
CERTIFICATE

To,
The Board of Directors,
Finwizard Technology Private Limited
IndiQube Sapphire, 2nd Floor,
No. 73/1, St Mark's Road,
Bangalore, Karnataka- 560 001

1. You have requested to us to provide a certificate on the Disclosure document for Portfolio Management services ("the Disclosure Document") of **Finwizard Technology Private Limited** ("the Company"). We understand that the disclosure document is required to be submitted to the Securities and Exchange Board of India ("the SEBI")
2. The Disclosure Document and compliance with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 and guidelines issued by SEBI from time to time is the responsibility of the management of the company. Our responsibility is to report in accordance with the Guidance note on Audit Reports and Certificates for special purposes issued by the Institute of Chartered Accountants of India. Further, our scope of work did not involve us performing audit tests for the purpose of expressing an opinion on the fairness or accuracy of any of the financial information or the financial statement taken as a whole. We have not performed an audit, the objective of which would be the expression of an opinion on the financial statement, specified elements, accounts or items thereof, for the purpose of this certificate. Accordingly, we do not express such opinion.
3. In respect of the information given in the Disclosure document, we state that
 - i. The list of persons classified as Associates or group companies and list of related parties are relied upon as provided by the company.
 - ii. The Promoters and partners, Key managerial personnel qualification, experience, ownership details are as confirmed by the Company and have been accepted without further verification.
 - iii. We have relied on the representations given by the management

of the company about the penalties or litigations against the Portfolio Manager mentioned in the Disclosure document.

- iv. With regard to TWRR calculation method, we have been informed by the management that the TWRR has been calculated by their software as per the logic specified by SEBI.
 - v. Our certification is based on the audited Balance sheet of the Company for the year ended March 31, 2024, and examination of other records, data made available and information & explanations provided to us.
4. Read with above and on the basis of our examination of the books of accounts, records, statements produced before us and to the best of our knowledge and according to the information, explanations and representations given to us, we certify that the disclosure made in the Disclosure Document dated December 18, 2024 are true and fair in accordance with the disclosure requirements laid down in Regulation 30 (2) read with Schedule V to the SEBI Regulations.
5. This certificate is intended solely for the use of the management of the company for the purpose as specified in paragraph 1 above.

For Sanjay Shah & CO LLP

Chartered Accountants

SANJAY
KUMAR
SHAH

Digitally signed by
SANJAY KUMAR
SHAH
Date: 2025.05.30
11:09:31 +05'30'

Sanjay Shah
Partner

Membership No. 118586

Firm Registration Number: 101007

UDIN No: 25118586BMKOCZ1791

Place: Mumbai

Date: May 30, 2025





FINWIZARD TECHNOLOGY PRIVATE LIMITED

**Disclosure Document
Of
Finwizard Technology Private Limited**



FINWIZARD TECHNOLOGY PRIVATE LIMITED

PORTFOLIO MANAGEMENT SERVICES – DISCLOSURE DOCUMENT

(As required under Regulation 22 and Schedule V of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020)

I. Declaration

- a) This Disclosure Document (hereinafter referred to as the “Document”) has been prepared under the SEBI (Portfolio Managers) Regulations, 2020 and has been filed with the Securities and Exchange Board of India (“SEBI”) along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020 (“Regulations”).
- b) This document serves the purpose of providing essential information about the portfolio services to assist and enable the investors in making an informed decision for engaging Finwizard Technology Private Limited (hereinafter referred to as the “Portfolio Manager” or “Finwizard”).
- c) This document contains the necessary information about the Portfolio Manager required by an investor before investing. The investor is advised to retain this Document for future reference. The delivery of this document at any time does not imply that the information contained herein is correct as of any time subsequent to the date shown above.
- d) The name, phone number, e-mail address of the principal officer as designated by the Portfolio Manager along with the address of the Portfolio Manager are as follows:

Name of the Principal Officer:	Nirav Karkera
Registered Address:	IndiQube Sapphire, 2nd Floor, No. 73/1, St Mark’s Road, Bangalore, Karnataka- 560 001.
Phone number:	+91 98213 23395
E-mail address:	nirav@fisdom.com

- e) The Disclosure Document is dated May 30, 2025

FINWIZARD TECHNOLOGY PRIVATE LIMITED

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FINWIZARD TECHNOLOGY PRIVATE LIMITED**I. Disclaimer**

This document has 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 this Document.

The distribution of this document in certain jurisdictions may be restricted or totally prohibited and accordingly, persons who come into possession of this document are required to inform themselves about and to observe any such restrictions.

II. Definitions

In this Disclosure Document, unless the context otherwise requires, the following words and expressions shall have the meaning assigned to them:

1. **“Act”** means the Securities and Exchange Board of India Act, 1992.
2. **“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 SEBI from time to time.
3. **“Accredited Investor”** means any person who fulfils the following eligibility criteria or such other criteria as may specified by SEBI from time to time and is granted a certificate of accreditation by an accreditation agency

The following persons shall be eligible to be considered as Accredited Investors:

- (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.
4. **“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
 5. **“Board” or “SEBI”** -means the Securities and Exchange Board of India.
 6. **“Client(s)” / “Investor(s)”** means any person who enters into an agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.
 7. **“Depository Account”** means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.
 8. **“Document”** Document refers to the risk disclosure document.
 9. **“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, Referral Interfaces or by any other name)
 10. **“Financial Year”** means the year starting from April 1 and ending on March 31 in the following year.

