

ALDER CAPITAL ADVISORS LLP

Disclosure Document for
Portfolio Management Services

FORM C

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

ALDER CAPITAL ADVISORS LLP

503, Morya Blue Moon, Off New Link Road
Andheri (West), Mumbai 400 053

Tel : (91 22) 40127003 / 4 / 5 / 6

Email : hemant@aldercapital.in

We confirm that:

- i. The Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
- ii. The disclosures made in the Disclosure Document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of the portfolio to **ALDER CAPITAL ADVISORS LLP** as Portfolio Managers;
- iii. This Disclosure Document contains necessary information about the Portfolio Manager required by an investor before investing. The investors / clients should carefully read the Disclosure Document prior to making a decision to avail of the portfolio management services and are advised to retain this document for future reference;
- iv. The Disclosure Document has been duly certified by an independent chartered accountant, Mr. Deven J. Bafna (CA Firm Registration No. 107911W) having office at 212, Ghanshyam Enclave, New Link Road, Kandivali-West, Mumbai- 400067 on 11th November,2023. The copy of the certificate is enclosed herewith.

For **ALDER CAPITAL ADVISORS LLP**

Sd/-

Mr. Hemant Bhaskar Patel

Principal Officer

Place : Mumbai

Date : 11.11.2023

PHIRODIA BAFNA & ASSOCIATES

Chartered Accountants

To,
The Partner, Alder Capital Advisors LLP,
503, 5Th Floor, Morya Blue Moon, off. New Link Road,
Andheri West,
Mumbai – 400053.

Background

Alder Capital Advisors LLP ('the LLP') having its corporate office at 503, 5Th Floor, Morya Blue Moon, off. New Link Road, Andheri West, Mumbai – 400053 requires a certificate from a Chartered Accountant for certifying the contents of Disclosure Document prepared by you in terms of regulation 22 of the SEBI (Portfolio Managers) regulations, 2020.

Management Responsibilities

The responsibility of the Management of the LLP includes the preparation and maintenance of all data and other relevant supporting records and documents. The accompanying Statement, including the creation and maintenance of all accounting and other records supporting its contents, is solely the responsibility of the Management. This responsibility includes the design, implementation, and maintenance of internal controls relevant to the preparation and presentation of the said data and is also responsible for ensuring that they comply with the requirements and for providing all the relevant information to the auditor.

Auditor's Responsibility

We conducted our examination in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India. Pursuant to the requirements, it is our responsibility to obtain reasonable assurance as to whether the company has complied with the matters contained in said Regulation.

We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control for the firm that perform Audits and Reviews of Historical Financial Information and other Assurance and Related Services Engagements.



Certificate

To the best of our knowledge along with the information & details furnished by M/s. **Alder Capital Advisors LLP** we certify that the information given in disclosure documents about portfolio management services provided by Alder Capital Advisors LLP and other relevant contents of the said disclosure document are true, fair and adequate and will enable the investor to make a well-informed decision regarding engaging Alder Capital Advisors LLP as Portfolio Managers.

This certificate is issued at the specific request of M/s. Alder Capital Advisors LLP for submission to the SEBI and must not be used for any other purpose without our prior consent.



For **PHIRODIA BAFNA & ASSOCIATES**
Chartered Accountants

Firm's registration No. 107911W



Deven Bafna
Partner

Membership No.: 043314

Mumbai, 11th November, 2023

UDIN: 23043314BGVNET5910

DISCLOSURE DOCUMENT

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

- i. The Disclosure Document has been filed with the Securities & Exchange Board of India along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.
- ii. 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 informed decision for engaging **ALDER CAPITAL ADVISORS LLP** as a Portfolio Manager.
- iii. The Disclosure Document contains the necessary information about the Portfolio Manager, required by an investor before investing, and hence, the investor is advised to retain the document for future reference.

Name of the Portfolio Manager	ALDER CAPITAL ADVISORS LLP
SEBI Registration Number	INP000004771
Registered Office Address	503, Morya Blue Moon, Off New Link Road, Andheri (West), Mumbai 400 053
Contact Details	Tel : (91 22) 40127003 / 4 / 5 Email : info@aldercapital.in
Website	www.aldercapital.in

- iv. The name, phone number and contact details of the Principal Officer designated by Portfolio Manager is as follows:

Name of the Principal Officer	Mr. Hemant Bhaskar Patel
Address	503, Morya Blue Moon, Off New Link Road, Andheri (West), Mumbai 400 053
Contact Details	Tel : (91 22) 40127009 Email : hemant@aldercapital.in

- v. This disclosure document is dated 11th November, 2023 and supersedes all the previous ones filed with SEBI.

TABLE OF CONTENTS

Sr. No.	Contents	Page No.
1.	Disclaimer clause	1
2.	Definitions	1
3.	Description <ul style="list-style-type: none"> 3.1 History, present business and background of the Portfolio Manager 3.2 Promoters, Partners and Investment Team of Portfolio Managers and their background 3.3 Top 10 group companies / firms of the Portfolio Manager in India on turnover basis 3.4 Details of the services being offered (discretionary / non-discretionary / advisory) 	3
4.	Penalties, pending litigation or proceedings, findings of inspection or investigations for which action may have been taken or initiated by any regulatory authority	4
5.	Services offered	4
6.	Risk factors	7
7.	Client Representation	7
8.	Financial Performance of the Portfolio Manager	8
9.	Portfolio Management performance for the last three years	8
10.	Audit Observations	8
11.	Nature of Costs & expenses	9
12.	Taxation – tax implications for the clients	10
13.	Accounting policies	10
14.	Investor services	12
15.	Details of Investment in the securities of Related Parties of the Portfolio Manager	12
16.	Details of the diversification policy of the Portfolio Manager	13
17.	General Provisions	13

1. Disclaimer clause

This Disclosure Document has been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020, and has been filed with the Securities Exchange Board of India ("SEBI"). This Disclosure Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the Disclosure Document.

2. Definitions

- i. **"Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992) as amended from time to time.
- ii. **"Accredited Investor"** means any person who fulfills the eligibility criteria as specified by SEBI and is granted a certificate of Accreditation by an Accredited Agency.

