CERTIFICATE

We have verified the Disclosure Document ("the Document") for Portfolio Management Services prepared by M/s. Wryght Research & Capital Private Limited, a Portfolio Manager to be registered with SEBI under the SEBI (Portfolio Managers) Regulations, 2020 (SEBI Reg. No. INP000007979), dated August 29, 2023, having its Registered Office at 103, Shagun Vatika, Prag Narayan Road, Lucknow-226001, Uttar Pradesh.

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

Our certification is based on the examination of records, data made available and information & explanations provided to us.

Based on such examination we certify that:

a. The Disclosure made in the document is true, fair and correct and

b. The information provided in the Disclosure Document is adequate to enable the investors to make well-informed decisions.

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

For A K Sarawgi & Co.
Chartered Accountant
Firm Registration no. 145517W

AMIT KUMAR SARAWGI

Digitally signed by AMIT KUMAR SARAWGI
Date: 2023.08.29 16:44:16 +05'30'

……………………….

CA Amit Kumar Sarawgi
Proprietor
M. No. 177664
UDIN: 23177664BGRZSR5121
Date: 29.08.2023

WRYGHT RESEARCH & CAPITAL PRIVATE LIMITED

DISCLOSURE DOCUMENT

As required under Regulation 22 of Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020

I. Declaration:

a) The Disclosure Document (hereinafter referred as the **"Document"**) has been filed with the Securities and Exchange Board of India (**"SEBI"**) along with the certificate in the prescribed format in terms of Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020 (**"Regulations"**).

b) The purpose of the Document is to provide essential information about the portfolio services in a manner to assist and enable the investors in making informed decision for engaging "Wryght Research & Capital Private Limited" (hereinafter referred as the **"Portfolio Manager"**) as the portfolio manager.

c) The Document contains the necessary information about the Portfolio Manager required by an investor before investing and the investor may also be advised to retain the Document for future reference.

d) The name, phone number, e-mail address of the principal officer as designated by the Portfolio Manager along with the address of the Portfolio Manager is as follows:

PRINCIPAL OFFICER	PORTFOLIO MANAGER
Name : Ms. Sonam Srivastava **Phone :** +91 9686195357 **E-Mail :** sonam@wrightresearch.in	**Name:** Wryght Research & Capital Private Limited **Registered Address**: 103, Shagun Vatika, Prag Narayan Road, Lucknow, Uttar Pradesh, 226001, India **Correspondance Address:** WeWork Enam Sambhav, C - 20, G Block BKC, G Block, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051, India

II. INDEX

III. Contents:

1. Disclaimer

(a) Particulars of this Document have been prepared in accordance with the Regulations as amended till date and filed with SEBI.

(b) This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the Document.

2. Definitions

In this Document, the following words and expressions shall have the meaning specified herein, unless the context otherwise requires:

(a) **Agreement:** means the portfolio management services agreement entered between the Portfolio Manager and the Client/Investor, as amended, modified, supplemented or restated from time to time together with all annexures, schedules and exhibits, if any.

(b) **Applicable Laws:** means any applicable Indian statute, law, ordinance, regulation including the Regulations, rule, order, bye-law, administrative interpretation, writ, injunction, directive, judgment or decree or other instrument which has a force of law in India, as is in force from time to time.

(c) **Capital Contribution:** means the sum of money or Securities or combination thereof, contributed by the Client simultaneously upon execution of the Agreement or any time thereafter, subject to a minimum of INR 50,00,000 (Indian Rupees Fifty Lakhs) or such other higher amount as may be specified by the Portfolio Manager in compliance with Applicable Laws.

(d) **Chartered Accountant:** means a Chartered Accountant as defined in clause (b) of sub-section of section 2 of the Chartered Accountants Act, 1949 (38 of 1949) and who has obtained a certificate of practice under sub-section (1) of section 6 of that Act.

(e) **Client / Investor:** means such person(s) whose money or portfolio is advised or directed or managed by Portfolio Manager and is specified in Schedule I of the Agreement.

(f) **Custodian:** means one or more custodian appointed by the Portfolio Manager, from time to time, for maintaining custody of funds and/or Securities of the Client.

(g) **Disclosure Document or Document:** means this document filed by the Portfolio Manager with SEBI and issued to the Client as required under the Regulations and as may be amended by the Portfolio Manager from time to time.

(h) **Distributor:** means a Person empaneled by the Portfolio Manager which refers clients to the Portfolio Manager in lieu of commission/charges.

(i) **Eligible Investor:** means individuals, company, body corporate, partnership firm, association of persons, limited liability partnership, trust, hindu undivided family and such other persons as may be deemed by the Portfolio Manager, to be eligible to avail of the services of the Portfolio Manager from time to time under the PMS.

(j) **Exit Load:** means the withdrawal charge/s payable to the Portfolio Manager in accordance with the terms of the Agreement and this Document.

(k) **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 by the Portfolio Manager, from time to time.

(l) **Management Fee:** means the management fee payable to the Portfolio Manager in accordance with the terms of the Agreement and this Document.

(m) **Performance Fee:** means the performance-linked fee payable to the Portfolio Manager in accordance with the terms of the Agreement and this Document.

(n) **Portfolio or Client Portfolio:** means the total holdings of Securities and goods belonging to the Client in accordance with the Agreement.

(o) "**Portfolio Entity**" means companies, enterprises, bodies corporate, or any other entities in the Securities of which the monies from the Client Portfolio are invested subject to Applicable Laws.

(p) **Portfolio Investments:** means investments in Securities of one or more Portfolio Entity/ies made by the Portfolio Manager on behalf of the Client under the PMS from time to time.

(q) **Portfolio Manager:** means Wryght Research & Capital Private Limited, a company incorporated under the provisions of Companies Act, 2013 and having its registered office at 103, Shagun Vatika, Prag Narayan Road, Lucknow-226001, Uttar Pradesh, India, which pursuant to a contract or arrangement with a Client/Investor, advises or directs or undertakes on behalf of the Client/Investor (whether as a discretionary Portfolio Manager or otherwise) the management or administration of a portfolio of securities or the funds of the Client/Investor, as the case may be.

(r) **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.

(s) **PMS:** means the portfolio management services provided by the Portfolio Manager in accordance with the terms and conditions set out in the Agreement, this Document and subject to Applicable Laws.

(t) **PML Laws:** means the Prevention of Money Laundering Act, 2002, Prevention of Money- laundering (Maintenance of Records) Rules, 2005, the guidelines/ circulars issued by SEBI thereto as amended and modified from time to time.

(u) **Regulations:** means the SEBI (Portfolio Managers) Regulations, 2020 as amended and modified from time to time and including any circulars/notifications issued pursuant thereto.

(v) **Securities:** shall mean and include securities/instruments of Portfolio Entities, all marketable securities including equity shares, quasi equity shares, preference shares, debentures (whether convertible or non-convertible and whether secured or unsecured and whether listed or unlisted), convertible securities, depository receipts, bonds, secured premium notes, government securities, pass-through certificates, treasury bills, units, derivatives, equity linked products, debt, hybrid debt products, mortgage-backed securities, commercial debt papers, notes, units of a trust and any other instrument falling within the definition of 'security' under section 2(h) of the Securities Contract (Regulation) Act, 1956.

(w) "**SEBI**" shall mean the Securities and Exchange Board of India established under sub-section (1) of Section 3 of the Securities and Exchange Board of India Act, 1992.

(x) Term: means the term of the Agreement as reflected in the respective Agreement entered with the Client by the Portfolio Manager.

Any term used in this Document but not defined herein (but defined in the Regulations) shall have the same meaning as assigned to them in the Regulations.

3. Description

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

The Applicant was incorporated on November 13, 2019 as a private limited company under the provisions of the Companies Act, 2013, having its registered office at 103, Shagun Vatika, Prag Narayan Road, Lucknow, Uttar Pradesh, 226001, India. The Applicant is promoted by Ms. Sonam Srivastava. The promoter, Ms. Sonam Srivastava, have extensive experience in Securities Market.

It is SEBI registered portfolio manager bearing registration number INP000007979. The Applicant is also registered with SEBI as an Investment Adviser (SEBI Registration Number INA100015717), providing investment Advisory services to its clients since January 2021.

It seeks to provide discretionary portfolio management services, non-discretionary portfolio management services and advisory services to High-Net-worth Individuals (HNIs), institutional clients, corporates and other permissible class of investors.

(ii) Promoters of the Portfolio Manager, Director and their background

1. Promoters and Director of the Portfolio Manager

(a) Ms. Sonam Srivastava

Sonam Srivastava is a globally recognized practitioner in the field of Quantitative Portfolio Management, well known for her published research work. She has 10+ years of experience in quantitative research and portfolio management working on systematic strategies and algorithmic trading. She has been recognized as India's Top 100 Women in Finance recently by Association of International Wealth Managers in India (AIWMI) and she serves as a Faculty at the Artificial Intelligence in Finance Institute, New York and BSE Institute, Mumbai.

She has worked as the principal officer of Wryght Research and Capital Private Limited, a highly successful SEBI registered corporate investment advisory since Jun 2021 where she has more than 9000 retail clients and more than 150 crores in AUA. Before becoming a corporate RIA, Sonam worked as a individual RIA from July 2019 to Jan 2021.

She has worked at HSBC as a quant portfolio management researcher building factor driven portfolio solutions enabling large scale trading at the central risk book & structuring desks that catered to institutional clients. She worked as an algorithm designer at Edelweiss institutional equity execution & arbitrage desks catering to Indian Mutual Fund & Insurance Fund clients and at Qplum, in a portfolio management role for artificial intelligence driven robo-advisor in the US and India. She graduated studying computational chemical engineering from IIT Kanpur and has a master's in financial engineering from Worldquant University.

