WEALTHBRIDGE CAPITAL ADVISORS PRIVATE LIMITED

DISCLOSURE DOCUMENT

PORTFOLIO MANAGEMENT SERVICES

16th September 2026

DISCLOSURE DOCUMENT OF

PORTFOLIO MANAGEMENT SERVICES

BEING OFFERED BY

WEALTHBRIDGE CAPITAL ADVISORS PRIVATE LIMITED

KEY INFORMATION AND DISCLOSURE DOCUMENT FOR PORTFOLIO MANAGEMENT SERVICES UNDERTAKEN BY WEALTHBRIDGE CAPITAL ADVISORS PRIVATE LIMITED (Registration No. INP000005240)

(i) The Disclosure Document has been filed with the Board (Securities and Exchange Board of India, SEBI) along with the certificate as per the requirement of Regulation 22 of SEBI (Portfolio Managers) Regulations 2020 and in accordance with the format prescribed under SEBI Circular No. SEBI/HO/IMD/IMD-RAC-3/P/CIR/2025/125 dated September 9, 2025.

(ii) The purpose of the Document is to provide essential information about the Portfolio Management Services (PMS) in a manner to assist and enable the investor in making informed decision for engaging a Portfolio Manager.

(iii) The Document contains necessary information about the Portfolio Manager required by an investor before investing.

(iv) Investors should carefully read the entire document before making a decision and should retain it for future reference.

(v) Investors may also like to seek further clarifications after the date of this document from the Portfolio Manager.

(vi) Latest Disclosure Document is available on the website of the Company.

(vii)

Name of the Principal Officer	:	Mrs. Avantika Bhargava
Address	:	202, Basera Green Meadows Apartments 90/91, A.P. Text Book Colony Karkhana, Secunderabad Hyderabad – 500 009
Phone No(s)	:	91 40 27812676
Email Address	:	avantika@wealthbridge.in
Website	:	www.wealthbridge.in

(viii) This Disclosure Document is dated 16th September 2026 and includes audited financial information for the year ended 31st March 2026.

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Part I – Static Section

1. Disclaimer

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

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

2. Definitions

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

1. "**Act**" means the Securities and Exchange Board of India Act, 1992.

2. "**Accreditation Agency**" means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by SEBI from time to time.

3. "**Accredited Investor**" means any person who is granted a certificate of accreditation by an accreditation agency who:

(i) in case of an individual, HUF, family trust or sole proprietorship has:

(a) annual income of at least two crore rupees; or
(b) net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees is in the form of financial assets; or
(c) annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crore fifty lakh rupees is in the form of financial assets.

(ii) in case of a body corporate, has net worth of at least fifty crore rupees;
(iii) in case of a trust other than family trust, has net worth of at least fifty crore rupees;
(iv) in case of a partnership firm set up under the Indian Partnership Act, 1932, each partner independently meets the eligibility criteria for accreditation:

Provided that the Central Government and the State Governments, developmental agencies set up under the aegis of the Central Government or the State Governments, funds set up by the Central Government or the State Governments, qualified institutional buyers as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category I foreign portfolio investors, sovereign wealth funds and multilateral agencies and any other entity as may be specified by the Board from time to time, shall deemed to be an accredited investor and may not be required to obtain a certificate of accreditation.

4. "**Advisory Services**" means advising on the portfolio approach, investment and divestment of individual Securities in the Client's Portfolio, entirely at the Client's risk, in terms of the Regulations and the Agreement.

5. "**Agreement**" or "**Portfolio Management Services Agreement**" or "**PMS Agreement**" means agreement executed between the Portfolio Manager and its Client for providing portfolio management services and shall include all schedules and annexures attached thereto and any amendments made to this agreement by the parties in writing, in terms of Regulation 22 and Schedule IV of the Regulations.

6. **"Applicable Law/s"** means any applicable statute, law, ordinance, regulation, rule, order, bye-law, administrative interpretation, writ, injunction, directive, judgment or decree or other instrument including the Regulations which has a force of law, as is in force from time to time.

7. "**Assets Under Management**" or "**AUM**" means aggregate net asset value of the Portfolio managed by the Portfolio Manager on behalf of the Clients.

8. "**Associate**" means (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager.

9. "**Benchmark**" means an index selected by the Portfolio Manager in accordance with the Regulations, in respect of each Investment Approach to enable the Clients to evaluate the relative performance of the Portfolio Manager.

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

11. "**Business Day**" means any day, which is not a Saturday, Sunday, or a day on which the banks or stock exchanges in India are authorized or required by Applicable Laws to remain closed or such other events as the Portfolio Manager may specify from time to time.

12. "**Client(s)**" / "**Investor(s)**" means any person who enters into an Agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.

13. "**Custodian(s)**" means an entity registered with the SEBI as a custodian under the Applicable Laws and appointed by the Portfolio Manager, from time to time, primarily for custody of Securities of the Client.

14. "**Depository**" means the depository as defined in the Depositories Act, 1996 (22 of 1996).

15. "**Depository Account**" means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.

16. "**Direct on-boarding**" means an option provided to clients to be on-boarded directly with the Portfolio Manager without intermediation of persons engaged in distribution services.

17. "**Disclosure Document**" **or** "**Document**" means the disclosure document for offering portfolio management services prepared in accordance with the Regulations.

18. "**Distributor**" means a person/entity who may refer a Client to avail services of Portfolio Manager in lieu of commission/charges (whether known as channel partners, agents, referral interfaces or by any other name).

19. "**Eligible Investors**" means a Person who: (i) complies with the Applicable Laws, and (ii) is willing to execute necessary documentation as stipulated by the Portfolio Manager.

20. "**Fair Market Value**" means the price that the Security would ordinarily fetch on sale in the open market on the particular date.

21. "**Foreign Portfolio Investors**" or "**FPI**" means a person registered with SEBI as a foreign portfolio investor under the Securities and Exchange Board of India (Foreign Portfolio Investors) Regulations, 2019 as amended from time to time.

22. "**Financial Year**" means the year starting from April 1 and ending on March 31 in the following year.

23. "**Funds"** or **"Capital Contribution**" means the monies managed by the Portfolio Manager on behalf of the Client pursuant to the Agreement and includes the monies mentioned in the account opening form, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to the Agreement, the proceeds of sale or other realization of the portfolio and interest, dividend or other monies arising from the assets, so long as the same is managed by the Portfolio Manager.

24. "**Group Company**" shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary

25. "**HUF**" means the Hindu Undivided Family as defined in Section 2(31) of the IT Act.

26. "**Investment Approach**" is a broad outlay of the type of Securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and Securities and includes any of the current Investment Approach or such Investment Approach that may be introduced at any time in future by the Portfolio Manager.

27. "**IT Act**" means the Income Tax Act, 1961, as amended and restated from time to time along with the rules prescribed thereunder.

28. "**Large Value Accredited Investor**" means an Accredited Investor who has entered into an Agreement with the Portfolio Manager for a minimum investment amount of ten crore rupees.

29. "**Non-resident Investors**" or "**NRI(s)**" shall mean non-resident Indian as defined in Section 2 (30) of the IT Act.

30. "**NAV**" shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.

31. "**NISM**" means the National Institute of Securities Markets, established by the Board.

32. "**Person**" includes an individual, a HUF, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.

33. "**Portfolio**" means the total holdings of all investments, Securities and Funds belonging to the Client.

34. **"Portfolio Manager" (PM)** means **WealthBridge Capital Advisors Private Limited,** a private limited company incorporated under the Companies Act 1956, registered with SEBI as a Portfolio Manager bearing registration number INP000005240 and having its registered office at 41, Gunrock Enclave (Second Floor), Phase-1, Secunderabad, Hyderabad-500009.

35. "**Principal Officer**" means an employee of the Portfolio Manager who has been designated as such by the Portfolio Manager and is responsible for:

    (i) the decisions made by the Portfolio Manager for the management or administration of Portfolio of Securities or the Funds of the Client, as the case may be; and
    (ii) all other operations of the Portfolio Manager

36. "**Regulations**" or "**SEBI Regulations**" means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended/modified and reinstated from time to time and including the circulars/notifications issued pursuant thereto.

