

Jainam Broking Limited
SEBI REGN. NO.INP000006785

**Portfolio Management
Services**

❖ **Disclosure Document**

Registered Office:-
P03-02C, P03-02D & P03-02E, 3rd Floor, WTC Tower (51A), Road 5E,
Block 51, Zone 5, DTA, GIFT CITY Gandhinagar GJ 385355 INDIA
Tel (0261) 6725555 E-mail:- compliance@jainam.in

This Disclosure Document has been filled with the Securities and Exchange Board of India together with the certificate in the prescribed format in terms of regulation 22 of the Securities and Exchange Board of India (Portfolio Manager) Regulations, 2020.

This Disclosure Documents sets forth concisely the essential information that a prospective investor ought to know about the portfolio management services, to assist and enable the investor before engaging a portfolio manager. Investors should carefully read the Disclosure document before making a decision of appointing portfolio manager.

The particulars of this Disclosure Document have been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulation, 2020, as amended till date and this Disclosure Document has been filled with SEBI. This Disclosure Document has neither been approved nor disapproved by SEBI, nor has SEBI certified the accuracy or adequacy of this Disclosure Document.

No person has been authorized to give any information or to make any representation not confirmed in this Disclosure Document, in connection with this Disclosure Document, and information or representation not contained herein must not be relied upon has having been authorized by Jainam Broking Limited

This disclosure document discloses the necessary information about the Portfolio Manager that an investor would require to know before investing.

Please retain this Disclosure Document for future reference.

Mr. Dilip Morakhia of Jainam Broking Limited Has been designated as the Principal Officer, details of whom are as under:

Mr. Dilip Morakhia
Jainam Broking Limited
Regd. Off. P03-02C, P03-02D & P03-02E, 3rd Floor, WTC Tower (51A), Road 5E, Block 51, Zone 5, DTA, GIFT CITY Gandhinagar - 385355, Gujarat, India.
Tel: +91-261-6725513, E-mail : dilip.morakhia@jainam.in

This Disclosure Document is dated 06 September 2023



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3. DESCRIPTIONS

3.(A) History, Present Business and Background of the Portfolio Manager.

- Jainam Broking Limited (formerly known as Jainam Share Consultant Pvt. Ltd.) was incorporated in 2003 with the vision to be the most preferred organization providing all financial services across the country. The foundation is on "Value" Systems - "Value" addition to Corporate, Retails and HNI Individuals through superior Wealth Creation Practices.
- Jainam Broking Limited was incorporated on November 10, 2003 & is mainly carrying on the broking business in the equity market.
- Since incorporation the company has been consistently growing with the present client base of around 2.5 lacs+ clients in Know Your Client (KYC) and 3 lacs+ clients in Depository Participants (DP). The company has total 24 branches in pan India. The company has 1200+ outlets to cater to the needs of the investors for their equity trading in the stock exchanges.
- Jainam Broking Limited provides all types of services like Equity Trading, Derivatives Trading, Currency Trading, Depository Services, Online Trading, Jobbing Arbitrage, Mutual Fund, Insurance, FD, IPO.

3.(B) Promoters and Directors of the Portfolio Manager and their Background in Brief

Sr. No.	Name	Designation Since	Experience	Background
1	Milan Suresh Parikh	Director since November 2003	23 years in Financial Services/capital market Industry.	Earlier he was working as a sub-broker of Exchange recognised Member Broker. He has a very good Experience in Equity Market as well as in Depository Market.
2	Vidhi Dishant Parikh	Director since November 2019	5 years in Financial Services/capital market Industry.	By profession she is a Chartered Accountant having sound knowledge of Accounting and back office operations.
3	Anal Milan Parikh	Director since September 2021	17 years in HR Activities and Administration activities.	By profession she has Diploma in Commercial Practice
4	Prarthana Enterprise	Promoter	N.A	N.A

3.(C) The Group Companies & Subsidiaries

- Jainam Commodities Pvt. Ltd.
- Jainam Fincap Pvt. Ltd.
- Jainam IFSC Mavens Pvt. Ltd.