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11. **“Funds”** means the moneys placed by the Client with the Portfolio Manager and shall include all accretions thereto.
12. **“Group Company”** means a company under the same management or control as the Portfolio Manager.
13. **“HUF”** HUF shall mean the Hindu undivided family as defined in Section 2(31) of the Income Tax Act, 1961.
14. **“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.
15. **“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, taking into account 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.
16. **“Large Value Accredited Investor”** means an Accredited Investor who has entered into an agreement with the Portfolio Manager for a minimum Capital Contribution of ten crore rupees
17. **“Portfolio”** means the total holdings of all investments, Securities and Funds belonging to the Client.
18. **“Portfolio Manager”** means Finwizard Technology Private Limited, a company incorporated under the Companies Act, 2013 and registered with SEBI as a portfolio manager
19. **“PMS”** shall mean Portfolio Management Services offered by Finwizard Technology Private Limited.
20. **“Principal Officer”** means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:
 - (i) 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; and
 - (ii) all other operations of the portfolio manager
21. **“Regulations”** means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020.
22. **“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;

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- (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;
- 23. **“Securities”** means security as defined under the Securities Contracts (Regulation) Act, 1956, and includes any other instruments or investments (including borrowing or lending of securities) as may be permitted by Applicable Law from time to time.
- 24. **“NRI”** shall mean Non-resident Indian as defined in Section 2 (30) of the Income Tax Act, 1961.
- 25. **“NAV”** shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.

Words and expressions used in this Disclosure Document and not expressly defined shall be interpreted according to their usage in the Regulations and the SEBI Act, 1992. The definitions are not exhaustive. They shall also carry the meaning assigned to them in the Regulations governing Portfolio Management Services.

III. Description**1. History, Present Business and Background of the Portfolio Manager**

Finwizard Technology Private Limited (**“Finwizard”** / **“the Portfolio Manager”**) is a Private Limited Company incorporated under the Companies Act, 2013 on June 05, 2015 with CIN number U74900KA2015PTC080747. Finwizard has its Registered Office at IndiQube Sapphire, 2nd Floor, No. 73/1, St Mark’s Road, Bangalore, Karnataka- 560 001, & Corporate office situated at 17th Floor, VIOS Tower, Off Eastern Express Highway, Near Anik Nagar Bus Depot, Sewri-Chembur Road, Mumbai – 400 037, India.

Finwizard is registered with SEBI as Stock Broker with registration number INZ000209036, Depository Participant with registration number IN-DP-572-2021, Depository Participant Number of CDSL is 92100 and NSDL is IN304551, Portfolio Manager with registration number INP000008950, Investment Advisor with registration number INA200005323, Research Analyst with registration number INH000010238 and Mutual Fund Distributor with AMFI registration number ARN-103168. Finwizard is a Trading Member of National Stock Exchange of India Limited (Member Code-90228) & BSE Limited (Member Code-6696)

Business Activity:**Portfolio Management and Advisory Services**

Finwizard has a valid certificate of registration with SEBI as a Portfolio Manager under the Regulations (Registration no. INP000008950). Finwizard seeks to provide Portfolio Management Services and offer Investment Advisory Services to its clients.

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2. Promoters of the Portfolio Manager, Directors and their background

The details of the Promoters & Directors are as follows:

Name of the Promoter/Director	Designation	Their Background
Mr. Subramanya Venkat Sumukh	Promoter & Whole time Director	<p>Mr. Subramanya Venkat Sumukh has 21 years' experience in Management and Venture capital Sector. He was associates with Wipro Technologies, KPMG, Avendus Capital and Bessemer Venture Partners. He was a partner at Bessemer Venture Partners (BVP), a global venture capital firm and Managing Director of India operations. While at BVP, Subu created the technology investing roadmap for BVP in India and established BVP's office in Bangalore. He served on the boards of TaxiForSure (Acq by Ola), Matrimony.com, Snapdeal, Nephroplus and several others.</p> <p>Subramanya holds Bachelor of Engineering in Computer Science from Mysore University and has completed MBA from IIM Ahmedabad.</p>
Mr. Anand Atmaram Dalmia	Promoter & Whole time Director	<p>Anand Dalmia is an entrepreneur and an experienced investment banker. Anand is currently Co-founder and CBO of Fisdom, a leading fintech start-up that aims to make financial products simpler and more accessible to the masses. Till August 2015, he was a Senior Vice President at Macquarie Capital in India. While at Macquarie Group, Anand was key to several M&A , private equity syndication, equity capital markets and debt syndication deals</p> <p>Prior to Macquarie, Anand has worked at UBS and Avendus in their investment banking in India. He used to lead the technology investment banking across these firms and has closed some of the largest deals in the technology space in India. He clients included Wipro, Genpact, Aegis, Tech Mahindra Intelenet, Minacs, Hexaware, among others</p> <p>Anand holds PGDM from IIM Lucknow and Bachelor of Commerce from St. Xavier's College - Kolkata</p>
Mr. Ganesh Venkateshwaran Rengaswamy	Nominee Director	<p>Ganesh has 17+ years of experience in the field venture capital and Partner at Quona Capital.</p> <p>Ganesh holds B.Tech, Master of Business Administration.</p>
Mr. Kiranbir Nag	Nominee Director	<p>Kiranbir Nag is a Chartered accountant and has 17+ years of experience in the field of Venture Capital and partner at Saama Capital.</p>

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3. Group Companies

The below mentioned companies are wholly owned subsidiaries of the Portfolio Manager –

- Winiin Taxscope Private Limited
- Finwizard Technology Services Private Limited
- Finwizard Securities Private Limited

Details of the services being offered:

A. Finwizard provides Portfolio Management Services to following client category. The detailed description of the services offered is provided in point VI- Services Offered by the Portfolio Manager.