37. "**Related Party**" means –

(i) a director, partner or his relative;
(ii) a key managerial personnel or his relative;
(iii) a firm, in which a director, partner, manager or his relative is a partner;
(iv) a private company in which a director, partner or manager or his relative is a member or director;
(v) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two per cent. of its paid-up share capital;
(vi) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
(vii) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:
Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;

(viii) any body corporate which is— (A) a holding, subsidiary or an associate company of the Portfolio Manager; or (B) a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary; (C) an investing company or the venturer of the Portfolio Manager— The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the Portfolio Manager would result in the Portfolio Manager becoming an associate of the body corporate;
(ix) a related party as defined under the applicable accounting standards;
(x) such other person as may be specified by the Board:

Provided that,

(a) any person or entity forming a part of the promoter or promoter group of the listed entity; or
(b) any person or any entity, holding equity shares:
(i) of twenty per cent or more; or
(ii) of ten per cent or more, with effect from April 1, 2023; in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediate preceding Financial Year; shall be deemed to be a related party;

38. "**Securities**" means security as defined in Section 2(h) of the Securities Contract (Regulation) Act, 1956, provided that securities shall not include any securities which the Portfolio Manager is prohibited from investing in or advising on under the Regulations or any other law for the time being in force.

3. Description of the Portfolio Manger

3.1 History, Present Business and Background of the Portfolio Manager

WealthBridge Capital Advisors Private Limited ("WealthBridge" or "Company") is a Private Limited Company incorporated under Companies Act, 1956 (as amended by Companies Act 2013) on June 30, 2005 having its Registered Office at 41, Gunrock Enclave (Second Floor), Phase-1, Secunderabad, Hyderabad-500009.

The Company had been in the business of financial services since 2005. The Company commenced the business of portfolio management services in October 2016 and also obtained a certificate of registration as a NBFC from the Reserve Bank of India in Dec 2016. Currently, these are the two major business activities of the Company.

The Company has been engaged in the business of investment/trading in securities since 2007 with a good track-record of performance.

WealthBridge is now offering Portfolio Management Services after registering with SEBI under the SEBI (Portfolio Manager) Regulations, 1993/2020 vide Registration Number INP000005240 from 25th September 2016.

Under the Portfolio Management Services offered by WealthBridge, the funds of investors have been managed by Mr. Vivek Bhargava assisted by a team of professionals having good experience in various facets of equity markets such as Research, Fund Management and Consultancy.

With effect from 18th September 2023, the Principal Officer of the Portfolio Manager has been changed to Mrs. Avantika Bhargava and Mr. Vivek Bhargava will be the Chief Investment Strategist. The funds of investors shall be managed by Mr. Karn Bhargava, CFA, with effect from 18th September 2023. He has been the Assistant Fund Manager since May 2020.

3.2 Promoters, Share Holders, Directors and their background:

Share Holding Pattern

S. No.	Name	Category	No. of shares held	Face value (Rs.)	Amount paid-up (Rs.)	(%) of total
1.	Vivek Bhargava &Anshu Bhargava (Executive Director)	Promoter-Director	2,304,600	10	23,046,000	47.109%
2.	Anshu Bhargava (Executive Director)	Promoter-Director	2,298,500	10	22,985,000	46.984%
4.	Karn Bhargava (Whole Time Director)	Promoter Group	75,000	10	750,000	1.533%
5.	Avantika Bhargava (Whole Time Director)	Promoter Group	75,000	10	750,000	1.533%
6.	Rajan Bhargava	Promoter Group	70,000	10	700,000	1.431%
7.	Ramanuj Das Lahoti (Director)	Others	69,000	10	690,000	1.410%
	TOTAL		4,892,100		48,921,000	100.00%

Director's Background

S. No.	Name of Director	Background
1.	Vivek Bhargava – Executive Director	Vivek Bhargava, a PGDM from IIM Calcutta with over thirty-five years of successful track-record in the field of investing, corporate finance and capital markets. He has been the Executive Chairman of WealthBridge for over fifteen years. He supports the proprietary investment and trading activities of the Company.
2.	Anshu Bhargava – Executive Director	Anshu Bhargava, a Chartered Accountant, has a very impressive track-record of investing in the stock markets over the last thirty years. With a strong focus on fundamental analysis, she focuses on long term investment opportunities. She is currently the Executive Director of the Company. She handles the investment activities of the Company.
3.	Ramanuj Lahoti - Director	Ramanuj Lahoti, a member and former Director of the Hyderabad Stock Exchange, has been in stock broking for over 30 years and has a very successful track-record as an investor and trader in the stock markets. He is currently on the Board of HSB Securities & Equities Limited.
4.	Karn Bhargava – Whole Time Director	Karn Bhargava is a Chartered Financial Analyst and postgraduate in Securities Markets from the National Institute of Securities Markets and has over 10 years of experience in analyzing companies in the listed space as well as start-ups. He has been actively involved in the field of research and fund management in WealthBridge after having worked in research at PCS Securities Limited. He also supports the proprietary investment and trading activities of the Company.
5.	Avantika Bhargava – Whole Time Director	Avantika Bhargava, a Chartered Accountant by profession, joined WealthBridge Capital Advisors Private Limited in 2017. At WealthBridge, she has worn several hats and is currently handling research and investment in the debt and equity markets. Her current role as a Research Analyst is to identify suitable opportunities in the debt and equity markets. She is also the Principal Officer of the Portfolio Management Services business of the Company.

Particulars of key personnel in WealthBridge Capital Advisors Private Limited (Portfolio Manager)

- **Mrs. Avantika Bhargava, Principal Officer**

Avantika Bhargava has been into wealth and asset management business and is based in Hyderabad. She is a Chartered Accountant by profession and has obtained certification from the National Institute of Securities Markets by passing the NISM-Series-XXI-B: Portfolio Managers Certification Examination as mentioned in the communiqué No. NISM/ Certification/Series-XXI-B: Portfolio Managers (PM) Certification/2021/01 dated June 15, 2021, issued by the National Institute of Securities Markets.

Mrs. Avantika Bhargava joined WealthBridge Capital Advisors Private Limited in March 2017 and is currently handling research into debt and equity opportunities apart from evaluating other asset classes for investments. She is one of the key management personnel in running the Portfolio Management business of the entity. She also supports the investment activities of the proprietary investments of WealthBridge.

- **Mr. Vivek Bhargava, Executive Chairman, Chief Investment Strategist**

Vivek Bhargava has over 35 years of successful track-record in the field of investment, corporate finance and capital markets. He has done PGDM from IIM Calcutta. He has been the Executive Chairman of WealthBridge for over fifteen years. He supports the proprietary investment and trading activities of the Company.

Mr. Vivek Bhargava started WealthBridge Capital Advisors Private Limited in June 2005 and heads the Research and Investment desk. His primary responsibility included evaluation of investment ideas, decide on whether to invest or not; and the exposure levels to individual levels/sectors. He also decided on exit from investments based on periodical/even-based reviews. He is one of the key management personnel in running the Portfolio Management business of the entity.

He will be the Chief Investment Strategist focusing mostly on the macro themes and trends and share his views to the Investment Team of WealthBridge. He will continue to provide overall guidance without being involved in the individual investment decisions for the PMS business of the Company.

He also supports the investment activities of the proprietary investments of WealthBridge.

- **Mr. Karn Bhargava, Fund Manager**

Karn Bhargava has over 10 years of experience into wealth and asset management business and is based in Hyderabad. He is a Chartered Financial Analyst by profession and has obtained certification from the National Institute of Securities Markets by passing the NISM-Series-XXI-B: Portfolio Managers Certification Examination as mentioned in the communiqué No. NISM/ Certification/Series-XXI-B: Portfolio Managers (PM) Certification/2021/01 dated June 15, 2021 issued by the National Institute of Securities Markets.

Mr. Karn Bhargava started his career with PCS Securities Limited in October 2015 as a Research Assistant. He joined WealthBridge Capital Advisors Private Limited in June 2017 as Research Analyst and became Assistant Fund Manager from May 2020 onwards. He has taken over as the Fund manager for the PMS business with effect from 18th September 2023. He is one of the key management personnel in running the Portfolio Management business of the entity.

He also supports the investment activities of the proprietary investments of WealthBridge.

3.3 <u>Top 10 Group Companies/Firms of the Portfolio Manager on turnover basis</u>

WealthBridge Capital Advisors Private Limited does not have any group companies under the same management.

3.4 The Portfolio Manager offers Portfolio Management services under Discretionary category to its prospective clients.

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

Sl. No.	Particulars	Remarks
1	All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made there under:	None
2	The nature of the penalty / direction:	None
3	Any pending material litigation / legal proceedings against the Portfolio Manager / key personnel with separate disclosure regarding pending criminal cases, if any:	None
4	Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory agency:	None
5	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
6	Penalties imposed for any economic offence and / or violation of any securities laws:	None

5. Details of Services Offered

5.1 Services Offered

Discretionary Portfolio Management Services

Under these services, the choice as well as the timing of the investment decisions rest solely with the Portfolio Manager. The Portfolio Manager shall have sole and absolute discretion to invest in respect of the Clients account as per the Agreement and make such changes in the investments and invest some or all of the Clients funds in such manner and in such markets as it deems fit. The Portfolio Manager's decision in investment of the Clients account will be absolute and final.