(b) Mr. Siddharth Singh Bhaisora

Siddharth is an experienced investment advisor with a strong background in finance and marketing. He graduated with a BSc (Hons) in Accounting & Finance from Cass Business School, City University London in June 2014. He then went on to earn an MBA in Finance & Marketing from Indian School of Business in April 2018, and also completed the CFA Level 1.

Siddharth began his career in investment advisory working as a Finance Analyst with UNICEF from July 2012 to June 2013, where he facilitated investment decisions and financing solutions for resolving global hunger, education, climate change, and healthcare crises. He then worked as a Valuation Analyst for OTC derivatives, Longevity Swaps, and Bond Indices for large financial institutions such as Blackrock, Brookfield, etc., at IHS Markit from June 2013 to August 2013.

In January 2015, Siddharth joined a healthcare facility where he set up their marketing and strategy functions and advised the facility on achieving financial efficiency by parking excess capital across various capital market instruments. He also enabled finance functions to undertake short and long-term loans from large financial institutions for growth capital.

After completing his MBA, Siddharth worked as a Senior Manager of Investment Banking & M&A in the Investment Advisory division for Mytrah Energy and its subsidiary companies from May 2018 to April 2021. He managed the buy-side and sell-side investment process for the purchase of SPVs of publicly listed entities and the sale of Mytrah's SPVs to publicly listed entities. Siddharth worked closely with the Project Finance team for short and long-term financing of Mytrah's SPVs and with the Cash Advisory team to deploy capital efficiently across mutual funds, ETFs, and debt instruments for efficient capital allocation. He also worked closely with the CEO on several projects regarding post-sale allocation of funds across investment opportunities, such as AIF, equity markets, and VC.

In May 2021, Siddharth started his own Financial Education venture, WIZ Finance, which focuses on promoting financial literacy and financial planning to 18-25-year-olds. He works closely with Franklin Templeton Asset Management for customer acquisition. He designed a financial planning and portfolio review tool to enable users of WIZ to understand how they were allocating their capital across existing investments and to identify which investment opportunities could be tapped into across several mutual funds and equity indices."

(c) Mr. Raman Ji Srivastava

Mr Raman Ji Srivastava is a retired Chief Engineer of the Uttar Pradesh Power Corporation Limited. He has spent 37 years working for the state electricity board. As a Chief Engineer he successfully led the Uttar Pradesh south zone transmission grid without any major breakdown and commissioned various new power stations and revamped the power networks to meet increasing electricity demand.

He has been awarded the Abhiyanta Ratna Award in 2014 which has only been awarded to 5 engineers since 1970. He has a Bachelor of Engineering from Madan Mohan Malviya University and has qualified for the Indian Engineering Services.

(iii) Key Personnel of Portfolio Manager and their background

(a) Ms. Sonam Srivastava
<Kindly refer to 1 (a) above.>

(b) Mr. Siddharth Singh Bhaisora
<Kindly refer to 1 (b) above.>

(c) Mr. Raman Ji Srivastava
<Kindly refer to 1 (c) above.>

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

The Portfolio Manager has no Group companies/firms

(v) Details of the services being offered: Discretionary, Non-Discretionary and Advisory

The Portfolio Manager proposes to primarily carry-on discretionary portfolio management services and if opportunity arises thereafter, then it also proposes to render non-discretionary portfolio management services and advisory services.

Wryght Research & Capital Private Limited shall provide the above services to the following category of clients:

Client Category	**Nature of services**
Indian resident individuals, non – resident Indians, bodies corporate, partnership firms, trust, societies, association of persons, limited liability partnership and such other persons as may be deemed by the Portfolio Manager to be eligible to avail the services of the Portfolio Manager	Discretionary/ Non-discretionary/ Advisory

Foreign Portfolio Investors and their sub - accounts	Discretionary/ Non-discretionary/ Advisory

The key features of all the said services are provided as follows:

(a) Discretionary Services:
Under the discretionary PMS, the choice as well as the timings of the investment decisions rest solely with the Portfolio Manager and the Portfolio Manager can exercise any degree of discretion in the investments or management of assets of the Client. The Securities invested/divested by the Portfolio Manager for Clients may differ from Client to Client. The Portfolio Manager’s decision (taken in good faith) in deployment of the Client’s account is absolute and final and cannot be called in question or be open to review at any time during the period of the Agreement or any time except on the ground of fraud, malafide intent, conflict of interest (other than those already disclosed in the Agreement) or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the Applicable Laws. Periodical statements in respect of the Client’s assets under management shall be sent to the respective Clients in accordance with the Agreement and the Regulations.

(b) Non - Discretionary Services:
Under the non-discretionary PMS, the assets of the Client are managed in consultation with the Client. Under this service, the assets are managed as per the requirements of the Client after due consultation with the Client. The Client has complete discretion to decide on the investment (quantity and price or amount). The Portfolio Manager, *inter alia*, manages transaction execution, accounting, recording or corporate benefits, valuation and reporting aspects on behalf of the Client.

(c) Advisory Services:
The Portfolio Manager may provide investment advisory services, in terms of the Regulations, which shall include the responsibility of advising on the Portfolio Investment Approach and investment and divestment of individual securities on the Client Portfolio, for an agreed fee structure and for a defined period, entirely at the Client's risk; to all eligible categories of Investors. The Portfolio Manager shall be solely acting as an advisor to the Client Portfolio and shall not be responsible for the investment/divestment of Securities and/or any administrative activities on the Client Portfolio. The Portfolio Manager shall provide advisory services in accordance with such guidelines and/or directives issued by the regulatory authorities and/or the Client, from time to time, in this regard.

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

   i. **All cases of penalties imposed by SEBI or the directions issued by SEBI under the SEBI Act or rules or regulations made thereunder.**
   None.
   ii. **The nature of the penalty/direction.**
   None.
   iii. **Penalties/fines imposed for any economic offence and/ or for violation of any securities laws.**
   None.
   iv. **Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.**
   None.
   v. **Any deficiency in the systems and operations of the Portfolio Manager observed by the SEBI or any regulatory agency.**
   None.
   vi. **Any enquiry/ adjudication proceedings initiated by SEBI against the Portfolio Manager or its partners, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its partners, principal officer or employee, under the SEBI Act or rules or regulations made thereunder.**
   None.

5. **Services Offered**

   (i) The present investment objectives and policies including the types of securities in which it generally invests shall be clearly and concisely stated in the Document for easy understanding of the potential investor.

   Investment Objective

   The investment objective of the Portfolio Manager is to endeavor to deliver superior risk adjusted returns for the Client.

   The Portfolio Manager seeks to deliver superior portfolio performance without taking undue risk thereby benefiting the Clients and helping them achieve their goals. Keeping the Clients' interests before its own, the Portfolio Manager intends to focus on best business practices of the fund management industry.

   (ii) Investment Approach of the Portfolio Manager

   Please refer to **Annexure** I for more details

(iii) The policies for investments in associates/group companies of the portfolio manager and the maximum percentage of such investments therein subject to the applicable laws/regulations/guidelines.

The Portfolio Manager will not be making investments on behalf of the Client in its associates/group companies.

(iv) Distributors: The Portfolio Manager may (i) appoint channel partners/distributors to on-board the Client (ii) On-board the Client directly without intermediation of any channel partners/distributors.

6. Risk factors

General Risk:

- Securities investments are subject to market risk and there is no assurance or guarantee that the objectives of the PMS will be achieved.

- The Portfolio Manager has no previous experience/track record in the field of portfolio management services and has obtained a license to function as a portfolio manager only on Apr 03, 2023. However, the Principal Officer, directors and other key management personnel of the Portfolio Manager have enriched individual experience.

- Without prejudice to the above, the past performance of the Portfolio Manager does not indicate its future performance.

- Any act, omission or commission of the Portfolio Manager under the Agreement would be solely at the risk of the Client and the Portfolio Manager will not be liable for any act, omission or commission or failure to act save and except in cases of gross negligence, willful default and/or fraud of the Portfolio Manager.

- The Client Portfolio may be affected by settlement periods and transfer procedures.

- The PMS is subject to risk arising out of non-diversification as the Portfolio Manager under its PMS may invest in a particular sector, industry, few/single Portfolio Entity/ies. The performance of the Client Portfolio would depend on the performance of such companies/industries/sectors of the economy.

- If there will be any transactions of purchase and/or sale of securities by Portfolio Manager and employees who are directly involved in investment operations those conflicts with transactions in any of the Client Portfolio, the same shall be disclosed to the Client.

- The group companies of Portfolio Manager may offer services in nature of consultancy, sponsorship etc., which may be in conflict with the activities of portfolio management services.
- The provisions of the Agreement and the principal and returns on the Securities subscribed by the Portfolio Manager may be subject to force majeure and external risks such as war, natural calamities, pandemics, policy changes of local / international markets and such events which are beyond the reasonable control of the Portfolio Manager. Any policy change / technology updates / obsolescence of technology would affect the investments made by the Portfolio Manager

Other risks arising from the investment objectives, investment strategy, Investment Approach and asset allocation are stated as under:

Risks associated with investments in equity and equity linked securities

- Equity and equity related securities by nature are volatile and prone to price fluctuations on a daily basis due to both macro and micro factors.

- In domestic markets, there may be risks associated with trading volumes, settlement periods and transfer procedures that may restrict liquidity of investments in equity and equity related securities.

- In the event of inordinately low volumes, there may be delays with respect to unwinding the Portfolio and transferring the redemption proceeds.

- The value of the Client Portfolio, may be affected generally by factors affecting securities markets, such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in policies of the government, taxation laws or policies of any appropriate authority and other political and economic developments and closure of stock exchanges which may have an adverse bearing on individual securities, a specific sector or all sectors including equity and debt markets. Consequently, the Portfolio valuation may fluctuate and can go up or down.

