

**DISCLOSURE DOCUMENT FOR PORTFOLIO MANAGEMENT****Savvy Capital Advisors LLP****SEBI Registration No: INP000005331**

- (i) This Disclosure Document 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.
- (ii) The purpose of the Disclosure Document is to provide essential information about the portfolio management services of Savvy Capital Advisors LLP (Savvy Capital Advisors), in a manner to assist and enable investors in making an informed decision while engaging Savvy Capital Advisors.
- (iii) The necessary information about the portfolio manager, Savvy Capital Advisors, required by an investor before investing is given herein, and the investor is advised to retain this document for future reference.
- (iv) Savvy Capital Advisors LLP is a SEBI registered Portfolio Manager having registration number INP000005331.
- (v) Details of the Principal Officer of Savvy Capital Advisors:

SAMIR PATEL  
Partner, Savvy Capital Advisors  
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OPP. ESIS HOSPITAL, AKURLI ROAD,  
KANDIVALI EAST, MUMBAI 400101.  
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FOR SAVVY CAPITAL ADVISORS LLP  
For Savvy Capital Advisors LLP

  
PARTNER / DESIGNATED PARTNER  
Samir Patel

SAVVY CAPITAL ADVISORS LLP

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### SAVVY CAPITAL ADVISORS LLP

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(1) **Disclaimer Clause**

The particulars have been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 as amended till date, and filed with 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**

**"Disclosure Document"** means this document, which has been prepared with the objective of providing essential information about the PMS of Savvy Capital Advisors LLP, to enable investors in making an informed decision to engage Savvy Capital Advisors LLP to manage their portfolio.

**"Portfolio Manager"** means any person who pursuant to a contract or arrangement with a client, 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.

**"Investor"** means any Individual, Partners in Partnership, Central or State Government, Company, Body Corporate, Co-operative Society, Corporation, Trust, Society, Hindu Undivided Family (HUF) or any other body of persons, whether incorporated or not.

**"Discretionary Portfolio Management Services"** means the portfolio management services rendered to the client, by the Portfolio Manager on the terms and conditions contained in an agreement, where under, the Portfolio Manager exercises any degree of discretion in investments or management of assets of the client.

**"Assets"** means (i) the Portfolio and/ or (ii) the Funds.

**"Bank Account"** means one or more accounts opened, maintained and operated by the Portfolio Manager, in the name of the client, with any scheduled commercial bank.

**"Custodian"** means any person who carries on or proposes to carry on the business of providing custodial services in accordance with the regulations issued by SEBI from time to time.

**"Depository Account"** means one or more accounts opened, maintained and operated by the Portfolio Manager, in the name of the client, with any depository or depository participant, registered under the SEBI (Depositories and Participants) Regulations, 1996.

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**"Funds"** means monies managed by the Portfolio Manager on behalf of the client pursuant to an agreement, and includes the initial monies, any further monies placed by the client with the Portfolio Manager for being managed, the proceeds of the sale or other realisation of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the same is managed by the Portfolio Manager.

**"Net Asset Value"** (NAV) means the market value of assets in the Portfolio including equity, debt, cash and cash equivalents.

**"Portfolio"** means the Securities managed by the Portfolio Manager on behalf of the client pursuant to an agreement, and includes initial Securities, any further Securities placed by the client with the Portfolio Manager for being managed pursuant to an agreement, Securities acquired by the Portfolio Manager through investment of Funds and bonus and rights shares in respect of Securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.

**"Regulations"** means the SEBI (Portfolio Managers) Regulations, 2020, as may be amended from time to time.

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

**"SEBI"** means the Securities and Exchange Board of India established under subsection 3 of the Securities and Exchange Board of India Act, 1992.

