

RIA Disclosure Document

Release Date: April 02, 2024

Updated RIA disclosure document is available at

<https://abakkusinvest.com/regulatory-disclosure/>

Abakkus Investment Advisors (a division of Abakkus Asset Manager LLP) providing Investment Advisory Services under the brand Abakkus Smart

Non-Individual Investment Adviser Registration no. INA000015729

BASL Membership ID: BASL1093

LLP Identification Number: AAM-2364

Validity of Registration: – Feb 03, 2021 – Perpetual

Registered Office Address: Abakkus Corporate Center, 6th Floor, Param House, Shanti Nagar, Near Grand Hyatt, Off Santacruz Chembur Link Road, Santacruz East, Mumbai – 400055, +91 22 6884 6600

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Disclaimers:

- Investments in securities markets are subject to market risks. Read all the related documents carefully before investing.
- Registration granted by SEBI, membership of BASL and certification from NISM in no way guarantee performance of the intermediary or provide any assurance of returns to investors.
- The securities quoted are for illustration only and are not recommendatory.
- Any performance depictions are for illustration purposes only and such past performance may or may not sustain in future.
- This Key Information and Disclosure Document has been prepared inter-alia in pursuant to regulation 15 and 18 of the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, as amended from time to time (the Regulations) and the Circulars, Guidelines and instructions issued by SEBI thereunder from time to time.
- This document is intended only for the personal use of the prospective investors to whom it is addressed or delivered and must not be reproduced or redistributed in any form to any other person without prior written consent of Abakkus Asset Manager LLP (the "Investment Advisor").
- This document does not purport to be all-inclusive / comprehensive, nor does it contain all the information which a prospective investor may desire for making decisions for engaging the Investment Advisor.

KEY INFORMATION AND DISCLOSURE DOCUMENT FOR INVESTMENT ADVISORY SERVICES UNDERTAKEN BY ABAKKUS ASSET MANAGER LLP (through its Investment Advisory Division known as “Abakkus Investment Advisors” under the Brand Name “Abakkus Smart”).

- The purpose of the Key Information and Disclosure Document is to provide essential information about the investment advisory services in a manner to assist and enable the Investors in making decisions for engaging an investment advisor.
- The necessary information about the Investment Advisor is disclosed in this Disclosure Document and the Investor is advised to carefully read the entire document and is advised to retain it for future reference.
- Investors may view this updated document at <https://abakkusinvest.com/regulatory-disclosure/> of the Investment Advisor.

History, Present Business and Background

Abakkus Asset Manager LLP (“Abakkus”) is registered as an Investment Advisor under SEBI (Investment Advisors) Regulations, 2013 as amended from time to time and the Circulars and Guidelines issued there under from time to time vide **SEBI Reg. No.: INA000015729** dated February 03, 2021. Abakkus is also registered as a Portfolio Manager with SEBI under SEBI (Portfolio Managers) Regulations, 2020 as amended from time to time and the Circulars and Guidelines issued there under from time to time vide **SEBI Reg. No.: INP000006457** dated March 14, 2019. Abakkus is also acts as an Investment Manager to Abakkus Growth Fund, a SEBI registered Category III AIF vide **SEBI Reg. No.: IN/AIF3/18-19/0550** dated June 05, 2018, India-Ahead Venture Trust, a SEBI registered Category I AIF vide **SEBI Reg. No.: IN/AIF1/21- 22/0976** dated January 25, 2022, India-Ahead Private Equity Trust, a SEBI registered Category II AIF vide **SEBI Reg. No.: IN/AIF2/21-22/0980** dated January 27, 2022, Abakkus India Equity Fund, a SEBI registered Category III AIF vide **SEBI Reg. No.: IN/AIF3/23-24/1326** under SEBI (Alternative Investment Fund) Regulations, 2012 as amended from time to time and the Circulars and Guidelines issued there under from time to time collectively referred as the SEBI Registered Intermediary. Additionally, branch office of Abakkus at IFSC GIFT City is registered as a Fund Management Entity (Non-Retail) under International Financial Services Centers Authority (Fund Management) Regulations 2022 (registered with effect from November 01, 2022)

Partners Name: (i) Mr. Sunil Singhania

Sunil Singhania is the founder of Abakkus Asset Manager LLP, an India-focused Asset Management Company established in 2018.

