

Portfolio Management Services

Disclosure Document

ARHAM WEALTH MANAGEMENT PRIVATE LIMITED

PORTFOLIO MANAGEMENT SERVICE SEBI
REGISTRATION NO.: INP000008853

Registered Office: Unit No. 418, 419, 419A, 4th Floor, DSCCSL Tower, Block-53, Road 5C, Gift City, Gandhinagar-382355, Gujarat, India.

Corporate Address: B-2, Ground Floor, International Trade Centre, Majuragate, Ring Road, Surat-395002, Gujarat, India.

Tel: (0261) 4245957 **E-mail:** - pms@arhamwealth.com

Website: www.arhamwealth.com

Disclosure Document

This Disclosure Document has been filled with the Securities and Exchange Board of India together with the certificate in the prescribed format in terms of Regulation 15 of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020.

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

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

No person has been authorized to give any information or to make any representation not confirmed in this Disclosure Document, in connection with this Disclosure Document, and information or representation not contained herein must not be relied upon as having been authorized by Arham Wealth Management Private Limited.

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

Please retain this Disclosure Document for future reference.

Mr. Sahil Dhirajkumar Modi of Arham Wealth Management Private Limited has been designated as the Principal Officer. His details are as under:

Name: Sahil Dhirajkumar Modi
Address: B/G-3, International Trade Centre,
Majura Gate,
Ring Road,
Surat- 395002, Gujarat, India.
Contact: 0261 – 4245958
E-mail Id: pms@arhamwealth.com



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Member : BSE, NSE, MCX & NCDEX

Depository of CDSL

CIN : U67120GJ2014PTC079165

Web : www.arhamwealth.com

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1. Disclaimer

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2. Definitions:

In this disclosure document unless the context otherwise requires:

"**Act**" means the Securities and exchange board of India Act, 1992 (15 of 1992). "**Board**"

means the Securities and exchanges board of India.

"**Client**" or investor means any person who registers with the Portfolio Manager for availing the services of the Portfolio Management.

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

"**Funds**" means the money placed by the clients with the portfolio manager. "**Funds**

managed" means the market value of the Portfolio of the Client as on date.

"**Internal Corpus**" means the value of the funds and the market value of readily realizable investments brought in by the clients at the time of registering as a client with the portfolio manager and accepted by the portfolio manager.

"**Portfolio**" means the total holdings of all investments, securities, and funds belonging to the client.

"**Portfolio Manager**" means Arham Wealth Management Private Limited a company incorporated under the Companies Act, 1956, and having its registered office.

"**Regulations**" means the Securities and Exchange Board of India (Portfolio Managers) regulations, 2020.

"**Rules**" means any of the Securities and exchange board of India (Portfolio Managers) rules, 2020.

"**Fund**" means any of the current investment Funds that may be introduced at any time in the future by the portfolio manager.

Words and expressions used in this document and not expressly defined shall be interpreted according to their general meaning and usage. The definitions are not exhaustive. They have been included only for clarity, shall in addition be interpreted according to their general meaning and usage, and shall

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carry meanings assigned to them in regulating governing portfolio management services • wealth • security • success

3. Descriptions

1) History, Present Business, and Background of the portfolio manager.

- This company was promoted by the KIRIT SHAH family members, who are directors of the company. This company was incorporated on 18th March 2014. It was in the post-economic liberalization scenario that the promoters felt good potential for the Capital Market. Arham Wealth Management Private Limited has grown horizontally and vertically over one decade.
- Arham Group was established by husband-wife directors Mr. Kiritbhai Manubhai Shah and Mrs. Nilamben Kiritbhai Shah. Their son, Mr. Divyesh Kiritbhai Shah, graduated with an M.B.B.S. degree from C.U. Shah Medical College, Surendranagar, Gujarat and subsequently joined the company in the 2020. Additionally, Mr. Jitendra Chauhan assumed the role of Chief Executive Officer of the company on February 3, 2024.