4. PENALTIES, PENDING LITIGATIONS OR PROCEEDINGS ETC

There have been no instances of penalties or directions issued or proceedings initiated by the SEBI under the Act or Rules or Regulations or by and Regulatory authority against the Portfolio Manager for any economic offense and / or for violation of any securities laws or for any deficiencies in the systems and operations of the Portfolio Manager. There are no legal proceedings, civil or criminal initiated against the Portfolio Manager or its key personnel by any entity; nor there do any case of inquiry/adjudication proceedings initiated by the Board against any persons or group entities either directly or indirectly connected with the Portfolio Manager under the Act or Rules.

5. SERVICES OFFERED

(A) Discretionary Services:

Under this services, the choice as well as the timings of the investment decision rest solely with the Portfolio Manager (in consultation with the research department). The Portfolio Manager, may at times and at his own discretion, adhere to the Clients pertaining to the investment / disinvestment decision of the Client's Portfolio.

The Portfolio Manager shall have the sole and the absolute discretion to invest in respect of the Client's account in any type of security as per the agreement and make such changes in the investments and invest some or all of the Client's account in such a manner and in such a market as it deems fit. The Client may give information guidance to customize the Portfolio plans, however the final decision rest with the Portfolio Manager.

The securities invested/disinvested by the Portfolio Manager for the Client's in the same fund may differ from Client to Client. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's account is absolute and final and cannot be called in question or be open to review at any time during the currency of the agreement or any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence. These rights of Portfolio Manager shall be exercised strictly in accordance with the relevant Acts, Rules and Regulations, guidelines and notification in force from time to time.

Under this services, the client's may authorize the Portfolio Manager to invest their portfolio funds in specific financial instruments or a mix of specific financial instruments or restrict the portfolio manager from investing in specific financial instruments or securities. Periodical statements in respect of Client's Portfolio shall be sent to the respective Client.



We offer following services at present under Discretionary Portfolio Management Service:

1. JPMS BHARAT 5T

Investment objective	Bharat 5T & is meant to be a core buy and hold portfolio strategy for investors who aim to capitalize on the wealth creation opportunity in the Indian economy through equity investing.
Description of types of securities	Listed Equity, Listed liquid mutual fund
Strategy	Equity
Basis of selection of such types of securities	We select companies where improvements in the fundamentals happen in small steps over a relatively longer period of time giving opportunity for valuation multiple expansion along with earnings growth.
Allocation of portfolio across types of securities	90-100% Equity and 0-10% Cash & Cash Equivalent.
Appropriate Benchmark to compare performance	NIFTY 50
Indicative tenure or investment horizon	3 years to 10 years
Risks associated with the investment approach	Please refer the clause 6 Risk Factor
Other salient features, if any	Nil

2. JPMS BHARAT 5T DYNAMIC

Investment objective	Bharat 5T Dynamic provides the opportunity to participate in 4 different Equity Strategies all through a single account, helping the investors to prudently allocate investment amounts in these strategies depending on their risk appetite.
Description of types of securities	Listed Equity, Listed liquid mutual fund
Strategy	Equity
Basis of selection of such types of securities	Investment Universe --> Approved Analysis List --> Focused Buy list Preparation --> Buying in portfolio --> Tracking & Risk Control

Allocation of portfolio across types of securities	90-100% Equity and 0-10% Cash & Cash Equivalent.
Appropriate Benchmark to compare performance	NIFTY 50
Indicative tenure or investment horizon	3 years to 10 years
Risks associated with the investment approach	Please refer the clause 6 Risk Factor
Other salient features, if any	Nil

3. JPMS YELLOW JERSEY BOOST

Investment objective	The objective of this portfolio is to invest in 20 to 25 high earning growth companies and create value to the portfolio backed by strong earnings momentum in portfolio companies.
Description of types of securities	Listed Equity, Listed liquid mutual fund
Strategy	Equity
Basis of selection of such types of securities	We select companies with growing sales & earnings, running by vision, expert, experienced management, good financial, Great market leaders & growth in sector.
Allocation of portfolio across types of securities	90-100% Equity and 0-10% Cash & Cash Equivalent.
Appropriate Benchmark to compare performance	NIFTY 50
Indicative tenure or investment horizon	3 years or more than 5 years
Risks associated with the investment approach	Please refer the clause 6 Risk Factor
Other salient features, if any	Nil