Investments will be made in listed equity shares, initial public offerings / offers for sale of equity shares that are proposed to be listed, Exchange Traded Funds (ETFs), liquid funds/savings funds/short-duration debt funds of mutual funds and bank balances.

A part of the portfolio will be invested in liquid/savings/short-duration funds of mutual funds or similar securities with the objective of maintaining liquidity and capital safety. The Portfolio Manager may invest in units of Mutual Funds only through direct plan.

Investment Objective

The objective is to formulate and device the investment philosophy to achieve long-term growth of capital by investing in suitable investments, which generate good returns and ensure liquidity.

5.2 Investment Approach of the Portfolio Manager

Strategy: Equity

Investment Approach: Equity Focused Discretionary PMS

IA Code	EFD1
Investment Objective	Investment objective is to achieve long term capital appreciation by investing in suitable investments, which generate good returns and ensure liquidity. However, the Client agrees and acknowledges that while the aforesaid is the objective, there is no guarantee that the objectives will be achieved nor there is any guarantee of any returns or of there being no capital loss.
Description of Type of Security	• Equity & Equity Related Securities (Including ETFs, REITs, InvITs etc.) • Fixed Income Securities (Including listed bonds & debentures, ETFs), units of fixed income mutual funds, cash/ fixed deposits etc. (used for temporary deployment of cash)
Basis of selection of such types of securities as part of the investment approach	The portfolio manager seeks to generate returns for the client through price appreciation of the stocks held over a period of time. Holdings and the sectors will be tracked on a constant basis and rebalancing wherever necessary based on revised prospects and valuations will be undertaken
Allocation of portfolio across types of securities	Equity & Equity Related Securities: 0 - 100% Fixed Income Securities: 0 - 100%

Appropriate benchmark to compare performance	S&P BSE 500 Total Return Index
Basis of selecting the benchmark	The portfolio will consist of a variation / combination of mid cap & small cap companies. Association of Portfolio Managers in India (APMI) has prescribed the Portfolio Managers to choose benchmarks from Nifty 50 TRI, S&P BSE 500 TRI and MSEI SX 40 TRI. Out of the options available under regulations, S&P BSE 500 TRI was considered to be most appropriate. As portfolio may be diversified across market caps, a diversified benchmark is chosen
Indicative tenure or investment horizon for each investment allocation	1-5 Years
Risk associated with Investment Approach	Risk of underperformance vs benchmark, loss of capital, liquidity & credit risk

Investments in PMS client accounts will be made with the primary objective of generating returns in the region of 20-26% per annum.

Investment in equity shares and ETFs is historically the proven way of generating superior long term returns for investors, and hence is the primary reason for selection as part of our investment objective. However, the percentage allocation to equity shares and ETFs will depend on market valuations and opportunities available at reasonable risk. Within the equity shares, focus will be more on mid and small cap stocks, though there is no restriction across market capitalization.

The allocation between equity shares, ETFs and liquid/savings/short-duration funds of mutual funds will vary depending on the assessment of risk, returns already generated and the potential for growth of the portfolio over the balance term of the PMS contract.

The target returns of 20-26% will require us to take aggressive bets on chosen stocks / sectors, and we plan to take large bets on individual companies / sectors than we have taken in the past. We could invest up to 25% of the funds into a single stock at the time of investment; and we might even invest up to 70% of the funds into a single sector depending on our confidence. This strategy could backfire and cause substantial losses if our judgement is wrong about our chosen investment ideas.

Our strategy of focusing in small and mid-cap stocks could cause us losses as such companies are more prone to disruptions in their business as has been the case in the last few years.

The Portfolio Manager will manage the Portfolio as per the investment objectives and restrictions, if any, stated in this Agreement as well as in accordance with the SEBI regulations, as amended from time to time and in accordance with Applicable Laws. Subject to such objectives and restrictions, the Portfolio Manager shall have complete discretion (including without prior reference, intimation or discussion with the Client) to buy, sell, retain, exchange or otherwise deal in any Securities and investments, place deposits, subscribe to issues and offer for sale and accept placing of any investments, effect transaction in any markets, take day to day decisions in respect of the funds of Client and otherwise act as the Portfolio Manager judges appropriate in relation to the management of the portfolio.

It is hereby clarified that while providing such services, the Portfolio Manager is not guaranteeing or assuring any return on or protection of the Capital Contribution, either directly or indirectly.

Minimum Investment Amount

The Client shall deposit with the Portfolio Manager, an initial corpus consisting of Securities and /or funds of an amount prescribed by Portfolio Manager for a Portfolio, subject to minimum amount as specified under SEBI Regulations, as amended from time to time. Currently the minimum investment amount is Rs. 50 Lakhs. The Client may on one or more occasion(s) or on a continual basis, make further placement of Securities and / or funds under the service.

Current Products

Equity Focused Discretionary PMS

Product Specific Details

Equity Focused Discretionary PMS

Minimum investment corpus: Rs. 50 lakhs

Investment objectives: Listed equity shares of Companies, debt and equity schemes of Mutual Funds, bonds, debentures and other investment products, whether listed or not. A part of the fund will be held as bank balance.

Duration of initial agreement: Maximum of five years (may vary from Client to Client).

DIRECT ON-BOARDING OF CLIENTS: WealthBridge Capital Advisors Private Limited provides the facility for direct on-boarding of clients i.e. on-boarding of clients without intermediation of distributors. At the time of on boarding of clients directly, no charges except statutory charges shall be levied.

5.3 Details of investments in the securities of related parties of the Portfolio Manager

The Portfolio Manager does not propose to make investment of PMS funds in associates/group companies/related parties nor will it make in the future.

Sr. No.	Investment Approach, if any	Name of the associate/related party	Investment amount (cost of investment) as on last day of the previous calendar quarter (INR in crores)	Value of investment as on last day of the previous calendar quarter (INR in crores)	percentage of total AUM as on last day of the previous calendar quarter
Not applicable / Nil					

6 Risk Factors

The Portfolio Manager is not responsible for the loss if any, incurred or suffered by the Client. The following are the inherent risks associated in the management of the Portfolio

A General Risks Factors

1. Investments in Securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc.
2. The Portfolio Manager does not assure that the objectives of any of the Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
3. Past performance of the Portfolio Manager does not indicate the future performance of the same or any other Investment Approach in future or any other future Investment Approach of the Portfolio Manager.
4. The names of the Investment Approach do not in any manner indicate their prospects or returns.
5. Appreciation in any of the Investment Approach can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any Investment Approach may also be affected due to any other asset allocation factors.
6. When investments are restricted to a particular or few sector(s) under any Investment Approach; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the Portfolio value will be adversely affected.
7. Each Portfolio will be exposed to various risks depending on the investment objective, Investment Approach and the asset allocation. The investment objective, Investment Approach and the asset allocation may differ from Client to Client. However, generally, highly concentrated Portfolios with lesser number of stocks will be more volatile than a Portfolio with a larger number of stocks.
8. The values of the Portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.
9. The Portfolio Manager shall act in fiduciary capacity in relation to the Client's Funds and shall endeavour to mitigate any potential conflict of interest that could arise while dealing in a manner which is not detrimental to the Client.

B Risks associated with equity and equity related instruments

10. Equity and equity related instruments by nature are volatile and prone to price fluctuations on a daily basis due to macro and micro economic factors. The value of equity and equity related instruments may fluctuate due to factors affecting the securities markets such as volume and volatility in the capital markets, interest rates, currency exchange rates, changes in law/policies of the government, taxation laws, political, economic or other developments, which may have an adverse impact on individual Securities, a specific sector or all sectors. Consequently, the value of the Client's Portfolio may be adversely affected.
11. Equity and equity related instruments listed on the stock exchange carry lower liquidity risk, however the Portfolio Manager's ability to sell these investments is limited by the overall trading volume on the stock exchanges. In certain cases, settlement periods may be extended significantly by unforeseen circumstances. The inability of the Portfolio Manager to make intended Securities purchases due to settlement problems could cause the Client to miss certain investment opportunities. Similarly, the inability to sell Securities held in the Portfolio may result, at times, in potential losses to the Portfolio, should there be a subsequent decline in the value of Securities held in the Client's Portfolio.

12. Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small number of scrip's accounting for a large proportion of trading volume among others.

C Risks associated with debt and money market instruments

13. Interest Rate Risk

Fixed income and money market Securities run interest-rate risk. Generally, when interest rates rise, prices of existing fixed income Securities fall and when interest rate falls, the prices increase. In case of floating rate Securities, an additional risk could arise because of the changes in the spreads of floating rate Securities. With the increase in the spread of floating rate Securities, the price can fall and with decrease in spread of floating rate Securities, the prices can rise.

14. Liquidity or Marketability Risk

The ability of the Portfolio Manager to execute sale/purchase order is dependent on the liquidity or marketability. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. The Securities that are listed on the stock exchange carry lower liquidity risk, but the ability to sell these Securities is limited by the overall trading volumes. Further, different segments of Indian financial markets have different settlement cycles and may be extended significantly by unforeseen circumstances.

15. Credit Risk

Credit risk or default risk refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). Because of this risk corporate debentures are sold at a higher yield above those offered on government Securities which are sovereign obligations and free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the changes in the perceived level of credit risk as well as any actual event of default. The greater the credit risk, the greater the yield required for someone to be compensated for the increased risk.

16. Reinvestment Risk

This refers to the interest rate risk at which the intermediate cash flows received from the Securities in the Portfolio including maturity proceeds are reinvested. Investments in fixed income Securities may carry re-investment risk as interest rates prevailing on the interest or maturity due dates may differ from the original coupon of the debt security. Consequently, the proceeds may get invested at a lower rate.

D Risks with derivative instruments

17. The use of derivative requires an understanding not only of the underlying instrument but of the derivative itself. Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such strategies depends upon the ability of the Portfolio Manager to identify such opportunities. Identification and execution of the strategies to be pursued by the Portfolio Manager involve uncertainty and decision of Portfolio Manager may not always be profitable. No assurance can be given that the Portfolio Manager will be able to identify or execute such strategies.
18. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price of interest rate movements correctly. The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments. Other risks include settlement risk, risk of mispricing or improper valuation and the inability of the derivative to correlate perfectly with underlying assets, rates and

indices, illiquidity risk whereby the Portfolio Manager may not be able to sell or purchase derivative quickly enough at a fair price.

E Risks associated with investments in mutual fund schemes

19. Mutual funds and securities investments are subject to market risks and there is no assurance or guarantee that the objectives of the schemes will be achieved. The various factors which impact the value of the scheme's investments include, but are not limited to, fluctuations in markets, interest rates, prevailing political and economic environment, changes in government policy, tax laws in various countries, liquidity of the underlying instruments, settlement periods, trading volumes, etc.
20. As with any securities investment, the NAV of the units issued under the schemes can go up or down, depending on the factors and forces affecting the capital markets.
21. Past performance of the sponsors, asset management company (AMC)/fund does not indicate the future performance of the schemes of the fund.
22. The Portfolio Manager shall not be responsible for liquidity of the scheme's investments which at times, be restricted by trading volumes and settlement periods. The time taken by the scheme for redemption of units may be significant in the event of an inordinately large number of redemption requests or of a restructuring of the schemes.
23. The Portfolio Manager shall not responsible, if the AMC/ fund does not comply with the provisions of SEBI (Mutual Funds) Regulations, 1996 or any other circular or acts as amended from time to time. The Portfolio Manager shall also not be liable for any changes in the offer document(s)/scheme information document(s) of the scheme(s), which may vary substantially depending on the market risks, general economic and political conditions in India and other countries globally, the monitory and interest policies, inflation, deflation, unanticipated turbulence in interest rates, foreign exchange rates, equity prices or other rates or prices, the performance of the financial markets in India and globally.
24. The Portfolio Manager shall not be liable for any default, negligence, lapse error or fraud on the part of the AMC/the fund.
25. While it would be the endeavor of the Portfolio Manager to invest in the schemes in a manner, which will seek to maximize returns, the performance of the underlying schemes may vary which may lead to the returns of this portfolio being adversely impacted.
26. The scheme specific risk factors of each of the underlying schemes become applicable where the Portfolio Manager invests in any underlying scheme. Investors who intend to invest in this portfolio are required to and are deemed to have read and understood the risk factors of the underlying schemes.

F Risks arising out of Non-diversification

27. The investment according to investment objective of a Portfolio may result in concentration of investments in a specific security / sector/ issuer, which may expose the Portfolio to risk arising out of non-diversification. Further, the portfolio with investment objective to invest in a specific sector / industry would be exposed to risk associated with such sector / industry and its performance will be dependent on performance of such sector / industry. Similarly, the portfolios with investment objective to have larger exposure to certain market capitalization buckets, would be exposed to risk associated with underperformance of those relevant market capitalization buckets. Moreover, from the style orientation perspective, concentrated exposure to value or growth stocks based on the requirement of the mandate/strategy may also result in risk associated with this factor.

G Risks arising out of investment in Associate and Related Party transactions

28. 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.
29. The Portfolio Manager may utilize the services of its group companies or associates for managing the portfolios of the client. In such scenarios, the Portfolio Manager shall endeavor to mitigate any potential conflict of interest that could arise while dealing with such group companies/associates by ensuring that such dealings are at arm's length basis.
30. The Portfolios may invest in its Associates/ Related Parties relating to portfolio management services and thus conflict of interest may arise while investing in securities of the Associates/Related Parties of the Portfolio Manager. Portfolio Manager shall ensure that such transactions shall be purely on arms' length basis and to the extent and limits permitted under the Regulations. Accordingly, all market risk and investment risk as applicable to securities may also be applicable while investing in securities of the Associates/Related Parties of the Portfolio Manager.

Proprietary Trades

The Portfolio Manager may carry out proprietary trading activities with the strategy which may be similar or at times different from that of the investor. The Portfolio Manager will avoid contra trades (opposite trades) at the same time by the Portfolio Manager on behalf of the Portfolio vis-à-vis it's own proprietary money.

The Portfolio Manager permits its employees to invest in the PMS strategies offered by it, as clients, on the same terms and conditions as any other client. Such investments are governed by the standard Portfolio Management Agreement and are subject to the same fee structure, investment approach, and regulatory framework applicable to all clients. No preferential treatment is accorded to employee accounts with respect to trade allocation, pricing, or portfolio construction.

The Portfolio Manager acknowledges that SEBI has not issued specific guidance on employee participation as clients in PMS strategies as of the date of this Document. Should SEBI issue specific guidance on this matter, the Portfolio Manager shall revise its policy accordingly and update this Disclosure Document.

7. Nature of Fees and Service Charges

The following are indicative types of charges incurred by the Portfolio Manager for and on behalf of clients availing Portfolio Management Services. The exact basis of charge relating to each of the following services shall be annexed to the PMS Agreement and the agreements in respect of each of the services availed at the time of execution of such agreements.

1. Fixed Management Fees:

The Client shall pay to the Portfolio Manager, a quarterly fee as agreed with the Client vide terms and conditions mentioned in the Agreement. Upon the termination of the Agreement by the Client, the Client shall be liable to pay the Fixed Management Fee mentioned above on proportionate basis for the quarter in which the Agreement is terminated. The fees would typically be in the range of 0.5% p.a. to 0.9% p.a, depending on the investment corpus.

The fixed management fee would be as per the following slabs:

Portfolio value	**Fixed Management Fee (% per annum)**
NAV less than Rs. 5 Crore	**0.9%**
NAV greater than/equal to Rs. 5 Crore, but less than Rs. 10 Crore	**0.7%**
NAV greater than/equal to Rs. 10 Crore	**0.5%**

2. Fees charged by other agencies involved:

These are on actual basis as negotiated by the portfolio manager with the custodian :

Head	**ORBIS Financial Corporation Limited**
Fund Accounting Service	Included in custody fee
Custody Service	0.08% p.a. on average monthly AUC
Depository Charges	INR 6 per debit

3. Brokerage and transaction cost :

Head			
	HSB Securities & Equities Limited	**Nuvama Wealth and Investment Limited**	**Phillip Capital**
Brokerage	0.10 paisa per Rs. 100	0.14 paisa per Rs. 100	0.08 paisa per Rs. 100
GST	As applicable	As applicable	As applicable
Bank charges	As may be applicable at actuals	As may be applicable at actuals	As may be applicable at actuals
Stamp duty	As may be applicable at actuals	As may be applicable at actuals	As may be applicable at actuals

- Some charges are there which are charged by regulator/ exchange through broker like SEBI regulatory charges etc. These will be charged on actual basis.