2) Promoters and Directors of the Portfolio Manager and their Background in Brief

- **Mr. Kiritbhai Manubhai Shah** - Mr. Kiritbhai Manubhai Shah holds a Bachelor's degree in Electrical Engineering (B.E.). With nearly three decades of experience in the stock market, he brings extensive expertise in management consultancy, stock broking, and investment services to his career.
- **Mrs. Nilamben Kiritbhai Shah** - Mrs. Nilamben Kiritbhai Shah holds a degree in Arts. As a director, she oversees the administration of the company. She has been actively involved in the business since its inception and has made significant contributions to its success and well-being. Mrs. Shah has served as a Director of the Group Company since its establishment.
- **Mr. Divyesh Kiritbhai Shah** - Mr. Divyesh Kiritbhai Shah completed his Bachelor of Medicine and Bachelor of Surgery degree from C.U. Shah Medical College, Surendranagar, Gujarat Following his graduation, he joined the group company in 2020. With a penchant for technology, he oversees the business development of the company.
- **Mr. Jitendra Chauhan** - Mr. Jitendra Chauhan assumed his role at Arham Wealth Management Private Limited in February 3, 2024, bringing with him 18 years of experience in the capital market. As the CEO, he oversees the organization's operations and ensures its smooth functioning. Mr. Chauhan is responsible for business development and serves various investment segments with dedication. His enthusiasm for the job and commitment to continuity are evident in his work.
- **Mr. Sahil Modi** - Mr. Sahil Modi has been employed at Arham Wealth Management Private Limited since 2023, accumulating 13+ years of experience in the capital market. With an MBA and possess extensive expertise in Fundamental, Quantitative and Technical analysis. In

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addition to in-depth analysis of company Fundamentals Research, Fund management, Investment advisory, Portfolio Advisory & Restructure, client relationship and technical research. This background and proven track record of delivering insightful strong base to drive informed investment decisions and enable him to manage portfolio and investment products. He serves as the Principal Officer at Company, overseeing the research team. His fervor for the role and dedication to consistency are prominent aspects of his work ethic.

- **Mr. Nirav Desai** - Mr. Nirav Desai has been employed since 2022 and presently designated as a Compliance Officer in Portfolio Management Service for Arham Wealth Management Private Limited, accumulating 17 years of experience in the capital market. He is acquainted with comprehensive expertise in regulatory compliance along with deep understanding of industry standards and best practices. His keen eye for detail and a proactive approach makes a significant impact in the dynamic field of compliance.

4. Penalties, Pending Litigations or Proceedings Etc.

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

There has not been any complaint filed in SEBI by any client.

5. Services Offered under PMS -

1) Discretionary & Non-discretionary Portfolio Management Services (PMS) Product details:

A. Arham Wealth Smart Beta 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.
- **Description of type of securities** - Portfolio manager will be investing in listed equity and liquid schemes of mutual funds.
- **Basis of selection of such type of securities as part of investment approach** – Research and identification of multiple quantitative factors influencing market returns which are based on fundamental & technical data. Research on factors influencing superior risk adjusted return over period of time.
- **Allocation of portfolio across type of Securities** – We track multiple long-term factors in the



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market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these themes. Position sizing methods are used to create a diversified portfolio 20-35 stocks using factor exposure data. Portfolio will be composed of 100% equities strategy with intermittent cash position in liquid / debt mutual fund.

- **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. The appropriate benchmark would be S&P BSE 500, S&P Midcap, S&P Small cap, S&P BSE 200, S&P BSE SENSEX and Nifty 50.
- **Indicative Tenure or Investment Horizon** – We used multiple quantitative factors which are based on fundamental & technical data looks to achieve capital appreciation over the long term. It requires a gestation of minimum 3 to 5 years in order for the investment manager to be able to maximize strategy performance.
- **Risk Associated with the Investment Approach** - The risk associated with this approach is company specific risk & macroeconomic risk, valuation risk, concentration risk, volatility risk, liquidity risk, rebalancing risk and other risk which is associated investing in equity and debt & fixed income market

