

INVESTOR CHARTER IN RESPECT OF PORTFOLIO MANAGEMENT SERVICES (PMS)

‘Annexure – A’

A. Vision and Mission Statements for investors.

Vision:

To implement diligently researched customized investment strategies which help investors meet their long-term financial goals in a risk appropriate manner.

Mission:

To ensure that the PMS industry provides a viable investment avenue for wealth creation by adopting high levels of skill, integrity, transparency and accountability.

B. Details of business transacted by the organization with respect to the investors.

- a) Appropriate risk profiling of investors
- b) To provide Disclosure Document to investors
- c) Executing the PMS agreement
- d) Making investment decisions on behalf of investors (discretionary) or investment decisions taken at the discretion of the Investor (non-discretionary) or advising investors regarding their investment decisions (advisory), as the case may be.

C. Details of services provided to investors and estimated timelines:-

Discretionary & Non-Discretionary Portfolio Management Services (PMS):-

Under these services, all an investor has to do, is to give his portfolio in any form i.e. in stocks or cash or a combination of both. The minimum size of the portfolio under the Discretionary and/ or Non-Discretionary Funds Management Service Should be Rs. 50 lakhs as per the current SEBI Regulations. However, the PMS provider reserves the right to prescribe a higher threshold product-wise or in any other manner at its sole discretion. The PMS provider will ascertain the investor's investment objectives to achieve optimal returns based on his risk profile. Under the Discretionary Portfolio Management service, investment decisions are at the sole discretion of the PMS provider if they are in sync with the investor's investment objectives.

Currently under the discretionary services, following strategies / portfolios are being offered to investors.

1. **Eureka Signature Approach** - S&P BSE 500 TRI (Benchmark)
2. **EuDynamic Debt**
3. **EuGrowth**
4. **EuValue**
5. **Multi Cap Select Fund**

Under the **Non-Discretionary** Portfolio Management service, investment decisions taken at the discretion of the Investor. The objective of this portfolio is to seek capital appreciation through managing the portfolio after consultation with the Client. The Assets will be managed as per the requirements of the Client after due consultation. The Client will have complete discretion to decide on the investment. The strategy will primarily invest in equity asset class. However, we may consider other asset classes permitted by SEBI regulations. The Portfolio Manager inter-alia will provide research report, structuring of clients' portfolios, investment advice and guidance at the Client's request and manage transaction execution, accounting, recording of corporate benefits, valuation and reporting aspects on behalf of the Client. The Portfolio Manager shall execute orders as per the mandate received from Clients. The deployment of the Client's Funds by the Portfolio Manager on the instructions of the Client is absolute and final and can never be called in question. The rights and obligations of the Portfolio Manager shall be exercised strictly in accordance with the Act, Rules and/or Regulations, guidelines and notifications in force from time to time. Periodical statements in respect of Client's Portfolio shall be sent to the respective Clients. Depending upon the portfolio constructed as per the desire of the client, appropriate benchmark shall be ascertained by the portfolio manager

i. Investment Advisory Services: -

Under these services, the Client is advised on buy/sell decision within the overall profile without any back-office responsibility for trade execution, custody of securities or accounting functions. The PMS provider acts solely as an Advisor to the Client and is responsible for the investment/divestment of securities and/or administrative activities on the client's portfolio. The PMS provider acts in a fiduciary capacity towards its Client and maintain arm's length relationship with its other activities. The PMS provider also provides advisory services in accordance with guidelines and/or directives issued by the regulatory authorities and/or the Client from time to time in this regard.

ii. Client On-boarding

- a) Ensuring compliance with KYC and AML guidelines.
- b) Franking & signing the Power of Attorney to make investment decisions on behalf of the investor.

- c) opening demat account and funding of the same from the investor's verified bank account and/or transfer of securities from verified demat account of the investor and
- d) Mapping the said demat account with Custodian.

Direct On-Boarding Of Clients:

As Per SEBI Circular SEBI/HO/IMD/DF1/CIR/P/2020/26 Dated February 13, 2020, Clients Can Now Directly Invest In Any Of The PMS Strategies, Offered By Eureka Portfolio Management Services Limited, As Portfolio Manager. Kindly Note That At The Time Of Direct On-Boarding, No Charges Except Statutory Charges Will Be Levied On The Client. For Details, Please Refer To The Application Forms.

iii. Ongoing activities

- a) To provide periodic statements to investors as provided under the PMS Regulations and other SEBI notifications and circulars ("PMS Regulations") and
- b) Providing each client an audited account statement on an annual basis which includes all the details as required under the PMS Regulations.

iv. Fees and Expenses

As per PMS Agreement and in accordance with the PMS Regulations

v. Closure and Termination

Upon termination of PMS Agreement by either party, the securities and the funds lying in the account of the investor shall be transferred to the verified bank account/ demat account of the investor.

vi. Grievance Redressal

- In case of any grievance client may reach our Customer Care Department

Email: care@eurekasec.com

Phone: 033-66280000 (Ext: 110/11/112)

- Client may also reach out to their Investor Relationship Officer

Email: pms@eurekasec.com

Phone: (033) 66280000 (Ext: 104)

- If the client is still dissatisfied, they may approach the Principal Officer for further resolutions.