- Certain charges are extra in case of NRI and FPI clients. However, these are on actual basis, as charged by services provider.
- Charges of MF AMC in case of investment in ETFs/ MF/ Debt funds etc. are on actual basis adjusted from respective NAV by AMC.

Any changes to these charges will be included in the fees schedule to be signed by the client at the time of onboarding.

4. Registration and transfer agents' fees:

Fees payable for the Registrars and Transfer agents in connection with effecting transfer of any or all of the securities and bonds including stamp duty, cost of affidavits, notary charges, postage stamps and courier charges.

5. Other Charges:

No upfront fees shall be charged by the Portfolio Managers, either directly or indirectly, to the clients at the time of onboarding of the Client.

Over and above the Portfolio Management fees and the transaction cost as mentioned above, the Portfolio Manager would recover audit fees for auditing and reporting of individual Client's accounts; and other charges that the Portfolio Manager may have to incur while running Portfolio Management Services.

Charges pertaining to partial withdrawal/closure would be levied as per the terms provided in Agreement entered into between Portfolio Manager and Client.

The Portfolio Manager shall deduct/withdraw directly from the cash account of the Client all the fees/costs specified above. Other expenses, which could be attributable to the Portfolio Management, would also be directly deducted and the Client would be sent a Statement about the same.

Note:
Operating expenses excluding brokerage, over and above the fees charged for Portfolio Management Service, shall not exceed 0.50% per annum of the client's average daily Assets under Management and no upfront fee will be charged.

The detailed description of the fees, expenses and compliance with SEBI Circular IMD/DF/13/2010 dated October 5, 2010 and SEBI Circular SEBI/HO/IMD/DF1/CIR/P/2020/26 dated February 13, 2020 relating to Performance fees including high water mark principle is given in Annexure A: Fees and Charges of the Agreement signed with the Portfolio Manager.

8 Taxation

A. General

The following information is based on the tax laws in force in India as of the date of this Disclosure Document and reflects the Portfolio Manager's understanding of applicable provisions. The tax implications for each Client may vary significantly based on residential status and individual circumstances. As the information provided is generic in nature, Clients are advised to seek guidance from their own tax advisors or consultants regarding the tax treatment of their income, losses, and expenses related to investments in the portfolio management services. The Client is responsible for meeting advance tax obligations as per applicable laws.

B. Tax deducted at source

In the case of resident clients, the income arising by way of dividend, interest on securities, income from units of mutual fund, etc. from investments made in India are subject to the provisions of tax deduction at source (TDS). Residents without Permanent Account Number (PAN) are subjected to a higher rate of TDS.

In the case of non-residents, any income received or accrues or arises; or deemed to be received or accrue or arise to him in India is subject to the provisions of tax deduction at source under the IT Act. The authorized dealer is obliged and responsible to make sure that all such relevant compliances are made while making any payment or remittances from India to such non-residents. Also, if any tax is required to be withheld on account of any future legislation, the Portfolio Manager shall be obliged to act in accordance with the regulatory requirements in this regard. Non-residents without PAN or tax residency certificate (TRC) of the country of his residence are currently subjected to a higher rate of TDS.

The Finance Act, 2021 introduced a special provision to levy higher rate for TDS for the residents who are not filing income-tax return in time for previous two years and aggregate of TDS is INR 50,000 or more in each of these two previous years. This provision of higher TDS is not applicable to a non-resident who does not have a permanent establishment in India and to a resident who is not required to furnish the return of income.

C. Long Term Capital Gains

Where investment under portfolio management services is treated as investment, the gain or loss from transfer of Securities shall be taxed as capital gains under section 45 of the IT Act.

Period of holding

Securities	**Position upto 22 July 2024 Period of Holding**	**Position on or after 23 July 2024 Period of Holding**	**Characterization**
Listed Securities (other than unit) and unit of equity oriented mutual funds, unit of UTI, zero coupon bonds	More than twelve (12) months	More than twelve (12) months	Long-term capital asset
	Twelve (12) months or less	Twelve (12) months or less	Short-term capital asset
Unlisted shares of a company	More than twenty-four (24) months	More than twenty-four (24) months	Long-term capital asset
	Twenty-four (24) or less	Twenty-four (24) or less	Short-term capital asset

Other Securities (other than Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023; or unlisted bond or unlisted debenture)	More than Thirty-six (36) months	More than Thirty-six (36) months	Long-term capital asset
	Thirty-six (36) months or less	Thirty-six (36) months or less	Short-term capital asset
Specified Mutual Fund or Market Linked Debenture acquired on or after 1 April 2023	Any period	Any period	Short-term capital asset
Unlisted bond or unlisted debenture	More than 36 months		Long-term capital asset
	36 months or less	Any period	Short-term capital asset

- **Definition of Specified Mutual Fund:**

Before 1st April 2025:
*"**Specified Mutual Fund**" means a Mutual Fund by whatever name called, where not more than thirty-five per cent of its total proceeds is invested in the equity shares of domestic companies.*

On and after 1st April 2025:
*"**Specified Mutual Fund**" means, —*
(a) a Mutual Fund by whatever name called, which invests more than sixty-five per cent. of its total proceeds in debt and money market instruments; or
(b) a fund which invests sixty-five per cent. or more of its total proceeds in units of a fund referred to in sub-clause (a).

- **Definition of debt and money market instruments:**

*"**debt and money market instruments**" shall include any securities, by whatever name called, classified or regulated as debt and money market instruments by the Securities and Exchange Board of India.*

- **Definition of Market Linked Debenture:**

*"**Market Linked Debenture**" means a security by whatever name called, which has an underlying principal component in the form of a debt security and where the returns are linked to the market returns on other underlying securities or indices, and includes any security classified or regulated as a market linked debenture by SEBI.*

- **For listed equity shares in a domestic company or units of equity oriented fund or business trust**

The Finance Act 2018 changed the method of taxation of long-term capital gains from transfer of listed equity shares and units of equity oriented fund or business trust.

As per section 112A of the IT Act, long term capital gains exceeding INR 1 lakh arising on transfer of listed equity shares in a company or units of equity oriented fund or units of a business trust is taxable at 10% , provided such transfer is chargeable to STT. This exemption limit has been increased from INR 1 lakh to INR 1.25 lakh and tax rate has been increased from 10% to 12.5% with effect from 23 July 2024. Further, to avail such concessional rate of tax, STT should also have been paid on acquisition of listed equity shares, unless the listed equity shares have been acquired through any of the notified modes not requiring to fulfil the pre-condition of chargeability to STT.

Long term capital gains arising on transaction undertaken on a recognized stock exchange located in any International Financial Services Centre and consideration is paid or payable in foreign currency, where STT is not

chargeable, is also taxed at a rate of 10%. This benefit is available to all assessees. This tax rate is increased from 10% to 12.5%.

The long term capital gains arising from the transfer of such Securities shall be calculated without indexation. In computing long term capital gains, the cost of acquisition (COA) is an item of deduction from the sale consideration of the shares. To provide relief on gains already accrued upto 31 January 2018, a mechanism has been provided to "step up" the COA of Securities. Under this mechanism, COA is substituted with FMV, where sale consideration is higher than the FMV. Where sale value is higher than the COA but not higher than the FMV, the sale value is deemed as the COA.

Specifically in case of long term capital gains arising on sale of shares or units acquired originally as unlisted shares/units upto 31 January 2018, COA is substituted with the "indexed COA" (instead of FMV) where sale consideration is higher than the indexed COA. Where sale value is higher than the COA but not higher than the indexed COA, the sale value is deemed as the COA. This benefit is available only in the case where the shares or units, not listed on a recognised stock exchange as on the 31 January 2018, or which became the property of the assessee in consideration of share which is not listed on such exchange as on the 31 January 2018 by way of transaction not regarded as transfer under section 47 (e.g. amalgamation, demerger), but listed on such exchange subsequent to the date of transfer, where such transfer is in respect of sale of unlisted equity shares under an offer for sale to the public included in an initial public offer.

The CBDT has clarified that 10% withholding tax will be applicable only on dividend income distributed by mutual funds and not on gain arising out of redemption of units.

No deduction under Chapter VI-A or rebated under Section 87A will be allowed from the above long term capital gains.

- **For other capital assets (securities and units) in the hands of resident of India**

Long-term capital gains in respect of capital asset (all securities and units other than listed shares and units of equity oriented mutual funds and business trust) is chargeable to tax at the rate of 20% plus applicable surcharge and education cess, as applicable. The capital gains are computed after taking into account cost of acquisition as adjusted by cost inflation index notified by the Central Government and expenditure incurred wholly and exclusively in connection with such transfer. This tax rate is reduced from 20% to 12.5%; but no indexation benefit will be available with effect from 23 July 2024.