B. Arham Wealth Momentum 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.
- **Description of type of securities** - Portfolio manager will be investing in listed equity and liquid schemes of mutual funds.
- **Basis of selection of such type of securities as part of investment approach** - Research and identification of multiple quantitative factors influencing market returns which are based on technical data. Research on factors influencing superior risk adjusted return over period of Time.
- **Allocation of portfolio across type of Securities** – We track multiple long-term factors in the market that can deliver outperformance, the research is ongoing to optimize and enhance participation in these stocks. Position sizing methods are used to create a diversified portfolio 20-35 stocks using factor exposure data. Portfolio will be composed of 100% equities strategy with intermittent cash position in liquid / debt mutual fund.
- **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. The appropriate benchmark would be S&P BSE 500, S&P Midcap, S&P Small cap, S&P BSE 200, S&P BSE SENSEX, Nifty 50.

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- **Risk Associated with the Investment Approach**- The risk associated with this approach is company specific risk & macroeconomic risk, concentration risk, volatility risk, liquidity risk, rebalancing risk and other risk which is associated investing in equity and debt & fixed income market.

Under above mentioned product, all investors have to do is, to give Arham Wealth Management Private Limited their portfolio in any form i.e. in stock or cash or a combination of both. The minimum size of the portfolio under the Discretionary and/ or Non-Discretionary Funds Management Service should be Rs.50 lakhs as per the current SEBI Regulations. However, Arham Wealth Management Private Limited reserves the right to prescribe a higher threshold product-wise or in any other manner at its sole discretion. Arham Wealth management Private Limited's Portfolio Manager will ascertain the investor's investment objectives to achieve optimal returns based on his risk profile.

- Under the Discretionary, investment decisions are at the sole discretion of the Portfolio Manager as long as they are in sync with the investor's investment Objectives.
- Under the Non-Discretionary, investment decisions are taken at the discretion of the Investor.

2) Investment Advisory Services

We are offering Investment services. This is a pure consultancy service for review, restructuring, and monitoring of Investment with a minimum size of Rs.50 Lakhs. This is a customized service for UHNI. Advice given is not binding to the client. Execution of advice is left to the client. Our role is just to guide and prepare investment strategy, and asset allocation strategy in confirmation with the client's preference and risk profile.

The Portfolio Manager have no previous experience or track record in managing investment portfolios. However, it shall attempt to mitigate such risk by diversification of the Portfolio.

6. Risk Factors

- Investments in Securities are subject to market risks and include price fluctuation risks. There are no assurances or guarantees that the objective of the Portfolio will be achieved. The investments may not be suitable to categories of investors.
- Past performance of the Portfolio Manager does not indicate the future performance of the portfolio. There is no assurance that the past performances will be repeated. Investor are not being offered any guarantee or assured return through any of the investments.



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- The names of the plans do not in any manner indicate their prospectus or returns, or do not guarantee the performance or returns of the plan. The performance of the equity plans may be adversely affected by the performance of individual companies, changes in the market place and industry-specific and macroeconomic factors.
- The investment strategy will be drawn up considering the current and expected market movement and trends. Though all endeavors shall be made by the Portfolio Manager to diversify the risk, the risk of below-market performance is not ruled out.
- The Portfolio Manager have no previous experience or track record in managing investment portfolios. However, it shall attempt to mitigate such risk by diversification of the Portfolio.
- The debt investments and other fixed income Securities may be subject to interest rate risk, credit risk and reinvestment risk. Liquidity in these investments may be affected by trading volumes, settlement periods and transfer procedures.
- Technology stocks and some of the investments in niche sectors run the risk of volatility, high valuation, obsolescence and low liquidity.
- Plans using derivative/future and options products are affected by risks difference from those associated with stock and bonds. Such products are highly leveraged instruments and their use requires a high degree of skill, diligence and expertise. Small price movements in the underlying security may have a large impact on the value of derivatives and future options. Some of the risk relate to miss-pricing or improper valuation of derivatives and future and options and inability to correlate the positions with underlying assets, rates and indices. Also the derivatives and futures and options market is nascent in India.
- In the case of stock lending, risks relate to the defaults from counter parties with regard to Securities lent and the corporate benefits accruing thereon, inadequacy of the collateral and settlement risks. The Portfolio Manager is not responsible or liable for any loss resulting from the operations of the Plans.
- Each portfolio will be exposed to various risks depending on the investment objective, investment strategy and the asset allocation. The investment objective, investment strategy and the asset allocation may differ from client to client.
- Highly concentrated portfolios with lesser number of stocks generally will be more volatile than a larger number of stocks, Portfolios with higher allocation to equities, will be subject to higher volatility than portfolios with low allocation to equities.
- Risk arising out of non-diversification, if any, Diversified portfolios allocated across companies and broad sectors may be less volatile than non-diversified portfolios.
- The Portfolio Manager is not responsible or liable for any loss resulting from the operations of