- Client may note that Portfolio Manager's investment decisions may not always be profitable, as actual market movements may be at variance with anticipated trends.

Risks associated with investments in foreign equity

- Investment in foreign equities leads to higher transaction costs
- An investment's value may decrease due to changes in the relative value of the involved

currencies. Investors may experience jurisdiction risk in the form of foreign exchange risk. Liquidity Risks

- Another risk inherent in foreign markets, especially in emerging markets, is liquidity risk. This is the risk of not being able to sell an investment quickly at any time without risking substantial losses due to a political or economic crisis.

<u>Risk Factors associated with investments in derivatives</u>

- 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 such strategies to be persuaded by the Portfolio Manager involve uncertainty and decision of the Portfolio Manager may not always be profitable. No assurance can be given that the Portfolio Manager shall be able to identify or execute such strategies.

- The risks associated with the use of derivatives are different from or possibly greater than, the risk associated with investing directly in securities and other traditional investments.

- As and when the Portfolio Manager on behalf of Clients would trade in the derivatives market there are risk factors and issues concerning the use of derivatives that investors should understand. Derivative products are specialized instruments that require investment techniques and risk analysis different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but also of the derivative itself. 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 or interest rate movements correctly. There is a possibility that loss may be sustained by the Portfolio as a result of the failure of another party (usually referred as the “counter party”) to comply with the terms of the derivatives contract. Other risks in using derivatives include the risk of mispricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices. Thus, derivatives are highly leveraged instruments. Even a small price movement in the underlying security could have a large impact on their value.

- The options buyer’s risk is limited to the premium paid, while the risk of an options writer is unlimited. However, the gains of an options writer are limited to the premiums earned.

- The writer of a put option bears the risk of loss if the value of the underlying asset declines below the exercise price. The writer of a call option bears a risk of loss if the value of the underlying asset increases above the exercise price.

- Investments in index futures face the same risk as the investments in a portfolio of shares representing an index. The extent of loss is the same as in the underlying stocks.

Risks associated with investments in fixed income securities/products

Some of the common risks associated with investments in fixed income and money market securities are mentioned below. These risks include but are not restricted to:

- **Interest Rate Risk:** As with all debt securities, changes in interest rates affects the valuation of the portfolios, as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of longer-term securities generally fluctuate more in response to interest rate changes than do shorter-term securities. Interest rate movements in the debt markets can be volatile leading to the possibility of large price movements up or down in debt and money market securities and thereby to possibly large movements in the valuation of portfolios.

- **Liquidity or Marketability Risk:** This refers to the ease at which a security can be sold at or near its true value. The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer. Liquidity risk is characteristic of the Indian fixed income market.

- **Credit Risk:** Credit risk or default risk refers to the risk which may arise due to default on the part of the issuer of the fixed income security (i.e. risk that the issuer will be unable to make timely principal and interest payments on the security). Due to this risk, debentures are sold at a yield spread above those offered on treasury securities, which are sovereign obligations and generally considered to be free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the actual changes in the perceived level of credit risk as well as the actual event of default.

- **Reinvestment Risk:** Investments in fixed income securities may carry reinvestment risk as interest rates prevailing on maturity due dates may differ from the original coupon of the bond. Consequently, the proceeds may get invested at a lower rate.

- **Rating Risk:** Different types of debt securities in which the Client invests, may carry different levels and types of risk. Accordingly, the risk may increase or decrease depending upon its investment pattern, for instance corporate bonds carry a higher amount of risk than government securities. Further even among corporate bonds, bonds, which are AA rated, are comparatively riskier than bonds, which are AAA rated.

- **Price Volatility Risk:** Debt securities may also be subject to price volatility due to factors such as changes in interest rates, general level of market liquidity and market perception of the creditworthiness of the issuer, among others (market risk). The market for these Securities may be less liquid than that for other higher rated or more widely followed Securities.

  Investment and Liquidity Risks: There may be no active secondary market for investments of the kind the Portfolio Manager may make for the Client Portfolio. Such investments may be of a medium-to-long term nature. There are a variety of methods by which unlisted investments may be realized, such as the sale of investments on or after listing, or the sale or assignment of investments to joint-venture partners or to third parties subject to relevant approvals. However, there can be no guarantee that such realizations shall be achieved, and the Portfolio’s investments may remain illiquid.

  Since the Portfolio may only make a limited number of investments, poor performance by one or a few of the investments could severely adversely affect the total returns of the PMS.

  Identification of Appropriate Investments: The success of the PMS as a whole depends on the identification and availability of suitable investment opportunities and terms. The availability and terms of investment opportunities will be subject to market conditions, prevailing regulatory conditions where the Portfolio Manager may invest, and other factors outside the control of the Portfolio Manager. Therefore, there can be no assurance that appropriate investments will be available to, or identified or selected by, the Portfolio Manager.

Management and Operational risks

Reliance on the Portfolio Manager

- The success of the PMS will depend to a large extent upon the ability of the Portfolio Manager to source, select, complete and realize appropriate investments and also reviewing the appropriate investment proposals. The Portfolio Manager shall have considerable latitude in its choice of Portfolio Entities and the structuring of investments. Furthermore, the team members of the Portfolio Manager may change from time to time. The Portfolio Manager relies on one or more key personnel and any change/removal of such key personnel may have material adverse effect on the returns of the Client.

- The investment decisions made by the Portfolio Manager may not always be profitable.
- Investments made by the Portfolio Manager are subject to risks arising from the investment objectives, Investment Approach, investment strategy and asset allocation.

Exit Load: Client may have to pay a high Exit Load to withdraw the funds/Portfolio (as stipulated in the Agreement with the Client). In addition, they may be restricted / prohibited from transferring any of the interests, rights or obligations with regard to the Portfolio except as may be provided in the Agreement and in the Regulations.

Non-diversification risks: This risk arises when the Portfolio is not sufficiently diversified by investing in a wide variety of instruments.

No Guarantee: Investments in Securities are subject to market risks and Portfolio Manager does not in any manner whatsoever assure or guarantee that the objectives will be achieved. Further, the value of the Portfolio may increase or decrease depending upon various market forces and factors affecting the capital markets such as delisting of Securities, market closure, relatively small number of scrips accounting for large proportion of trading volume. Consequently, the Portfolio Manager provides no assurance of any guaranteed returns on the Portfolio.

Ongoing risk profiling risk: The Client would be subject to ongoing risk profiling in accordance with the Regulation. If in case during such ongoing risk profiling, it is found that the Client is not suitable for the investments in Securities or doesn't have risk appetite, the Portfolio Manager may terminate the Agreement with the Client.

India-related Risks

Political, economic and social risks: Political instability or changes in the government could adversely affect economic conditions in India generally and the Portfolio Manager's business in particular. The Portfolio Entity's business may be affected by interest rates, changes in government policy, taxation, social and civil unrest and other political, economic or other developments in or affecting India.

Since 1991, successive governments have pursued policies of economic liberalization and financial sector reforms. Nevertheless, the government has traditionally exercised and continues to exercise a significant influence over many aspects of the economy. Moreover, there can be no assurance that such policies will be continued and a change in the government's economic liberalization and deregulation policies in the future could affect business and economic conditions in India and could also adversely affect the Portfolio

Manager's financial condition and operations. Future actions of the Indian central government or the respective Indian state governments could have a significant effect on the Indian economy, which could adversely affect private sector companies, market conditions, prices and yields of the Portfolio Entity/ies.

Inflation and rapid fluctuations in inflation rates have had, and may have, negative effects on the economies and securities markets of the Indian economy. International crude oil prices and interest rates will have an important influence on whether economic growth will be met. Any sharp increases in interest rates and commodity prices, such as crude oil prices, could reactivate inflationary pressures on the local economy and negatively affect the medium-term economic outlook of India.

Many countries have experienced outbreaks of infectious illnesses in recent decades, including severe acute respiratory syndrome and the COVID-19. The COVID-19 outbreak has resulted in numerous deaths and the imposition of both local and more widespread "work from home" and other quarantine measures, border closures and other travel restrictions, causing social unrest and commercial disruption on a global scale. The ongoing spread of the COVID-19 has, had, and will continue to have a material adverse impact on portfolio entities, local economies and also the global economy, as cross border commercial activity and market sentiment are increasingly impacted by the outbreak and government and other measures seeking to contain its spread. Additionally, the Portfolio Manager's operations could be disrupted if any of its member or any of its key personnel contracts the COVID-19 and/or any other infectious disease. Any of the foregoing events could materially and adversely affect the Portfolio Manager's ability to source, manage and divest its investments and its ability to fulfil its investment objectives. Similar consequences may arise with respect to other comparable infectious diseases, death, disabilities etc.

Legal and Tax risks:

Tax risks: Clients/ Investors are subject to a number of risks related to tax matters. In particular, the tax laws relevant to the Client Portfolio are subject to change, and tax liabilities could be incurred by the Clients/ Investors as a result of such change. The government of India, state governments and other local authorities in India impose various taxes, duties and other levies that could affect the performance of the Portfolio Entities. The tax consequences of an investment in the Portfolio Entities are complex, and the full tax impact of an investment in the Portfolio Entities will depend on circumstances particular to each Client/ Investor. Furthermore, the tax laws in relation to the Client Portfolio are subject to change, and tax liabilities could be incurred by Client as a result of such changes. Alternative tax positions adopted by the income tax authorities could also give rise to incremental tax liabilities in addition to the tax amounts already paid by the Client/Investors. An increase in these taxes, duties or levies, or the imposition of new taxes, duties or levies in the future may have a material adverse effect on the Client Portfolio's profitability.

