the same. The Client shall be entitled to terminate the PMS Agreement before the expiry of the term according to the terms/clauses specified in the said agreement.

**15) Termination of Agreement:**

1. Notwithstanding anything contained above, the funds or securities can be withdrawn or taken back by the client before the maturity of the contract under the following circumstances, namely -
  - a. Voluntary or compulsory termination of portfolio management services by the Portfolio Manager or the client.
  - b. Suspension or cancellation of the certificate of registration of the Portfolio manager by the Board.
  - c. Bankruptcy or liquidation of the Portfolio Manager.
2. There shall be written intimation about such termination by the terminating party.
3. On termination of the agreement, the Portfolio Manager shall give a detailed statement of accounts to the client and settle the account with the client as agreed in the agreement.

**16) Disclaimer by Portfolio Manager:**

Prospective investors should review / study this Disclosure Document carefully and in its entirety and shall not construe the contents hereof or regard the summaries contained herein as advice relating to legal, taxation, or financial / investment matters and are advised to consult their own professional advisor(s) as to the legal, tax, financial or any other requirements or restrictions relating to the subscription, gifting, acquisition, holding, disposal (sale or conversion into money) of Portfolio and to the treatment of income (if any), capitalization, capital gains, any distribution, and other tax consequences relevant to their portfolio, acquisition, holding, capitalization, disposal (sale, transfer or conversion into money) of portfolio within their jurisdiction of nationality, residence, incorporation, domicile etc. or under the laws of any jurisdiction to which they or any managed funds to be used to purchase/gift portfolio of securities are subject, and also to



determine possible legal, tax, financial or other consequences of subscribing / gifting, purchasing or holding portfolio of securities before making an investment.

### 17) Investor Services:

- i. The details of the investor relation officer who shall attend to the investor queries and complaints are mentioned here below:

Name of the person	<b>Ms. Vidhi Gulabani</b>
Designation	Compliance Officer
Address	Office no.602, 6 <sup>th</sup> floor, Landmark Platinum Plot no.337/338, Corner of S.V Road and 34 <sup>th</sup> Road, Khar (W) Mumbai -400052
Email	<a href="mailto:vidhi@marathontrends.com">vidhi@marathontrends.com</a>
Investor Grievance Email ID	<a href="mailto:grievances@marathontrends.com">grievances@marathontrends.com</a>
Telephone	+91- 9930800809

The official mentioned above will ensure prompt investor services. The portfolio manager will ensure that this official is vested with the necessary authority, independence and the means to handle investor complaints.

In case the query is not resolved within 45 days of the complaint then you can get in touch with the Principal officer Mr. Atul Suri by sending an email on [atul@marathontrends.com](mailto:atul@marathontrends.com) or call him on his mobile number +91-9820289026.

### ii. **Grievances redressal and Dispute settlement mechanism.**

Grievances, if any, that may arise pursuant to the Portfolio Management Services Agreement entered into shall as far as possible be redressed through the administrative mechanism by the Portfolio Manager and are subject to SEBI (Portfolio Managers) Regulations 2020 and any amendments made thereto from time to time. However, all the legal actions and proceedings are subject to the jurisdiction of the court in Mumbai only and are governed by Indian laws.

The Portfolio Manager will endeavor to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time. If the Investor remains dissatisfied with the remedies offered or the stand taken by the Portfolio Manager, the investor, and the Portfolio Manager shall abide by the following mechanisms: -

All disputes, differences, claims and questions whatsoever arising from this agreement between the Client and the Portfolio Manager and/or their respective representatives touching these presents or any clause or thing herein contained or otherwise in any way relating to or arising from these presents or in the event of failure by the parties to resolve the dispute in the manner set out above within 30 days from the date when the dispute arose, the dispute shall submitted to a dispute resolution mechanism that includes mediation and/or conciliation and/or arbitration, in accordance with the procedure specified by the Board.

Alternatively, with effect from September 2011, SEBI has launched a new web-based centralized grievance system called SCORES i.e., SEBI Complaints Redressal System, for online filing, forwarding, and tracking of resolution of investor complaints. The Client may also make use of the SCORES facility for any escalations on redressal of their grievances. Following is the link to visit the website and inform their dispute/complaints against the company.