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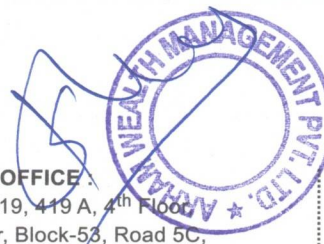
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the funds. All funds under portfolio management are subject to change at any time at the discretion of the Portfolio manager.

7. Client Representation

The Portfolio Management Services will be offered by Company. Category of Clients serviced by Company for portfolio management is as given below:

Category of Clients	No. of Clients	Funds Managed
-	0	0

The Portfolio Management does not invest the funds of the client in Arham Wealth management Private Limited or allied company.

8. Performance of the Portfolio Manager

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

PMS Performance				
PMS Fund	Arham Wealth Smart Beta Fund	Benchmark Return	Arham Wealth Momentum Fund	Benchmark Return
Return Since Inception	-	-	-	-
Annualized	-	-	-	-
Last 1 Year	-	-	-	-

- Returns are post expenses.
- Past performance may or may not be sustained in future

9. Financial Performance of Portfolio Manager:



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Income Statement as on 31 st March, 2025	
PARTICULARS	AMOUNT IN LAKHS
Total Income	17878.47
Total Expenditure	8320.69
Profit After Depreciation	9557.78
Profit/Loss before taxes	9557.78
Current Tax	2476.46
Deferred Tax Effect	(3.22)
Prior Period Adjustment	-
Profit/Loss After Tax	7084.54

Summarized Financial Statement - Balance Sheet Audited 31 st March, 2025	
PARTICULARS	AMOUNT IN LAKHS
Sources of Funds	
Share Capital	1617.52
Reserves and Surplus	14094.68
Deferred Tax Liability	-
Long Tern Provision	-
Current Liability and Provision	14367.48
TOTAL	30079.69
Application of Funds	
Net Fixed Assets	343.96
Investments	131.00
Deferred Tax Asset	11.23
Long Term Loans and Advances	167.50
Other Non-Current Assets	-
Current Assets	29426.00

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TOTAL	30079.69
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10. Audit Observations

There are no Audit Observations of the preceding three years.

11. Nature of Costs and Expenses for Clients

The following are indicative types of costs and expenses for clients availing of the portfolio management services. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Agreement and the agreement in respect of each of the services availed at the time of execution of such agreements.

- **Management Fees**

Professional charges relate to the portfolio Management services offered to clients. The fee may be a fixed charge or a percentage of the quantum of funds managed i.e., ranging between 2-2.5% of AUM (Asset under Management).

- **Custodian / Depository Fees**

The charges related to the opening and operation of dematerialized accounts. Custody and transfer charges are for shares, bonds, and units. Dematerialization and other charges are in connection with the operation and management of the depository accounts.

- **Registrar and transfer agent Fees**

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

- **Brokerage and transaction costs**

The brokerage charges and other charges like services charge, stamp duty, Securities transaction tax, transaction costs, turnover tax, exit and entry loads on the purchase and sale of shares, stocks, bonds, debt, deposits, units, and other financials.

- **Certification and professional charges**

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

- **Incidental Expenses**

Charges in connection with the courier expenses stamp duty, services tax, postal, telegraphic,

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and opening and operation of bank accounts, etc.