Bankruptcy of Portfolio Entity: Various laws enacted for the protection of creditors may operate to the detriment of the PMS if it is a creditor of a Portfolio Entity that experience financial difficulty. For example, if a Portfolio Entity becomes insolvent or files for bankruptcy protection, there is a risk that a court may subordinate the Portfolio Investment to other creditors. If the PMS/Client holds equity securities in any Portfolio Entity that becomes insolvent or bankrupt, the risk of subordination of the PMS's/Client's claim increases.

Change in Regulation: Any change in the Regulation and/or other Applicable Laws or any new direction of SEBI may adversely impact the operation of the PMS.

Risk pertaining to Investments

Investment in Securities/Instruments

- The Client Portfolio may comprise of investment in unlisted securities, fixed income securities, debt securities/products and in case of such securities, the Portfolio Manager's ability to protect the investment or seek returns or liquidity may be limited.

- In case of in-specie distribution of the Securities by the Portfolio Manager upon termination or liquidation of the Client Portfolio, the same could consist of such Securities for which there may not be a readily available public market. Further, in such cases the Portfolio Manager may not be able transfer any of the interests, rights or obligations with respect to such Securities except as may be specifically provided in the agreement with Portfolio Entities. If an in-specie distribution is received by the Client from the Portfolio Manager, the Client may have restrictions on disposal of assets so distributed and consequently may not be able to realize full value of these assets.

- Some of the Portfolio Entities in which the Portfolio Manager will invest may get their Securities listed with the stock exchange after the investment by the Portfolio Manager. In connection with such listing, the Portfolio Manager may be required to agree not to dispose of its securities in the Portfolio Entity for such period as may be prescribed under the Applicable Law, or there may be certain investments made by the Portfolio Manager which are subject to a statutory period of non-disposal or there may not be enough market liquidity in the security to effect a sale and hence Portfolio Manager may not be able to dispose of such investments prior to completion of such prescribed regulatory tenures and hence may result in illiquidity.

- The Client Portfolio may be invested in listed securities and as such may be subject to the market risk associated with the vagaries of the capital market.

The Portfolio Manager may also invest in portfolio entity/ies which are investment vehicles like mutual funds/trusts. Such investments may present greater opportunities for growth but also carry a greater risk than is usually associated with investments in listed securities or in the securities of established companies, which often have a historical record of performance. Provided investments in mutual funds shall be through direct plans only

7. Client Representation:

(i) The Portfolio Manager has no previous experience/track record in the field of portfolio management services and has obtained a certificate of registration to function as a portfolio manager only on Apr 03, 2023 and therefore has no record of representing any persons/entities in the capacity of a portfolio manager.

(ii) Complete disclosure in respect of transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India- No Such Transaction.

8. Details of investments in the securities of related parties of the Portfolio Manager:

Investments in the securities of associates/related parties of Portfolio Manager:

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
-	NIL	NIL	NIL	NIL	NIL

9. The Financial Performance of Portfolio Manager (based on audited financial statements) as on March 31, 2022

	As on March 31, 2022
Net Profit	40,34,525.90

Financial Statement of the Portfolio Manager as on March 31, 2023 has not been audited as on date.

10. Performance of the Portfolio Manager

The Portfolio Manager has no previous experience/track record in the field of portfolio management services. Accordingly, the same is not applicable.

11. Audit Observations for preceding three years

No Audit observation.

12. Nature of expenses

The following are the general costs and expenses to be borne by the Clients availing the services of the Portfolio Manager. However, the exact nature of expenses relating to each of the following services is annexed to the Agreement in respect of each of the services provided.

i. Management fee:

The management fee relates to the portfolio management services offered to the Clients. The fee may be a fixed charge or a percentage of the quantum of the funds being managed as agreed in the Agreement.

ii. Advisory fees:

The advisory fees relates to the advisory services offered by the Portfolio Manager to the client. The fee may be a fixed charge or a percentage of the quantum of the funds being advised as agreed in the Agreement.

iii. Performance fee:

The performance fee relates to the share of profits charged by the Portfolio Manager, subject to hurdle rate and high-water mark principle as per the details provided in the Agreement.

iv. Exit Load:

The Portfolio Manager may charge early withdrawal fee as a percentage of the value of the Portfolio /withdrawn Portfolio as per the terms and conditions of a particular Product as agreed in the Agreement

v. Other fees and expenses:

The Portfolio Manager may incur the following expenses which shall be charged/

reimbursed by the Client:

(a) Transaction expenses including, but not limited to, statutory fees, documentation charges, statutory levies, stamp duty, registration charges, commissions, charges for transactions in Securities, custodial fees, fees for fund accounting, valuation charges, audit and verification fees, depository charges, and other similar or associated fees, charges and levies, legal fees, incidental expenses etc.;
(b) Brokerage shall be charged at actuals;
(c) Legal and statutory expenses including litigation expenses, if any, in relation to the Portfolio;
(d) Statutory taxes and levies, if any, payable in connection with the Portfolio;
(e) Valuation expenses, valuer fees, audit fees, levies and charges;
(f) All other costs, expenses, charges, levies, duties, administrative, statutory, revenue levies and other incidental costs, fees, expenses not specifically covered above, whether agreed upon in the Agreement or not, arising out of or in the course of managing or operating the Portfolio.

Provided the Portfolio Manager shall not charge any up-front fees to the Client whether directly or indirectly. Notwithstanding the above, the Portfolio Manager may charge up-front costs and expenses so attributable to the Client in terms of the Agreement.

13. Taxation

It may be noted that the information given hereinafter is only for general information purposes and is based on the Portfolio Manager's understanding regarding the Tax laws and practice currently in force in India and the Investors should be aware that the relevant fiscal rules or their interpretation may change or it may not be acceptable to the tax authorities. As is the case with any interpretation of any law, there can be no assurance that the tax position or the proposed tax position prevailing at the time of an investment will be accepted by the tax authorities or will continue to be accepted by them indefinitely.
In view of the individual nature of tax consequences, each client is advised to consult his/her/its tax advisor with respect to the specific tax consequences to him/her/it of participation in the product. The portfolio manager shall not be responsible for assisting in or completing the fulfillment of the client's tax obligations. For complete details on taxation clients are urged to visit https://www.incometaxindia.gov.in/Pages/default.aspx

Income Tax: Under the portfolio management service, responsibility of the income tax payment on the income earned from PMS activities is on the investors. The Portfolio Manager will provide adequate statements required for the accounting purpose.

Securities Transaction Tax: Securities Transaction Tax (STT) at the rate mentioned below is applicable transactions. STT paid is eligible for income tax benefit under the provisions of the Income Tax Act, subject to such conditions prescribed therein.

Taxable securities transaction	**Rate of STT**	**Person responsible to pay STT**	**Value on which STT is required to be paid**
Delivery based purchase of equity share	0.1%	Purchaser	Price at which equity share is purchased*
Delivery based sale of an equity share	0.1%	Seller	Price at which equity share is sold*
Delivery based sale of a unit of oriented mutual fund	0.001%	Seller	Price at which unit is sold*
Sale of equity share or unit of equity oriented mutual fund in recognised stock exchange otherwise than by actual delivery or transfer and intraday traded shares	0.025%	Seller	Price at which equity share or unit is sold*
Derivative – Sale of an option in securities	0.017%	Seller	Option premium
Derivative – Sale of an option in securities where option is exercised	0.125%	Purchaser	Settlement price
Derivative – Sale of futures in securities	0.01%	Seller	Price at which such futures is traded
Sale of unit of an equity-oriented fund to the Mutual Fund – Exchange traded funds (ETFs)	0.001%	Seller	Price at which unit is sold*
Sale of unlisted shares under an offer for sale to public included in IPO and where such shares are subsequently listed in stock exchanges	0.2%	Seller	Price at which such shares are sold*
Purchase Of Units Of Equity Oriented Mutual Funds	Nil	Purchaser	Na

* Please refer Rule 3 of Securities Transaction Tax Rules, 2004 for the manner of determining value of taxable equity or Equity oriented mutual fund transactions.

Short Term Capital Gain Tax: Short-Term Capital Gain Tax is the tax that is levied on the proceeds earned through the sale of shares within one year of purchase date for assets being shares in a company or any other security listed on a recognised stock exchange in India i.e. equity shares, preference shares or debentures, or a unit of the Unit Trust of India or a unit of an equity oriented mutual fund or zero-coupon bonds.

Long Term Capital Gain Tax: Long-Term Capital Gain Tax is the tax that is levied on the proceeds earned through the sale of shares after one year of purchase date for assets being shares in a company or any other security listed on a recognised stock exchange in India i.e. equity shares, preference shares or debentures, or a unit of the Unit Trust of India or a unit of an equity oriented mutual fund or zero-coupon bonds.

Goods and Service Tax (GST): will be applicable on services provided by the Portfolio Manager to Clients. Accordingly, GST at the rate of 18% would be levied on fees if any, payable towards investment management fee, Audit Fees, Custodian Fees, Fund Accounting Fees, etc.

Dividend Distribution tax (DDT): Effective 1 April 2020 the Dividend received on the shares and units of Mutual Funds held in the Portfolio Management Services are subject to tax in the hands of investor at the applicable slab rates.

TDS on Sale Proceeds for Non-Resident Individuals: In respect to short-term capital gains from units of equity-oriented schemes, tax is required to be deducted at the rate of 15% for both corporate and non- corporate non-resident unit holders. Long term capital gains from equity-oriented schemes & listed equity shares are liable to be withhold @10% if the capital gain exceed Rs 1 Lakh during the financial year starting from April 1, 2018 subject to Grandfathering Clause.

14. Accounting policies

Following key accounting policies shall be followed:

- All investments will be marked to market.
- In determining the holding cost of investments and the gains or loss on sale of investments, the ‘first in first out’ method shall be followed.
- The cost of investments acquired or purchased would include brokerage, stamp charges and any charge customarily included in the broker’s contract note.

- Accounting norms prevalent in the portfolio management services industry and as may be prescribed/applicable from time to time.