As per Finance Act, 2017, the base year for indexation purpose has been shifted from 1981 to 2001 to calculate the cost of acquisition or to take Fair Market Value of the asset as on that date. Further, it provides that cost of acquisition of an asset acquired before 1 April 2001 shall be allowed to be taken as Fair Market Value as on 1 April 2001.

- **For capital assets in the hands of Foreign Portfolio Investors (FPIs)**

Long term capital gains, arising on sale of debt Securities, debt oriented units (other than units purchased in foreign currency and capital gains arising from transfer of such units by offshore funds referred to in section 115AB) are taxable at the rate of 10% under Section 115AD of the IT Act. This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.Such gains would be calculated without considering benefit of (i) indexation for the COA and (ii) determination for capital gain/loss in foreign currency and reconversion of such gain/loss into the Indian currency.

Long term capital gains, arising on sale of listed shares in the company or units of equity oriented funds or units of business trust and subject to conditions relating to payment of STT, are taxable at 10% as mentioned in para 12.10.2 above. This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

- **For other capital asset in the hands of non-resident Indians**

Under section 115E of the IT Act, any income from investment or income from long-term capital gains of an asset other than specified asset as defined in Section 115C (specified assets include shares of Indian company, debentures and deposits in an Indian company which is not a private company and Securities issued by Central Government or such other Securities as notified by Central Government) is chargeable at the rate of 20%. Income by way long-term capital gains of the specified asset is, however, chargeable at the rate of 10% plus applicable surcharge and cess (without benefit of indexation and foreign currency fluctuation). This tax rate has been increased from 10% to 12.5% with effect from 23 July 2024.

D. Short term capital gains

Section 111A of the IT Act provides that short-term capital gains arising on sale of listed equity shares of a company or units of equity oriented fund or units of a business trust are chargeable to income tax at a concessional rate of 15% plus applicable surcharge and cess, provided such transactions are entered on a recognized stock exchange and are chargeable to Securities Transaction Tax (STT). This tax rate has been increased from 15% to 20% with effect from 23 July 2024. However, the above shall not be applicable to transaction undertaken on a recognized stock exchange located in any International Financial Services Centre and where the consideration for such transaction is paid or payable in foreign currency. Further, Section 48 provides that no deduction shall be allowed in respect of STT paid for the purpose of computing Capital Gains.

Short term capital gains in respect of other capital assets (other than listed equity shares of a company or units of equity oriented fund or units of a business trust) are chargeable to tax as per the relevant slab rates or fixed rate, as the case may be.

The Specified Mutual Funds or Market Linked Debentures acquired on or after 1 April 2023 will be treated as short term capital asset irrespective of period of holding as per Section 50AA of the IT Act. The unlisted bonds and unlisted debentures have been brought within the ambit of Section 50AA of the IT Act with effect from 23 July 2024.

E. Profits and gains of business or profession

If the Securities under the portfolio management services are regarded as business/trading asset, then any gain/loss arising from sale of such Securities would be taxed under the head "Profits and Gains of Business or Profession" under section 28 of the IT Act. The gain/ loss is to be computed under the head "Profits and Gains of Business or Profession" after allowing normal business expenses (inclusive of the expenses incurred on transfer) according to the provisions of the IT Act.

Interest income arising on Securities could be characterized as 'Income from other sources' or 'business income' depending on facts of the case. Any expenses incurred to earn such interest income should be available as deduction, subject to the provisions of the IT Act.

F. Losses under the head capital gains/business income

In terms of section 70 read with section 74 of the IT Act, short term capital loss arising during a year can be set-off against short term as well as long term capital gains. Balance loss, if any, shall be carried forward and set-off against any capital gains arising during the subsequent 8 assessment years. A long-term capital loss arising during a year is allowed to be set-off only against long term capital gains. Balance loss, if any, shall be carried forward and set-off against long term capital gains arising during the subsequent 8 assessment years.

Business loss is allowed to be carried forward for 8 assessment years and the same can be set off against any business income.

G. General Anti Avoidance Rules (GAAR)

GAAR may be invoked by the Indian income-tax authorities in case arrangements are found to be impermissible avoidance arrangements. A transaction can be declared as an impermissible avoidance arrangement, if the main

purpose of the arrangement is to obtain a tax benefit and which satisfies one of the 4 (four) below mentioned tainted elements:

The arrangement creates rights or obligations which are ordinarily not created between parties dealing at arm's length;

- It results in directly / indirectly misuse or abuse of the IT Act;
- It lacks commercial substance or is deemed to lack commercial substance in whole or in part; or
- It is entered into, or carried out, by means, or in a manner, which is not normally employed for bona fide purposes.

In such cases, the tax authorities are empowered to reallocate the income from such arrangement, or recharacterize or disregard the arrangement. Some of the illustrative powers are:

- Disregarding or combining or recharacterising any step in, or a part or whole of the arrangement;
- Ignoring the arrangement for the purpose of taxation law;
- Relocating place of residence of a party, or location of a transaction or situation of an asset to a place other than provided in the arrangement;
- Looking through the arrangement by disregarding any corporate structure; or
- Recharacterising equity into debt, capital into revenue, etc.

The GAAR provisions would override the provisions of a treaty in cases where GAAR is invoked. The necessary procedures for application of GAAR and conditions under which it should not apply, have been enumerated in Rules 10U to 10UC of the Income-tax Rules, 1962. The Income-tax Rules, 1962 provide that GAAR should not be invoked unless the tax benefit in the relevant year does not exceed INR 3 crores.

On 27 January 2017, the CBDT has issued clarifications on implementation of GAAR provisions in response to various queries received from the stakeholders and industry associations. Some of the important clarifications issued are as under:

- Where tax avoidance is sufficiently addressed by the Limitation of Benefit Clause (LOB) in a tax treaty, GAAR should not be invoked.
- GAAR should not be invoked merely on the ground that the entity is located in a tax efficient jurisdiction.
- GAAR is with respect to an arrangement or part of the arrangement and limit of INR 3 crores cannot be read in respect of a single taxpayer only.

H. FATCA Guidelines

According to the Inter-Governmental Agreement read with the Foreign Account Tax Compliance Act (FATCA) provisions and the Common Reporting Standards (CRS), foreign financial institutions in India are required to report tax information about US account holders and other account holders to the Indian Government. The Indian Government has enacted rules relating to FATCA and CRS reporting in India. A statement is required to be provided online in Form 61B for every calendar year by 31 May. The reporting financial institution is expected to maintain and report the following information with respect to each reportable account:

(a) the name, address, taxpayer identification number and date and place of birth;
(b) where an entity has one or more controlling persons that are reportable persons:
(i) the name and address of the entity, TIN assigned to the entity by the country of its residence; and
(ii) the name, address, date of birth, place of birth of each such controlling person and TIN assigned to such controlling person by the country of his residence.
(c) account number (or functional equivalent in the absence of an account number);
(d) account balance or value (including, in the case of a cash value insurance contract or annuity contract, the cash value or surrender value) at the end of the relevant calendar year; and
(e) the total gross amount paid or credited to the account holder with respect to the account during the relevant calendar year.

Further, it also provides for specific guidelines for conducting due diligence of reportable accounts, viz. US reportable accounts and other reportable accounts (i.e. under CRS).

I.Goods and Services Tax on services provided by the portfolio manager

Goods and Services Tax (GST) will be applicable on services provided by the Portfolio Manager to its Clients. Accordingly, GST at the rate of 18% would be levied on fees if any, payable towards portfolio management fee.

9 Accounting Policies

Following accounting policies are followed for the portfolio investments of the Client:

A. Client Accounting

(1) The Portfolio Manager shall maintain a separate Portfolio record in the name of the Client in its book for accounting the assets of the Client and any receipt, income in connection therewith as provided under Regulations. Proper books of accounts, records, and documents shall be maintained to explain transactions and disclose the financial position of the Client's Portfolio at any time.

(2) The books of account of the Client shall be maintained on an historical cost basis.

(3) Transactions for purchase or sale of investments shall be recognised as of the trade date and not as of the settlement date, so that the effect of all investments traded during a Financial Year are recorded and reflected in the financial statements for that year.

(4) All expenses will be accounted on due or payment basis, whichever is earlier.