Client Category	Nature of Services
Resident Individual, Non Resident Indian, Resident Corporate	Discretionary/ Non-Discretionary/ Advisory
Foreign Institutional Investor (FII), Foreign Portfolio Investors and their sub-accounts	Discretionary/ Non-Discretionary/ Advisory

At present Finwizard offers Discretionary Portfolio Management Services.

B. Services offered to Accredited Investors and Large Value Accredited Investors:

The below regulatory concessions are available to Accredited Investor and Large Value Accredited Investor under SEBI (Portfolio Managers) Regulations, 2020:

Particulars	Applicability
Contents of agreement specified under Schedule IV of SEBI (Portfolio Managers) Regulations, 2020 shall not apply to the agreement between the Portfolio Manager and Large Value Accredited Investor	Large Value Accredited Investor
The requirement of minimum investment amount per client shall not apply	Accredited Investor
The Portfolio Manager may offer discretionary or non-discretionary or advisory services for investment up to hundred percent of the assets under management in unlisted securities subject to the terms agreed between the client and the Portfolio Manager	Large Value Accredited Investor
The quantum and manner of exit load applicable to the client of the Portfolio Manager shall be governed through bilaterally negotiated contractual terms	Large Value Accredited Investor

The detailed framework for Accredited Investors and Large Value Accredited Investors is available on the website of the Portfolio Manager at []

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C. Client On-boarding:

The Portfolio Manager may:

- a. Empanel Distributor to on-board the clients
- b. Investors can avail the portfolio management services directly from Finwizard. Such investments can be made without any intermediary or distribution agent. Clients can onboard with Finwizard directly by contacting us on our investor desk email ID - pmsonboarding@fisdom.com .

I. Net worth of the Portfolio Manager

The net worth of the Portfolio Manager as on March 31,2024 is INR 80,74,81,003.

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

a)	All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made there under.	None
b)	The nature of penalty/direction.	Not Applicable
c)	Penalties imposed for any economic offence and/or for violation of any securities laws.	None
d)	Any pending material litigation/legal proceedings against the portfolio manager/key personnel with separate disclosure regarding pending criminal cases, if any.	None
e)	Any deficiency in the systems and operations of the portfolio manager observed by the Board or any regulatory agency.	None
f)	Any enquiry/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

III. Services Offered by the Portfolio Manager

i. Investment Objectives and Policies

The investment objective is to invest in business following GARP style (Growth at reasonable price) with an objective to provide risk adjusted return over long term through various Approaches by investing in asset classes of equities, fixed income products, mutual funds, private equity and venture capital denominated in local/foreign currencies and any other asset classes and Securities as permissible under the Regulations. Though reasonable endeavour will be made to achieve the objectives of each Approach, there is no guarantee or assurance that the investment objective will be achieved. No guaranteed returns are being offered under these services.

The Portfolio Manager offers the following three types of services:

- i. **Discretionary Services:** The Portfolio Manager exercises its discretion in managing the Funds/Securities in the Client's portfolio. Subject to such investment objective and restrictions as may be contained in the agreement with the Client, the Portfolio Manager will have complete discretion to manage, invest and re-invest the Client's account, including to buy, sell or

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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. The Client may, under these services, authorize or restrict the Portfolio Manager to invest the Client's Portfolio in specific financial instruments or Securities or a mix of specific instruments or Securities. The Portfolio Manager, may at its discretion, adhere to the views of the Client pertaining to the investment/ disinvestment decisions of the Client's Portfolio. The Portfolio Manager's decision in deployment of the Client's Portfolio is absolute and final and is not open to review or question by the Client during the currency of the agreement or at any time thereafter, except on the grounds of *malafide*, fraud, conflict of interest or gross negligence. The Portfolio Manager shall send periodical statements to the Client.

- ii. **Non-Discretionary Services:** Under the Non-Discretionary Portfolio Management Services, the Portfolio of the Client shall be managed in consultation with the Client. Under this service the Assets will be managed as per express prior instructions issued from the Client from time to time. The Client will have complete discretion to decide on the investment (Stock Quantity and Price or amount). The Portfolio Manager inter-alia manages transaction execution, accounting, recording of corporate benefits, valuation and reporting aspects on behalf of the client entirely at client's risk.
- iii. **Advisory Services:** Finwizard will offer Clients Advisory Services in relation to the Clients' Portfolio. Under these services, the Portfolio Manager advises the Client on investments in general or any specific advice required by the clients and agreed upon in the client agreement. The Portfolio Manager will render the best possible advice to the client having regard to the client's needs and the environment, and his own professional skills. The same can be binding or non-binding in nature or in such terms as mentioned in the client agreement. For such services, the Portfolio Manager charges the client a fee for services rendered mentioned in 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.

At present Finwizard offers Discretionary Portfolio Management Services.

The minimum investment amount per Client as prescribed by SEBI under the Regulations is Rs. 50 lakhs.

ii. Investment Approach under Discretionary Services:

I. Fisdrom Wealth Edge

Sr. No.	Particulars	Description
1	Strategy Name	Fisdrom Wealth Edge
2	Investment Objective	The investment objective of the scheme is to generate long-term capital appreciation from a portfolio of stocks, mutual funds Bonds (listed & unlisted), ETFs.
3	Description of types of Securities	stocks, mutual funds Bonds (listed & unlisted), ETFs etc.