15. Custody of Securities

i) Custody of all Securities of the Client shall be with the Custodian who shall be appointed, from time to time, at the discretion of the Portfolio Manager.
ii) The Custodian shall act on instructions of the Portfolio Manager.
iii) All such custodian fees, charged by the Custodian shall be payable by the Client.
iv) The Portfolio Manager shall not be liable for any act of the Custodian, done with or without the instruction of the Portfolio Manager, which may cause or is likely to cause any loss or damage to the Client.

16. Investors services

The Portfolio Manager seeks to provide the Clients a high standard of service. The Portfolio Manager is committed to put in place and upgrade on a continuous basis the systems and procedures that will enable effective servicing through the use of technology. The Client servicing essentially involves:

(a) Reporting portfolio actions and client statement of accounts at pre-defined frequency;
(b) Attending to and addressing any client query with least lead time;
(c) Ensuring portfolio reviews at predefined frequency.

Name, address and telephone number of the investor relation officer who shall attend to the investor queries and complaints:

Name	Mr. Lovish jain
Designation	Compliance Officer
Address	WeWork Enam Sambhav, C - 20, G Block BKC, G Block, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051
Telephone No	+91 80540 81772
Email id	jain.lovish.lf@gmail.com

Grievance redressal and dispute settlement mechanism:

The aforesaid personnel of the Portfolio Manager shall attend to and address any Client query/concern/grievance at the earliest. The Portfolio Manager will ensure that this official is vested with the necessary authority and independence to handle Client complaints. The aforesaid official will immediately identify the grievance and take appropriate steps to eliminate the causes of such grievances to the satisfaction of the Client. Effective grievance management would be an essential element of the Portfolio Manager’s portfolio management services and the aforesaid official may adopt the following approach to manage grievance effectively and expeditiously:

1. **Quick action-** As soon as any grievance comes to the knowledge of the aforesaid personnel, it would be identified and resolved. This will lower the detrimental effects of the grievance.
2. **Acknowledging grievance-** The aforesaid officer shall acknowledge the grievance put forward by the Client and look into the complaint impartially and without any bias.
3. **Gathering facts**- The aforesaid official shall gather appropriate and sufficient facts explaining the grievance's nature. A record of such facts shall be maintained so that these can be used in later stage of grievance redressal.
4. **Examining the causes of grievance**- The actual cause of grievance would be identified. Accordingly, remedial actions would be taken to prevent repetition of the grievance.
5. **Decision making** - After identifying the causes of grievance, alternative course of actions would be thought of to manage the grievance. The effect of each course of action on the existing and future management policies and procedure would be analysed and accordingly decision should be taken by the aforesaid official. The aforesaid official would execute the decision quickly.
6. **Review -** After implementing the decision, a follow-up would be there to ensure that the grievance has been resolved completely and adequately.

Grievances/concerns, if any, which may not be resolved/satisfactorily addressed in aforesaid manner shall be redressed through the administrative mechanism by the designated Compliance Officer, namely Ms. Varsha Kasera and subject to the Regulations. The Compliance Officer will endeavor to address such grievance in a reasonable manner and time. The coordinates of the Compliance Officer are provided as under:

Name	Mr. Lovish jain
Designation	Compliance Officer
Address	WeWork Enam Sambhav, C - 20, G Block BKC, G Block, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051
Telephone No	+91 80540 81772
Email id	jain.lovish.lf@gmail.com

If the Client still remains dissatisfied with the remedies offered or the stand taken by the Compliance Officer, the Client and the Portfolio Manager shall abide by the following mechanisms:

Any dispute unresolved by the above internal grievance redressal mechanism of the

Portfolio Manager, can be submitted to arbitration under the Arbitration and Conciliation Act, 1996. The arbitration shall be before three arbitrators, with each party entitled to appoint an arbitrator and the third arbitrator being the presiding arbitrator appointed by the two arbitrators. Each party will bear the expenses / costs incurred by it in appointing the arbitrator and for the arbitration proceedings. Further, the cost of appointing the presiding arbitrator will be borne equally by both the parties. Such arbitration proceedings shall be held at Kolkata and the language of the arbitration shall be English. The courts of Kolkata shall have the exclusive jurisdiction to adjudicate upon the claims of the parties.

Without prejudice to anything stated above, the Client can also register its grievance/complaint through SCORES (SEBI Complaints Redress System), post which SEBI may forward the complaint to the Portfolio Manager and the Portfolio Manager will suitably address the same. SCORES is available at http://scores.gov.in. SCORES may be accessed thorough SCORES mobile application as well, same can be downloaded from below link: https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330

17. General

Prevention of Money Laundering

The Portfolio Manager shall presume that the identity of the Client and the information disclosed by the Client is true and correct. It will also be presumed that the funds invested by the Client through the services of the Portfolio Manager come from legitimate sources / manner only and does not involve and is not designated for the purpose of any contravention or evasion of the provisions of the Income Tax Act, 1961, PML Laws, Prevention of Corruption Act, 1988 and/or any other Applicable Law in force and the investor is duly entitled to invest the said funds.

To ensure appropriate identification of the Client(s) under its Know Your Client (KYC) policy and with a view to monitor transactions in order to prevent money laundering, the Portfolio Manager (itself or through its nominated agency as permissible under Applicable Laws) reserves the right to seek information, record investor's telephonic calls and/or obtain and retain documentation for establishing the identity of the investor, proof of residence, source of funds, etc.

Where the funds invested are for the benefit of a person (beneficiary) other than the person in whose name the investments are made and/or registered, the Client shall provide an undertaking that the Client, holding the funds/securities in his name, is legally authorised/entitled to invest the said funds/securities through the services of the Portfolio Manager, for the benefit of the beneficiaries.

The Portfolio Manager will not seek fresh KYC from the Clients who are already KYC Registration Agency (KRA) compliant except the information required under any new

KYC requirement. The Clients who are not KRA compliant, the information will be procured by the Portfolio Manager and uploaded.

The Portfolio Manager, and its directors, shareholders, employees, agents and service providers shall not be liable in any manner for any claims arising whatsoever on account of freezing the Client's account/rejection of any application or mandatory repayment/returning of funds due to non- compliance with the provisions of the PML Laws and KYC policy. If the Portfolio Manager believes that transaction is suspicious in nature within the purview of the PML Laws, then it will report the same to FIU-IND.

Notwithstanding anything contained in this Document, the provisions of the Regulations, PML Laws and the guidelines there under shall be applicable. Clients/Investors are advised to read the Document carefully before entering into an Agreement with the Portfolio Manager.

For and on behalf of Wryght Research & Capital Private Limited

Ms. Sonam Srivastave **DPIN:** 08608826 Director	:	SONAM SRIVASTAVA Digitally signed by SONAM SRIVASTAVA Date: 2023.08.29 20:17:19 +05'30'
Mr. Siddharth Singh Bhaisora **DPIN:** 09664115 Director	:	SIDDHARTH SINGH BHAISORA Digitally signed by SIDDHARTH SINGH BHAISORA Date: 2023.08.29 11:19:34 +05'30'

Place: Mumbai
Date: August 29, 2023

Annexure I
Investment Approach

1. Wright Factor Fund - Hedged

Investment Objective

The objective of the portfolio is long-term wealth generation at a low risk using tactical allocation to quantitative factors in the market within appropriate risk management.

Our core philosophy at Wryght Research & Capital is structured around 3 key principles:

- Portfolio construction in line with client's risk & return objectives.
- Achieve efficient capital protection by hedging known risk.
- Seek capital appreciation over a defined investment horizon.

We seek to invest in Indian Equities of based on tactical allocation multiple factors like value investing or investing in undervalued companies, growth investing or investing in high growth companies, quality investing or investing companies with high quality of earnings, momentum investing or investing in companies that have shows a significant price trend and many other quantitative factors that we research upon. We would also hedge the portfolio for anticipated risk using derivative instruments.

The investment strategy is focused on:

- Research and identification of multiple quantitative factors influencing market returns (based on fundamental & technical data)
- Research on factors influencing risk
- Quantitative Position sizing & risk management
- Efficient Hedging
- Optimal trading & turnover control
- Use of statistical & machine learning methods in investment management

Investment decisions will be taken after rigorous research and due diligence while factoring for risk exposures leading to an appropriate fair value. We believe our investment approach ensures building a portfolio with long term wealth generation prospects within the appropriate risk return parameters.

Investment Approaches

Under this approach, Wryght Research & Capital would primarily invest in listed equities in the Large-cap, Mid-cap and Small-cap space and derivative instruments to hedge. It may also invest opportunistically in other permissible securities/products in accordance with the Applicable Laws.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Basis of selection of such types of securities as part of the investment approach

Key Investment Attributes we look for:

- Quality of Business
- Quality of Management
- Profitability
- Efficiency
- Price Momentum
- Volatility
- Dividend Yield
- Size of opportunity
- Earnings & Sales growth
- Valuations
- Sentiment
- Sustainability
- Corporate Governance

Opportunity Funnel:

- Observe a broad Investment universe consisting stocks of 1000 cr + Market capitalization.
- Use proprietary screening methodology to weed out business with undesirable attributes.
- Multiple factors are tracked and the companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modeling and forecast the multiple factors are combined to create a tactical well diversified portfolio
- Hedging the portfolio using derivatives based on risk metrics in the market.

Exit Strategy:

- Difference between fair value and over valuation beyond defined threshold.
- Change in long term prospects of business.
- Corporate governance and ethics issues.
- Investment determined no longer suitable for given Portfolio Construct.

Businesses we avoid:

- Low scores on altman Z scores and other key forensic accounting metrics
- Businesses in sectors with structural Headwinds.
- Businesses with corporate givernance issues
- Businesses with high potential for disruption.
- Faliure to meet minimum threshold return requirements.