Following criteria or such other criteria as may be specified by SEBI from time to time will be considered for granting certificate of Accreditation by an Accredited Agency:

(i) Individuals, HUFs, Family Trusts and Sole Proprietorships, which meet the criteria as under:

a. Annual Income \geq INR 2 Crore; OR

b. Net Worth \geq INR 7.5 Crore, out of which at least INR 3.75 Crore is in the form of financial assets; OR

c. Annual Income \geq INR 1 Crore+ Net Worth \geq INR 5 Crore, out of which at least INR 2.5 Crore is in the form of financial assets;

(ii) Partnership Firms set up under the Indian Partnership Act, 1932 in which each partner independently meets the criteria for accreditation.

(iii) Trusts (other than family trusts) with net worth greater than or equal to INR 50 Crore.

(iv) Body Corporates with net worth greater than or equal to INR 50 Crore.

- iii. **"Accredited Agency"** means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as specified by SEBI from time to time.
- iv. **"Agreement"** or **"Client Agreement"** or **"PMS Agreement"** means the agreement by whatever name called entered into between the Client and the Portfolio Manager for provision of Portfolio Management Services by the Portfolio Manager to the Client as provided for by SEBI regulation 22 of the Act, including any addendum thereto and shall be read in conjunction with the Application Form.
- v. **"Assets"** or **"Assets of the Account"** shall mean the Securities and other investments and funds managed by the Portfolio Manager from time to time in terms of the Portfolio Management Services Agreement entered into with the Client.
- vi. **"Associate"** means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager
- vii. **"Cash Account"** means cash maintained in the bank account opened, maintained and operated by Portfolio Manager in name of the Client or Pool account managed in name of the Portfolio Manager for the purpose of managing funds held by the Portfolio Manager on behalf of the Client.
- viii. **"Client"** means any person, whether an individual or a non-individual, who enters into the Portfolio Management Services Agreement with the Portfolio Manager for availing of the Portfolio Management Services offered by the Portfolio Manager.
- ix. **"Custodian"** shall mean the custodian providing custodial services in accordance with the regulations issued by SEBI and appointed from time to time for safe keeping of the Assets of the Client.
- x. **"Depository"** shall mean Depository as defined in the Depositories Act, 1996 (22 of 1996).
- xi. **"Disclosure Document"** shall mean this disclosure document for the Portfolio Management Services.
- xii. **"Discretionary Portfolio Management Services"** shall mean portfolio management services where the Portfolio Manager exercises or may, under a contract relating to portfolio management exercise any degree of discretion as to the investments or management of the Portfolio of securities or the Funds of the Client, as the case may be.
- xiii. **"Discretionary Portfolio Manager"** means a portfolio manager who under a contract relating to portfolio management, exercises or may exercise, any degree of discretion as to the investment of funds or management of the portfolio of securities of the client.
- xiv. **"Distributor"** means a person/entity who may refer a client to avail services of Portfolio Manager in lieu of commission/charges (whether known as Channel Partners, Agents, and Referral Interfaces or by any other name).
- xv. **"Financial year"** shall mean the year starting from 1st April of a year and ending on 31st March the following year.
- xvi. **"Funds"** shall mean the moneys placed by the Client with the Portfolio Manager and any accretions thereto.
- xvii. **"Fund Manager"** means the individual/s appointed by the Portfolio Manager who manages, advises or directs or undertakes on behalf of the Client (whether as a discretionary portfolio manager or otherwise) the management or administration of a portfolio of securities or the funds of the client, as the case may be.

- xviii. **“Group Company”** means a company under the same management or control as the Portfolio Manager.
- xix. **“Initial Corpus”** means the value of the Funds and the market value of Securities brought in by the Client and accepted by the Portfolio Manager at the time of entering into an agreement with the Portfolio Manager to avail its portfolio management services.
- xx. **“Investment Approach”** is a broad outlay of the type of securities and permissible instruments to be invested in by the Portfolio Manager for the Client, considering factors specific to Clients and securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.
- xxi. **“PMS”** or **“Portfolio Management Services”** means portfolio management services that are carried out by the Portfolio Manager in accordance with SEBI (Portfolio Managers) Regulations, 1993, whether in Discretionary Portfolio Management Services, Non-Discretionary Portfolio Management Services or Investment Advisory Services, as the context may require.
- xxii. **“Portfolio”** means the total holdings of securities and funds belonging to the client that are managed by the Portfolio Manager on the client’s behalf as per the PMS Agreement.
- xxiii. **“Portfolio Manager”** means ALDER CAPITAL ADVISORS LLP, a Limited Liability Partnership incorporated pursuant to section 12(1) of Limited Liability Partnership Act 2008, having its registered office at 503, Morya Blue Moon, Link Road, Andheri West, Mumbai and registered with SEBI to act as a Portfolio Manager under Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993, vide Registration no. INP000004771 dated 25th August, 2015 and which pursuant to a contract with a client, advises or directs or undertakes on behalf of the client the management or administration of a portfolio of securities or funds of the client.
- xxiv. **“Principal Officer”** is a senior employee or director of the Portfolio Manager who has been designated as Principal Officer by the Portfolio Manager and is responsible for the decisions and activities of the Portfolio Manager including managing securities and funds belonging to the client as per the PMS Agreement.
- xxv. **“Regulations”** means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993 including any modification or amendment thereof.
- xxvi. **“Related Party”** means :
- (i) a director, partner or his relative;
 - (ii) a key managerial personnel or his relative;
 - (iii) a firm, in which a director, partner, manager or his relative is a partner;
 - (iv) a private company in which a director, partner or manager or his relative is a member or director;
 - (v) 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;
 - (vi) 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;
 - (vii) 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;
 - (viii) any body corporate which is— (A) a holding, subsidiary or an associate company of the portfolio manager; or (B) a subsidiary of a holding company to which the portfolio manager is also a subsidiary; (C) an investing company or the venturer of the portfolio manager. The investing company or the venturer of the 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.
 - (ix) a related party as defined under the applicable accounting standards;
 - (x) 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.
- xxvii. **“SEBI”** or **“Board”** means the Securities and Exchange Board of India established under subsection (1) of Section 3 of the Securities and Exchange Board of India Act 1992 as amended from time to time.
- xxviii. **“Securities”** means and includes, whether listed or unlisted, securities as defined under the Securities Contracts (Regulation) Act, 1956, as amended from time to time.

Note: Words and expressions used in this Disclosure Document and not expressly defined shall be interpreted according to their usage in the Regulations governing Portfolio Management Services and as specified by SEBI from time to time.