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

SEBI vide press release PR No. 80/2012 dated 30<sup>th</sup> August' 2012 has extended its toll-free helpline service for Investors (1800 22 7575 / 1800 266 7575) to Saturday and Sunday from the existing Monday to Friday. The service on Saturday and Sunday would be available initially to investors from all over India in English, Hindi, Marathi, and Gujarati from 9:30 a.m. to 5:30 p.m. For any queries/ feedback or assistance, the Client may also e-mail to [sebi@sebi.gov.in](mailto:sebi@sebi.gov.in)





**Arbitration:**

The agreement with the client shall be governed by construed and enforced in accordance with the laws of India. Any dispute with the client shall at first be settled by mutual discussion, failing which the same will be referred to and settled by arbitration in accordance subject to the provisions of the Arbitration and Conciliation Act, 1996 or any statutory modification/enactment thereof for the time being in force. A sole arbitrator will be appointed by mutual consent of the portfolio manager and the client. The arbitration shall be held in Mumbai and be conducted in the English language. Any action or suit involving the agreement with a client or the performance of the agreement by either party of its obligations will be exclusively in courts located at any place in India subject to the jurisdiction clause in the portfolio agreement.

**18) Details of investments in the securities of related parties of the portfolio manager:**

Investments in the securities of associate / related parties of Portfolio Manager:

Sr.no	Investment Approach, if any	Name of the associate/ related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores)	Percentage of total AUM as on last day of the previous calendar quarter
NOT APPLICABLE					

**19) Details of the diversification policy of the portfolio manager**

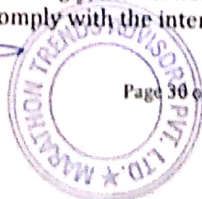
The Portfolio Manager follows a diversified approach for investing in its Investment Approach as mentioned in point 4 above. Further, the Portfolio Manager does not have any associates or related parties as mentioned in Point 3.iii above.

**20) Anti-Money Laundering Compliances:**

The Government of India has put a policy framework to combat money laundering through the Prevention of Money Laundering Act, 2002 (PMLA 2002). PMLA 2002 and the Rules notified there under (PMLA Rules) came into effect from July 1, 2005. Director, FIU-IND, and Director (Enforcement) have been conferred with exclusive and concurrent powers under relevant sections of the Act to implement the provisions of the Act. Consequently, SEBI has mandated that all registered intermediaries formulate and implement a comprehensive policy framework on anti-money laundering and adopt 'Know Your Customer' (KYC) norms.

Further, SEBI vide Circular No. SEBI/HO/MIRSD/DOP/CIR/P/2019/113 dated February 03, 2023 (which supersedes all the earlier circular) issued a 'Master Circular for Guidelines on Anti Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed thereunder' consolidating all the requirements/instructions/obligations of Securities Market Intermediaries and Circular No. SEBI/HO/MIRSD/MIRSDSECFATF/P/CIR/2023/091 dated June 16, 2023 issued Amendment to Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) /Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under.

Accordingly, Client's should ensure that the amount invested by them is through legitimate sources only and does not involve and are not designed for any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of Income Tax Act, Prevention of Money Laundering Act, Anti-Corruption Act and or any other applicable laws in India from time to time. The Portfolio Manager is committed to complying with all applicable -anti-money laundering laws and regulations in all of its operations. Accordingly, the Portfolio Manager reserves the right to reject or refund or freeze the account of the Client if the Client fails to comply with the internal policies of the Portfolio Manager or any of the Applicable Laws including the KYC requirements.



The Portfolio Manager shall not be held liable in any manner for any claims arising whatsoever on account of freezing the account/rejection or refund of the application etc. due to non-compliance with the provisions of any of the aforesaid Regulations or Applicable Laws.

Investors are requested to note that KYC is mandatory for all investors. SEBI vide circular no. MIRSD/SE/Cir-21/2011 dated October 5, 2011, and CIR/MIRSD/ 11/2012 dated September 5, 2012, has mandated that the uniform KYC form and supporting documents shall be used by all SEBI registered intermediaries in respect of all new clients from January 1, 2012. Further, SEBI vide circular no. MIRSD/Cir-23/2011 dated December 2, 2011, has developed a mechanism for centralization of the KYC records in the securities market to bring about uniformity in securities markets.

Accordingly, KYC registration is being centralized through KYC Registration Agencies (KRA) registered with SEBI. Thus, each investor has to undergo a uniform KYC process only once in the securities market and the details would be shared with other intermediaries by the KRA. Applications shall be liable to be rejected if the investors do not comply with the aforesaid KYC requirements.