4. JPMS INDIA'S FRONT RUNNERS FUND

Investment objective	To generate long-term capital appreciation along with Consistent Dividend Earnings by creating a portfolio that is invested in equity and equity-related securities of Front-runner Stocks from Demanding Industries.
Description of types of securities	Listed Equity, Listed liquid mutual fund

Strategy	Equity
Basis of selection of such types of securities	We select those companies that have good market share in that particular industry where they operate, with Better & Consistent Profit Margins, High solvency & better liquidity & from demanding industries.
Allocation of portfolio across types of securities	90-100% Equity and 0-10% Cash & Cash Equivalent.
Appropriate Benchmark to compare performance	NIFTY 50
Indicative tenure or investment horizon	3 years to 10 years
Risks associated with the investment approach	Please refer the clause 6 Risk Factor
Other salient features, if any	Nil

5. JPMS Excellence of daily object

Investment objective	Deliver Superior returns over a long term with a target IRR of 18-20% by adding minimum 1% improvement on daily basis into what we are offering.
Description of types of securities	Listed Equity, Listed liquid mutual fund
Strategy	Equity
Basis of selection of such types of securities	The Excellence of daily object investment approach involves formation 1) Long universe 2) Short universe. The long universe consists of 180+ businesses which have been identified using quant and quality parameters. The short universe consists of 20-30 stocks which are handpicked from the long universe and are in our immediate tracking . The stocks from the short universe become the part of our core portfolio.
Allocation of portfolio across types of securities	90-100% Equity and 0-10% Cash & Cash Equivalent.
Appropriate Benchmark to compare performance	NIFTY 50
Indicative tenure or investment horizon	3 years to 20 years
Risks associated with the investment approach	Please refer the clause 6 Risk Factor
Other salient features, if any	Nil

6. JPMS SAMURRAI-CoffeCan

Investment objective	Long term wealth creation with low volatility so that investors would stay longer in the game and can achieve near to potential return.
Description of types of securities	Listed Equity, Listed liquid, mutual fund
Strategy	Equity
Basis of selection of such types of securities	Stocks are selected by our proprietary algorithmic System. Every Month/Quarter our system will scan strong Momentum Stocks from defined Universe and will pick top 15 to 20 Stocks and thereafter rebalance will take place on regular intervals. There are well-defined exit rules to protect against the large drawdown.
Allocation of portfolio across types of securities	90-100% Equity and 0-10% Cash & Cash Equivalent.
Appropriate Benchmark to compare performance	NIFTY 50
Indicative tenure or investment horizon	3 years to 20 years
Risks associated with the investment approach	Please refer the clause 6 Risk Factor
Other salient features, if any	<ul style="list-style-type: none"> ✓ The universe of the stocks is defined by the principles of coffee-can investing. The focus of the Coffee-can investing is to identify the companies with strong revenue growth, high ROCE and generation of free cash flow. ✓ The stocks are selected from the above universe, based on the momentum ranking and every month/quarter a rebalance ensures that the strongest of the pack remains in the portfolio. ✓ There is zero discretion of the Fund manager in running this portfolio. The strategies have been rigorously back tested on years of data to prove their efficacy. ✓ The historical performance of this portfolio has beaten the benchmark by a wide margin. ✓ Winners are allowed to run while losers are removed at the next balance if they meet the exit criterion. ✓ High-quality stocks with strong momentum and low volatility. ✓ Protecting downside and providing stable return to the clients are among the important objectives of this scheme. We intend to buy/sell options (index options only) in order to manage the volatility in the performance of the client's portfolio ✓ Monthly/quarterly portfolio rebalancing to maintain low turnover

Currently We broadly manage Client's funds in 2 plans i.e JPMS BHARAT 5T. & JPMS INDIA'S FRONT RUNNERS FUND

Note:

The Portfolio of each client may differ from that of the other client in the same plan as per the discretion of the Portfolio Manager. The client may give informal guidance to customize the portfolio plan, however the final decision rest with the Portfolio Manager.