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4	Basis of selection of such types of securities as part of the investment approach	Ability to deliver diversified and effective portfolio of funds to optimise performance and risk across market cycles
5	Allocation of portfolio across types of securities	100% allocation to a combination of of stocks, mutual funds Bonds (listed & unlisted), ETFs. Etc.
6	Appropriate benchmark to compare performance and basis for choice of benchmark	BSE 500 TRI
7	Indicative tenure or investment horizon for each investment allocation	5 Years +
8	Risk associated with Investment Approach	Investments in equity/equity related instruments/bonds are subject to market risks. These risks could be security specific or market specific and arising from company, industry, economic (both domestic and global), political, etc., factors. This could result in volatility in near term performance or even permanent loss of capital in some instances. The NAV may be affected, inter-alia, by changes in the performance of the market, market interest rates, price/interest-rate risk and credit risk, concentration of sectoral risk associated with derivatives trading pertaining to equity markets, changes in credit rating, government policy, volatility and liquidity in the money markets, pressure on the exchange rate of the rupee, trading volumes, performance of individual stocks, settlement periods and transfer procedures, basic risk, spread risk and re-investment risk.

II. Fisdom Custom Edge (Hybrid)

Sr. No.	Particulars	Description
1	Strategy Name	Fisdom Custom Edge (Hybrid)
2	Investment Objective	The investment objective of the scheme is to generate long-term capital appreciation utilising a multi-asset, multi-product approach
3	Description of types of Securities	Mutual Funds, ETF, Stocks, Bonds (Listed & Unlisted).
4	Basis of selection of such types of securities as part of the investment approach	Ability to deliver diversified and effective portfolio of funds to optimise performance and risk across market cycles in alignment with strategy goals.
5	Allocation of portfolio across types of securities	100% allocation to a combination of Mutual Funds, ETF, Stocks, Bonds (Listed & Unlisted)
6	Appropriate benchmark to compare performance and	Nifty Multi Asset Index 2

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	basis for choice of benchmark	
7	Indicative tenure or investment horizon for each investment allocation	5 Years +
8	Risk associated with Investment Approach	Investments in equity/equity related instruments/bonds are subject to market risks. These risks could be security specific or market specific and arising from company, industry, economic (both domestic and global), political, etc., factors. This could result in volatility in near term performance or even permanent loss of capital in some instances. The NAV may be affected, inter-alia, by changes in the performance of the market, market interest rates, price/interest-rate risk and credit risk, concentration of sectoral risk associated with derivatives trading pertaining to equity markets, changes in credit rating, government policy, volatility and liquidity in the money markets, pressure on the exchange rate of the rupee, trading volumes, performance of individual stocks, settlement periods and transfer procedures, basic risk, spread risk and re-investment risk.

III. Policies for investments in Group Companies of the Portfolio Manager

The Portfolio Manager shall not make any investments, whether in equity, debt or hybrid instruments, of any of its associates, group companies and/ or related parties and accordingly it does not propose to seek any prior consent from the investors. If at any time in the future, the portfolio manager proposes to make any investments in securities of associates, group companies and/ or related parties it shall adhere to the limits for such investments as stated in the SEBI circular SEBI/HO/IMD/IMD-I/DOF1/P/CIR/2022/112 dated August 26, 2022 and shall also take prior consent of all investors. Please refer to clause XVII on the diversification policy of the portfolio manager.

VII. Risk Factors

1. Investment in Securities, whether based on fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc and there is no assurance or guarantee that the objective of the investments will be achieved.
2. The Portfolio Manager does not assure that the objectives of any of the model Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
3. The Portfolio Manager would like to inform investors that it does not have any previous experience or established track record as a portfolio manager, as the portfolio manager is launching its inaugural portfolio.
4. Past performance of the Portfolio Manager does not indicate the future performance of the same or any other model portfolio in future or any other future model portfolio of the Portfolio Manager.
5. The names of the model portfolios do not in any manner indicate their prospects or returns.

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6. Investments in equity may be adversely affected by the performance of companies, changes in the economy, government policy, the marketplace, credit ratings and industry specific factors.
7. Debt and other fixed income investments may be subject to changes in interest rates and/or liquidity, credit and reinvestment risks.
8. Liquidity in the investments and performance of portfolio may be affected by trading volumes, settlement periods and transfer procedures.
9. Industry specific stocks, like technology stocks, may be subject to volatility, high valuations, obsolescence and low liquidity.
10. Appreciation in any of the model portfolio can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any model portfolio may also be affected due to any other asset allocation factors.
11. When investments are restricted to a particular or few sector(s) under any model portfolio; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the portfolio value will be adversely affected.
12. 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 Portfolio Manager is not responsible for any loss resulting from stock lending.
13. Each portfolio will be exposed to various risks depending on the investment objective, Investment Approach and the asset allocation. The investment objective, Investment Approach and the asset allocation may differ from client to client. However, generally, highly concentrated portfolios with lesser number of stocks will be more volatile than a portfolio with a larger number of stocks.
14. The values of the portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.
15. Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small number of scrip's accounting for a large proportion of trading volume among others.
16. The Portfolio Manager and its employees directly involved in investment operations may trade in securities in their personal account which may result in a conflict with transactions in any of the Client's portfolio. However, to mitigate the said conflict in relation to employees, the Portfolio Manager has implemented the personnel securities transaction guidelines. The employees of the Portfolio Manager are required to abide by the said policy as may be applicable to them. The Portfolio Manager has guidelines for managing conflicts of interest in place to achieve and maintain discipline and transparency in all investment activities and to avoid any potential or actual conflict of interests.
17. The Portfolio Manager shall act in fiduciary capacity in relation to the Client's Funds and shall endeavour to mitigate any potential conflict of interest that could arise while dealing in a manner which is not detrimental to the Client.
18. Conflict of interest would be inherent between the activities of the Portfolio Manager, Portfolio Entity/ies and the Relevant Parties. The Portfolio Manager has adopted, inter alia, certain policies and procedures intended to protect the interest of all the investors. It is intended for such conflicts to be managed primarily by complying with the Applicable Laws, acting in good faith to develop equitable resolutions of known conflicts and developing policies to reduce the possibilities of such conflict. The Portfolio Manager shall ensure fair treatment to all its clients in case of conflicts of interest. The attorneys, accountants, and other professionals, who perform