Sunil Singhania, CA and CFA Charter Holder, founder of Abakkus Asset Manager LLP was rated among the Best fund managers by Outlook Business in 2016 and 2017 over a 10 year time frame. He was the first Indian to be appointed on the Global Board of CFA institute, USA (2013-2019). Currently he is the only Indian to be appointed on the IFRS Capital Market Advisory Committee (CMAC) (2020-2023). He was Chief Investment Officer (CIO), Equities of Reliance Nippon Asset

Management (now Nippon Life India Asset Management) overseeing – USD 11 billion of equity asset. He was also an Honorary Chairman of Investment committee of CFA Institute (2018–2019) managing – USD 450 million. Mr. Singhania graduated in commerce from the Bombay University and completed his Chartered Accountancy from the Institute of Chartered Accountants of India, New Delhi (ICAI) with an all-India rank. He has also earned the right to use the Chartered Financial Analyst designation, conferred by CFA Institute. Having travelled extensively across the world, Singhania has also attended many global investment conferences and seminars.

(ii) **Abakkus Expert Professionals LLP:** Abakkus Expert Professionals LLP (Formerly known as Abakkus Expert Professionals Private Limited) is a Limited Liability Partnership, formally incorporated as Private Limited company incorporated on February 20, 2018 and converted in to LLP on March 07, 2024, in Mumbai. Its main objects are to act as financial consultants, management consultants, and provide advice, services, consultancy in various fields viz. general, administrative, secretarial, commercial, financial, and legal. Mr. Biharilal Deora is acting as the representative/nominee of Abakkus Expert Professionals LLP.

Affiliation with other intermediaries

There are no affiliations with other intermediaries except that Abakkus has empaneled various financial intermediaries and / or financial institutions and / or individuals for promoting / distributing its various financial product offerings including availing their advisory / on-boarding platform(s).

Disciplinary History / Complaint Status

- 1 Administrative warning issued by SEBI vide letter dated December 07, 2023 in name of India-Ahead Venture Trust ("Trust"), Abakkus Asset Manager LLP, in capacity of Investment Manager of the Trust and its KMP for delayed filing of Quarterly Activity Report with SEBI for quarter ended March 2023.

Investment Manager has submitted the representation letter dated December 14, 2023 with SEBI. The said representation letter is under consideration with SEBI.

- 2 Administrative warning issued by SEBI vide letter dated January 10, 2024 in the name of Abakkus Growth Fund, Abakkus Asset Manager LLP in capacity of Investment Manager of the Trust and its KMP for delayed filing of Quarterly Activity Report with SEBI for quarter ended December 2022 and March 2023.

Investment Manager has submitted the representation letter dated January 19, 2024 with SEBI. The said representation letter is under consideration with SEBI.

- i. There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority against the Abakkus or its Partners, or employees except for the foregoing.
- ii. For latest update on complaints kindly visit website: <https://abakkusinvest.com/regulatory-disclosure/>

Services offered and terms of offerings

- a. The Investment Adviser shall provide investment advice to the Clients relating to investing, purchasing, selling, or dealing in securities or investment products/asset classes such as shares, debentures, bonds, derivatives, securities instruments, structured products, units of MF/AIF/REIT/InvIT/ETF/PMS, private equity, alternative asset class such as real estate, commodities, angel investment, offshore investment etc.
- b. The Investment Adviser provides advice on investment portfolio containing or any other investment product suitable to the Client's needs and on-going monitoring, periodic review, asset allocation and financial planning including analysis of Clients' financial position, identification of its financial goals and developing and recommending financial strategies to realise such goals.
- c. Investment Adviser undertakes that all such Investment Advisory services shall be offered to the client with no binding whatsoever and client shall be free to implement or execute the services with any distributor/broker/intermediary of his/her/its choice.
- d. The performance / returns of the stock advised across individual portfolios may vary significantly from the data depicted by the Investment Advisor. The data depicted by the Investment Advisor is not verified by any regulatory authority and does not provide any guarantee of returns or performance. Investment advisor does not provide any guarantee on the future performance. No claims may be made or entertained for any variances between the performance depictions and that of the stock within individual client portfolios. Neither the Investment Adviser, nor its Partners, employees, affiliates shall in any way be liable for any variation noticed in the returns of individual portfolios. Performance of Abakkus shall have no bearing on the expected performance of an Individual Client Portfolio. Abakkus also does not guarantee or assure any minimum or risk-free returns. Past performance of the financial products, instruments and the securities advised by Abakkus may or may not be sustained in future and should not be used as a basis for comparison with other investments.
- e. The above services offered by Abakkus can also be availed by Accredited Investor(s) subject to meeting the eligibility criteria, obtaining accreditation status from the Accreditation