Portfolio Construction Methodology:

- We track multiple long-term factors in the market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these themes.
- Companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modelling and forecast the multiple factors are combined to create a tactical well-diversified portfolio
- Final portfolio has many other risk management layers based on various scenario analysis and stress testing methods.
- The portfolio is hedged using derivative instruments to reduce risk.

Risk Management:

Wryght Research & Capital PMS will set up and implement both Qualitative and Quantitative risk management procedures with a regular review and analysis protocol.

Key Quantitative Risk Management Factors:

Risk Factor: Concentration Risk

- Stock Exposure Limit: 10%
- Sector Exposure Limit: 25%
- Promotor exposure Limit: 25%
- Factor exposure Limit: 50%

Risk Factor: Liquidity Risk

- Use of liquidity seeking algorithms such as VWAP, TWAP to minimize impact cost.
- Seek to invest in securities with sufficient free float i.e >500cr.

Qualitative Risk Management

- Establish deep understanding of qualitative analysis including but not limited to the Track record of management, corporate governance and ethics and Business Strategy.

Our Claim to alpha:

- As fund managers we seek to minimize long-term risks by investing in businesses with superior wealth generation prospects and creating a very well diversified basket. This objective will be achieved on the back of rigorous research and analysis, multiple factor-based analysis which looks at the business from fundamental as well as technical fashion and tactical market risk and regime models.

Allocation of portfolio across types of securities

The investment shall be made in the following Asset Class

- Equity and equity-related securities
- Derivatives
- Mutual Funds: Equity, Debt & other Instrument of Mutual funds
- Debentures (Convertible & Non –Convertible)
- Government Securities
- Treasury bills, Commercial Papers, Certificate of deposit and other similar money market
- another eligible mode of investment and /or forms investment within the meaning of the regulation and those approved by SEBI from time to time.

Investment Style	Multi Factor
Investment Approach	Top Down
Market Cap	All Cap
Estimated Holdings	20-40

Under this approach, Portfolio would be primarily invested in listed equities and opportunistically also in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws.

The portfolio shall be focused through collection of core holdings and shall seek diversification across various sector of the equity markets.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Strategy

Equity

Indicative tenure or investment horizon

Typically, investments will have a medium to the long-term time horizon of 6 months-2 years.

Appropriate benchmark to compare performance and basis for choice of benchmark

The Portfolio Manager aims to invest in a market capitalization agnostic manner and the portfolio may consist of large, mid or small cap companies. Effective April 1, 2023 SEBI has prescribed the Portfolio Managers to choose benchmarks from Nifty 50 TRI, S&P BSE 500 and MSEI SX 40 TRI. Out of the options available under regulations, S&P BSE 500 TRI was considered to be most appropriate

Risks associated with the investment approach

Below are certain risks associated with the investment approach apart from those disclosed in **Annexure "C"** of the PMS Agreement. The risks may affect portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

Company risk: The performance of the investment approach will depend upon the performance of the Portfolio schemes and its future prospects. Portfolio Manager's focus on fundamentals through the detailed approach mentioned above will help the Portfolio Manager in mitigating these sector or company risks.

Valuation risk: The Portfolio Manager will assess the Portfolio schemes from varied parameters, the Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations of the entities invested by the schemes are reasonable while investing and reassessing the same from time to time.

Concentration Risk: Endeavor to have a concentrated portfolio of 20-25 schemes.

Volatility Risk: The value of mutual fund schemes in the portfolio depends upon companies' performance, which often gets affected due to the prevalent microeconomic factors.

Liquidity Risk: Investment in closed-ended schemes come with liquidity risk.

Rebalancing risk: Rebalancing of schemes depending on market conditions pose rebalancing risk to the portfolio.

Other salient features, if any.

N.A.

2. Wright Factor Fund - NRI

Investment Objective

The objective of the portfolio is long-term wealth generation at a low risk using tactical allocation to quantitative factors in the market within appropriate risk management.

Our core philosophy at Wryght Research & Capital is structured around 3 key principles:

- Portfolio construction in line with client's risk & return objectives.
- Achieve efficient capital protection by hedging known risk.
- Seek capital appreciation over a defined investment horizon.

We seek to invest in Indian Equities of based on tactical allocation multiple factors like value investing or investing in undervalued companies, growth investing or investing in high growth companies, quality investing or investing companies with high quality of earnings, momentum investing or investing in companies that have shows a significant price trend and many other quantitative factors that we research upon. We would also hedge the portfolio for anticipated risk using derivative instruments.

The investment strategy is focused on:

- Research and identification of multiple quantitative factors influencing market returns (based on fundamental & technical data)
- Research on factors influencing risk
- Quantitative Position sizing & risk management
- Efficient Hedging
- Optimal trading & turnover control
- Use of statistical & machine learning methods in investment management

Investment decisions will be taken after rigorous research and due diligence while factoring for risk exposures leading to an appropriate fair value. We believe our investment approach ensures building a portfolio with long term wealth generation prospects within the appropriate risk return parameters.

Investment Approaches

Under this approach, Wryght Research & Capital would primarily invest in listed equities in the Large-cap, Mid-cap and Small-cap space and derivative instruments to hedge. It may also invest opportunistically in other permissible securities/products in accordance with the Applicable Laws.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Basis of selection of such types of securities as part of the investment approach

Key Investment Attributes we look for:

- Quality of Business
- Quality of Management
- Profitability
- Efficiency
- Price Momentum
- Volatility
- Dividend Yield
- Size of opportunity
- Earnings & Sales growth
- Valuations
- Sentiment
- Sustainability
- Corporate Governance

Opportunity Funnel:

- Observe a broad Investment universe consisting stocks of 1000 cr + Market capitalization.
- Use proprietary screening methodology to weed out business with undesirable attributes.
- Multiple factors are tracked and the companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modeling and forecast the multiple factors are combined to create a tactical well diversified portfolio
- Hedging the portfolio using derivatives based on risk metrics in the market.

Exit Strategy:

- Difference between fair value and over valuation beyond defined threshold.
- Change in long term prospects of business.
- Corporate governance and ethics issues.
- Investment determined no longer suitable for given Portfolio Construct.

Businesses we avoid:

- Low scores on altman Z scores and other key forensic accounting metrics
- Businesses in sectors with structural Headwinds.

- Businesses with corporate givernance issues
- Businesses with high potential for disruption.
- Faliure to meet minimum threshold return requirements.

Portfolio Construction Methodology:

- We track multiple long-term factors in the market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these themes.
- Companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modelling and forecast the multiple factors are combined to create a tactical well-diversified portfolio
- Final portfolio has many other risk management layers based on various scenario analysis and stress testing methods.
- The portfolio is hedged using derivative instruments to reduce risk.

Risk Management:

Wryght Research & Capital PMS will set up and implement both Qualitative and Quantitative risk management procedures with a regular review and analysis protocol.

Key Quantitative Risk Management Factors:

Risk Factor: Concentration Risk

- Stock Exposure Limit: 10%
- Sector Exposure Limit: 25%
- Promotor exposure Limit: 25%
- Factor exposure Limit: 50%

Risk Factor: Liquidity Risk

- Use of liquidity seeking algorithms such as VWAP, TWAP to minimize impact cost.
- Seek to invest in securities with sufficient free float i.e >500cr.

Qualitative Risk Management

- Establish deep understanding of qualitative analysis including but not limited to the Track record of management, corporate governance and ethics and Business Strategy.

Our Claim to alpha:

- As fund managers we seek to minimize long-term risks by investing in businesses with superior wealth generation prospects and creating a very well diversified basket. This objective will be achieved on the back of rigorous research and analysis, multiple factor-based analysis which looks at the business from fundamental as well as technical fashion and tactical market risk and regime models.

Allocation of portfolio across types of securities

The investment shall be made in the following Asset Class

- Equity and equity-related securities
- Derivatives
- Mutual Funds: Equity, Debt & other Instrument of Mutual funds
- Debentures (Convertible & Non –Convertible)
- Government Securities
- Treasury bills, Commercial Papers, Certificate of deposit and other similar money market
- another eligible mode of investment and /or forms investment within the meaning of the regulation and those approved by SEBI from time to time.

Investment Style	Multi Factor
Investment Approach	Top Down
Market Cap	All Cap
Estimated Holdings	20-40

Under this approach, Portfolio would be primarily invested in listed equities and opportunistically also in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws.

The portfolio shall be focused through collection of core holdings and shall seek diversification across various sector of the equity markets.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Strategy

Equity

Indicative tenure or investment horizon

Typically, investments will have a medium to the long-term time horizon of 6 months-2 years.

Appropriate benchmark to compare performance and basis for choice of benchmark

The Portfolio Manager aims to invest in a market capitalization agnostic manner and the portfolio may consist of large, mid or small cap companies. Effective April 1, 2023 SEBI has prescribed the Portfolio Managers to choose benchmarks from Nifty 50 TRI, S&P BSE 500 and MSEI SX 40 TRI. Out of the options available under regulations, S&P BSE 500 TRI was considered to be most appropriate

Risks associated with the investment approach

Below are certain risks associated with the investment approach apart from those disclosed in **Annexure "C"** of the PMS Agreement. The risks may affect portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

Company risk: The performance of the investment approach will depend upon the performance of the Portfolio schemes and its future prospects. Portfolio Manager's focus on fundamentals through the detailed approach mentioned above will help the Portfolio Manager in mitigating these sector or company risks.

Valuation risk: The Portfolio Manager will assess the Portfolio schemes from varied parameters, the Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations of the entities invested by the schemes are reasonable while investing and reassessing the same from time to time.

Concentration Risk: Endeavor to have a concentrated portfolio of 20-25 schemes.

Volatility Risk: The value of mutual fund schemes in the portfolio depends upon companies' performance, which often gets affected due to the prevalent microeconomic factors.