(5) The cost of investments acquired or purchased shall include brokerage, stamp charges and any charges customarily included in the broker's contract note. In respect of privately placed debt instruments any front-end discount offered shall be reduced from the cost of the investment. Sales are accounted based on proceeds net of brokerage, stamp duty, transaction charges and exit loads in case of units of mutual fund. Securities transaction tax, demat charges and Custodian fees on purchase/ sale transaction would be accounted as expense on receipt of bills. Transaction fees on unsettled trades are accounted for as and when debited by the Custodian.

(6) Tax deducted at source (TDS) shall be considered as withdrawal of portfolio and debited accordingly.

B. Recognition of portfolio investments and accrual of income

(7) In determining the holding cost of investments and the gains or loss on sale of investments, the "first in first out" (FIFO) method will be followed.

(8) Unrealized gains/losses are the differences, between the current market value/NAV and the historical cost of the Securities. For derivatives and futures and options, unrealized gains and losses will be calculated by marking to market the open positions.

(9) Dividend on equity shares and interest on debt instruments shall be accounted on accrual basis. Further, mutual fund dividend shall be accounted on receipt basis.

(10) Bonus shares/units to which the security/scrip in the portfolio becomes entitled will be recognized only when the original share/scrip on which bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis.

(11) Similarly, right entitlements will be recognized only when the original shares/security on which the right entitlement accrues is traded on the stock exchange on the ex-right basis.

(12) In respect of all interest-bearing Securities, income shall be accrued on a day-to-day basis as it is earned.

(13) Where investment transactions take place outside the stock exchange, for example, acquisitions through private placement or purchases or sales through private treaty, the transactions shall be recorded, in the event of a purchase, as of the date on which the scheme obtains an enforceable obligation to pay the price or, in the event of a sale, when

the scheme obtains an enforceable right to collect the proceeds of sale or an enforceable obligation to deliver the instruments sold.

C. Valuation of portfolio investments

(14) Investments in listed equity shall be valued at the last quoted closing price on the stock exchange. When the Securities are traded on more than one recognised stock exchange, the Securities shall be valued at the last quoted closing price on the stock exchange where the security is principally traded. It would be left to the portfolio manager to select the appropriate stock exchange, but the reasons for the selection should be recorded in writing. There should, however, be no objection for all scrips being valued at the prices quoted on the stock exchange where a majority in value of the investments are principally traded. When on a particular valuation day, a security has not been traded on the selected stock exchange, the value at which it is traded on another stock exchange may be used. When a security is not traded on any stock exchange on a particular valuation day, the value at which it was traded on the selected stock exchange or any other stock exchange, as the case may be, on the earliest previous day may be used provided such date is not more than thirty days prior to the valuation date.

(15) Investments in units of a mutual fund are valued at NAV of the relevant scheme. Provided investments in mutual funds shall be through direct plans only.

(16) Debt Securities and money market Securities shall be valued as per the prices given by third party valuation agencies or in accordance with guidelines prescribed by Association of Portfolio Managers in India (APMI) from time to time.

(17) Unlisted equities are valued at prices provided by independent valuer appointed by the Portfolio Manager basis the International Private Equity and Venture Capital Valuation (IPEV) Guidelines on a semi-annual basis.

(18) In case of any other Securities, the same are valued as per the standard valuation norms applicable to the mutual funds.

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.

The Portfolio Manager may change the valuation policy for any particular type of security consequent to any regulatory changes or change in the market practice followed for valuation of similar Securities. However, such changes would be in conformity with the Regulations.

10 Investor Services

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

Name	:	Mrs. Nandita Bhardwaj
Address	:	202, Basera Green Meadows Apartments 90/91, A.P. Text Book Colony Karkhana, Secunderabad Hyderabad – 500 009 Telangana
Telephone	:	91 040 27812676
Email address	:	helpdesk@wealthbridge.in

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 the means to handle investor complaints.

Grievance Redressal / Dispute handling Mechanism

The Portfolio Manager will endeavour to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable, amicable manner and within 30 days time. If the Client remains dissatisfied with the remedies offered, the Client and the Portfolio Manager shall abide by the following mechanisms.

All disputes, differences, claims and questions whatsoever arising between the Client and the Portfolio Manager and/or their respective representatives shall be settled in accordance with the provisions of The Arbitration and Conciliation Act, 1996 or any statutory requirement, modifications or re-enactment thereof for the time being in force. Such arbitration proceedings shall be held at **Hyderabad** or such other place as the Portfolio Manager thinks fit. The Arbitration proceedings shall be conducted in English.

There will be occasions when investors have a complaint against intermediary registered with **SEBI**. In the event of such complaint investor should first approach the concerned intermediary against whom investor has a complaint. However, if investor may not be satisfied with their response, then investor may lodge their complaint online with SEBI in SEBI Complaints Redress System platform ("SCORES"). The following is the link of the same: http://scores.gov.in/

SCORES facilitates investors to lodge their complaint online with **SEBI** and subsequently view its status.

After exhausting all aforementioned options for resolution, if the client is not satisfied with the outcome, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at https://smartodr.in/login , subject to the provisions of the Arbitration and Conciliation Act, 1996, or any statutory modification or re-enactment thereof for the time being in force.

11 Details of the diversification policy of the Portfolio Manager

The Portfolio Manager follows a structured diversification policy aimed at optimizing risk-adjusted returns while maintaining prudent risk control. Diversification is a key element of the investment philosophy and serves to mitigate the impact of adverse movements in any single stock, sector, or market segment.

The Portfolio Manager may allocate between 0% to 100% of the client's portfolio in Equity & Equity Related Securities and between 0% to 100% in Fixed Income Securities, subject to the investment objective and risk profile agreed upon with each client under the Portfolio Management Agreement. The aggregate allocation across both asset classes shall, at all times, be within the overall portfolio value of the client. The portfolios are constructed through a combination of core holdings and selectively identified opportunities. Such opportunities are across a broad spectrum of market capitalizations and sectors in the case of stocks.

Part II – Dynamic Section

12 Client Representation

I)

Category of Clients	No. of Clients	Funds managed (Rs. in crores)	Discretionary/ Non-discretionary/Advisory
Associates/Group Companies (Last 3 years)	Nil	Nil	NA
Others: As on 31 March 2026 As on 31 March 2025 As on 31 March 2024	 27 29 24	 72.17 72.14 100.91	 Discretionary Discretionary Discretionary

II) **Complete disclosure in respect of transactions with related parties as per the Accounting Standards specified by the Institute of Chartered Accountants of India**

Related parties with whom transactions have taken place during the period from 1st April 2025 to 31st March 2026 are given as Annexure I

13 Financial Performance of the Portfolio Manager

The audited financial performance of the Company for the years ended on 31st March 2024 and 31st March 2025 and 31st March 2026 are as follows (in Lakhs) :

Financial Year ended	Total Income	Profit after tax	Paid up capital	Reserves & Surplus	Net-worth
31st March 2024	990.25	686.86	489.21	3,020.87	3,510.07
31st March 2025	323.31	108.10	489.21	3,128.97	3,618.18
31st March 2026	386.43	135.34	489.21	3,264.31	3,377.52

Details of Financial Performances are as per audited accounts [as per regulation 22 of SEBI (Portfolio Managers) Regulations, 2020]. The Accounts are last audited up to 31st March 2026.

14 Portfolio Management Performance of the Portfolio Manager in the Last Three Years and in case of Discretionary Portfolio Manager, disclosure of performance indicators calculated using Time Weighted Rate of Return in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020

Date of inception : 13 November 2016

The performance of the portfolio manager for the year ended 31 March 2024 ,31 March 2025 and 31 March 2026 is as below:

	Year ended 31 March 2024	**Year ended 31 March 2025**	**Year ended 31 March 2026**
Portfolio Performance	55.93%	-16.27%	2.15%
BSE 500 TRI	40.16%	5.96%	-3.12%

Note: The performance data is calculated using Time Weighted Rate of Return' method in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020. Please note the performance-related information provided therein is not verified by SEBI.

15 Audit observations of the preceding 3 years

The Company has followed proper accounting methods and procedures in preparation of the books of accounts and has performed their duties in accordance with the law. There were no adverse comments in the preceding 3 years.

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

The Portfolio Manager has not invested and does not plant to invest in the future client's funds in the securities of its related parties or associates.

For **WealthBridge Capital Advisors Private Limited**

Avantika Bhargava
Director

Vivek Bhargava
Director

Place : Hyderabad
Date : 16th September 2026

WealthBridge Capital Advisors Pvt Ltd
Hyderabad

WealthBridge

CIN: U65923TG2005PTC046708

FORM C

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

Portfolio Manager: WealthBridge Capital Advisors Private Limited

We confirm that:

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;
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 Scheme;

The Disclosure Document has been duly certified by Kamlesh Bhargava, Chartered Accountants, (Membership No.: 16307) having office at 235 Adarsh Nagar, Hill Fort Road, Hyderabad -500063, Telangana (Tel No +91 40 23234952) on 16th September 2026. Enclosed is a copy of the Chartered Accountant's certificate to the effect that the disclosures made in the document are true, fair and adequate to enable the investors to make well-informed decision.