3. Description

3.1 History, Present Business and Background of the Portfolio Manager

ALDER CAPITAL ADVISORS LLP, a Limited Liability Partnership incorporated on 17th December 2014 pursuant to section 12(1) of Limited Liability Partnership Act 2008, having its registered office at 503, Morya Blue Moon, Link Road, Andheri West, Mumbai – 400 053.

Alder Capital Advisors LLP holds Certificate of Registration No. INP000004771 dated 10th July, 2018 issued under SEBI (Portfolio Managers) Regulations, 1993 to act as a Portfolio Manager and the certificate of registration is valid unless it is suspended or cancelled by the Board, subject to payment of fees as prescribed in the Act.

SEBI has permitted the company to commence portfolio management services and provide management and advisory services to offshore funds, pension funds, provident funds, venture capitals funds, and management of insurance funds, financial consultancy and exchange of research on commercial basis.

3.2 Promoters, Partners and Investment Team of the Portfolio Manager and their background

3.2.1 Promoters of Portfolio Manager

Alder Capital Advisors is a limited liability partnership formed in December, 2014 by Mr. Hemant Bhaskar Patel, Managing Partner and Mrs. Chaitali Hemant Patel.

The Shareholding structure of LLP:

HEMANT BHASKAR PATEL, Managing Partner – DIN 07029136 – Share Holding 75%

CHAITALI HEMANT PATEL, Designated Partner – DIN 07031493 – Share Holding 25%

3.2.2 Partners of Portfolio Manager

Hemant Bhaskar Patel, Managing Partner and Principal Officer for Alder Capital Advisors LLP, has over 23 years of experience in institutional equity research, including 10 years with Axis capital (earlier known as Enam Securities) culminating in his role as Executive Director of Consumer Equity Research. At Axis Capital, he was also responsible for all the matic research across consumption related sectors including fast moving consumer goods, auto, consumer durables, retail and NBFCs. He was worked as an institutional research analyst servicing some of the largest domestic and global institutional investors.

He holds a bachelor of commerce degree from Loyola, Chennai and MBA (Finance) from Australian Graduate School of Management, University of NSW. He is also a CFA level III candidate. Recent awards received by him include – Wall Street Journal, India's top Analyst Home and personal care sector; Zee business channel, Best fundamental analyst; Reuters Star Mine Award for food, household and personal products. He also holds NISM Series XXI-B certificate of Portfolio Manager as required under SEBI (Certificate of Associated Persons in the Securities Markets) Regulations, 2007.

Chaitali Hemant Patel, Designated Partner of Alder Capital Advisors LLP, holds a bachelor of commerce degree from University of Mumbai and Diploma in commercial arts from L. S. Raheja. She has handled designing advertisements and corporate marketing contents at JKS Advertising.

3.2.3 Investment Manager

Rakhi Prasad is Investment Manager for Alder Capital Advisors LLP with focus on investment research covering financials, healthcare and technology. She has over 22 years of experience across asset management, investment banking, private equity and risk management. She joined Alder Capital after solid stints at leading institutions in India and US. In her career at Goldman Sachs, N.Y. she built strategies to hedge against counterparty risk. At Enam Securities, one of the leading investment banking and financial market intermediary, she played a critical role in mandates relating to consumer sector. As Director of operations at Matrix Partners India, she managed investor relations and fund portfolio reporting.

Rakhi received her BA Economics, Lady Shri Ram College; BS Computer Science, University of Michigan, Ann Arbor and MS Financial Engineering, Columbia University, New York.

She has been honoured as India's Top 100 Women in Finance in 2020 by AIWMI and holds NISM Series XXI-B certificate of Portfolio Manager as required under SEBI (Certificate of Associated Persons in the Securities Markets) Regulations, 2007.

3.3 Top 10 group companies / firms of the Portfolio Manager in India on turnover basis

Alder Capital Advisors LLP does not have any group or associate companies.

3.4 Details of the services being offered (discretionary / non-discretionary / advisory):

Services mentioned below are offered to investors who are Individual, Non-Individual, Resident, Non-Resident and investor holding certificate of Accreditation from Accredited Agency. All clients will have the option to be onboarded directly to avail these services, without intermediation of persons engaged in distribution services.

1. Discretionary portfolio management services: Under this, the Portfolio Manager has the sole and absolute discretion to manage, invest and re-invest on behalf of the client in the type of security as agreed upon in their mutual agreement including to buy, sell or otherwise deal in any Securities, as permissible under the Regulations, effect transactions in such manner and in such markets, as it deems fit, and take day to day decisions in respect of the portfolio of the Client and make such changes in the portfolio as the Portfolio Manager deems fit. The rights of the Portfolio Manager shall be exercised strictly in accordance with the relevant acts, rules, guidelines and notifications in force from time to time.
2. Non-Discretionary Services: Under these services, the Portfolio Manager executes transactions in securities as per the discretion and instructions of the Client and in terms of the PMS Agreement. The Portfolio Manager's role is limited to providing research, investment advice, trade execution facility and maintaining books of accounts for the Client. The Portfolio Manager shall execute orders as per the mandate received from Client.
3. Advisory Services: The Portfolio Manager will provide advisory services, which shall be in the nature of investment advisory, which includes the responsibility of advising on the portfolio strategy and investment / divestment of individual securities in the Client's Portfolio in terms of the PMS Agreement and within overall risk profile. In such case, the Portfolio Manager does not make any investment on behalf of the Client.

The Portfolio Manager shall be solely acting as an advisor in respect of Portfolio of the Client and shall not be responsible for the investment / divestment of securities and / or administrative activities of the Client's Portfolio. For such services, the Portfolio Manager charges the client a fee as per the client agreement. The advice may be either general or specific in nature and may pertain to a particular portfolio. Entry/exit timing, execution and settlement are solely the client's responsibility.

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

- (i) There have been no penalties imposed on the Portfolio Manager by SEBI and no directions have been issued by SEBI under the Act, Rules or Regulations made thereunder.
- (ii) There have been no penalties imposed for any economic offence and /or for violation of any securities laws.
- (iii) There are no pending material litigation / legal proceedings against the Portfolio Manager / key personnel.
- (iv) There has been no deficiency in the systems and operations of the Portfolio Manager observed by SEBI or any regulatory agency.
- (v) There are no enquiry / adjudication proceedings initiated by SEBI against the Portfolio Manager, its directors, principal officer or employees or any other person connected directly / indirectly with the Portfolio Manager, its directors, principal officer or its employees, under the Act / Rules / regulations made there under.