As per the 2015 amendment to PML (Maintenance of Records) Rules, 2005 (the rules), every reporting entity shall capture the KYC information for sharing with the Central KYC Records Registry in the manner mentioned in the Rules, as per the KYC template for 'Individuals' finalized by CERSAI. Accordingly, the KYC template finalized by CERSAI shall be used by the registered intermediaries as Part I of AOF for individuals.

Further, in terms of Rule 9 (1A) of the PML (Maintenance of Records) Rules, 2005 (the rules) and, as per the circular/guidelines issued by the respective regulator, every reporting entity shall capture the KYC information pertaining to Legal Entities from 01st April 2021.

**21) List of Approved Share Brokers involved for Portfolio Management activities:**

Sr. No.	Name	SEBI Registration No
1.	Kotak Securities Limited	INZ000200137
2.	Incred Capital Wealth Portfolio Managers Private Limited	INZ000294632

**22) General:**

The portfolio manager and the client can mutually agree to be bound by specific terms through a written two-way agreement between themselves in addition to the standard agreement.

The Portfolio Manager has outsourced Custody and Fund Accounting services to Kotak Mahindra Bank Limited & HDFC Bank Limited.

For Marathon Trends Advisory Private Limited.

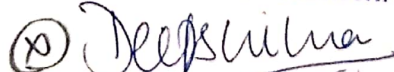
FOR MARATHON TRENDS ADVISORY PVT. LTD.



Mr. Atul Suri  
AUTHORISED SIGNATORY/DIRECTOR  
Director  
Din No. 00256461

D-D

FOR MARATHON TRENDS ADVISORY PVT. LTD.



Ms. Deepshikha Dharam  
AUTHORISED SIGNATORY/DIRECTOR  
Director  
Din No. 00266324

Place: Mumbai,  
Date: 11<sup>th</sup> August, 2023



**FORM C****SECURITIES AND EXCHANGE BOARD OF INDIA (PORTFOLIO MANAGERS) REGULATIONS, 2020  
(Regulation 22)**

We confirm that:

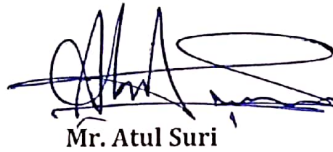
The Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;

The disclosures made in the document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us/investment in the Portfolio Management;

The Disclosure Document has been duly certified by an independent Chartered Accountant M/s. B Y & Associates, Chartered Accountants, 8A-2, Chander Mukhi Building, 8<sup>th</sup> Floor, Opposite Nirmal Building, Nariman Point, Mumbai 400 021, Phone No. 022- 40172000, firm registration number 123423W on 11<sup>th</sup> August, 2023

Date: 11<sup>th</sup> August, 2023  
Place: Mumbai

Signature of the Principal Officer



Mr. Atul Suri



Office no.602, 6th floor, Landmark Platinum  
Plot no.337/338, Corner of S.V Road and 34<sup>th</sup> Road, Khar (W)  
Mumbai -400052

**FORM C****SECURITIES AND EXCHANGE BOARD OF INDIA (PORTFOLIO MANAGERS) REGULATIONS, 2020  
(Regulation 22)**

We confirm that:

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;

The disclosures made in the document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us/investment in the Portfolio Management;

The Disclosure Document has been duly certified by an independent Chartered Accountant M/s. B Y & Associates, Chartered Accountants, 8A-2, Chander Mukhi Building, 8<sup>th</sup> Floor, Opposite Nirmal Building, Nariman Point, Mumbai 400 021, Phone No. 022- 40172000, firm registration number 123423W on 09<sup>th</sup> August, 2023

Date: 11<sup>th</sup> August, 2023  
Place: Mumbai

Signature of the Principal Officer



Mr. Atul Suri

Office no.602, 6th floor, Landmark Platinum  
Plot no.337/338, Corner of S.V Road and 34<sup>th</sup> Road, Khar (W)  
Mumbai -400052



**Marathon Trends Advisory Private Limited**  
**Annexure -1 Disclosure in respect of transactions with Related Parties.**

**Related Party Transactions**

Name of the Party	Relationship
Mr. Atul Suri	Key Management Personnel
Ms. Deepshikha Dharmaraj	Key Management Personnel

Details of related Party transactions are as below.

Nature of Transactions	For the FY 2022-2023 (As per Audited Financials)
Shares Issued	250.00
Loans and Advances	3.19
Remuneration	24