12. Tax Implication on Client

- **Resident Taxation & Non- Resident Taxation:** The Clients are advised to consult their tax practitioners concerning tax consequences that may be faced by the Client on account of their participation in any of the Plans of the Portfolio Manager and NRI Taxation of Income Tax Act, 1961 as applicable. The Portfolio Manager shall not be responsible for assisting or completing the fulfillment of the Client's obligations.
- **Tax Deduction at sources:** Whether required by the relevant act, rules, and regulations, the tax will be deducted at source by the Portfolio Manager.
- **Advance Tax instalment obligation:** The obligation of paying Advance Tax installment shall be lie on the client.

i. Income categorization (LTCG / STCG):

- **Long-term capital gain:** If equity shares listed on a stock exchange are sold beyond 12 months of purchase, the seller may make a long-term capital gain (LTCG) or incur a long- term capital loss (LTCL) at the time of sale. It is calculated as the difference between the sale price and purchase prices of assets held for more than a year.
- **Short-term capital gain -** If equity shares listed on a stock exchange are sold within 12 months of purchase, the seller may make a short-term capital gain (STCG) or incur a short-term capital loss (STCL) at the time of sale. It is calculated as the difference between the sale price and purchase prices of assets held for less than a year.

If the Portfolio Manager deals, in shares, securities, etc., on an average basis for its PMS Clients, the Securities Transaction Tax charged by Broker in its contrast shall be appropriated among its concerned PMS Clients based on transaction value or any appropriate basis and will be informed to the concerned PMS client along with transactions details or other details. Based on the documents and as advice or PMS Client tax advisor, the client shall claim applicable tax benefits under Income Tax Act, 1961, the tax liability will be entirely borne by the Client only.

13. Accounting Policies/Valuations

The following accounting policies will be applied to the portfolio investments of clients:



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1. Accounting policies of investments:

- a. The Books of Account of the Client is maintained on an historical cost basis.
- b. In determining the holding cost of investments and the gains or loss on sale of investments, the First-in-First-out (FIFO) method shall be followed. In case of long term capital gain /loss, gain loss will be computed on basis of highest price of 31st January 2018.
- c. For derivatives/futures and options, unrealized gains and losses will be calculated by marking all the open positions to market.
- d. Unrealized gains/losses are the differences between the current market values / NAV's and the historical cost of the securities/price at which securities are valued on the date of admitting as a Corpus.
- e. All income will be accounted on accrual or receipt basis, whichever is earlier.
- f. All expenses will be accounted on due or payment basis, whichever is earlier.
- g. Purchase and Sale transactions are accounted for on contract date basis.
- h. Transactions for purchase or sale of investments shall be recognized as of the trade date and not as of the settlement date, so that the effect of all investments traded during a financial year is recorded and reflected in the financial statements for that year.
- i. Purchases are accounted at the cost of acquisition inclusive of brokerage, stamp duty, transaction charges and entry loads in case of units of mutual fund. Sales are accounted based on proceeds net of brokerage, stamp duty, transaction charges and exit loads in case of units of mutual fund. Securities Transaction Tax, Demat charges and Custodian fees on purchase/ sale transaction would be accounted as expense on receipt of bills. Transaction fees on unsettled trades are accounted for as and when debited by the Custodian.
- j. Securities Transaction Tax paid on purchase/sale of securities including derivatives, during the Financial Year is recognized as an expense in the books of accounts.
- k. Bonus shares shall be recognized only when the original shares on which the bonus entitlement accrues are traded on the stock exchange on an ex-bonus basis Dividend income earned shall be recognized, not on the date the dividend is declared, but on the date the share is quoted on an ex-dividend basis. For investments, which are not quoted on a stock exchange, dividend income shall be recognized on the date of receipt.
- l. In respect of all interest-bearing investments, income shall be accrued on a day- to-day basis as it is earned. Therefore, when such investments are purchased, interest paid for the period from the last interest due date up to the date of purchase shall not be treated as a cost of purchase but shall be debited to Interest Recoverable Account. Similarly, interest received at



ARHAM WEALTH MANAGEMENT PRIVATE LIMITED

Member : BSE, NSE, MCX & NCDEX

Depository of CDSL

CIN : U67120GJ2014PTC079165

Web : www.arhamwealth.com

REGISTERED OFFICE :