**"Securities"** includes

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

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(3) **Description**

(i) **History, Present Business and Background of the Portfolio Manager**

Savvy Capital Advisors has been promoted by Samir Patel, Investment Advisor and Vinod Patel and Janki Patel, both partner in Exchange registered Authorised Person, who have over 24 years of experience, in the financial services industry. Samir Patel was engaged in SEBI registered Investment Advisory service and Authorised Person of Exchange, Senior Consultant at Covansys Corporation, Detroit, USA and Software Engineer at Tata Infotech Ltd. Vinod Patel and Janki Patel were engaged as Partner in the Securities business as Exchange Registered Authorised Person/Sub Broker in organization M/s. Savvy Securities.

In July 2016, the promoters resolved to set up a Portfolio Management and Portfolio Advisory company. Savvy Capital Advisors received its Certificate of Incorporation on August 19, 2016. Savvy Capital Advisors was granted registration by SEBI effective from February 22, 2017, as registered portfolio managers. Savvy Capital Advisors proposes to act as portfolio managers and carry on the business of rendering Portfolio Management and Portfolio Advisory Services in accordance with the provisions of the SEBI (Portfolio Managers) Regulations, 2020.

(ii) **Promoters of the Portfolio Manager, Directors and their backgrounds**

The promoters of Savvy Capital Advisors are Samir Patel and Vinod Patel and Janki Patel.

Savvy Capital Advisors is a Limited Liability Partnership firm with three Partners - Samir Patel and Vinod Patel and Janki Patel. Samir Patel, Investment Advisor and Vinod Patel and Janki Patel, both partners in Exchange registered Authorised Person, who have over 54 years of total combined experience in the financial services industry. Samir Patel was engaged in SEBI registered Investment Advisory service and Authorised Person of Exchange, Senior Consultant at Covansys Corporation, Detroit, USA and Software Engineer at Tata Infotech Ltd. Vinod Patel and Janki Patel were engaged as Partners in the Securities business as Exchange Registered Authorised Person/Sub Broker in organization M/s. Savvy Securities.

**(iii) Top 10 group companies / firms of the Portfolio Manager on turnover basis (latest audited financial statements may be used for this purpose)**

The Portfolio Manager has no other group companies, associates or firms. and presently there is no policy to invest in group companies, associates or firms.

The Portfolio Manager has not dealt with any of the other group companies/ firms.

**(iv) Details of the services being offered**

The Portfolio Manager currently offers Discretionary Portfolio Management and Portfolio Advisory Management Services.

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

|  |                |
|--|----------------|
| (i) Cases of penalties imposed by SEBI or the directions issued by SEBI under the SEBI Act or Rules and Regulations made there under   | None           |
| (ii) The nature of the penalty / direction   | Not applicable |
| (iii) Penalties imposed for any economic offence and/ or for violation of any securities laws  | None           |
| (iv) Any pending material litigation/ legal proceedings against the portfolio manager /key personnel with separate disclosures regarding pending criminal cases, if any  | None           |
| (v) Any deficiency in the systems and operations of the portfolio manager observed by the Board or any regulatory agency   | None           |
| (vi) 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 there under | None           |

(5) **Services Offered**

**(a) Discretionary Portfolio Management Service**

- (i) The service offering of the Portfolio Manager are Discretionary Portfolio Management Services,
- (ii) The Portfolio will comprise of investment in listed Securities, Bonds, Mutual Funds, Cash or other instruments, in accordance with and as per agreement, between the client and the Portfolio Manager,

**(b) Advisory Portfolio Management Service**

The Portfolio Manager will also provide Advisory Portfolio Management Services, in terms of the Regulations, which shall be in the nature of investment advisory and shall include the responsibility of advising on the portfolio strategy and Investment and divestment of individual securities on the client's portfolio, for an agreed fee structure, entirely at the Client's risk.