The above information has been disclosed in good faith as per the information available to the Portfolio Manager.

5. Services offered

5.1 The Portfolio Manager offers the following services under its Portfolio Management Services:

- Advisory services
- Discretionary portfolio services
- Non-discretionary portfolio services

The Client's funds may be invested in Equity, Debt, Money market instruments and such other securities which will, inter-alia, include:

- Equity & Equity related Instruments
 - a) Equity and Equity related instruments including convertible bonds, convertible Debentures, warrants, convertible preference shares, etc.
 - b) Equity linked instruments
- Debt & Money Market Instruments
 - a) Certificate of Deposits (CDs)
 - b) Fixed Deposits with Banks
 - c) Commercial Papers (CPs)
 - d) Government Securities
 - e) Non-Convertible Debentures as well as bonds or securities issued by companies / institutions promoted / owned by the Central or State Governments and statutory bodies
 - f) Floating rate debt instruments
- Units of Schemes of mutual funds registered with SEBI

5.2 Minimum Investment Amount

The Client shall deposit with the Portfolio Manager, an initial corpus consisting of Securities and / or funds of an amount prescribed by Portfolio Manager for a specific Portfolio, subject to minimum amount Rs. 50 lakhs as specified under SEBI Regulations, as amended from time to time. The minimum investment amount of Rs. 50 lakhs should be maintained throughout the period under investment. Withdrawal below Rs. 50 lakhs (minimum investment) will not be processed. The Client may on one or more occasion(s) or on a continual basis, make further placement of Securities and / or funds under the service.

The requirement of minimum investment of Rs. 50L as initial corpus from client shall not apply to Accredited Investors holding certificate of Accreditation from Accredited Agency, subject to terms agreed between the client and the portfolio manager. To know more about the detailed framework for Accredited Investors, please contact our Investor Relation Officer (details mentioned under 'Investor Services' of this disclosure document).

5.3 On-Boarding of Client

Alder Capital may on-board the Client (a) directly or (b) through empaneled Distributor.

5.4 Investment Objectives

The investment objective is to generate capital appreciation and steady returns for the client over a long time frame by investing in fundamentally strong businesses. We believe, the rise of Indian consumer is a multi-decade event which will have positive spillover effect on consumer product and services businesses. Thus our portfolios are essentially made up of businesses that cater to domestic consumers, based on a fundamental bottom-up approach and structured with a long term orientation. In particular we are keen on B2C business models with outstanding management, enduring moats and demonstrating scalability. Such businesses not only tend to generate more cash but also could utilize the surplus to build a pipeline of innovations or brand extensions.

5.4.1 Fundamental bottom-up approach

At Alder Capital, our core approach of fundamental investing is driven by in-depth research of business, management, industry and competition. We don't mind spending disproportionate time on doing on-the-ground research to identify businesses with enduring and scalable moats. We believe great businesses, with disciplined management, would create value over a longer period of time, irrespective of market cycles. We typically invest with a 3 to 5 year investment horizon and tend to concentrate our holding. We like small businesses in scalable niche as much as large businesses with sustainable industry leadership

5.4.2 Circle of competence

Indian consumerism is expected to demonstrate secular growth over the next decade driven by income effect, demographic dividend and rising aspiration levels. We expect all business from basic necessities, discretionary products and financial services to benefit from this mega trend. We intend to focus our investments into 3 baskets - consumer staples, consumer discretionary and branded B2C businesses. Our knowledge advantage built over years of understanding consumption related businesses, industry dynamics, competitive rivalry and managements enables us to reduce portfolio diversification and increase prospects of consistent returns. Plus the benefit of specialization is it eliminates surprises and results in performance in line with our investment decisions.

5.4.3 Investment screening

All our investment ideas need to clear our good to great screener and our risk-to-return criteria.

- GTG framework is our proprietary grading system which ranks companies on the basis of innovation, branding, management culture and discipline, strategic assets, industry rivalry, scalability, capital allocation and financial shenanigans. We believe great businesses tend to score high on all these parameters to generate high and consistent return on capital invested. This framework also enables us to think though how businesses in attractive industries are able to adapt to changes to maintain their competitive edge in the long term.
- We pay more attention to historical financial analysis rather than just the forecast of the next few years. In the process we like to understand how businesses were managed in a down cycle and how business transformations over the years have led it to achieve cost/growth leadership over peers. Thus we try to assess the level of risk to achieve a minimum level of return over the next few years.

5.4.4 Risk minimization

We believe in risk-adjusted return verses pursuit of just superior returns. Avoiding investments that could have higher probabilities of absolute loss, would not only minimize portfolio volatility but also results in outstanding returns over extended period of time. We are agnostic to any market capitalization or liquidity criteria, as we believe true value of a business with scalable, predictable and profitable business models will eventually be discovered irrespective of such limitations. We do not believe in hedging or leverage strategies.

5.4.5 Ignore market timing

Consumption related businesses tend to have sufficient internal accruals to growth at a normative pace. Cyclical slowdown in such structural growth businesses causes asymmetries in risk-to-returns. Thus we seek these bargains which generate disproportionate returns for seemingly low level of risk. We also believe in a passive investment strategy with low churn, as we feel outstanding businesses are capable of generating compound growth and difficult to come by. Market cycles may make us take a defensive tilt in the portfolio or increase sensitivity, but we refrain from increasing our cash allocation.