For **WealthBridge Capital Advisors Private Limited**

Date: 16th September 2026
Place: Hyderabad

Signature of the Principal Officer
Name : Avantika Bhargava
Address : 202, Basera Green
Meadows Apartments,
90/91, A.P. Text Book Colony
Karkhana, Secunderabad
Hyderabad – 500 009

KAMLESH KUMAR BHARGAVA

Chartered Accountant

To,

The Board of Directors,

WealthBridge Capital Advisors Private Limited,
41, Gunrock Enclave (Second Floor), Phase-1,
Secunderabad - 500009

Sub: Auditors certification for Disclosure Document

1) This certificate is issued in connection with the request made by M/S WEALTHBRIDGE CAPITAL ADVISORS PRIVATE LIMITED (CIN – **U65923TG2005PTC046708**) for the purpose of submission to Securities and Exchange Board of India (hereinafter referred to as "SEBI") in accordance with Regulation 22(5) of the SEBI Portfolio Managers Regulations, 2020.

2) I, Kamlesh Bhargava, Chartered Accountant, the statutory auditor of the Company has examined the books of accounts of the Company and other relevant records and documents for the purpose of certifying the contents of Disclosure Document as at September 16, 2026. The Disclosure Document is prepared in accordance with Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as amended from time to time ("the SEBI Portfolio Managers Regulations") for onward submission to SEBI for compliance with Regulation 22(5) of the SEBI Portfolio Managers Regulations. The Disclosure Document has been certified by the Principal Officer of the Company in the manner prescribed in Form C of the SEBI Portfolio Managers Regulations.

Management's Responsibility

3) The Company's Management is solely and entirely responsible for the preparation of the enclosed Disclosure Document. This includes collecting, collating and validating data and presentation thereof in the Disclosure Document and design, implementation and maintenance of internal controls relevant to the preparation of the Disclosure Document, and the underlying financial and other information which the Company represents, is free from material misstatement, whether due to fraud or error.

4) The Company's Management is also responsible for complying with the provisions of the SEBI Portfolio Managers Regulations.

Auditors' Responsibility

5) Our responsibility is to provide a limited assurance on the information contained in the Disclosure Document based on procedures performed on relevant records/documents provided to us by the Company's management. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less extent than for, a reasonable assurance engagement, and consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

KAMLESH KUMAR BHARGAVA
M.No. 016307
HYD.
Chartered Accountants

6) We conducted our examination of the Statement in accordance with the Guidance Note on Reports or Certificates for Special Purposes (Revised 2016) ("Guidance Note") issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

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

8) The criteria against which the Information contained in the enclosed Disclosure Document were evaluated and reviewed by us are the following:

a) We have perused and relied on the Definition stated in section 2 of the Disclosure Document as defined by the Company.

b) The details mentioned in section 3 of Disclosure Document giving description about the Portfolio Manager, its Promoters, group companies and details of services offered by the Portfolio Manager are as per the information and explanations provided to us by the Company's management.

c) We have relied solely and entirely on the representations given by the Management of the Company about the penalties, pending litigations or proceedings, findings of inspection or investigations by any regulatory authority as set out in section 4 of the Disclosure Document.

d) We have relied solely and entirely on the representations given by the Management of the Company about the investment objectives, policies, product offerings offered and other details disclosed in section 5 of the Disclosure Document, in respect of existing strategy.

e) The risk factors as disclosed in section 6 and nature of costs and expenses as set out in section 7 of the Disclosure Document are traced from the agreements of the existing strategy entered into by the Company with the clients (Client Agreement), accounting policies stated in the audited financial statements of the respective years and other records as provided to us by the management. We make no representations regarding the completeness of the risk factors or the qualitative evaluation of these risk factors by the Company.

f) The Taxation related information set out in section 8 of the Disclosure Document lists the possible implications under the Income Tax Act, 1961 on the clients under the current tax law, presently in force in India. These benefits are dependent on the Company or its Clients fulfilling the conditions prescribed under the relevant provisions of the statute. Hence, the ability of the clients to derive these direct tax benefits is dependent upon their fulfilment of such conditions. This taxation related information is only intended to provide general information to Clients and is neither designed nor intended to be a substitute for professional tax advice. The taxation related information is not intended to provide any assurance as to whether:

KAMLESH KUMAR BHARGAVA
M.No. 016307
HYD.
Chartered Accountants

(i) Company and client have obtained or will obtain these benefits in future; or
(ii) The conditions prescribed for availing the benefits have been or would be met with by the Company or its clients.

g) The financial and related disclosures set out in section 13 of the Disclosure Document have been traced to the audited financial statements of the Company for the years ended March 31, 2026, 2025 and 2024 and other financial records maintained by the Company. The disclosure relating to client representation for the period from April 01, 2025 to March 31, 2026 has been traced from the audited books of accounts maintained by the Company. Management of the Company has represented that the accounting policies for the Client Portfolio set out in section 9 of the Disclosure Document are generally accepted accounting policies and few of them have been traced from the audited financial statements for the year ended March 31, 2026, of the Portfolio management service clients.

h) The details given in section 10 of the Disclosure Document on Investor Services is as per the information and explanation given by the management of the Company and relied upon by us.

i) For the purposes of the Portfolio Management performance of the Portfolio Manager set out in section 14 of the Disclosure Document, we have verified the arithmetical accuracy of the calculation of the portfolio performance percentage (%) of the strategy using the 'Time Weighted Rate of Return' method as prescribed in the Regulation 22 of the SEBI Portfolio Managers Regulations.

j) We have perused the Auditor's Report on the Financial Statements of the Company for the past 3 years for reporting on section 15 of the Disclosure Document on Audit Observations.

Conclusion

9) Based on the work done as mentioned above and the information, explanations and representations given to us by the management, nothing has come to our attention which causes us to believe that the information contained in the Disclosure Document of the Company as at September 16, 2026 has not been prepared in the manner prescribed in Schedule V of the SEBI Portfolio Managers Regulations and the financial information referred to above, pertaining to period up to March 31, 2026 are not in agreement with the audited books of account maintained by the Company.

KAMLESH KUMAR BHARGAVA
M.No. 016307
HYD.
Chartered Accountants

Restriction on Use

10) This certificate has been issued at the request of the Company for onward submission to the SEBI. This certificate is intended solely for the information and use of the management of the Company and for onward submission to SEBI and should not be circulated, used/ referred to for any other purpose, without our prior written consent.

For Kamlesh Kumar Bhargava
Chartered Accountant

Kamlesh Kumar Bhargava

KAMLESH KUMAR BHARGAVA
M.No. 016307
HYD.
Chartered Accountants

Membership No. 16307
UDIN : 26016307SAGJSY2667
16th September 2026

Annexure-I

Related parties with whom transactions have taken place for the year ended 31.03.2026

		2025-26	
Name of related party and nature of relationship	**Nature of transaction**	**Transaction value (Rs.)**	**Outstanding values standing in Balance Sheet (Rs.)**
Key Managerial Personnel (KMP) and their relatives			
1. Vivek Bhargava (Executive Chairman)	Managerial Remuneration	24,00,000.00	-
	Custody & DP Charges	1,40,314.23	-
	PMS Management Fees received	11,03,628.55	2,63,311.77
2. Anshu Bhargava (Executive Director)	Managerial Remuneration	24,00,000.00	-
	Custody & DP Charges	2,45,233.53	-
	PMS Management Fees received	18,90,310.77	4,58,954.26
3. Avantika Bhargava (Whole Time Director)	Remuneration	12,00,000.00	-
	Custody & DP Charges	23,727.98	-
	PMS Management Fees received	2,21,179.75	52,163.57

4. Karn Bhargava (Whole Time Director)	PMS Management Fees received	2,04,032.47	48,595.36
	Custody & DP Charges	22,062.42	-
	Remuneration	24,96,000.00	-
5. Poonam Bhargava (Relative of KMP)	PMS Fees received	4,69,340.48	1,11,147.28
	Custody & DP Charges	49,657.38	-
6. Santosh Bhargava (Relative of KMP)	Sale of Non-convertible debentures	45,53,400.00	-
7. Kamakshi Bhargava (Relative of KMP)	Remuneration	3,60,000.00	-