The Portfolio Manager shall be solely acting as an advisor to the portfolio of the client and shall not be responsible for the investment/ divestment of securities and/ or administrative activities on the client's portfolio. The Portfolio Manager shall, provide advisory services in accordance with such guidelines and/ or directives issued by the regulatory authorities and/ or the Client, from time to time, in this

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**(c) Investment Approach**

|                              |  |
|------------------------------|--|
| <u>Investment Objective:</u> | To achieve capital appreciation by investing in small & midcap listed stocks.          |
| <u>Type of Securities:</u>   | Listed Small cap/Midcap equity stocks & liquid mutual funds.                           |
| <u>Basis of Selection:</u>   | Fundamental analysis of stocks with relevant business cycle analysis.                  |
| <u>Portfolio Allocation:</u> | Spread across 12-18 stocks with decent concentration.                                  |
| <u>Benchmark:</u>            | S&P BSE 500 TRI. Majority of stock selection are part of this index.                   |
| <u>Investment Horizon:</u>   | Atleast 5 years of investment horizon is required.                                     |
| <u>Risk Associated:</u>      | Highly volatile as small cap stocks are most volatile compared to Large/Midcap stocks. |

**(d) Direct On-Boarding of Clients**

Pursuant to SEBI Circular No. SEBI/HO/IMD/DF1/CIR/P/2020/26 dated February 13, 2020, Clients have an option to enter into PMS agreement with the Portfolio Manager directly, without intermediation of persons engaged in distribution services. At the time of on-boarding of Clients directly, no charges except statutory charges will be levied. This facility will be available with effect from October 1, 2020 or such other subsequent date as specified by SEBI from time to time. The Portfolio Manager engages distributors who ensure that they abide by SEBI Distributor code of conduct as specified in Annexure C of SEBI circular no. SEBI/HO/IMD/DF1/CIR/P/2020/26 dated February 13, 2020. Prospective clients who are introduced by a Distributor will be informed about the fees to be shared with the Distributor.

**(6) Risk Factors**

The following are the risk factors as perceived by the management:

- (i) The PMS will be implemented strictly in accordance with SEBI (Portfolio Managers) Regulations, 2020 and amendments thereto. Investors are requested to familiarize themselves with these regulations.
- (ii) Securities investments are subject to a wide range of market risks, which include amongst others, and by way of illustration, may lead to an unpredictable loss in value of the Assets, which may extend to a total loss of value of the Assets.

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- (iii) The Portfolio Manager does not guarantee or assure the client of the value of or returns on the Assets, in any manner whatsoever. The value of the Assets under the Discretionary Portfolio Management Service may stand a risk of total loss of capital and the client should be aware that they may lose all or any part of their investments with portfolio manager.
- (iv) The past performance of the strategy, promoters or Directors is not indicative of and does not guarantee future performance of the strategy.
- (v) The performance of the strategy may be affected by changes in Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- (vi) Investments in debt instruments are subject to default risk and interest rate risk. Interest rate risk results from changes in demand and supply for money and other macro-economic factors and creates price changes in the value of the debt instruments. Consequently, the NAV of the portfolio may be subject to fluctuation.
- (vii) Investments in debt instruments are subject to re-investment risks as interest rates prevailing in interest or maturity due dates may differ from the original coupon of the bond, which may result in the proceeds being invested at a lower rate.
- (viii) The valuation of the Portfolio's investments, may be affected generally by factors affecting securities markets, such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in policies of the Government, taxation laws or any other appropriate authority policies and other political and economic developments which may have an adverse bearing on individual securities, a specific sector or all sectors including equity and debt markets. There will be no prior intimation or prior indication given to the Clients when the composition/ asset allocation pattern changes.
- (ix) A portfolio which tends to concentrate on a specific asset class or a specific sector could carry the risk with regard to non-diversification of the portfolio and hence, the scope for diversification could be limited at times. There could be instances when the portfolio might have an unusually high exposure to a few stocks.
- (x) Portfolio Manager has a sound track record and has experience of managing client portfolios since February, 2017.
- (xi) All transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations shall be disclosed if found having conflict of interest with the transactions in any of the client's portfolio.