Unit No. 418, 419, 419 A, 4th Floor,
DSCCSL Tower, Block-53, Road 5C,
Gift City, Gandhinagar-382050, Gujarat, India.
E-mail : arhamwealthsurat@gmail.com

CORPORATE OFFICE :

B-2, Ground Floor,
International Trade Center, Majuragate,
Ring Road, Surat-395002, Gujarat, India
Tele.: 0261 6941000 / 40



Arham Wealth

the time of sale for the period from the last interest due date up to the date of sale shall not be treated as an addition to sale value but shall be credited to Interest Recoverable Account.

- m. For derivatives including futures and options, unrealized gains and losses will be calculated by marking to market the open positions.

2. Valuation of Investments:

- i. Investments in Equities, will be valued at the closing price of the exchanges (closing price of NSE or BSE as the case may be and BSE or NSE as the case may be). If Price is not available on primary exchange than price of secondary exchange will be considered. If Price is not available on secondary exchange than previous day price will be considered.
- ii. Mutual Funds will be valued at the at NAV available on AMFI.
- iii. Debt Instruments will be valued at the market value (NSE / BSE) of the debt instrument or client will appoint value to value the Debt securities.
- iv. For derivatives including futures and options, unrealized gains and losses will be calculated by marking to market the open positions.
- v. Valuation of Unlisted Shares, Valuation of Suspended/Non traded Share/debt: Unlisted Shares: Unlisted shares would be valued at cost of acquisition till the shares get listed on a recognized stock exchange.
- vi. Valuation of Suspended/Non traded Share: If a listed share is suspended for a certain period, then last traded price would be used for valuation and after 30 days the valuation methodology would be decided on a case to case basis and approved by the valuation committee.
- vii. Shares awaiting listing due to IPO would be valued at allotment price. Valuation of Non-traded debt: Non-traded fixed income instruments will be valued at cost.
- viii. In case of demerger 1) if both the companies are traded than market price of both will be considered 2) If one company is traded, then the traded company's share will be valued at traded price. For non-traded share, Market value to be derived based on market value of the original traded share on one trading day prior to the ex-date of demerger minus market value of demerger traded share on ex-date.
- ix. The Fund Manager and the client can adopt any specific norms or methodology for valuation of investments or accounting the same as may be mutually agreed between them on a case specific basis.

The accounting policies and standards as outlined above are subject to changes made from time to time by Fund Manager. However, such changes would be in conformity with the Regulations.

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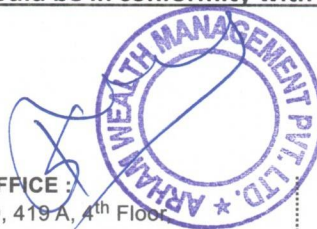
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14. Investor Services

1) Contact Information

Name:	Mr. Sahil Dhirajkumar Modi (Principal Officer)
Address:	B/G-3, International Trade Centre, Majura Gate, Ring Road, Surat-395002 Gujarat, India.
Contact:	0261 – 4245958
Email:	pms@arhamwealth.com

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

2) GRIEVANCE redressal and dispute settlement mechanism

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

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

The portfolio manager has appointed Mr. Sahil Dhirajkumar Modi, fund manager as the first point for the redressal of the Clients complaints. The client can approach the fund manager at the below-mentioned contacts.

Name:	Mr. Sahil Dhirajkumar Modi (Principal Officer)
Address:	B/G-3, International Trade Centre, Majura Gate, Ring Road, Surat-395002, Gujarat, India.
Contact:	0261 – 4245958
Email:	pms@arhamwealth.com

Clients can also email their complaints to a dedicated email id i.e., pms@arhamwealth.com. If the client remains dissatisfied with the remedies offered or the stand taken by the fund manager, he/she can contact **Mr. Nirav Parulbhai Desai, Compliance Officer at:**

Name:	Mr. Nirav Parulbhai Desai
Address:	B/G-3, International Trade Centre, Majura Gate, Ring Road, Surat-395002,