Agency and complying with the requirements as detailed in the framework for Accredited Investors available on the website of the Abakkus at <https://abakkusinvest.com/regulatory-disclosure/> or ria.abakkusinvest.com

Risk Factors

The value of the investments and the expected returns may be affected generally by factors affecting financial and securities markets, such as price and volume, volatility in interest rates, currency exchange rates, changes in regulatory and administrative policies of the Government or any other appropriate authority (including tax laws) or other political, economic, and other developments as detailed below:

- **Portfolio Entities/ Companies Risk:** The performance of the model portfolio will depend upon the business performance of the Portfolio Entities and Companies and its prospects. Investment Advisor focuses on studying the business and the sustainability with focus on studying the balance sheet will help the Investment Advisor in mitigating these sector or company risks.
- **Valuation Risk:** Investment Advisor will assess the Portfolio Entities from varied valuation parameters in order to establish whether the valuations are reasonable while creating the model portfolio and reassess the same from time to time.
- **Market Risk:** Investment Advisor endeavours to create a portfolio of Entities /Companies using bottom-up fundamental research rather than trying to time the markets. However, in order to mitigate Market Risk, the Investment Advisor will monitor and analyse the market and economic circumstances from time to time that may affect the performance of the Portfolio Entities.
- **Liquidity Risk:** While investing in equities and Portfolio Entities, liquidity constraints are potential near-term risk while investing and disinvesting the Portfolio Entities. The Investment Advisor endeavours to mitigate the risks by investing creating a portfolio with a medium to long term time horizon.
- **Service Provider Risk:** Investment Advisor is reliant upon the performance of third-party service providers for their functions. Weak control over technology used in the third-party arrangement may result in threats to security and the integrity of systems and resources, which can have materially detrimental impact upon the operations of the Abakkus. These issues could result in unauthorized transactions or the inability to transact business as expected. The Investment Advisor endeavours to mitigate these risks by entering into the arrangement with regulated entities and/or incorporating indemnity clause in agreement entered with service providers.
- **Other Risks:** The advisory portfolio offered by the Investment Advisor is suitable for clients with "Aggressive"/ "High Risk" risk profile. The Investment Advisory does not offer any assured /

guaranteed returns. Investment in securities market are subject to market risks. Read all the related documents carefully before investing.

Abakkus is not liable or responsible for any loss or shortfall resulting on account of Non-Discretionary Investment Advice. This document represents the views of Abakkus and should not be taken as the basis for an investment decision.

Holdings and Disclosure of Interest

Abakkus or its affiliates or employees/partners or funds advised/managed by Abakkus may have same or contra positions in personal or fiduciary capacity the above securities/stocks. Investors should take caution while executing the advice based on their risk/return profile and suitability.

Conflict of Interest

Considering Abakkus Asset Manager LLP (**Abakkus**) is acting as Portfolio Manager, Investment Manager and also providing advisory services, a potential conflict of interest could be perceived between the investments and disinvestments undertaken by the Investment Manager for the schemes/funds of Alternative Investment Fund (**AIF**) and various investment approach(es) under the Portfolio Management Services (**PMS**) and investments and disinvestments advise (**RIA**) provided to investment advisory clients.

The conflicts of interest may arise in relation to the various activities carried out by Abakkus and its affiliate/group entities and their respective directors/partners, officers employees, agents, it's associates/ affiliates/ group companies and their respective directors/officers/employees/agents (collectively, the **Relevant Parties**) which are engaged in broad spectrum of activities in the financial sector.