5.5 Investment Approach

The Portfolio Manager provides Portfolio Management services under below Investment Approach:

(1) Investment Approach- B2C GROWTH

Sr.No.	Particulars	Description
1	Investment Objective	Generate capital appreciation for clients over a long-time frame (3-5 yrs.) by investing in B2C businesses having structural competitive advantage with outstanding owner operators.
2	Description of Securities	Primarily invest in B2C companies that are listed on BSE and NSE. May park surplus liquidity in liquid mutual funds.
3	Investment Strategy	Equity
4	Basis of selection of types of securities as part of the investment approach	We believe, the rise of Indian consumer is a multi-decade event which will have positive spillover effect on consumer product and services businesses. Thus, our portfolios are concentrated, catering to domestic consumers, based on a fundamental bottom-up approach and structured with a long-term orientation. We are keen on B2C business models with outstanding management, demonstrating scalability, and having enduring moats. Such businesses not only tend to generate more cash but also could utilize the surplus to build a pipeline of innovations or brand extensions.
5	Allocation of portfolio across types of securities	We are market cap agnostic. Invest across Large, Mid and Small capitalization companies. Maintain fair amount of sectoral diversification. Also maintain maximum cap of 15% for any security.
6	Appropriate benchmark to compare performance and basis for choice of benchmark	S&P BSE 500 TRI (It is the total return Index)
7	Indicative tenure or investment horizon	Term is 3-5 years (at complete discretion of the Portfolio Manager)
8	Risk associated with Investment Approach	Please refer point no.6 of this document on Risk Factors
9	Investment Allocation	As per PMS regulations of INR 50 lacs
10	Fees	As per the current fee structure applicable
11	Exit Load	No exit loads.
12	Terms for Redemption	Partial withdrawal shall be allowed only to such extent that portfolio value after recovery of fees, charges, exit load (if any) and payment of withdrawal amount is not less than the minimum investment specified under PMS regulations of INR 50 lacs.

6. Risk factors

- i. Securities investments are subject to market risk and there is no assurance or guarantee that the objective of the investments will be achieved.
- ii. Past performance of the Portfolio Manager does not indicate its future performance.
- iii. Securities investments are subject to market risks, company specific risks and other risks related to capital markets and there is no assurance or guarantee of profits. The investment value of the Portfolio may increase or decrease depending on various market forces and factors affecting stock markets. Investments in the Portfolio Management Strategies stand a risk of loss of capital and the Clients should be aware that they may lose all or any part of their investments.
- iv. Investment decisions made by the Portfolio Manager may not always be profitable. While the Portfolio Manager shall take all reasonable steps to invest the funds in a prudent manner, such decisions may not always prove to be profitable or correct.
- v. The Portfolio Manager is neither responsible nor liable for any losses resulting from the services or operations of the Clients' Portfolios.
- vi. The tax benefits described in this Disclosure Document are as available under the present taxation laws and are available subject to conditions. The information given is included for general purpose only and is based on advice received by the Portfolio Manager regarding the law and practice in force in India and the investors should be aware that the relevant fiscal rules or their interpretation may change. As is the case with any investment, there can be no guarantee that the tax position or the proposed tax position prevailing at the time of an investment in the Portfolio will endure indefinitely. In view of the individual nature of tax consequences, each investor is advised to consult his/ her own professional tax advisor.

- vii. The investments and growth of the Portfolio are subject to a very wide range of risks which include loss in value of investments due to, inter alia:
- Overall economic slowdown, unanticipated corporate performance, environmental changes, political problems, changes to monetary or fiscal policies (including changes in tax laws and rates), changes in government policies and regulations;
 - Act of state, sovereign action, acts of God, acts of war, civil disturbance;
 - Delisting or market closure
- viii. Investments made by the Portfolio Manager are subject to risks arising out of non-diversification etc.
- ix. Investments made by the Portfolio Manager are subject to risks arising from the investment objective, investment strategy and asset allocation.
- x. The portfolio investment scheme is the first such scheme launched by Portfolio Manager.

7. Client Representation

7.1 Details below are as on 31st October, 2023:

Category of Clients	No. of Clients	Funds managed (Rs.in Cr.)	Discretionary / Non-Discretionary
Associates/ Group Companies			
F.Y. 2023-2024 (As on 31.10.23)	N.A	N.A	N.A
F.Y. 2022-2023	N.A	N.A	N.A
F.Y. 2021-2022	N.A	N.A	N.A
F.Y. 2020-2021	N.A	N.A	N.A
Others			
F.Y. 2023-2024 (As on 31.10.23)	32	37.65	Discretionary
	1	32.41	Advisory
F.Y. 2022-2023	45	43.03	Discretionary
	1	29.75	Advisory
F.Y. 2021-2022	64	59.07	Discretionary
	1	35.32	Advisory
F.Y. 2020-2021	67	60.78	Discretionary
	1	36.58	Advisory

7.2 Details of transaction with the related parties as on 31.03.23:

Key Management Personal:

- Hemant Patel – Managing Partner
- Chaitali Patel – Partner

Expense	Amount (Rs.)	Income	Amount (Rs.)
Remuneration to Partners	1,50,000	Fee Receipts	2,54,275
Rent	3,85,000		

8. The Financial Performance of the Portfolio Manager

Based on the Audited Financial Statements, the financial performance of the Alder Capital is as follows:

(Figures in INR)

Abstract of Financial Statement	As on 31.03.2023	As on 31.03.2022	As on 31.03.2021
Profit & Loss Statement			
Total Income	94,88,608	327,47,896	199,06,202
Less: Total Expenditure (other than Depreciation & Tax)	86,61,976	137,70,626	86,20,989
Less: Depreciation	12,18,497	9,48,801	8,19,408
Profit/ Loss before Tax	(3,91,865)	180,28,469	104,65,805
Less: Provision for Tax	2,820	30,27,207	32,35,568
Less: Deferred Tax	2,30,614	8,22,128	(30,869)
Profit/ Loss after Tax	(6,25,299)	141,79,134	72,61,106

Balance Sheet	As on 31.03.2023	As on 31.03.2022	As on 31.03.2021
SOURCES OF FUNDS			
Partner's Capital	571,21,585	345,41,922	401,91,853
Secured Loans	0	0	5,08,713
TOTAL	571,21,585	345,41,922	407,00,566
APPLICATION OF FUNDS			
Net Fixed Assets	272,79,378	39,21,593	44,77,649
Investments	280,01,011	314,76,411	263,42,663
Deferred Tax	(1,02,731)	1,27,883	9,50,011
Current Assets	28,97,419	28,62,540	1,62,60,131
Less: Current Liabilities	9,53,492	38,46,505	73,29,888
Net Current Assets	19,43,927	(9,83,965)	89,30,243
TOTAL	571,21,585	345,41,922	407,00,566
NET WORTH (in crores)	5.71	3.45	4.07

9. Portfolio Management performance for the last three years

Portfolio Management performance of the Portfolio Manager for last three years with performance indicators calculated using 'Time weighted Rate of Return' method in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.