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- (xii) All the group / associate companies shall abide by high level principles on avoidance of conflicts of interest while entering into its / their transactions.
- (xiii) The Clients may not be able to avail of securities transaction tax credit benefit and/or tax deduction at source (TDS) credit and this may result in an increased incidence of tax on the Clients. The Client may incur a higher rate of TDS/ Dividend Distribution Tax in case the investments are aggregated in the name of the Portfolio Management Portfolio/Product

**(7) Client Representation**

| Category of clients                                | No. of clients | Funds Managed (Rs. Cr) | Discretionary/ Non-discretionary/ Advisory (if available) |
|--|----------------|------------------------|---|
| Associates / Group Companies / Firm (last 3 years) | NIL            | NIL                    | NIL   |
| <b>Others (last 3 years)</b>                       |                |                        |   |
| 2020-21 (as on 31/03/21)                           | 116            | 174.72                 | Discretionary   |
| 2020-21 (as on 31/03/21)                           | NIL            | NIL                    | Advisory  |
| 2021-22 (as on 31/03/22)                           | 134            | 328.50                 | Discretionary   |
| 2021-22 (as on 31/03/22)                           | NIL            | NIL                    | Advisory  |
| 2022-23 (as on 31/03/23)                           | 141            | 298.05                 | Discretionary   |
| 2022-23 (as on 31/03/23)                           | NIL            | NIL                    | Advisory  |

- (ii) Complete disclosure in respect of transactions with related parties as per standards specified by the Institute of Chartered Accountants of India.

| Particulars | Remuneration for Partners |
|-------------|---------------------------|
|             | FY 22-23                  |
| Samir Patel | NIL                       |
| Vinod Patel | NIL                       |
| Janki Patel | NIL                       |

Savvy Capital Advisors apart from investment in its own account and Partners under the Portfolio has clients from the family of the Partners investing in the portfolio. The funds managed for these clients are:

| Name of Client  | Relationship with Partners | Funds managed as on 31/03/2023 (Rs in lakhs) |
|-----------------|----------------------------|--|
| Jashvanti Patel | Mother                     | 770.80                                       |

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(8) **Financial Performance based on audited financial statements (Rs in lakhs)**

| <b>Particulars</b>   | <b>FY21-22</b> | <b>FY2020-21</b> | <b>FY2019-20</b> |
|----------------------|----------------|------------------|------------------|
| Total Income         | 2330.76        | 130.77           | 5.84             |
| Net Profit After Tax | 722.14         | 53.26            | -56.36           |
| Net Worth            | 506.98         | 378.14           | 254.22           |

(9) **Portfolio Management performance for the last three years, and in case of discretionary Portfolio Manager, disclosure of performance indicators calculated using Time Weighted Rate of Return method in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020.**

**Annualised Return for last 3 financial years (%):**

|                         | <b>Financial Year<br/>2022-2023</b> | <b>Financial Year<br/>2021-2022</b> | <b>Financial Year<br/>2020-2021</b> |
|-------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| <b>Portfolio Return</b> | -9.3                                | 62.6                                | 233.03                              |
| <b>Small Cap</b>        | -4.5                                | 36.6                                | 114.90                              |

Portfolio Returns are net of all fees and expenses.

\*Calculated as per TWRR Method

(10) **Audit Observations**

There have been no adverse observations reported by the Statutory Auditor in preceding three years.

(11) **Nature of expenses**

The following are indicative types of costs and expenses for clients availing the Portfolio Management services. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Agreement and the agreements in respect of each of the services availed at the time of execution of such agreements.

(12) **Fee Structure**

The fee may be linked to the portfolio returns. Performance shall be computed on the basis of high water mark principle over the life of the investment for charging of performance fees.

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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. A Performance Fee is chargeable on Profits, based on closing NAV as on 31st December Every Year.

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

Below table represents the current fee structure as per the SEBI provisions

|                                   |  |
|-----------------------------------|--|
| Hurdle                            | 0  |
| Fees above hurdle                 | 12% of the profit + GST as applicable                      |
| Size discount of Rs 10 Cr & above | 10% of the profit + GST as applicable                      |
| High Watermark                    | Applicable as per SEBI rules (Illustration provided below) |
| Custody & Fund Accounting         | charges at actual  |

#### **Custodian/Fund Accounting/Depository Fee**

The charges relating to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization, rematerialisation and other charges in connection with the operation and management of the depository accounts.