Name: Mr. Anurag Somani

Email: anurag@eurekasec.com

Phone: 033-66280000 (Ext: 119)

- If the Principal Officer fails to resolve the client grievance, they may write to the Director of Eureka Portfolio Management Services Limited.

Name: Mr. Rakesh Somani

Email: rakesh@eurekasec.com

Phone: 033-66280000 (Ext: 143)

- In case of Non-Resolution of grievance from all the ends, the client may write an e-mail to grievance@eurekasec.com stating the details of the grievances and resolutions provided by the previous level.

If the investor grievance is not resolved by Portfolio Manager, The Investor can directly lodge the Complaints to SCORES portal if they feel aggrieved by an act of any Capital Market Intermediary through SEBI Scores New Portal Link: SCORES v 2.0 - <https://scores.sebi.gov.in> by clicking on "Complaint Registration" under "Investor Corner".

The client needs to register himself on the SCORES portal using the above link, and then he can lodge his complaint.

Timelines of the services provided to investors are as follows:

Sr. No.	Service / Activity	Timeline
1	Opening of PMS account (including demat account) for residents.	7 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.
2	Opening of PMS account (including demat account) for non-individual clients.	14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.
3	Opening of PMS account (including demat account, bank account and trading account) for non-resident clients.	14 days from receipt of all requisite documents from the client, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.

4	Registration of nominee in PMS account and demat account.	Registration of nominee happens along with account opening; therefore turnaround time is same as account opening turnaround time.
5	Modification of nominee in PMS account and demat account.	10 days from receipt of requisite nominee modification form, subject to review of the documents for accuracy and completeness by portfolio manager and allied third party service providers as may be applicable.
6	Uploading of PMS account in KRA and CKYC database.	10 days from date of account opening.
7	Whether portfolio manager is registered with SEBI, then SEBI registration number.	At the time of client signing the agreement; this information is a part of the account opening form and disclosed. SEBI Registration No : INP000005740
8	Disclosure about latest networth of portfolio manager and total AUM.	We disclose the portfolio manager's total AUM to SEBI on a monthly basis. Additionally, we update the disclosure document with the latest net worth whenever there are any material changes.
9	Intimation of type of PMS account – discretionary.	At the time of client signing the agreement; this information is a part of the account opening form.
10	Intimation of type of PMS account - non discretionary.	At the time of client signing the agreement; this information is a part of the account opening form.
11	Intimation to client what discretionary account entails and powers that can be exercised by portfolio manager.	At the time of client signing the agreement; this information is a part of the account opening form.
12	Intimation to client what non-discretionary account entails and powers that can be exercised by portfolio manager.	At the time of client signing the agreement; this information is a part of the account opening form.
13	Copy of executed PMS agreement sent to client.	Within 3 days of client request.
14	Frequency of disclosures of available eligible funds.	All details regarding client portfolios are shared on a quarterly basis, as per point 26.
15	Issuance of funds and securities balance statements held by client.	All details regarding client portfolios are shared on a quarterly basis and upon client request as well.

16	Intimation of name and demat account number of custodian for PMS account.	Within 3 days of PMS and demat account opening.
17	Conditions of termination of contract.	At the time of client signing the agreement; this information is a part of the account opening form.
18	Intimation regarding PMS fees And modes of payment or frequency of deduction.	At the time of client signing the agreement; this information is a part of the account opening form.
19	POA taken copy providing to client.	Within 3 days of client request.
20	Intimation to client about what all transactions can portfolio manager do using PoA.	At the time of client signing the agreement; this information is a part of the account opening form.
21	Frequency of providing audited reports to clients	Annual.
22	Explanation of risks involved in investment.	At the time of client signing the agreement; this information is a part of the account opening form.
23	Intimation of tenure of portfolio investments.	We disclose the indicative tenure at the time of the client signing the agreement, ensuring this information is included in the account opening form.
24	Intimation clearly providing restrictions imposed by the investor on portfolio manager.	Negative list of securities are taken from the client at the time of client signing the agreement; this information is a part of the account opening form.
25	Intimation regarding settling of client funds and securities.	Settlement of funds and securities are done by the Custodian. The details of clients' funds and securities are sent to the clients in the prescribed format not later than on a quarterly basis.
26	Frequency of intimation of Transactions undertaken in portfolio account.	Not later than on a quarterly basis or upon clients' request.
27	Intimation regarding conflict of interest in any transaction.	We provide details of related party transactions if any and conflicts of interest in the Disclosure Document, which is always available on our website.