(B) Non-discretionary Services

Under these services, the client's decide their own investments with Portfolio Manager only facilitating the execution of transactions. The Portfolio Manager's role is limited to providing research, investment advice, and guidance an trade execution at the Client's request. The Portfolio Manager shall execute orders as per the mandate received form Clients. The Portfolio Manager's decision (taken in good faith) in deployment of the Client's account is absolute and final and cannot be called in question or be open to review at any time during the currency of the agreement or any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence. This rights and obligation of Portfolio Manager shall be exercised strictly in accordance with the relevant Acts, Rules and Regulations, guidelines and notification in force from time to time. Periodical statements in respect of Client's Portfolio shall be sent to the respective Clients.

(C) Investment Advisory Services

Under these services, the portfolio manager advises the client on investment in general or any specific advise required by client. This is a pure consultancy services for review, restructuring & monitoring of investment with minimum size of Rs.50 lacs. The advises given by portfolio manager to client can not binding him. Entry / exit timing, execution and settlement are solely the Client's responsibility. Portfolio manager role is just to guide & prepare investment strategy, asset allocation in confirmation with client's preference and risk profile. For such services, the Portfolio Manager charges the Client a fee for services rendered mentioned in the Client agreement.

6. RISK FACTORS

- Investments in Securities are subject to market risks and include price fluctuation risks. There are no assurances of guarantees that the objective of the Portfolio will be achieved. The investments may not be suitable to categories of investors.
- Past performance of the Portfolio manager does not indicate the future performance of the portfolio. There is no assurance that the past performances indicated will be repeated. Investors are not being offered any guaranteed or assured return through any of the investment.
- The names of the plans do not in any manner indicate their prospectus or returns or does not guarantee the the performance or returns of the plan. The performance in the equity plans may be adversely affected by the performance of individual companies, changes in the market place and industry specific and macro economic factors.
- The investment strategy will be drawn up considering the current and expected market movement and trends. Though all endeavors shall be made by the Portfolio Manager to diversify the risk, the risk of below market performance is not ruled out.

- If the Portfolio has a high/lower exposure to any particular sector or company, there is an additional risk due to over/under dependence or one sector/company. The Portfolio Manager shall attempt to migrate such risk by diversification of Portfolio.
- The debt investments and other fixed income securities may be subject to interest rate risk, credit risk and re investment risk. Liquidity in these investments may be affected by trading volumes, settlement periods and transfer procedures.
- Technology stocks and some of the investments in niche sectors run the risk of volatility, high valuation, obsolescence and low liquidity.
- Plans using derivative/future and options products are affected by risks difference from those associated with stock and bonds. Such products are highly leveraged instruments and their use requires a high degree of skill, diligence and expertise. Small price movements in the underlying security may have a large impact on the value of derivatives and future options. Some of the risk relate to mis-pricing or improper valuation of derivatives and future and options and inability to correlate the positions with underlying assets, rates and indices. Also the derivatives and futures and options market is nascent in India.
- In the case of stock lending, risks relate to the defaults from counter parties with regard to Securities lent and corporate benefits accrue in thereon, inadequacy of the collateral and settlement risks. The Portfolio Manager is not responsible or liable for any loss resulting from the operations of the Plans.
- Each portfolio will be exposed to various risks depending on the investment objective, investment strategy and the asset allocation. The investment objective, investment strategy and the asset allocation may differ from client to client.
- Highly concentrated portfolios with lesser number of stocks generally will be more volatile than a larger number of stocks, Portfolios with higher allocation to equities will be subject to higher volatility than portfolios with low allocation to equities.
- Risk arising out of non-diversification, if any Diversified portfolios allocated across companies and broad sectors may be less volatile than non-diversified portfolios.
- The Portfolio Manager is not responsible or liable for any loss resulting from the operations of the funds. All funds under portfolio management are subject to change at any time at the discretion of the portfolio manager.
- There have been no transactions in securities by Jainam Broking Ltd and its employees directly involved in investment operations having conflict of interest with the transactions in any of the client's portfolio
- There is no conflict of interest related to services offered by group companies of Jainam Broking Limited.
- Funds of the clients has not been invested in any Security of an associate or group companies of the Portfolio Manager
- Portfolio manager is a multifaceted individual with a formidable educational background - an engineer, an MBA, and a CFA. His insatiable passion for learning has led him to become an avid reader, immersing himself in diverse streams of trading and investing. Within the vast realm of finance, Mr. Mistry stands out for his unparalleled expertise in derivative trading and proficiency in utilizing various analytical tools, especially for options trading. His forte lies in quantitative trading methods and the application of highly effective Money Management techniques. What sets him apart is his exceptional ability to "crash-test" trading methods, ensuring stability and resilience in the face of market fluctuations. With a wealth of experience and insight, he continues to inspire and enlighten those in the financial industry.
- Dr. Rakesh Doshi the co-fund manager is a commerce graduate with MBA in Finance. He has his Ph.D. in 'Traders Psychology'. He is trained with UTI Institute of Capital Management for PORTFOLIO MANAGEMENT PRACTICES. He got trained with the traders like **** and **** at OTL and XLT. Furthermore, Dr. Doshi's passion for understanding investors' needs has driven him to develop several technological innovations in the field of investment management. Notably, he is credited as the pioneer behind the introduction of online real-time Computer to Computer linked trading (CTCL) in India, which has revolutionized the way investors engage with the stock market.