FINWIZARD TECHNOLOGY PRIVATE LIMITED

services for the Portfolio Manager may, and in some cases do, also perform services for the Relevant Parties.

Client Representation

i. Fund management business details:

Since the portfolio manager is registered on September 09, 2024 i.e. during the Financial Year 2024-25, past details of client representation are not applicable

Category of Clients	No. of Clients	Funds Managed (Rs. in Crores)	Discretionary/ Non-Discretionary
Associates/ Group Companies			
As on []			
F.Y. 2024-2025	1	0.46	N.A.
F.Y. 2023-2024	N.A	N.A	N.A.
F.Y. 2023-2022	N.A	N.A	N.A.
Others			
As on []			
F.Y. 2024-2025	10	5.32	N.A.
F.Y. 2023-2024	N.A	N.A	N.A.
F.Y. 2023-2022	N.A	N.A	N.A.

ii. Disclosures in respect of transactions with related parties as per Accounting Standard 18 "Related Party Disclosure" issued by the Institute of Chartered Accountants of India.

Name of the related parties where there were transactions during the year 2023-24:

Nature of relationship	Related parties
Key management personnel	Subramanya Venkat Sumukh (Director)
	Anand Dalmia (Director)
	Kiranbir Nag (Representative of Saama III Capital Ltd)
	Venkateshwaran Ganesh Rengaswamy (Representative of Accion Frontier Inclusion Mauritius)
Wholly owned Subsidiary	Winiin Taxscope Private Limited
	Finwizard Securities Private Limited (Previously known as Finwizard Insurance Broking Private Limited)
	Finwizard Technology Services Private Limited

Details of related party transaction during the year 2023-24:

Key management personnel	31 March 2024 (Rupees in Thousands)
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FINWIZARD TECHNOLOGY PRIVATE LIMITED

Nature of transactions	
<i>Salaries, wages and bonus</i>	
Subramanya Venkat Sumukh	4,800.00
Anand Dalmia	4,800.00
<i>Reimbursement of expenses Paid/ (Received)</i>	
Anand Dalmia	58.74
Subramanya Venkat Sumukh	131.95
Winiin Taxscope Private Limited	(1,413.65)
<i>Unsecured Loan Received / (Repaid)</i>	
Anand Dalmia	50,000.00
<i>Unsecured Loan Given</i>	
Winiin Taxscope Private Limited	4,500.00
<i>Unsecured Loan Repayment Received</i>	
Winiin Taxscope Private Limited	15,000.00
Interest on Unsecured Loan to Subsidiary (Income)	
Winiin Taxscope Private Limited	1,517.88
<i>Service Fees and Commission Receipt</i>	
Finwizard Technology Services Private Limited	34,575.50
Winiin Taxscope Private Limited	16,025.00
Nature of balances	
<i>Outstanding receivables</i>	
Winiin Taxscope Private Limited	17,309.00
Finwizard Technology Services Private Limited	-
<i>Outstanding Interest receivables</i>	
Winiin Taxscope Private Limited	797.30
<i>Interest on Unsecured Loan Payable</i>	
Anand Dalmia	535.07
<i>Unsecured Loan Receivable</i>	
Winiin Taxscope Private Limited	13,500.00
<i>Unsecured Loan Payable</i>	
Anand Dalmia	50,000.00

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VIII. Financial Performance of the Portfolio Manager (Rupees in Thousands)

Balance sheet			31 March 2024 (audited)	31 March 2023 (audited)	31 March 2022 (audited)
I	EQUITY AND LIABILITIES				
(1)	Shareholders' Funds				
	(a) Share capital		8,643.10	8,243.49	7,434.17
	(b) Reserves and surplus		7,98,837.90	8,77,714.34	3,52,636.82
			8,07,481.00	8,85,957.83	3,60,070.99
(2)	Non-current liabilities				
	Long-term borrowings		-	-	32,608.69
	Long-term provisions		30,372.41	27,761.07	18,749.70
			30,372.41	27,761.07	51,358.39
(3)	Current liabilities				
	(a) Trade payables				
	- total outstanding dues of micro enterprises and small enterprises		803.63	1,071.74	950.74
	- total outstanding dues of creditors other than micro enterprises and small enterprises		1,09,778.19	1,77,822.42	1,20,722.13
	(b) Other current liabilities		26,027.01	21,528.30	17,036.02
	(c) Short-term provisions		3,411.15	4,191.51	19,440.23
	(d) Short term borrowings		2,39,709.00	29,347.83	39,130.44
	Total		12,17,582.39	11,47,680.70	6,08,708.94
I	ASSETS				
(1)	Non-current assets				
	(a) Property, plant and equipment		8,546.19	17,833.91	18,547.94
	(i) Tangible assets				
	(ii) Intangible assets		-	-	-
	(iii) Intangible asset under development				
	(b) Deferred tax assets (net)		-	-	-
	(c) Long term loans and advances		40,891.20	16,878.91	10,258.98