A) Investment Approach- B2C Growth (Strategy- Equity):

Particulars	FY 23-24 (Till 31.10.23)	FY 22-23	FY 21-22	FY 20-21	Cumulative Return Since Inception (05.10.15 – 31.10.23)
Discretionary Portfolio Return	17.1%	-9.6%	0.1%	48.0%	11.9%
Benchmark: S&P BSE 500 TRI	16.0%	-0.9%	22.3%	78.6%	13.6%

Notes:

- 1) All returns over 1 year are annualized.
- 2) Returns are calculated on Time Weighted Rate of Return (TWRR) method for an Investment Approach This return may differ at individual client level depending on the inflows and outflows of funds and differences in the portfolio composition because of restrictions and other constrains.
- 3) Performance data is net of all fees and expenses (including taxes).
- 4) Disclaimer- The performance related information provided therein is not verified by SEBI

10. Audit Observations

Audit observations for Alder Capital Advisors LLP for preceding 3 years:

Financial Year	Audit Observations
2022-2023	No Observations Reported
2021-2022	No Observations Reported
2020-2021	No Observations Reported

11. Nature of Costs & Expenses

The following are the broad types of costs and expenses chargeable to Clients availing the Portfolio Management Services. The exact quantum of the fees / expenses related to each of the services shall be annexed to the PMS Agreement executed between the Client and the Portfolio Manager.

11.1 Portfolio Management Fees:

The Portfolio Management Fees relate to the Portfolio Management Services offered to the Clients. The fee may be a fixed fee or performance based fee or a combination of both, as agreed by the client in the PMS Agreement.

Pursuant to SEBI Cir./IMD/DF/13/2010 dated October 05, 2010 for charging of performance/profit sharing fee, high water mark principle will be followed.

High Water Mark Principle: High Water Mark shall be the highest value that the portfolio/account has reached. Value of the portfolio for computation of high watermark shall be taken to be the value on the date when performance fees are charged. For the purpose of charging performance fee, the frequency shall not be less than quarterly. The Portfolio Manager shall charge performance based fee only on increase in portfolio value in excess of the previously achieved high water mark.

Please refer PMS Agreement for illustration on the fees structure.

11.2 Withdrawal Fee:

The Portfolio Manager may also charge premature exit fees / withdrawal fees at time of redemption of the portfolio by Client.

11.3 Other Expenses:

Apart from Portfolio Management Fees, the following are the general costs and expenses to be borne by the Client availing the Portfolio Management Services of the Portfolio Manager on actual basis.

i. Custodian / Depository / Fund Accounting fees:

The charges related to opening and operation of depository accounts, custody and transfer charges for securities, dematerialization and materialization and other charges in connection with the operation and management of the depository accounts.

ii. Brokerage and transaction costs:

The brokerage charges and other charges like GST, stamp duty, transaction costs including bank charges, turnover tax, securities transaction tax or any other tax levied by statutory authorities on the purchase and sale of securities and entry or exit loads (if any) on units of Mutual Funds.

iii. Certification and professional charges:

Charges payable for out sourced professional services like accounting, auditing, taxation and legal services etc. would be recovered. Charges for documentation, notarizations, certifications, attestations required by bankers or regulatory authorities would be borne by Alder Capital.

iv. Services related expenses:

Charges in connection with day to day operations like courier expenses, stamp duty, postal, telegraphic any other out of pocket expenses as may be incurred by the Portfolio Manager, would be borne by Alder Capital.

v. Any other incidental and ancillary charges:

All incidental and ancillary expenses not covered above but incurred by the Portfolio Manager on behalf of the Client for Portfolio Management and expenses incurred by the Portfolio Manager in terms of the PMS Agreement shall be charged to the Client.

The exact fees structure to be charged will be set out as a separate annexure to the Portfolio Application form and at the time of execution of the PMS Agreement. These charges will be exclusive of GST and statutory levies will be charged separately as per the prevailing rates.

Management fees shall be subject to TDS (tax deducted at source) wherever applicable, at prescribed rates under the Income Tax Act, 1961 as prescribed from time to time.

Nature of Expense	Maximum Indicative Rate (%)
1. Investment Management & Advisory Fees**	
a) Upfront Fee	NIL
b) Fixed Management fee	Upto 2.5% p.a.
c) Performance fee	Upto 20% over hurdle rate
d) Exit Loads	Upto 2% p.a.
2. Custodian Fee**	Upto 0.05% p.a.
3. Brokerage and transaction costs	Upto 0.30% of contract value
4. Fund Accounting Charges**	Upto 0.05% p.a.
**Basis of Charge – Indicative as of average daily asset under management	

12. Taxation - tax implications for the clients

Clients will be responsible and liable for taxes under Income Tax Act, 1961 for any income generated out of investment made in Alder Capital Portfolio Management Services. The client is advised to consult his or her tax advisor/consultant for appropriate counsel on tax treatment of the various incomes generated out of the portfolio; viz Dividends, capital gains etc. The information set forth below is based on the Portfolio Manager's understanding of the Tax Laws as of this date of Disclosure Document and is indicative in nature.

Alder Capital will not deduct TDS on any income generated from the investment. For non-resident clients, TDS will be deducted at source by the Custodian bank on Capital Gains.

12.1 Dividends:

Dividend received by shareholders, on or after 1st April, 2020, would be taxable in the hands of the shareholder at normal tax rates as applicable. The dividend income, in the hands of a non-resident person (including FPIs and non-resident Indian citizens (NRIs)), is taxable at the rate of 20%^ without providing for deduction under any provisions of the Income-tax Act. However, dividend income of an investment division of an offshore banking unit shall be taxable at the rate of 10%^.

Dividend will be subject to TDS @ 10% if the dividend distributed or paid by the company to a resident shareholder, exceeds Rs.5,000/- in a financial year.

^ Plus applicable surcharge if any and Education cess @ 4% on tax and surcharge.