#### **Costs and Taxes**

All taxes, costs, fees, charges and expenses such as, GST, securities transaction tax, depository charges, brokerage, transfer charges, etc to be charged to the Client at actuals.

#### **(13) Taxation**

As per the taxation laws currently in force as at the date of the Disclosure Document, the tax implications on investors investing through the Portfolio Management Services are stated below:

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|  |  |
|--|--|
| Long Term Capital Gain<br>(Listed equity shares and securities which are subject to STT) | 10%* if capital gain is more than 1 Lakh with grandfathering clause                            |
| Long Term Capital Gain<br>(Other securities)   | 20%* of Gain computed after Cost indexation &<br>10%* of Gain computed without Cost indexation |
| Dividend   | Exempt u/s. 10(34) subject to ceiling u/s. 115BBDA   |
| Short Term Capital Gain  | 15%*   |

\* Surcharge and Education Cess applicable as per taxable income

The above is subject to various deductions and other tax laws as per The Indian Income Tax Act, 1961 (The Act) and each investor is advised to consult his tax consultant with respect to individual circumstances. Non-resident Indians (NRIs) are subject to similar rates as above, however are also subject to Tax Deducted at Source (TDS) provisions as per The Act.

#### (14) Accounting Policies

- (i) Investments of clients are stated at cost. Investments introduced by the client into their respective portfolios are booked at the market value on the date of introduction into the PMS.
- (ii) Profit or Loss on sale of investments is calculated using the "First in First Out" (FIFO) method of accounting.
- (iii) As far as possible the Portfolio Manager is complying with the relevant Accounting Standards issued by the Institute of Chartered Accountants of India. Investments are valued in accordance with Accounting Standard 2 on Valuation of Inventories. Revenue arising from interest and dividends is accounted for in accordance with Accounting Standard 9 on Revenue Recognition. Investments are accounted for in accordance with Accounting Standard 13 on Accounting for Investments.
- (iv) The investments under the PMS are made on behalf of the Investors. Hence, separate depository accounts are opened in the name of the Investors, which are operated by the Portfolio Manager duly authorised by a Power of Attorney.

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**(15) Investor Services**

- (i) All investor queries and complaints should be addressed to the Principal Officer of the Portfolio Manager, whose contact co-ordinates are provided below:

SAMIR PATEL  
 Partner, Savvy Capital Advisors  
 OFFICE NO.1, SHUBHAM APARTMENT,  
 OPP. ESIS HOSPITAL, AKURLI ROAD,  
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 Telephone: +91 9819834111  
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Alternatively, they can lodge complaints directly with SEBI on the link:  
<http://www.scores.gov.in/>

- (ii) Grievance redressal and dispute settlement mechanism

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

**(16) General****Acts done in good faith**

Any act, thing or deed done in good faith in pursuance of or with reference to the information provided in the application or other communication received from the Client will constitute good and full discharge of the obligation of the Portfolio Manager.

In case of copies of the documents/ other details such as list of authorized signatories, that are submitted by a limited company, body corporate, registered society, trust or partnership, if the same are not specifically authenticated to be certified true copies but are attached to the application form and/ or submitted to the Fund, the onus for authentication of the documents so submitted shall be on such investors and the Portfolio Manager will accept and act on these in good faith wherever the documents are not expressly authenticated.

Submission of these documents/ details by such investors shall be full and final proof of the corporate Client's authority to invest and the Portfolio Manager shall

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not be liable under any circumstances for any defects in the documents so submitted. In cases where there is a change in the name of such client, such change will be affected by the Portfolio Manager only upon receiving the duly certified copy of the revised Certificate of Incorporation issued by the relevant Registrar of Companies/ Registering Authority. In cases where the changed PAN Number reflecting the name change is not submitted, such transactions accompanied by duly certified copy of the revised Certificate with a copy of the old PAN card and confirmation of application made for new PAN card along with amended PAN card copy will be required as a documentary proof.