7. CATEGORIES OF CLIENTS SERVICES

The Portfolio Management Services will be offered by Jainam Broking Limited & Categories of Clients serviced by Jainam Broking Limited For Portfolio Management is as given below:

Category of clients	No. of clients	Funds managed (Rs. In Crs)*	Discretionary/ Non-discretionary (if available)
Associates / group companies (last 3 years)	NIL	NIL	NIL
Others(As on 31.03.2020)	2	0.93	Discretionary
Others (As on 31.03.2021)	3	2.25	Discretionary
Others (As on 31.03.2022)	5	3.64	Discretionary
Others (As on 31.03.2023)	13	7.13	Discretionary

* "Funds Managed" indicates market value of Assets under Management

8. DISCLOSURES IN RESPECT OF TRANSACTIONS WITH RELATED PARTIES PERTAINING TO PORTFOLIO MANAGEMENT SERVICES

Relationship	Name of related party
Enterprise owning an interest in voting that gives them control or significant influence over the enterprise	M/s. Prarthana Enterprises
Key Management Personnel Managing Director Whole time director (appointed during 2019 Director) Director (appointed during Sept. 2021 Director) Chief financial officer (appointed during June 2022) Company Secretary (appointed during Nov 2022)	Mr. Milan Suresh Parikh Mrs. Vidhi Dishant Parikh Mrs.Anal Milan Parikh Mr. Dishant Milan Parikh Mittal Shah
Wholly Owned Subsidiaries	Jainam IFSC Mavens Pvt. Ltd.
Relative Of Key management personnel	Mr. Bharat S. Parikh Mr. Dishant M. Parikh Mr. Jainam M. Parikh
Enterprise over which relative of key management personnel exercise significant influence	JNM Corporation Jainam Commodities Pvt. Ltd. Milanbhai Sureshbhai Parikh HUF Parikh Bharat HUF

Note:

- The related party relationships have been determined on the requirement of the Accounting Standard (AS) - 18 " Related Party Disclosure" are the same have been relied upon by the auditors.
- The relationships as mentioned above pertain to those related parties with whom transactions have taken place during the year.
- Transaction Executed as an agent/broker for related parties in normal course of business and amount paid (including profits earned by related parties) as an agent/broker are not disclosed separately.

Transaction during the period with related parties :

Nature of Transaction	Related Parties	F.Y. 2021-22	F.Y. 2020-21
Revenue From Operation	Mrs. Vidhi D. Parikh	0.05	0.01
	Parikh Bharat HUF	3.00	0.07
	Prarthana Enterprises	6126.04	450.00
Director Remuneration	Mr. Milan S. Parikh	72.00	24.00
	Mrs. Anal M. Parikh	30.00	24.00
	Mrs. Vidhi D. Parikh	36.00	7.20
Salary & incentives	Mr. Dishant D. Parikh	60.00	-
	Ms. Meghavi Gonawala	1.10	-
Rent Expenses	Mr. Milan S. Parikh	5.40	3.00
	Mrs. Anal M. Parikh	-	3.50
	Legal representatives of Nirmalaben S. Parikh	-	2.40

9. PERFORMANCE OF THE PORTFOLIO MANAGER

The Portfolio Management Services are being offered by the Portfolio Manager. The performance of the plan is given below:

a) JPMS BHARAT 5T:

Performance	From 01-04-2020 to 31-03-2021	From 01-04-2021 to 31-03-2022	From 01-04-2022 to 31-03-2023
JPMS BHARAT5T	67.89%	21.64%	-11.00%
NSE 500	75.99%	20.96%	-2.26%

b) JPMS INDIA'S FRONT RUNNERS FUND:

Performance	From 01-04-2021 to 31-03-2022	From 01-04-2021 to 31-03-2022	From 01-04-2022 to 31-03-2023
JPMS INDIA'S FRONT RUNNERS FUND	NA	-8.09%	-7.13%
NSE 500	NA	20.96%	-2.26%

10. FINANCIAL PERFORMANCE OF THE PORTFOLIO MANAGER**10.1 Capital Structure (in Rs.)**

	Year prior to the preceding year of current year (31/03/2020)	Preceding year (31/03/2021)	Current year (As on 31/03/2022)
(a) Paid-up capital	60,39,000	60,39,000	25,53,45,280
(b) Free reserves (excluding evaluation reserves)	1,32,77,51,922	2,071,497,146	3,496,435,279
(c) Total (a) + (b)	1,33,37,90,922	2,077,536,146	3,751,780,559

10.2 Deployment of Resources (in Rs.)

	Year prior to the preceding year of current year (31/03/2020)	Preceding year (31/03/2021)	Current year (As on 31/03/2022)
(a) Fixed Assets	63,247,446	61,875,413	71,340,000
(b) Plant & Machinery and office equipment	5,588,976	4,697,749	47,89,000
(c) Investments (Details should be given separately)	1,331,500	1,331,500	1,331,500
(d) Others (Intangible Assets)	NIL	NIL	NIL

10.3 Major Sources of Income: (in Rs.)

	Year prior to the preceding year of current year (31/03/2020)	Preceding year (31/03/2021)	Current year (As on 31/03/2022)
Brokerage	24,82,19,285	41,47,42,836	66,54,67,490

10.4 Net Profit (in Rs.)

	Year prior to the preceding year of current year (31/03/2020)	Preceding year (31/03/2021)	Current year (As on 31/03/2022)
Net Profit	32,37,69,617	744,764,024	1,217,337,413

As per SEBI circular no. SEBI/HO/IMD/IMD-II_DOF7/P/CIR/2021/681 dated December 10, 2021, networth of portfolio manager is required to be disclosed in Disclosure Document. Pursuant to the said circular, the networth of Jainam Broking Ltd as on March 31, 2022 is Rs. 37,517.81 lakhs as per regulation 9 of the SEBI (Portfolio Manager) Regulations, 2020.

11. **Audit Observations:**

<u>Year</u>	<u>Observations/Remarks</u>
<u>2019-2020</u>	No Audit Conducted
<u>2020-2021</u>	No Audit Conducted
<u>2021-2022</u>	Audit in process
<u>2022-2023</u>	Audit in process



12. NATURE OF COSTS AND EXPENCES FOR CLIENTS

the following are indicative types of cost and expenses for client 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 agreement in respect of each of the services availed at the execution of such agreements.

Management Fees

Professional charges relate to the Portfolio Management Services offered to clients. The fee may be a fixed charge or a percentage of the quantum of funds managed and may be return based or a combination of any of these

Custodian / Depository Fees

The charges relating to the opening and operation of dematerialized accounts.

Custody and transfer charges for shares, bonds and units, dematerialization and other charges in connection with the operation and management of the depository accounts.

Registrar and Transfer Agent Fees

Charges payable to registrars and transfer agents in connection with effecting transfer of the securities and bonds is including stamp charges cost of affidavits, notary charges, postage stamp and courier charges.

Brokerage and Transaction Costs

The brokerage charges and others charges like service charge, stamp duty, securities transaction tax, transaction cost, turnover tax, GST, exit and entry loads on the purchase and sales of shares, stocks, bonds, debt, deposits, units and other financial.

Certification and Professional Charges

Charges payable for out sourced professional services like accounting, taxation and legal services, notarization etc for certification, attestation required by bankers or regulatory authorities.

Incidental Expenses

Charges in connection with the courier expenses stamp duty, service tax, postal, telegraphic, opening and operation and bank accounts etc.