12.2 Capital Gains Tax:

Profit on sale of investments, (being shares in a company or any other securities listed on a recognised stock exchange in India or units of the Unit Trust of India established under the Unit Trust of India Act, 1963 (52 of 1963) or units of a Mutual Fund specified under section 10(23D)) held for a period of more than 12 months (24 months in case of any other investments) immediately preceding the date of transfer, will be treated as long-term capital gains; in all other cases, it would be treated as short-term capital gains. The taxability of long term and short-term capital gains is discussed below:

12.3 Taxation on Gains derived from sale of Listed Securities and Equity Oriented Mutual Fund:

- Long term capital gains on sale of listed securities (on recognized stock exchanges and subject to STT) and units of an equity oriented fund are taxable at @ 10%^ (without indexation) of such capital gain only if it exceeds Rs.1 Lakhs.
- Short term capital gains on sale of listed securities (on recognized stock exchanges and subject to STT) and units of an equity oriented fund are taxable @ 15%^

^ Plus applicable surcharge if any and Education cess @ 4% on tax and surcharge.

12.4 Set-off of Capital Loss derived from sale of Shares and Equity Oriented Mutual Fund:

Long term capital loss can be set-off against Long term capital gain only. However, short term capital loss can be set off against both short term and long term capital gains of the year. Unabsorbed short term and long term capital loss can be carried forward for 8 assessment years immediately following the assessment year in which the loss was first computed.

12.5 Details under FATCA/Foreign Tax Laws

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

13. Accounting Policies

13.1 Basis of Accounting

Books and Records are separately maintained 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 Managers) Regulations, 2020 as amended from time to time. Accounting under the respective portfolios will be done in accordance with Generally Accepted Accounting Principles followed in India.

13.2 Maintenance of Client Account

In the case of investments by the Client in listed securities and in the event that the Client is a Non-Resident Indian, as defined by SEBI from time to time and further in instances where the Client opts for the Non-Pool Account, the Portfolio Manager shall keep the funds of the Client in a separate designated account to be maintained by it in a scheduled commercial bank and shall also maintain a separate Portfolio record in the name of the Client in its books for accounting the assets and income of the Client. The Portfolio Manager also maintains a separate depository account of each client.

In line with SEBI circular No. IMD / DOF I / PMS / Cir-4 / 2009 dated 23rd June 2009, the Portfolio Manager keeps the funds of all clients in a separate bank account maintained by the Portfolio Manager and the following conditions are adhered to:

- i. There are clear segregation of each client's fund through proper and clear maintenance of back office records;
- ii. Portfolio Managers do not use the funds of one client for another client;
- iii. Portfolio Managers also maintain an accounting system containing separate client wise data for their funds and provide statement to clients for such accounts at least on monthly basis; and
- iv. Portfolio Managers reconcile the client-wise funds with the funds in the aforesaid bank account on daily basis

13.3 Portfolio Valuation

- a) Investments are stated at cost of acquisition by the Portfolio Manager.
- b) In determining the holding cost of investments and the gains or loss on sale of investments, the First-in-First-out (FIFO) method shall be followed.
- c) Bonus shares shall be recognized only when the original shares on which the bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.
- d) Rights entitlement shall be recognized only when the original shares on which the rights entitlement accrues are traded on the stock exchange on an ex-rights basis.
- e) In cases of corporate action like stock split, the new stock received with split face value is recorded in books on ex-date. However, date of acquisition of original shares is construed as date of acquisition of stock received on split for the purpose of computing short term/long term gain.
- f) In cases of corporate action of demerger, the new shares received on de-merger is recorded in books on ex-date but the date of purchase of original shares is reckoned as date of acquisition for new demerged stock for the purpose of computing gain/(loss). The apportionment of cost between old share and new share is made based on the information provided by the company. However, in case where such information about cost apportionment is not available on ex-date, cost of original share is taken as same % which opening ex price of such share bear to closing cum price and balance cost is taken as cost of demerged shares.
- g) Equity securities awaiting listing are valued at fair value as determined in good faith by the Portfolio Manager.
- h) The cost of investments acquired or purchased shall include brokerage, stamp duty and any charge customarily included in the broker's contract note.
- i) Investments in listed equity and debt instruments will be valued at the closing market prices on the National Stock Exchange (NSE)/Bombay Stock Exchange (BSE). If the securities are not traded on the NSE/BSE on the valuation day, the closing price of the security on the Bombay Stock Exchange/NSE will be used for valuation of securities as the case may be. In case of the securities are not traded on the valuation date, the last available traded price shall be used for the valuation of securities.
- j) Investments in units of Mutual Funds shall be valued at the Net Asset Value of the previous day declared for the relevant Scheme on the date of the report.
- k) Pre IPO placements will be valued at cost till it is listed.
- l) Securities brought in or withdrawn by the Client shall be valued at the closing price of the Security at BSE/NSE.

13.4 Securities Transaction

Transactions for purchase or sale of investments shall be recognized as of the trade date and not as of the settlement date, so that the effect of all investments traded during a financial year is recorded and reflected in the financial statements for that year.

13.5 Income/Expenses

- i. Dividend income earned shall be recognized, not on the date the dividend is declared, but on the date the share is quoted on an ex-dividend basis. For investments, which are not quoted on a stock exchange, dividend income shall be recognized on the date of receipt.
- ii. In respect of all interest-bearing investments, income shall be accrued on a day-to-day basis as it is earned. Therefore, when such investments are purchased, interest paid for the period from the last interest due date upto the date of purchase shall not be treated as cost of purchase but shall be debited to Interest Recoverable Account. Similarly, interest received at the time of sale for the period from the last interest due date up to the date of sale shall not be treated as an addition to sale value but shall be credited to Interest Recoverable Account.
- iii. All other expenses payable by the Client shall be accrued as and when Liability is incurred.
- iv. Unrealised gain / losses are the differences, between the current market value / Net Asset Value and the historical cost of the securities.
- v. Management fees, Performance fees, Custodial fees, Fund accounting fees and other charges / fees shall be accounted as stated in the PMS Agreement.

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 and communicated to the client as and when made.

14. Investor Services

- A) Name, address and telephone number of the Investor Relation Officer who shall attend to the investor queries and complaints.

Ms. Madhavi Gore

503, Morya Blue Moon, Off New Link Road,
Andheri (West), Mumbai 400 053.

Tel: +91 22 40127005

Mobile: +91 8591711921

Email: info@aldercapital.in

- B) **Grievances & Dispute Settlement Mechanism**

Grievance, if any can be addressed by the client to the Investor Relation Officer and further Portfolio Manager shall attend to and address client query or concern as soon as possible to mutual satisfaction within 21 calendar days of receipt of complaint. In case the client is not satisfied with the redressal by the Portfolio Manager, the client may lodge a complaint on SEBI's web-based complaints redressal system SCORES Platform.