Liquidity Risk: Investment in closed-ended schemes come with liquidity risk.

Rebalancing risk: Rebalancing of schemes depending on market conditions pose rebalancing risk to the portfolio.

Other salient features, if any.

N.A.

3. **Wright Factor Fund**

Investment Objective

The objective of the portfolio is long-term wealth generation at a low risk using tactical allocation to quantitative factors in the market within appropriate risk management.

Our core philosophy at Wryght Research & Capital is structured around 3 key principles:

- Portfolio construction in line with client's risk & return objectives.
- Achieve efficient capital protection over time.
- Seek capital appreciation over a defined investment horizon.

We seek to invest in Indian Equities of based on tactical allocation multiple factors like value investing or investing in undervalued companies, growth investing or investing in high growth companies, quality investing or investing companies with high quality of earnings, momentum investing or investing in companies that have shows a significant price trend and many other quantitative factors that we research upon.

The investment strategy is focused on:

- Research and identification of multiple quantitative factors influencing market returns (based on fundamental & technical data)
- Research on factors influencing risk
- Quantitative Position sizing & risk management
- Optimal trading & turnover control
- Use of statistical & machine learning methods in investment management

Investment decisions will be taken after rigorous research and due diligence while factoring for risk exposures leading to an appropriate fair value. We believe our investment approach ensures building a portfolio with long term wealth generation prospects within the appropriate risk return parameters.

Investment Approaches

Under this approach, Wryght Research & Capital would primarily invest in listed equities in the Large-cap, Mid-cap and Small-cap space. It may also invest opportunistically in other permissible securities/products in accordance with the Applicable Laws.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Basis of selection of such types of securities as part of the investment approach

Key Investment Attributes we look for:

- Quality of Business
- Quality of Management
- Profitability

- Efficiency
- Price Momentum
- Volatility
- Dividend Yield
- Size of opportunity
- Earnings & Sales growth
- Valuations
- Sentiment
- Sustainability
- Corporate Governance

Opportunity Funnel:

- Observe a broad Investment universe consisting stocks of 1000 cr + Market capitalization.
- Use proprietary screening methodology to weed out business with undesirable attributes.
- Multiple factors are tracked and the companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modeling and forecast the multiple factors are combined to create a tactical well diversified portfolio

Exit Strategy:

- Difference between fair value and over valuation beyond defined threshold.
- Change in long term prospects of business.
- Corporate governance and ethics issues.
- Investment determined no longer suitable for given Portfolio Construct.

Businesses we avoid:

- Low scores on altman Z scores and other key forensic accounting metrics
- Businesses in sectors with structural Headwinds.
- Businesses with corporate givernance issues
- Businesses with high potential for disruption.
- Faliure to meet minimum threshold return requirements.

Portfolio Construction Methodology:

- We track multiple long-term factors in the market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these themes.

- Companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modelling and forecast the multiple factors are combined to create a tactical well-diversified portfolio
- Final portfolio has many other risk management layers based on various scenario analysis and stress testing methods.

Risk Management:

Wryght Research & Capital PMS will set up and implement both Qualitative and Quantitative risk management procedures with a regular review and analysis protocol.

Key Quantitative Risk Management Factors:

Risk Factor: Concentration Risk

- Stock Exposure Limit: 10%
- Sector Exposure Limit: 25%
- Promotor exposure Limit: 25%
- Factor exposure Limit: 50%

Risk Factor: Liquidity Risk

- Use of liquidity seeking algorithms such as VWAP, TWAP to minimize impact cost.
- Seek to invest in securities with sufficient free float i.e >500cr.

Qualitative Risk Management

- Establish deep understanding of qualitative analysis including but not limited to the Track record of management, corporate governance and ethics and Business Strategy.

Our Claim to alpha:

- As fund managers we seek to minimize long-term risks by investing in businesses with superior wealth generation prospects and creating a very well diversified basket. This objective will be achieved on the back of rigorous research and analysis, multiple factor-based analysis which looks at the business from fundamental as well as technical fashion and tactical market risk and regime models.

Allocation of portfolio across types of securities

The investment shall be made in the following Asset Class

- Equity and equity-related securities

- Derivatives
- Mutual Funds: Equity, Debt & other Instrument of Mutual funds
- Debentures (Convertible & Non –Convertible)
- Government Securities
- Treasury bills, Commercial Papers, Certificate of deposit and other similar money market
- another eligible mode of investment and /or forms investment within the meaning of the regulation and those approved by SEBI from time to time.

Investment Style	Multi Factor
Investment Approach	Top Down
Market Cap	All Cap
Estimated Holdings	20-40

Under this approach, Portfolio would be primarily invested in listed equities and opportunistically also in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws.

The portfolio shall be focused through collection of core holdings and shall seek diversification across various sector of the equity markets.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Strategy
Equity

Indicative tenure or investment horizon

Typically, investments will have a medium to the long-term time horizon of 6 months-2 years.

Appropriate benchmark to compare performance and basis for choice of benchmark

The Portfolio Manager aims to invest in a market capitalization agnostic manner and the portfolio may consist of large, mid or small cap companies. Effective April 1, 2023 SEBI has prescribed the Portfolio Managers to choose benchmarks from Nifty 50 TRI, S&P BSE 500 and MSEI SX 40 TRI. Out of the options available under regulations, S&P BSE 500 TRI was considered to be most appropriate

Risks associated with the investment approach

Below are certain risks associated with the investment approach apart from those disclosed in **Annexure "C"** of the PMS Agreement. The risks may affect portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

Company risk: The performance of the investment approach will depend upon the performance of the Portfolio schemes and its future prospects. Portfolio Manager’s focus on fundamentals through the detailed approach mentioned above will help the Portfolio Manager in mitigating these sector or company risks.

Valuation risk: The Portfolio Manager will assess the Portfolio schemes from varied parameters, the Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations of the entities invested by the schemes are reasonable while investing and reassessing the same from time to time.

Concentration Risk: Endeavor to have a concentrated portfolio of 20-25 schemes.

Volatility Risk: The value of mutual fund schemes in the portfolio depends upon companies’ performance, which often gets affected due to the prevalent microeconomic factors.

Liquidity Risk: Investment in closed-ended schemes come with liquidity risk.

Rebalancing risk: Rebalancing of schemes depending on market conditions pose rebalancing risk to the portfolio.

Other salient features, if any.
N.A.

4. Wright Alpha Fund

Investment Objective

The objective of the portfolio is long-term wealth generation at a high risk using tactical allocation to momentum factors in the market within appropriate risk management.

Our core philosophy at Wryght Research & Capital is structured around 3 key principles:

- Portfolio construction in line with client's risk & return objectives.
- Achieve efficient capital protection over time.
- Seek capital appreciation over a defined investment horizon.

We seek to invest in Indian Equities of based on tactical allocation to high momentum investing or investing in companies that have shows a significant price trend and many other quantitative factors that we research upon.

The investment strategy is focused on:

- Research and identification of multiple momentum factors influencing market returns (based on fundamental & technical data)
- Research on factors influencing risk
- Quantitative Position sizing & risk management
- Optimal trading & turnover control
- Use of statistical & machine learning methods in investment management

Investment decisions will be taken after rigorous research and due diligence while factoring for risk exposures leading to an appropriate fair value. We believe our investment approach ensures building a portfolio with long term wealth generation prospects within the appropriate risk return parameters.

Investment Approaches

Under this approach, Wryght Research & Capital would primarily invest in listed equities in the Large-cap, Mid-cap and Small-cap space. It may also invest opportunistically in other permissible securities/products in accordance with the Applicable Laws.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Basis of selection of such types of securities as part of the investment approach

Key Investment Attributes we look for:

- Price Momentum
- Earnings Momentum

Opportunity Funnel:

- Observe a broad Investment universe consisting stocks of 1000 cr + Market capitalization.
- Use proprietary screening methodology to weed out business with undesirable attributes.
- Multiple factors are tracked and the companies are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modeling and forecast the multiple factors are combined to create a tactical well diversified portfolio

Exit Strategy:

- Difference between fair value and over valuation beyond defined threshold.
- Change in long term prospects of business.
- Corporate governance and ethics issues.
- Investment determined no longer suitable for given Portfolio Construct.

Businesses we avoid:

- Low scores on altman Z scores and other key forensic accounting metrics
- Businesses in sectors with structural Headwinds.
- Businesses with corporate givernance issues
- Businesses with high potential for disruption.
- Faliure to meet minimum threshold return requirements.

Portfolio Construction Methodology:

- We track multiple long-term momentum factors in the market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these themes.
- Companies are assigned appropriate scores based on the momentum factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modelling and forecast the multiple factors are combined to create a tactical well-diversified portfolio
- Final portfolio has many other risk management layers based on various scenario analysis and stress testing methods.

Risk Management:

Wryght Research & Capital PMS will set up and implement both Qualitative and Quantitative risk management procedures with a regular review and analysis protocol.

Key Quantitative Risk Management Factors:

Risk Factor: Concentration Risk

- Stock Exposure Limit: 10%
- Sector Exposure Limit: 25%
- Promotor exposure Limit: 25%
- Factor exposure Limit: 50%

Risk Factor: Liquidity Risk

- Use of liquidity seeking algorithms such as VWAP, TWAP to minimize impact cost.
- Seek to invest in securities with sufficient free float i.e >500cr.

Qualitative Risk Management

- Establish deep understanding of qualitative analysis including but not limited to the Track record of management, corporate governance and ethics and Business Strategy.

Our Claim to alpha:

- As fund managers we seek to minimize long-term risks by investing in businesses with superior wealth generation prospects and creating a very well diversified basket. This objective will be achieved on the back of rigorous research and analysis, multiple momentum factor-based analysis which looks at the business from fundamental as well as technical fashion and tactical market risk and regime models.