There could be multiple portfolios/schemes/funds, domiciled globally, under the management of Abakkus Asset Manager LLP as a Portfolio Manager/Investment Manager/Advisor to other funds/approaches and/or any of the Relevant Parties, domiciled globally, thereby presenting possibility of conflict of interest in allocating investment opportunities amongst the various portfolios. Abakkus will endeavour to resolve any such conflicts in a reasonable manner as it deems fit.

The Relevant Party(ies) shall exercise a standard of good faith in their dealings with the various activities and any of its investee entities. Abakkus will be transparent and make disclosures with respect to conflicts of interest situation that Abakkus determines may have arisen (or which seem likely to arise) between the Relevant Parties and the various activities of Abakkus (or any

of its investee entities).

Abakkus maintains and operates effective organisational and administrative arrangements with the view of taking all reasonable steps to identify, continuously monitor and manage conflicts of interest. Some of the potential conflicts of interest situations are provided below. It is not intended to provide a comprehensive list of conflicts of interest or account of the processes and procedures which Abakkus adopts in connection with the management of conflicts of interest but is instead intended to be a statement of principles with which Abakkus seeks to manage foreseeable conflicts of interest. Abakkus may identify additional conflicts of interest situations from time to time, which will be managed/mitigated with the help of the principles identified herein and by also taking into account further processes which Abakkus may develop over the period of time. The following are the potential conflicts of interest situations that may arise:

- The Relevant Parties providing services to the investor will have, in addition to their responsibilities for the investor, responsibilities for other companies, projects and clients. Accordingly, they may have conflicts of interests in allocating management time and other resources amongst the various activities of Abakkus and such other projects and clients.
- Abakkus and/or any of the Relevant Parties can act as manager/advisor to any of the Portfolio Entity/ies, charge fee for the services rendered to them, provide broad range of financial services, from time to time and earn fee in addition to the fee charged to the investor.
- Abakkus, as investment manager of the AIF or as Portfolio Manager or Investment Advisor, may affect transactions in securities and/or provide services to investee entities in respect of which any of its affiliate/group company may benefit from a commission or fee.
- Abakkus and/or any of the Relevant Parties, while managing the funds of investor, may from time-to-time effect transactions in securities in which Abakkus may have a financial or other business interest.
- Abakkus and/or any of the Relevant Parties and/or its advisory clients or managed clients like AIF/FPI may have existing similar or contra positions in the stocks/ recommended in the client's account and may execute their trades at different timeline based on their execution strategy which may not match with trade execution in the AIF/PMS/RIA.
- Abakkus may or may not have a similar position as fund/scheme/approach/advise in its other products/services/funds/vehicle where it acts as investment manager/portfolio manager/advisor.
- Certain Relevant Parties may also serve as employees or partner(s) /director(s) of the company within the group. In such situations, the employee or partner is considered to be in a "dual hat" situation, which may result in conflicts of interest due to duties to differing entities.
- The attorneys, accountants, and other professionals, who perform services for Abakkus may,

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

- At the level of Abakkus

There cannot be any assurance that an investment opportunity that comes to the attention of Abakkus will be referred or otherwise made available to the fund/scheme/approach/advise. Investment opportunities identified may be suitable for the fund/scheme/approach/Investment Advise and/or a Relevant Party. Abakkus will endeavour to resolve any such conflicts in a reasonable manner taking into account such factors as it may consider relevant including investment strategy and objectives, investment policy, sector focus, deal size, regulatory and tax considerations, etc. However, there can be no assurance that the fund/approach shall be allocated any particular investment opportunities that are identified.

- At the level of Abakkus Fund Sponsors LLP (“Sponsor”)

The Sponsor of the fund may act as sponsor of other funds and will be required to maintain a continuing interest with such funds. Accordingly, they may have conflicts of interests in allocating resources and time for such funds.

- At the level of the Investor

The investors, apart from investing in the AIF, PMS and/or RIA, may also invest in the companies where the fund/scheme/approach/advise has also invested or advised to invest at the differential terms than that of the fund/scheme/approach. Such investment of the investors may conflict with the investment of the fund/scheme/approach/advise.