### **Prevention of Money Laundering**

Prevention of Money Laundering Act, 2002 ('PML Act') came into effect from July 1, 2005 vide Notification No. GSR 436 (E) dated July 1, 2005 issued by the Department of Revenue, Ministry of Finance, Government of India. Further, SEBI vide its Circular No. ISD/ CIR/ RR/ AML/ 1/ 06 dated January 18, 2006 mandated that all intermediaries including Portfolio Managers should formulate and implement a proper policy framework as per the guidelines on anti-money laundering measures and also to adopt a "Know Your Customer" (KYC) policy. The intermediaries may, according to their requirements specify additional disclosures to be made by clients for the purpose of identifying, monitoring and reporting incidents of money laundering and suspicious transactions undertaken by clients. SEBI has further issued Circular No. ISD/ CIR/ RR/ AML/ 2/ 06 dated March 20, 2006 advising all intermediaries to take necessary steps to ensure compliance with the requirement of section 12 of the PML Act requiring inter-alia maintenance and preservation of records and reporting of information relating to cash and suspicious transactions to Financial Intelligence Unit - India (FIU-IND). The PML Act, the Rules issued there under and the guidelines/ circulars issued by SEBI thereto, as amended from time to time, are hereinafter collectively referred to as 'AML laws'.

The Client(s) where Client is a minor, should ensure that the amount invested through the services offered by the Portfolio Manager is through legitimate sources 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, AML Laws, Prevention of Corruption Act and/ or any other applicable law in force and also any laws enacted and also any laws enacted by the Government of India from time to time or any rules, regulations, notifications or directions issued there under.

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 reserves the right to seek information, record investor's telephonic calls and/ or obtain and retain documentation for establishing the identity of the investor,

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proof of residence, source of funds, etc. it may re-verify and obtain any incomplete or additional information for this purpose, including through the use of third party databases, personal visits, or any other means as may be required for the Portfolio Manager to satisfy themselves of the investor(s) identity, address and other personal information.

The Client(s) and their Attorney(ies), if any, shall produce reliable, independent source documents such as photographs, certified copies of Ration Card/ Passport/ Driving License/ PAN card etc. and/ or such other documents or produce such information as may be required from time to time for verification of the personal details of the Client(s) including inter alia identity, residential address(es), occupation and financial information by the Portfolio Manager. If the Client(s), their attorney(ies), or the person making payment on behalf of the Client(s), refuses/ fails to provide the required documents/ information within the period specified by the Portfolio Manager then the Portfolio Manager shall have absolute discretion to freeze the Account of the Client(s), reject any application(s) and effect mandatory repayment/ returning of Assets of the Account of the Client(s) subject to the fees payable to the Portfolio Manager if any. The Portfolio Manager shall also, after application of appropriate due diligence measures, have absolute discretion to report any transactions to FIU-IND that it believes are suspicious in nature within the purview of the AML Laws and/ or on account of deficiencies in the documentation provided by the Client(s) and the Portfolio Manager shall have no obligation to advise investors or distributors of such reporting. The KYC documentation requirements shall also be complied with by the persons becoming the client by virtue of operation of law e.g. transmission, etc. The Portfolio Manager, and its Directors, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Account/ rejection of any application or mandatory repayment/ returning of funds/ Asset of the Account due to non-compliance with the provisions of the AML Laws and KYC policy and/ or where the Portfolio Manager believes that transaction is suspicious in nature within the purview of the AML Laws and/ or reporting the same to FIU-IND.

### **Client Information**

The Portfolio Manager shall presume that the identity of the Client and the information disclosed by him 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 and the investor is duly entitled to invest the said funds. 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 authorized/ entitled to invest the said funds through the

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services of the Portfolio Manager, for the benefit of the beneficiaries. Notwithstanding anything contained in this Disclosure Document, the provisions of the Regulations and the guidelines there under shall be applicable. Investors are advised to read the Disclosure Document carefully before entering into an agreement with the Portfolio Manager.