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Arham Wealth

wealth • security • success

	Gujarat, India.
Contact:	0261 – 4245955
Email:	compliance@arhamwealth.com

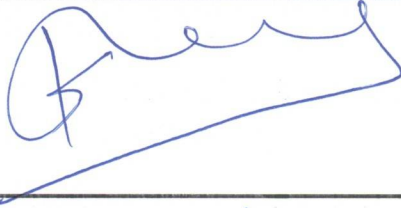
If the client remains dissatisfied with the remedies offered or the stand taken by the authorities, he/she can lodge their complaint with SEBI on the website <https://scores.gov.in>.

All disputes, differences, claims, and questions that arise between the client and the Portfolio Manager and/or their respective representative shall be settled by and subject to the provisions of the Arbitration and Conciliation Act 1996, or any statutory requirement, modification or re-enactment thereof. Such Arbitration shall be held at Surat or such other Place as the Portfolio Manager thinks fit.

13. General

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

APPROVED BY THE DIRECTORS

Sr. No.	Name of Directors	Signature
1.	Mr. Kiritbhai Manubhai Shah	
2.	Mrs. Nilamben Kiritbhai Shah	



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FORM C

ARHAM WEALTH MANAGEMENT PRIVATE LIMITED

SEBI REGN. NO.: INP000008853

Registered Office: Unit No. 418, 419, 419A, 4th Floor, DSCCSL Tower, Block-53, Road 5C, Gift City, Gandhinagar-382355, Gujarat, India.

Corporate Office: B-2, Ground Floor, International Trade Centre, Majuragate, Ring Road, Surat-395002, Gujarat, India.

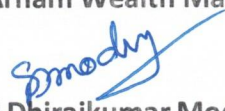
Tel No.: (0261) 4245957 | **E-mail:** pms@arhamwealth.com | **Website:** www.arhamwealth.com

Dear Investor,

We confirm that:

1. The Disclosure Document forwarded to the board is by the SEBI (Portfolio Managers) Regulations, 2020, and the guidelines and directives issued by the Board from time to time;
2. The disclosures made in the document are true, fair, and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us/ investment in the portfolio management.
3. The Disclosure Document has been duly certified by an Independent Chartered Accountant, **Mr. Rasesh Shah, Proprietor/Partner** of M/s Rasesh Shah & Associates, having office at 4th Floor, Tiaanum Business Hub, Khajod Road, Near Sarsana, Bhimrad, Surat – 395007, on 27th October 2025.

For, Arham Wealth Management Private Limited


(Sahil Dhirajkumar Modi)
Principal Officer

Date: 10th October 2025

Place: Surat, Gujarat.

ARHAM WEALTH MANAGEMENT PRIVATE LIMITED

Member : BSE, NSE, MCX & NCDEX

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To,
Board of Directors,
Arham Wealth Management Private Limited,
Surat

CERTIFICATE

We have verified the Disclosure Document for portfolio management services prepared by **Arham Wealth Management Private Limited**, having registered office at Unit No. 418, 419, 419A, 4th Floor, DSCSL Tower, Block-53, Road 5C, Gift City, Gandhinagar-382355, Gujarat, India and Corporate Office situated at B-2, Ground Floor, International Trade Centre, Majuragate, Ring Road, Surat-395002, Gujarat, India.

The Company has availed license for portfolio management services bearing registration No. INP000008853. Based on such examination, we certify that disclosure made in the document is broadly as per model disclosure document as stated in Schedule V of Regulation 14 of Securities and Exchange Board of India (Portfolio Managers) Regulations 1993.

We do not express any opinion or provide any assurance other than amounts taken from Audited financial statements of Arham Wealth Management Private Limited as on 31st March 2025 as reproduced in the disclosure document.

For,
RASESH SHAH & ASSOCIATES
CHARTERED ACCOUNTANTS
FRN. 0108671W


JAYDEEP J. DOSHI
(PARTNER)
M. No. 043465
UDIN- 25043465BMHGML1407



Place: Surat
Date: 27/10/2025