- At the level of members of various governance bodies

The members of the Investment Committee or any other board or committee of Abakkus, in addition to their responsibilities for the fund/scheme/approach/advise, will have responsibilities for other funds, projects and clients. Accordingly, allocating management time and other resources among the fund/scheme/approach/advise and such other funds, projects and clients can be a challenge.

- At the level of the Sponsor and/or Investment Manager group entity, in relation to various schemes managed by the Sponsor and/or Investment Manager

The Investment Manager, Sponsor, and their affiliates, subject to Applicable Laws, may be involved in a variety of advisory, management and investment-related activities including management of other funds in future. The fund shall not have any rights in or to any cash receipts or profits of the Investment Manager, Sponsor, and any of their affiliates. The Investment Manager, Sponsor and any of their affiliate/group entities may, from time to time,

act as investment managers or advisers to other entities, companies, or funds other than the fund. It is therefore possible that the Investment Manager, Sponsor, and their affiliates may in the course of their business have potential conflicts of interest *inter-se* different activities.

- Investments in Investee Entities in which Relevant Parties have Interests

Abakkus while acting as the investment manager, portfolio manager or investment advisor of the AIF/PMS/RIA may from time-to-time effect transactions in securities issued by a investee entity that is otherwise a (i) client or (ii) investee company of any of the affiliate/associate/group companies of Abakkus or of the team of Abakkus. It may also effect transactions by the fund/approach in securities in which an affiliate/associate/group company may have a financial or other commercial interest at any time;

- Purchase from and sale of investments to Relevant Parties

Abakkus may purchase investments from or sell investments to Relevant Parties. In such cases, conflicts may arise in determining the price and terms of the sale or purchase as the case may be;

- Board of Fund Investment

As part of its investment methodology, Abakkus may require investee entities to grant to the fund/Abakkus a seat on the boards of directors of such investee entities. The seat will be filled by a nominee of Abakkus. As a consequence, such persons will have fiduciary and other duties to the investee entity, which may conflict with the interests of the fund/Abakkus;

- Conflict in case of warehousing

The Investment Manager/Sponsor and/or its associates/affiliates may make warehoused investments in Portfolio Entities. The transfer of such warehoused investments to the fund is expected to be at such price as the Investment Manager may decide in accordance with this Memorandum, which may not necessarily reflect an accurate intrinsic value of the warehoused investment.

- Conflict in case of co-investment

Co-Investment by the eligible investors alongside the fund is seen as a positive and motivating factor for such investors. However, conflicts of interest can occur if the eligible investor is permitted to invest on a deal-by-deal basis and/or on different terms to those offered to fund. Sometimes, providing a Co-Investment opportunity to the eligible investor might result in dilution of stake of the fund in the investee entity. The eligible investor may employ a person on the advisory board of such investee entity and may involve in decision making along with the Fund.

Conflict of interest would be inherent between the activities of the Portfolio Manager, investee entity/ies and the Relevant Parties. Abakkus 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 Investment Manager/Portfolio Manager/Adviser shall ensure fair treatment to all its clients in case of conflicts of interest. The protection of the investors' interests is Abakkus's foremost priority. The conflict-of-interest situation may adversely affect the interest of the investors and the investor may lose its capital contribution due to such conflict of interest. The investor acknowledges the existence of risk arising out of conflict of interest.

The Client shall not be under any obligation to avail the execution, or any other such services offered by Abakkus Smart or Abakkus Investment Advisors, the division of Abakkus or affiliate of Abakkus. All fees and charges, wherever applicable, for such services shall be paid directly to execution service providers and not through the Investment Advisor.

Client Level Segregation

In compliance with Regulation 22 of the SEBI (Investment Advisers) Regulations, 2013 Abakkus has maintained client level segregation at the group level.