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

|   |   |   |
|---|---|---|
| Name of the Portfolio Manager                                     | : | <b>SAVVY CAPITAL ADVISORS LLP</b>   |
| Address of the Portfolio Manager including phone number and email | : | <b>Office No.1, Shubham Apartment, Opp. ESIS Hospital, Akurli Road, Kandivali East, Mumbai - 400101.<br/>Tel No: +91 9819834111<br/>Email: info@savvycapital.in</b> |

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 in the Portfolio Management;
- (3) The Disclosure Document has been duly certified by M/S Bharat B. Shah & Co. Office no. 101/A, Keval Tower, Opp. Vodafone store, Near Liberty Garden, Malad West, Mumbai 400064, Maharashtra, India. Contact - +919833065929. A copy of Chartered Accountant's certificate is enclosed herewith.

DATE: 17/08/2023

Place: Mumbai

*Samir Patel*

**PARTNER / DESIGNATED PARTNER**  
Name and Address of Principal Officer

**SAMIR PATEL**  
OFFICE NO.1, SHUBHAM APARTMENT,  
OPP. ESIS HOSPITAL, AKURLI ROAD,  
KANDIVALI EAST, MUMBAI - 400101.

**SAVVY CAPITAL ADVISORS LLP**

Office No.1, Shubham Apartment, Opp. ESIS Hospital, Akurli Road, Kandivali East, Mumbai 400101.  
www.savvycapital.in Email: info@savvycapital.in



**M/s. BHARAT B. SHAH & CO**  
**Chartered Accountants**

001/A-WING, KEVAL TOWER, OPP. S.N.D.T. COLLEGE, NEAR LIBERTY GARDEN, B.J.PATEL ROAD, MALAD(W), MUM- 400 064  
Tel.No. 28818403/04, 9833065929  
Website : www.cabharatbshah.com  
Email ID: bbshah99@hotmail.com

Bharat B. Shah (B.Sc., F.C.A.)

To,  
The Partners,  
**SAVVY CAPITAL ADVISORS LLP**  
Office No.1, Shubham Apartment,  
Opp. ESIS Hospital, Akurli Road,  
Kandivali East, Mumbai 400101.

**INDEPENDENT AUDITORS CERTIFICATE**

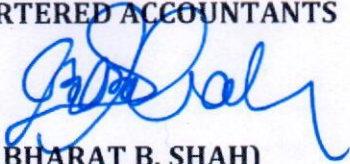
We have examined the Disclosure Document for Portfolio Management dated 31<sup>st</sup> March, 2023 prepared in accordance with model disclosure document as stated in Schedule V of Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020 by **SAVVY CAPITAL ADVISORS LLP**, having **SEBI Registration number INP000005331** and registered office at Office No.1, Shubham Apartment, Opp. ESIS Hospital, Akurli Road, Kandivali East, Mumbai 400101

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.

Based on our examination and checks of the relevant books of account and other records and documents of **SAVVY CAPITAL ADVISORS LLP** and based on such verification and the information and explanations given to us by the firm, we certify that the disclosures made in the Disclosure Document for the period from **01st April, 2022 to 31st March, 2023** are true, fair and adequate to enable the investors to make well informed investment decisions.

This Certificate has been issued on request of **SAVVY CAPITAL ADVISORS LLP** for submission to Securities and Exchange Board of India under SEBI (Portfolio Management) Regulations, 2020 and should not be used or referred to for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care for any other purpose or to any other person to whom this certificate is shown or into whose hands it may come save where expressly agreed by our prior consent in writing.

For **BHARAT B SHAH & CO**  
**CHARTERED ACCOUNTANTS**

  
**(CA. BHARAT B. SHAH)**  
**PROPRIETOR**  
MEMBERSHIP NO -034935  
FRN NO - 101201W

Date : 17/08/2023  
Place: MUMBAI  
UDIN: 23034935BGUZDS8672