13. TAX IMPLICTAION ON CLIENT

The clients are advised to consult their tax practitioner with respect to tax consequences that may be faced by the client on account of their participation in any of the Plans of the Portfolio Manager. The Portfolio Manager shall not be responsible for assisting or completing the fulfillment of the Clients obligations. Whether required by the relevant act, rules and regulations, tax will be deducted at source by the Portfolio Manager. The obligation of paying Advance Tax installment shall lie on the Client.



14. ACCOUNTING POLICIES / VALUATIONS

The following accounting policies will be applied for portfolio investments of clients: Investments in Equities, Mutual Funds and Debt instruments will be valued at the closing market prices of the exchanges (BSE or NSE as the case may be) or the repurchase Net Asset Value declared for the relevant fund on the date of the report or any cut off date or the market value of the instrument at the cut off date. Alternatively, the last available prices on the exchange or the most recent NAV will be reckoned.

Realized gains / losses will be calculated by applying the first in first out and / or weighted average principle. The Portfolio Manager and the client can adopt any specific norms or valuation of investments or accounting the same as may be mutually agreed between them on a case specific basis.

For derivatives and futures and options, unrealized gains and losses will be calculated by marking to market the open positions. Unrealized gains / losses are the different between the current market values / NAV and the historical cost of the securities.

Dividend is on shares to which the portfolio becomes entitled shall be recognized only when the original shares on which the bonus entitlement accrues are traded on the ex-bonus basis. Similarly right entitlement shall be recognized only when the original shares on right entitlement accrues are traded on the stock exchange on ex-right bonus.

The cost of investments acquired or purchased shall include grossed up brokerage, stamp charges and any charge customarily included in the broker's bought note. In respect of privately placed debt instruments. Any front end discount offered may be reduced from the cost of the investments.

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

15. INVESTOR SERVICES

15.1 Contact Information

Name : Mr. Nirav Kansariwala
Address : "Jainam House", New Passport Office Road, Piplod, Surat - 395007
Email : nirav.kansariwala@jainam.in
Telephone: 0261-6725536

The official mentioned above will ensure prompt investor services. The Portfolio Manager will ensure that this official is vested with the necessary authority, independence and he wherewithal to handle investor complaints.

15.2 Grievance Redressal And Dispute Settlement Mechanism

The Portfolio Manager will endeavor to addresses all complaints regarding services deficiencies or causes for grievance for whatever reason a reasonable manner and the Portfolio Manager shall abide by following mechanisms.

For the timely and proper redressal of clients complaints and grievances, the Portfolio Manager shall have the following Grievance Redressal and Dispute Handling Mechanism at place.



The portfolio manager has appointed Mr. Asit J. Mistry, fund manager as first point for the redressal of the clients complaints. The client can approach to the fund manager at below mentioned contacts.

Name : Mr. Asit Mistry/Dr. Rakesh Doshi
Address : "Jainam House", New Passport Office Road, Piplod, Surat - 395007
Email : Rakesh.doshi@jainam.in
Telephone: 0261-6725555

Clients can also email their complaints to a dedicated email id compliance@jainam.in
If the client remains dissatisfied with the remedies offered or the stand taken by the fund manager, he/she can contact Mr. Omprakash Singh, compliance Officer at :

Name : Mr. Omprakash Singh
Address : "Jainam House", New Passport Office Road, Piplod, Surat - 395007
Email : omprakashsingh@jainam.in
Telephone: 0261-6725545

If the client remains dissatisfied with the remedies offered or the stand taken by the compliance officer, he/she can contact Mr. Milan Parikh, Director at:

Name : Mr. Milan Parikh
Address : "Jainam House", New Passport Office Road, Piplod, Surat - 395007
Email : milan.parikh@jainam.in
Telephone: 0261-6725554

If the client remains dissatisfied with the remedies offered or the stand taken by the director, he/she can lodge their complaint with SEBI on website: scores.gov.in

The Portfolio Manager may appoint a custodian & Fund accounting for its Portfolio Management Services. Currently, Yes bank Limited is appointed as custodians as well as fund accounting.

All disputes, differences, claims and questions whatever arising between the client and the Portfolio Manager and /or their respective representative shall be settled in accordance with and subject to the provisions of the Arbitration and Conciliation Act, 1996 or any statutory requirement, modification or re-enactment thereof. Such Arbitration shall be held at Surat or such other place as the Portfolio Manager think fit.