Sr. No.	Financial Year	Client Level Segregation Certificate	Remarks, if any
1.	FY 2021-22	Obtained	None
2.	FY 2022-23	Obtained	None
3.	FY 2023-24	In process	None

Annual Audit

Sr. No.	Financial Year	Compliance Audit Status	Remarks, if any
1.	FY 2021-22	Conducted	None
2.	FY 2022-23	Conducted	None
3.	FY 2023-24	In process	None

Other Disclosures

This document is intended only for the personal use of the prospective investors/contributors (herein after referred as the Clients) to whom it is addressed or delivered and must not be reproduced or redistributed in any form to any other person without prior written consent of Abakkus. This document does not purport to be all-inclusive, nor does it contain all of the

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The Abakkus declares that the data and analysis provided shall be for informational purposes. The information contained in the analysis shall been obtained from various sources and reasonable care would be taken to ensure sources of data to be accurate and reliable. The Abakkus will not be responsible for any error or omission in the data or for any losses suffered on account of information contained in the analysis. While the Abakkus will take due care to ensure that all information provided is accurate however the Abakkus neither guarantees/warrants the sequence, accuracy, completeness, or timeliness of the report. Neither the Abakkus nor its affiliates or their partners, directors, employees, agents, or representatives, shall be responsible or liable in any manner, directly or indirectly, for views or opinions expressed in this analysis or the contents or any systemic errors or discrepancies or for any decisions or actions taken in reliance on the analysis. The Abakkus does not take any responsibility for any clerical, computational, systemic, or other errors in comparison analysis.

There can be no assurance that future results, performance or events will be consistent with the information provided in this document and the past performance, if any is not the guarantee of the future/assured performance. Any decision or action taken by the recipient of the document based on this information shall be solely and entirely at the risk of the recipient of the document. The distribution of this information in some jurisdictions may be restricted and/or prohibited by law, and persons into whose possession this information comes should inform themselves about such restriction and/or prohibition and observe any such restrictions and/or prohibition. Unauthorized disclosure, use, publication, dissemination or copying (either whole or partial) of this information, is prohibited. The Abakkus shall not treat recipient/user as a client by virtue of his receiving/using the contents of the document in full or part. Neither the Abakkus nor its affiliates, directors, partners, employees, agents, or representatives, shall be responsible or liable in any manner, directly or indirectly, for the contents or any errors or

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The Abakkus (including its affiliates) and any of its Partners, officers, employees, and other personnel will not accept any liability, loss, damage of any nature, including but not limited to direct, indirect, punitive, special, exemplary, consequential, as also any loss of profit in any way arising from the use of this document or any information in any manner whatsoever.

This document may include certain forward-looking words, statements and scenario which contain words or phrases such as "believe", "expect", "anticipate", "estimate", "intend", "plan", "objective", "goal", "project", "endeavor" and similar expressions or variations of such expressions that are forward-looking statements, words, and scenario. Actual results may differ materially from those suggested by the forward-looking statements due to risks, uncertainties, or assumptions. The Abakkus takes no responsibility of updating any data/information.

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Prospective investors/clients are advised to review this Document, the Private Placement Memorandum/Disclosure Document, the Contribution Agreement/Client Agreement, representations and presentation(s) and other related documents carefully and in its entirety and seek clarification wherever required from the SEBI Registered Intermediary/ Abakkus. Prospective investors should make an independent assessment, and consult their own counsel, business advisor and tax advisor as to legal, business and tax related matters concerning this document and the other related documents before becoming investing with /though the Abakkus /in the Fund.

The information contained in this document has been prepared for general guidance and does not constitute a professional advice/assurance and no person should act upon any information contained herein without obtaining specific professional advice/Assurance. Neither the Abakkus nor its Affiliates or advisors would be held responsible for any reliance placed on the content of this document or for any decision based on it. Each existing/prospective client, by accepting delivery of this document agrees to the foregoing. The Investment portfolio are subject to several risk factors including but not limited to political, legal, social, economic, and

overall market risks. The recipient alone shall be fully responsible/are liable for any decision taken on the basis of this document. The Abakkus, its partners, employees, PMS clients, AIF scheme(s), Advisory clients may have existing exposure to the stocks that form part of the PMS portfolio/Advisory portfolio/AIF scheme(s). Further, in view of the investment objective/strategy of the PMS /Advisory and AIF scheme(s) there may be situations where Abakkus may be selling a stock which is part of the PMS portfolio/Advisory portfolio/AIF scheme as the case may be.