- **SEBI Scores Platform (SCORES Portal)**

SEBI has launched a centralized web-based complaints redress system SCORES, which enable investors to lodge and follow up their complaints and track the status of redressal of such complaints from anywhere. All the activities starting from lodging of a complaint till its disposal by SEBI would be carried online in an automated environment and the status of every complaint can be viewed online at any time. An investor, who is not familiar with SCORES or does not have access to SCORES, can lodge complaints in physical form. However, such complaints would be scanned and uploaded in SCORES for processing.

Client can lodge/ register complaint on SCORES portal <https://scores.gov.in/scores/Welcome.html> by clicking on 'Complaint Registration' tab or download the mobile app 'SEBI SCORES' to register a complaint.

- **Online Dispute Resolution Platform (ODR Portal)**

In case the client is still not satisfied with the outcome, then client can initiate dispute resolution through the common Online Dispute Resolution Portal (ODR Portal) at <https://smartodr.in/login> by creating account under 'Investor Login' and can raise complaint/ dispute. The ODR Portal has necessary features and facilities to, inter alia, enroll and file complaint /dispute and to upload documents or papers pertaining thereto. The portal also has the facility to provide status updates on the complaint/dispute in the login.

Alternatively, the client can initiate dispute resolution through ODR Portal if the grievance lodged with the Portfolio Manager was not satisfactorily resolved or at any stage of subsequent escalations on SEBI Scores platform (only prior to or at the end of such escalation). The dispute resolution through the ODR Portal can be initiated when the complaint /dispute is not under consideration with Portfolio Manager or under SCORES guidelines or is not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law. The dispute resolution through the ODR Portal can be initiated when within the applicable law of limitation (reckoned from the date when the issue arose/occurred that has resulted in the complaint/date of the last transaction or the date of disputed transaction, whichever is later).

All disputes, differences, claims and questions whatsoever which shall arise either during the subsistence of the PMS Agreement with a client or afterwards with regard to the terms thereof or any clause or thing contained therein or otherwise in any way relating to or arising there from or the interpretation of any provision therein shall be, in the first place settled by mutual discussions, failing which the same shall be referred SEBI SCORES platform, failing the same will be settled by arbitration in accordance with and subject to the provisions of online conciliation and/or online arbitration by participating in the ODR Portal and/or undertaking dispute resolution in the manner specified in SEBI Circular No. SEBI/HO/OIAE/OIAE_IAD-1/P/CIR/2023/131 dated 31st July, 2023.

15. Details of Investments in the securities of Related Parties of the Portfolio Manager:

Sr. No.	Investment Approach	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 (INR in crores)	Percentage of total AUM as on the last day of the previous calendar quarter
Nil	Nil	Nil	Nil	Nil	Nil

16. Details of the Diversification policy of the portfolio manager:

Alder Capital invest into B2C businesses with structural competitive advantages with outstanding owners/managers with high governance standards, enduring moats and demonstrating scalability. Our core competency lies in understanding B2C businesses driven by in-depth on ground research via insights from meeting customers (& surveys), competitors, auditors, ex-employees, suppliers, and distributors. Portfolio diversification is a strategy of risk management which helps to mitigate the risk on the overall investment portfolio. Thus, our portfolios are based on a fundamental bottom-up approach and structured with a long-term orientation. We are market cap agnostic and focus on building a concentrated (max 15 stocks), multi-cap and low churn portfolio with a long-term view of 3-5 years (maximum cap for any security in our portfolio is 15%). We have exposure to healthcare, financials, staples, hospitality, etc. thus maintaining a fair amount of sectoral diversification which assist in managing risk and to reduce the exposure of massive draw down of a single stock.

17. General Provisions:

The Prevention of Money Laundering Act, 2002 (PMLA Act) came into force with effect from July 1, 2005, forming the core of the legal framework to combat Money Laundering. As per the provisions of the PMLA Act, Portfolio Managers have certain obligations regarding verification of the identity of their clients, maintaining records and furnishing information to Financial Intelligence Unit- India (FIU-IND). SEBI via its various circulars has directed Portfolio Managers to formulate and implement policies and procedures for dealing with Money Laundering and adoption of 'Know Your Customer' (KYC) policy.

The Portfolio Manager reserves the right to take all steps and actions including retaining all documentation for establishing the identity of the client, proof of residence, sources of funds, etc in accordance applicable law from the client and/ or the custodian as may be required to ensure appropriate identification/ verification and re-verification of the client, the source of fund etc. under its KYC policy as may be amended and updated from time to time. If at any time Portfolio Manager believes that the transaction is suspicious in nature in accordance with applicable law, the Portfolio Manager shall have the absolute discretion to report the transaction to FIU-IND and/or any other statutory body that the Portfolio Manager is bound to report from time. The Portfolio Manager can also reject any application, freeze the account, compulsorily close the client account and pay out the proceeds to the client, at its option. The Portfolio Manager shall have no obligation to inform the client or its representative (if any) in the event of such reporting.

The Portfolio Manager and its Partners, Directors and Employees shall not be responsible/ liable for any loss suffered by the client in any manner whatsoever due to any reporting to the FIU-IND by the Portfolio Manager.

For **ALDER CAPITAL ADVISORS LLP,**

For **Phirodia Bafna & Associates**
Chartered Accountants
Firm Reg No. : 107911W

Principal Officer

Place : Mumbai

Date: 11.11.2023

CA Deven J. Bafna
Partner
Membership No.043314
UDI 23043314BGVNET5910

Dear Sir / Madam,

Please find enclosed herewith the Disclosure Document for Portfolio Management Services. We request you to go through the contents of the document.

Kindly acknowledge receipt of the same.

Thanking you.

For **ALDER CAPITAL ADVISORS LLP**

Sd/-

Mr. Hemant Bhaskar Patel

Principal Officer

Place : Mumbai

Date:

Acknowledgement of Risk Disclosure Document

Name of the client	
Signature of the client	

ALDER CAPITAL ADVISORS LLP

503, Morya Blue Moon, Off New Link Road,
Andheri (West), Mumbai 400 053.

Tel: +91 22 4012 7003/4/5/6

Email: info@aldercapital.in Web: www.aldercapital.in

SEBI PMS Registration No. : INP000004771