Investors have the option to avail the Portfolio Management Services by direct on-boarding with Jainam Broking Limited or through a Distributor. Clients can be on-boarded directly with Jainam Broking Limited by visiting our website www.Jainam.in
Note : Currently JBL has zero pms distributor. Distributor will get 50% as Referral Fees or Commission of what JBL will get in terms of Portfolio management fees.

16. Details of investments in the securities of related parties of the portfolio manager

- Not Applicable



17. Details of the diversification policy of the Portfolio Manager

- JBL is identifying the companies based on coffee-can investing philosophy with focus on sales growth, ROCE and free cash flow over a longer period. Furthermore, Our automated algorithm churns out the high velocity stocks based on the proprietary ranking criteria, We believe in providing higher allocation to the winning stocks. Hence, over a period of time the stocks that performs better, retains higher allocation. We don't choke the winner and feed the loser. Also Protecting the downside is as important to us as generating superior returns. We have well-defined exit strategy that monitors the stocks in the portfolio and the entire portfolio on a daily basis. On a regular basis, we review our universe. Also, every month we review the ranking of scrip's in the universe and we adjust our portfolio.

18. GENERAL

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

APPROVED BY THE DIRECTOR

Sr. No.	Name of the Director	Signature
1	Mr. Milan Parikh	<i>m. s. Parikh</i>
2	Mrs. Vidhi Parikh	<i>Vidhi Parikh</i>



FORM C

**Jainam Broking Limited
SEBI REGN. NO. INP000006785**

**Jainam House, Near shardayatan school, New passport office road, kargil chowk, piplod
Surat - 395007**

Tel (0261) 6725555

E-mail: - PMS@JAINAM.IN

Web site: - www.jainam.in

Dear Investor,

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 an independent Chartered Accountant viz. M/s. Shah & Ramaiya Address: 36/227, RDP 10, Sector 6, Charkop, Near Ambe Mata Mandir, Kandivali (West), Mumbai: 400067; Phone no.:91-22-28085277 bearing registration no.126489W on September 05, 2023.

For Jainam Broking Limited



(Dilip Morakhia)
Principal Officer



Date: - 06/09/2023

Place: - SURAT

CERTIFICATE

We have verified the Disclosure Document ("the Document") for Portfolio Management Services prepared by **M/s. Jainam Broking Limited**, a Portfolio Manager registered with SEBI under the SEBI (Portfolio Managers) Regulations, 2020 (SEBI Reg. No. INP00000 6785), dated September 5, 2023, having its Registered Office at 'Jainam House, New Passport Office Road, Piplod, Surat, 395007, Gujrat'.

The disclosure made in the document is made on the model disclosure document as stated in Schedule V of Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations 2020.

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.

Our certification is based on the audited Balance sheet of the Company for the quarter ended March 31, 2022, audited by Statutory Auditors NDJ & Company-Chartered Accountants and examination of other records, data made available and information & explanations provided to us.

Based on such examination we certify that:

- The Disclosure made in the document is true, fair and correct and
- The information provided in the Disclosure Document is adequate to enable the investors to make well-informed decisions.

The enclosed document is stamped and initialed / signed by us for the purpose of identification.

For Shah & Ramaiya.
Chartered Accountants
FRN.:126489W

SHARDUL
JASHWANTLAL
SHAH

Digitally signed by SHARDUL JASHWANTLAL SHAH
DN: c=IN, s=Maharashtra,
Phone=7848231484ca6f9802b02b072abes9e112852211c11a46c79a6
a0d9025a, PostalCode=400091, STREET=Mumbai,
OID.2.5.4.65=+9806067225510a7de29b2b378d79e,
SERIALNUMBER=+9806067225510a7de29b2b378d79e1c088&1162b8ddfd
*02d8f94885663f, O=Personal, CN=SHARDUL JASHWANTLAL SHAH
Reason: I am the author of this document
Location: your signing location here
Date: 2023.09.06 14:56:23
Font: PhantomPDF Version: 9.5.0

CA Shardul Shah
Partner
M No.: 118394
UDIN No.: 23118394BGWRZW8467

Place: Mumbai
Date: September 6, 2023