28	Timeline for providing disclosure document to investor.	The latest Disclosure Document is provided to the investors prior to the account opening, and it is always available on our website.
29	Intimation to investor about details of bank accounts where client funds are kept.	Within 3 days of PMS and demat account opening.
30	Redressal of investor grievances.	Within 30 days, subject to all the information required to redress the complaint is provided by the complainant to the portfolio manager

Notes:

1. The number of days in the above timelines indicates clear working days.

D. Details of grievance redressal mechanism and how to access it

1. It is mandatory for every PMS provider to register itself on SEBI SCORES (SEBI Complaint Redress System). SCORES is a centralised online complaint resolution system through which the complainant can take up his grievance against the PMS provider and subsequently view its status. (<https://scores.sebi.gov.in/>)
2. The details such as the name, address and telephone number of the investor relations officer of the PMS provider who attends to the investor queries and complaint should be provided in the PMS Disclosure document.
3. The grievance redressal and dispute mechanism should be mentioned in the Disclosure Document.
4. Investors can approach SEBI for redressal of their complaints. On receipt of complaints, SEBI takes up the matter with the concerned PMS provider and follows up with them.
5. Investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4- A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.

E. Expectations from the investors (Responsibilities of investors)

1. Check registration status of the intermediary from SEBI website before availing services.
2. Submission of KYC documents and application form in a timely manner with signatures in appropriate places and with requisite supporting documents.
3. Read carefully terms and conditions of the agreement before signing the same.
4. Thorough study of the Disclosure Documents of the PMS to accurately understand the risks entailed by the said investment in PMS.
5. Accurate and sincere answers given to the questions asked in the 'Risk Questionnaire' shall help the PMS provider properly assess the risk profile of the investor.
6. Thorough study of the quarterly statements sent by the PMS provider to the investor intimating him about the portfolio's absolute and relative performance, its constituents and its risk profile.
7. Ensure providing complete details of negative list of securities as part of freeze instructions at the time of entering into PMS agreement and every time thereafter for changes, if any, in a timely manner.
8. To update the PMS provider in case of any change in the KYC documents and personal details and to provide the updated KYC along with the required proof.

‘Annexure – B’

COMPLAINT DATA BY EUREKA PORTFOLIO MANAGEMENT SERVICES PVT. LTD.

Data for the month ending – June, 2025

Sr. No.	Received from	Pending at the end of last month	Received	Resolved*	Total Pending#	Pending complaints > 3months	Average Resolution time^ (in days)
1	Directly from Investors	NIL	NIL	NIL	NIL	NIL	NIL
2	SEBI (SCORES)	NIL	NIL	NIL	NIL	NIL	NIL
3	Other Sources (if any)	NIL	NIL	NIL	NIL	NIL	NIL
	Grand Total	NIL	NIL	NIL	NIL	NIL	NIL

^ Average Resolution time is the sum total of time taken to resolve each complaint in days, in the current month divided by total number of complaints resolved in the current month.

TREND OF MONTHLY DISPOSAL OF COMPLAINTS

Sr. No.	Month	Carried forward from previous month	Received	Resolved*	Pending#
1	June, 2024	NIL	NIL	NIL	NIL
2	July, 2024	NIL	NIL	NIL	NIL
3	August, 2024	NIL	NIL	NIL	NIL
4	September, 2024	NIL	NIL	NIL	NIL
5	October, 2024	NIL	NIL	NIL	NIL
6	November, 2024	NIL	NIL	NIL	NIL
7	December, 2024	NIL	NIL	NIL	NIL
8	January, 2025	NIL	NIL	NIL	NIL
9	February, 2025	NIL	NIL	NIL	NIL
10	March, 2025	NIL	NIL	NIL	NIL
11	April, 2025	NIL	NIL	NIL	NIL
12	May, 2025	NIL	NIL	NIL	NIL
	Grand Total	NIL	NIL	NIL	NIL

Eureka Stock & Share Broking Services Ltd.

TREND OF ANNUAL DISPOSAL OF COMPLAINTS

Sr. No.	Year	Carried forward from previous year	Received	Resolved	Pending
1	2022-23	NIL	NIL	NIL	NIL
2	2023-2024	NIL	NIL	NIL	NIL
3	2024-2025	NIL	NIL	NIL	NIL
4	2025-2026	NIL	NIL	NIL	NIL
	Grand Total	NIL	NIL	NIL	NIL

Eureka Portfolio Management Services Pvt. Ltd. SEBI Registration Number: INP000005740

For further details please visit 'www.eurekasec.com'. To explore Infinity, visit 'infinity.eurekasec.com'. T&C's Apply.

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Disclaimer: Investment in securities market are subject to market risks, read all the related documents carefully before investing.