The Abakkus (including its affiliates) may offer services in nature of advisory, consultancy, portfolio management, sponsorship of funds, investment management of funds which may conflict with each other.

The Abakkus operates from within India and is subject to Indian laws and any dispute shall be resolved in the courts of Mumbai, Maharashtra only.

All regulatory disclosures with respect to the LLP are available at <https://abakkusinvest.com/regulatory-disclosure/>

Complaint and Grievance Redressal

1. The Client shall first take up his/her/their grievance with the Investment Adviser by lodging a complaint directly with the Investment Adviser.
2. The Investment Adviser shall address such grievance promptly within a time period of 21 (twenty-one) calendar days from the date of receipt of the grievance.
3. If the grievance is not redressed satisfactorily, the Client may, in accordance with the SCORES guidelines, escalate the same through the SCORES Portal at <https://scores.sebi.gov.in> or to SEBI office. The SCORES registration number is IADA3186. The complaint shall be lodged on SCORES within one year from the date of cause of action, where –
 - a. The complainant has approached the Investment Adviser, for redressal of the complaint and the Investment Adviser has rejected the complaint or,
 - b. The complainant has not received any communication from Investment Adviser or,
 - c. The complainant is not satisfied with the reply received or the redressal action taken by the Investment Adviser.
4. If the Client is not satisfied with the extent of redressal of grievance by the Investment Adviser, there is a one-time option for 'review' of the extent of the redressal, which can be exercised within 15 (fifteen) days from the date of closure of the complaint on SCORES.
5. After exhausting these options for resolution of the grievance, if the Client is still not satisfied with the outcome, he/she/they can initiate dispute resolution through the ODR Portal at <https://smartodr.in/login>.

The client(s) can also directly initiate dispute resolution through the ODR Portal if the

grievance lodged with the Investment Adviser is not satisfactorily resolved at any stage of the subsequent escalations mentioned above.

6. Further, the dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration:
 - a. in terms of the paragraph 1 and 3 above;
 - b. not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law (including when moratorium under the Insolvency and Bankruptcy Code is in operation due to the insolvency process or if liquidation or winding up process has been commenced against the Market Participant).
7. Alternatively, the Client can directly initiate dispute resolution through the ODR Portal, if the grievance lodged with the Investment Adviser is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.
8. The Website of the IA has a link (<https://abakkusinvest.com/regulatory-disclosure/>) to access the SEBI Master Circular and the ODR Portal.

Complete name of Investment Adviser as registered with SEBI: Abakkus Asset Manager LLP

Type of Registration: Non-individual

Registration Number with validity: INA000015729 (valid until cancelled/surrendered)

BASL Membership ID: 1093

LLPIN: AAM-2364

Brand Name: Abakkus Smart

Complete address with telephone numbers: Abakkus Corporate Center, 6th Floor, Param House, Shanti Nagar, Near Grand Hyatt, Off Santacruz Chembur Link Road, Santacruz East, Mumbai – 400055
Phone no. +91 22 6884 6600

Contact Details of Principal Officer:

Mr. Biharilal Deora

Phone no. +91 22 6884 6600

Email - biharilal.deora@abakkusinvest.com

Contact Details of Compliance Officer/Grievance Officer:

Mr. Lijo Varghese

Phone no. +91 22 6884 6699

For Queries/Grievances - Email - complianceteam@abakkusinvest.com;
lijo.varghese@abakkusinvest.com

Investor Charter is available here: <https://abakkusinvest.com/regulatory-disclosure/>

Corresponding SEBI regional/local office address:

Market Intermediaries Regulation and Supervision Department (MIRSD)

Securities and Exchange Board of India,

SEBI Bhavan, Plot No. C4- A, 'G Block',

Bandra Kurla Complex, Bandra (East),

Mumbai - 400 051

Regional / Local office address can be found at

<https://www.sebi.gov.in/contact-us.html#contact-us-main>

Contact Us:

Website: www.abakkusinvest.com | Email: ria@abakkusinvest.com | Tel: 022-68846600