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		(d) Capital Work in progress	-	-	4,460.40
		(e) Other non-current assets	54,532.62	50,299.96	52,924.86
		(f) Other non-current investments	2,13,636.60	2,13,636.60	2,13,636.60
			3,17,606.61	2,98,649.38	2,99,828.78
	(2)	Current assets			
		(b) Trade receivables	33,430.82	42,683.95	14,996.44
		(c) Cash and bank balances	1,40,402.77	3,35,707.90	1,55,888.20
		(d) Current Investments	1,35,009.89	29,257.53	24,492.14
		(e) Short term loans and advances	4,88,749.88	3,05,423.50	89,115.63
		(f) Other current assets	1,02,382.42	1,35,958.44	24,387.75
			8,99,975.78	8,49,031.32	3,08,880.16
		Total	12,17,582.39	11,47,680.70	6,08,708.94

IX. Portfolio Management Performance

Sr. No.	Investment Approach	Portfolio Performance Returns (%)			
		As on March 31, 2025	As on March 31, 2024	As on March 31, 2023	
1.	Fisdor Wealth Edge	-6.19*	N.A	N.A	
	S&P BSE 500 TRI	-4.39	N.A	N.A	

Finwizard has obtained a certificate of registration to function as a portfolio manager on September 09, 2024 and recently launched its product. Performance of 3 months of the strategy has been given.

X. Audit Observations for preceding three years

As stated above, the Portfolio Manager has obtained a certificate of registration to function as a portfolio manager on September 9, 2024 and has just commenced portfolio management services. Audit observations, if any, as may be required to be disclosed under the Regulations, as on March 31, 2025 shall be disclosed after end of the financial year and completion of the relevant audit.

XI. Nature of expenses

The following are indicative types of expenses. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Services Agreement which will be

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entered into between the Portfolio Manager and the Client, and the agreements in respect of each of the services availed at the time of execution of such agreements.

1. Management Fees

The client pays a management fee up to 2% p.a. of AUM (To be accrued on daily closing AUM and charged on monthly basis) All fees and charges shall be levied on the actual amount of Clients' assets under management. In case of interim contributions/withdrawals by Clients, performance fees may be charged on proportionate basis.

Management Fees relates to the portfolio management services offered to Clients. For managing a discretionary investment portfolio, the fixed management fee will as mentioned in Agreement plus applicable surcharges or a fixed fee and/or a variable charge as negotiated and agreed with the Client in the agreement.

Clients on-boarded without intermediary; the management fees shall be appropriately adjusted by the Portfolio Manager in such a manner that benefit of lower Fixed Fees is available to such Clients.

2. Exit Fees

Exit fees shall be charged to the clients as stipulated in SEBI (Portfolio Managers) Regulations, 2020 and guidelines applicable from time to time.

3. Custodian/ Depository Fees

These charges are pertaining to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialisation, re-materialisation and other charges in connection with the operation and management of the Depository Accounts, which may be outsourced. The charges relating to opening and operation of demat accounts, custody and transfer charges of shares, bonds and units, custodian charges etc. will not be exceeding 10bps of the average daily assets under management of the client. Taxes including GST are charged on the fees as applicable.

4. Other Expenses

- a. **Registrar and Transfer Agent Fee**-Charges payable to registrar and transfer agents in connection with effecting transfer of Securities, including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges, etc.
- b. **Brokerage and transaction costs**-The brokerage charges and other charges like service tax/Goods and Service Tax (GST), securities transaction tax, service charges, stamp duty, transaction costs, turnover tax, exit and entry loads on the purchase and sale of shares, stocks, bonds, debt, deposits, units and other financial instruments.
- c. **Performance Fee**-Performance fees may be charged upon exceeding a hurdle rate or benchmark as specified in the agreement between the Client and the Portfolio Manager. The client pays a performance fee up to 10% of the return over and above a hurdle rate of 10% p.a. to be charged annually or upon withdrawal of funds by the client, on High Watermark basis.

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- d. Certification and Professional Charges-** Charges payable for outsourced professional services like accounting, taxation and legal services, notarization, etc. for certification, attestation required by bankers, intermediaries and regulatory authorities.
- e. Incidental Expenses-** Courier charges, stamp duty, service tax, postal stamps, opening and operation of bank accounts, etc.
- f. Fund Accounting Charges-** Fund Accounting charges will be the fees paid to the Fund Accountant for providing Fund Accounting Services for Portfolio Accounts. These charges, primarily driven by Average Investments, will vary between Investment strategies. Fund Accounting Charges will be up to 0.05% plus applicable statutory levies and taxes.
- g. Goods and Service Tax will be extra as per Government rates**

Finwizard will not charge any mark-up on “other expenses” and these will be a complete pass through. Moreover, Finwizard will endeavour to keep the cost bare minimum.

h. Termination fees

The client will pay an exit load of 1% for the first two years on the amounts withdrawn.