Allocation of portfolio across types of securities

The investment shall be made in the following Asset Class

- Equity and equity-related securities
- Derivatives
- Mutual Funds: Equity, Debt & other Instrument of Mutual funds
- Debentures (Convertible & Non –Convertible)
- Government Securities
- Treasury bills, Commercial Papers, Certificate of deposit and other similar money market
- another eligible mode of investment and /or forms investment within the meaning of the regulation and those approved by SEBI from time to time.

Investment Style	Multi Factor
Investment Approach	Top Down

Market Cap	All Cap
Estimated Holdings	20-40

Under this approach, Portfolio would be primarily invested in listed equities and opportunistically also in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws.

The portfolio shall be focused through collection of core holdings and shall seek diversification across various sector of the equity markets.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Strategy
Equity

Indicative tenure or investment horizon

Typically, investments will have a medium to the long-term time horizon of 6 months-2 years.

Appropriate benchmark to compare performance and basis for choice of benchmark

The Portfolio Manager aims to invest in a market capitalization agnostic manner and the portfolio may consist of large, mid or small cap companies. Effective April 1, 2023 SEBI has prescribed the Portfolio Managers to choose benchmarks from Nifty 50 TRI, S&P BSE 500 and MSEI SX 40 TRI. Out of the options available under regulations, S&P BSE 500 TRI was considered to be most appropriate

Risks associated with the investment approach

Below are certain risks associated with the investment approach apart from those disclosed in **Annexure "C"** of the PMS Agreement. The risks may affect portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

Company risk: The performance of the investment approach will depend upon the performance of the Portfolio schemes and its future prospects. Portfolio Manager's focus on fundamentals through the detailed approach mentioned above will help the Portfolio Manager in mitigating these sector or company risks.

Valuation risk: The Portfolio Manager will assess the Portfolio schemes from varied parameters, the Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations of the entities invested by the schemes are reasonable while investing and reassessing the same from time to time.

Concentration Risk: Endeavor to have a concentrated portfolio of 20-25 schemes.

Volatility Risk: The value of mutual fund schemes in the portfolio depends upon companies' performance, which often gets affected due to the prevalent microeconomic factors.

Liquidity Risk: Investment in closed-ended schemes come with liquidity risk.

Rebalancing risk: Rebalancing of schemes depending on market conditions pose rebalancing risk to the portfolio.

Other salient features, if any.
N.A.

5. Wright Debt Fund

Investment Objective

The objective of the portfolio is long-term wealth generation at a low risk using tactical allocation to debt mutual funds and ETFS in the market within appropriate risk management.

Our core philosophy at Wryght Research & Capital is structured around 3 key principles:

- Portfolio construction in line with client's risk & return objectives.
- Achieve efficient capital protection over time.
- Seek capital appreciation over a defined investment horizon.

We seek to invest in Indian Equities of based on tactical allocation multiple debt mutual funds and ETFs.

The investment strategy is focused on:

- Research and identification of mutual funds to invest in
- Research on factors influencing risk
- Quantitative Position sizing & risk management
- Optimal trading & turnover control
- Use of statistical & machine learning methods in investment management

Investment decisions will be taken after rigorous research and due diligence while factoring for risk exposures leading to an appropriate fair value. We believe our investment approach ensures building a portfolio with long term wealth generation prospects within the appropriate risk return parameters.

Investment Approaches

Under this approach, Wryght Research & Capital would primarily invest in listed ETFs and Debt Mutual Funds. It may also invest opportunistically in other permissible securities/products in accordance with the Applicable Laws.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Basis of selection of such types of securities as part of the investment approach

Key Investment Attributes we look for:

- Fund Performance
- Fund Manager
- Fund AUM
- Current Interest Rate Regime
- Fund Yields
- Fund Expense Ratio

Opportunity Funnel:

- Observe a broad Investment universe consisting debt mutual funds and ETFs
- Use proprietary screening methodology to weed out funds with undesirable attributes.
- Multiple factors are tracked and the funds are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modeling and forecast the multiple factors are combined to create a tactical well diversified portfolio

Exit Strategy:

- Change in long term prospects of fund.
- Corporate governance and ethics issues.
- Investment determined no longer suitable for given Portfolio Construct.

Portfolio Construction Methodology:

- We track multiple long-term factors in the market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these themes.
- Funds are assigned appropriate scores based on the factor exposures and statistical analysis
- Position sizing methods are used to create a diversified portfolio using factor exposure data and the correlation metrics of the stocks
- Using market regime modelling and forecast the multiple factors are combined to create a tactical well-diversified portfolio
- Final portfolio has many other risk management layers based on various scenario analysis and stress testing methods.

Risk Management:

Wryght Research & Capital PMS will set up and implement both Qualitative and Quantitative risk management procedures with a regular review and analysis protocol.

Key Quantitative Risk Management Factors:

Risk Factor: Concentration Risk

- Fund Exposure Limit: 20%

Risk Factor: Liquidity Risk

- Seek to invest in securities with sufficient AUM i.e >500cr.

Qualitative Risk Management

- Establish deep understanding of qualitative analysis including but not limited to the Track record of funds and Interest Rate regime.

Our Claim to alpha:

- As fund managers we seek to minimize long-term risks by investing in businesses with superior wealth generation prospects and creating a very well diversified basket. This objective will be achieved on the back of rigorous research and analysis, multiple factor-based analysis which looks at the funds from fundamental as well as technical fashion and tactical market risk and regime models.

Allocation of portfolio across types of securities

The investment shall be made in the following Asset Class

- Equity and equity-related securities
- Derivatives
- Mutual Funds: Equity, Debt & other Instrument of Mutual funds
- Debentures (Convertible & Non –Convertible)
- Government Securities
- Treasury bills, Commercial Papers, Certificate of deposit and other similar money market
- another eligible mode of investment and /or forms investment within the meaning of the regulation and those approved by SEBI from time to time.

Investment Style	Multi Factor
Investment Approach	Top Down
Market Cap	All Cap
Estimated Holdings	20-40

Under this approach, Portfolio would be primarily invested in listed equities and opportunistically also in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws.

The portfolio shall be focused through collection of core holdings and shall seek diversification across various sector of the equity markets.

In no case shall the Portfolio Manager deploy the Capital Contribution in unregulated financing mechanism such as badla or discounting of bills of exchange or for the purpose of lending or placement with corporate or non-corporate bodies unless otherwise permitted by SEBI.

Strategy

Debt

Indicative tenure or investment horizon

Typically, investments will have a medium to the long-term time horizon of 6 months-2 years.

Appropriate benchmark to compare performance and basis for choice of benchmark

The Portfolio Manager aims to invest in a agnostic manner and the portfolio may consist of debt funds. Effective April 1, 2023 SEBI has prescribed the Portfolio Managers to choose from Nifty Medium to Long-duration Debt Index, Nifty 50 Hybrid Composite Debt 50:50 Index and NSE Multi Asset Index are among the indices suggested. Out of the options available under regulations, Nifty 50 Hybrid Composite Debt 50:50 Indexwas considered to be most appropriate

Risks associated with the investment approach

Below are certain risks associated with the investment approach apart from those disclosed in **Annexure "C"** of the PMS Agreement. The risks may affect portfolio performance even though the Portfolio Manager may take measures to mitigate the same.

Company risk: The performance of the investment approach will depend upon the performance of the Portfolio schemes and its future prospects. Portfolio Manager's focus on fundamentals through the detailed approach mentioned above will help the Portfolio Manager in mitigating these sector or company risks.

Valuation risk: The Portfolio Manager will assess the Portfolio schemes from varied parameters, the Portfolio Manager is definitely wary of overpaying and will consider various parameters in order to establish whether the valuations of the entities invested by the schemes are reasonable while investing and reassessing the same from time to time.

Concentration Risk: Endeavor to have a concentrated portfolio of 4-10 schemes.

Volatility Risk: The value of mutual fund schemes in the portfolio depends upon funds' performance, which often gets affected due to the prevalent microeconomic factors.

Liquidity Risk: Investment in closed-ended schemes come with liquidity risk.

Rebalancing risk: Rebalancing of schemes depending on market conditions pose rebalancing risk to the portfolio.

Other salient features, if any.

N.A.

FORM C

Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020

(Regulation 22)

Name	Wryght Research & Capital Private Limited
Address	**Registered office address:** 103, Shagun Vatika, Prag Narayan Road, Lucknow, Uttar Pradesh, 226001. **Correspondence address:** WeWork Enam Sambhav, C - 20, G Block BKC, G Block, Bandra Kurla Complex, Bandra East, Mumbai, Maharashtra 400051
Phone	+91 9686195357
Fax Number	Not Applicable
Email	sonam@wrightresearch.in

We confirm that:

(i) the Disclosure Document forwarded to SEBI is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by SEBI from time to time;

(ii) 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 through the Portfolio Manager;

(iii) the Disclosure Document has been duly certified by an independent Chartered Accountant, as on August 29, 2023. The details of the Chartered Accountants are as follows:

Name of the Firm:	A K Sarawgi & Co.
Registration Number:	177664
Prorietor:	Mr. Amit Kumar Sarawgi
Membership Number:	177664
Address:	Office no. 12, Grow More Tower, near Kharghar Railway Station, navi Mumbai- 410210

(enclosed is a copy of the Chartered Accountants' certificate to the effect that the disclosures made in the Document are true, fair and adequate to enable the investors to make a well informed decision).

For and on behalf of Wryght Research & Capital Private Limited

Date: August 29, 2023

Signature of the Principal Officer

Ms. Sonam Srivastava

Place: Mumbai

SONAM SRIVASTAVA

Digitally signed by SONAM SRIVASTAVA
Date: 2023.08.29 17:10:23 +05'30'