XII. Taxation

Clients will be responsible and liable for taxes under the provisions of the Income Tax Act, 1961 for any income generated out of the investment made in the portfolio management Investment Approach. Finwizard will not deduct tax on the capital gains generated out of the investment to be made in the portfolio management Investment Approach. However, this will be subject to any of the provisions of the Income Tax Act, 1961 or the Finance Bill, as applicable. Finwizard shall provide adequate statements to the clients for accounting purpose.

For non-resident clients, the short-term Capital Gains tax is deducted at source by the bank.

In view of the individual nature of tax benefits, each prospective client/investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their availing Portfolio management services, in terms of the provisions of the Income-tax Act, 1961. Clients are best advised to take independent opinion from their tax advisors / experts for any income earned from such investments. The Portfolio Manager shall not be responsible for assisting in or completing the fulfilment of the Client's tax obligations. The provisions of the Income Tax Act, 1961 shall apply to the Client and the Portfolio Manager in respect of their individual income.

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

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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.

XIII. Accounting Policy

The following accounting policy will be applied for the Portfolio Investments of the Client:

1. Contribution to portfolio

Contribution to portfolio by way of securities is recorded at the previous day closing market value from the date the securities are received by the portfolio manager.

2. Portfolio investments

Portfolio investments are stated at market/fair value prevailing as on year end, and the difference as compared to book value is recognized as accrued gain/loss in the statement of affairs for the year.

Market value/fair value of portfolio investments is determined as follows:

Investments in listed equity shares are valued at the closing quoted price on BSE Ltd. / National Stock Exchange.

Investments in units of a mutual fund are valued at Net Asset Value of the relevant scheme. Provided investments in mutual funds shall be through direct plans only.

For the purpose of financial statements, the Portfolio Manager shall mark all the investments on mark to market. Investments will be marked at cost where market price is not available (e.g. unlisted Securities).

Dividend income shall be tracked from the date of declaration and recognized on the date of the security being quoted on an ex-dividend basis. For unlisted investments, dividend income would be recognized on the date of declaration.

Bonus units shall be tracked from the date of declaration and recognized on the date of the Security being quoted on an ex-bonus basis. For unlisted investments, bonus units would be recognized on the date of declaration.

Purchase and sale of investments are accounted for on trade date basis. Cost of purchase and sale includes consideration for scrip and brokerage (including service tax thereon) but excludes securities transaction tax paid on purchase / sale of securities.

Consideration received against fractional entitlements on account of corporate actions is entirely considered as revenue under other income.

3. Revenue

Realized gain/loss on sale of investments is accounted on trade date basis by comparing sale consideration with the cost of investment. The cost of investment is identified following First-in-First out (FIFO) method.

Corporate dividend income is recognized on ex-dividend date.

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The accounting policies and standards as stated above may be modified from time to time by the Portfolio Manager, subject to such modifications being in conformity with the applicable regulations.

4. Expenses

Portfolio Management fees is accounted on cash basis based on average of daily portfolio value at monthly interval.

Securities transaction tax paid on purchase / sale of securities is treated as expenditure shown under other operating expenses in the statement of affairs.

Other expenses like depository charges, transaction charges, audit fees are recorded on cash basis.

The Client may contact the customer services official of the Portfolio Manager for the purpose of clarifying or elaborating on any of the above policy issues.

XIV. Investor Services

Finwizard shall ensure timely and prompt redressal of any grievances or dispute with the client.

1. Name, address and telephone number of the investor relations officer who shall attend to the Client's queries and complaints:

Name	Krishna Jakkula
Designation	Compliance Officer
Address	Registered: IndiQube Sapphire, 2nd Floor, No. 73/1, St Mark's Road, Bangalore, Karnataka- 560 001 Correspondence: 17th Floor, VIOS Tower, Off Eastern Express Highway, Near Anik Nagar Bus Depot, Sewri-Chembur Road, Mumbai – 400 037
Telephone	91 89519 49507
E-mail	compliance@fisdom.com

2. Grievance Redressal and Dispute Settlement mechanism

- a. The Portfolio Manager will endeavour to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, within 21 days from date of complaints was received.
- b. It is mandatory for the Client having grievance to take up the matter directly with the Portfolio Manager.
- c. Portfolio Manager has designated Mr. Krishna Jakkula, email id: compliance@fisdom.com to receive and redress all the queries.
- d. The internal deadline for resolving the complaints will be as follows:
 - (a) Matters relating to the portfolio manager's office, i.e., regarding portfolio performance and funds allocation: within 3 working days
 - (b) Matters regarding to custodian: within 7 working days
 - (c) Matters regarding dividend and other corporate actions: will be followed up vigorously with the agencies concerned under intimation to Clients.

FINWIZARD TECHNOLOGY PRIVATE LIMITED

While, the Portfolio Manager shall endeavour to follow the internal deadline as mentioned above, it shall take adequate steps for redressal of grievances of the Client not later than twenty-one calendar days of the date of the receipt of the complaint.

- e. Finwizard will ensure that every complaint is attended immediately and an acknowledgement will be given immediately.
- f. The Register of complaint and Grievance will be made available to the Internal/External Auditors during the time of Audit and to the Regulatory Authorities.
- g. The soft copies / hard copies of the complaints received from the customers are preserved by the Portfolio Manager for future reference, if required.
- h. If Client/s are still not satisfied with the response from the Portfolio Manager, they can lodge their grievances with SEBI at <https://scores.sebi.gov.in/> or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575. The complaint shall be lodged on SCORES 2.0 within one year from the date of cause of action, where,
 - The complainant has approached the Portfolio Manager, for redressal of the complaint and,
 - The Portfolio Manager has rejected the complaint or,
 - The complainant has not received any communication from Finwizard or,
 - The complainant is not satisfied with the reply received or the redressal action taken by Finwizard.
- i. After exhausting all options as mentioned above for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login>.
- j. Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Portfolio Manager is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
- k. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCOREs guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.
- l. The process on Online Dispute Resolution Mechanism is available at <https://smartodr.in/login>

Records that will be maintained:

Complaints Register: where the date of receipt of complaint and action taken will be recorded and time taken for resolving the complaints will be mentioned.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.

FINWIZARD TECHNOLOGY PRIVATE LIMITED

XV. Investments in the securities of associates/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		

XVI. Diversification Policy:

Portfolio diversification is a strategy of risk management used in investing, which allows to reduce risks by allocating the funds in multiple asset types. It helps to mitigate the associated risks on the overall investment portfolio.

The Portfolio Manager shall invest in equity and equity related securities. However, from time to time on opportunistically basis, may also choose to invest in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws. The Portfolio Manager may also, from time to time, engage in hedging strategies by investing in derivatives and permissible securities/instruments as per Applicable Laws.

For investments in securities of Associates/ Related Parties, the Portfolio Manager shall comply with the following:

The Portfolio Manager shall invest up to a maximum of 30% of the Client's AUM in the securities of its associates/related parties. The Portfolio Manager shall ensure compliance with the following limits:

Security	Limit for investment in single associate/related party (as percentage of Client's AUM)	Limit for investment across multiple associates/related parties (as percentage of Client's AUM)
Equity	15%	25%
Debt and hybrid securities	15%	25%
Equity + Debt + Hybrid securities*	30%	

*Hybrid securities includes units of Real Estate Investment Trusts (REITs), units of Infrastructure Investment Trusts (InvITs), convertible debt securities and other securities of like nature.

The aforementioned limits shall be applicable only to direct investments by Portfolio Manager in equity and debt/hybrid securities of its associates/related parties and not to any investments in the Mutual Funds.

The Portfolio Manager shall not make any investment in unrated and below investment grade securities.


FINWIZARD TECHNOLOGY PRIVATE LIMITED**XVII. General**

The Portfolio Manager shall presume that the identity of the Client and the information disclosed by the Client is true and correct. It will also be presumed that the funds invested by the Client through the services of the Portfolio Manager come from legitimate sources / manner only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, 1961, PML Laws, Prevention of Corruption Act, 1988 and/or any other Applicable Law in force and the investor is duly entitled to invest the said funds.

To ensure appropriate identification of the Client(s) under its KYC policy and with a view to monitor transactions in order to prevent money laundering, the Portfolio Manager (itself or through its nominated agency as permissible under Applicable Laws) reserves the right to seek information, record investor's telephonic calls and/or obtain and retain documentation for establishing the identity of the investor, proof of residence, source of funds, etc. Where the funds invested are for the benefit of a person (beneficiary) other than the person in whose name the investments are made and/or registered, the Client shall provide an undertaking that the Client is holding the funds/Securities in his name is legally authorised/entitled to invest the said funds through the services of the Portfolio Manager, for the benefit of the beneficiaries.

The Portfolio Manager will not seek fresh KYC from the Clients who are already KYC Registration Agency (KRA) compliant except the information required under any new KYC requirement. The Clients who are not KRA compliant, the information will be procured by the Portfolio Manager and uploaded. The Portfolio Manager, and its partners, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Client's account/rejection of any application or mandatory repayment/returning of funds due to non-compliance with the provisions of the PML Laws and KYC policy and/or where the Portfolio Manager believes that transaction is suspicious in nature within the purview of the PML Laws and/or for reporting the same to FIU-IND.

Notwithstanding anything contained in this Document, the provisions of the Regulations, PML Laws and the guidelines there under shall be applicable. Clients/Investors are advised to read the Document carefully before entering into an Agreement with the Portfolio Manager.

For Finwizard Technology Private Limited

Subramanya Venkat Sumukh
Director
DIN: 02068130



Anand Atmaram Dalmia
Director
DIN: 07341702

Date: May 30, 2025

Place: Mumbai



FINWIZARD TECHNOLOGY PRIVATE LIMITED

FORM C

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

Finwizard Technology Pvt. Ltd.

IndiQube Sapphire, 2nd Floor, No. 73/1, St Mark's Road, Bangalore, Karnataka- 560 001

We confirm that:

1. 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.
2. 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 through the Portfolio Manager.
3. The Disclosure Document has been duly certified by an independent Chartered Accountant. The details of the Chartered Accountant are as follows:

Name of the Firm	Sanjay Shah & CO LLP, Chartered Accountants
Firm Registration No.	Firm No. W101007
Address	Office No. 69, 6 th Floor, Kalpataru Avenue, Opp. ESIS Hospital, Akurli Road, Near Thakur House, Kandivali East, Mumbai-400101
Telephone No.	8879408575

The copy of the certificate is enclosed herewith.

For Finwizard Technology Private Limited

Nirav Krakera
Principal Officer

Registration No. INP000008950

Office Address: IndiQube Sapphire, 2nd Floor, No. 73/1, St Mark's Road, Bangalore, Karnataka- 560 001

Date: May 30, 2025

Place: Mumbai