

DISCLOSURE DOCUMENT

The particulars given in this Disclosure Document have been prepared in accordance with SEBI (Investment Advisers) Regulations, 2013.

The purpose of the Document is to provide essential information about the Investment Advisory Services in a manner to assist and enable the perspective client/client in making an informed decision for engaging Investment Advisor before investing.

For the purpose of this Disclosure Document, Investment Advisor is Ankur Kapur.

A. Descriptions about Ankur Kapur

History, Present business and Background

Ankur Kapur is the founder chief investment officer of Plutus Capital, an independent investment advisory firm. Ankur has over 17 years of experience in the financial services industry and is passionate about making a positive impact on his clients' lives.

Ankur created an independent financial advisory firm so that he can look out for his client's best interests.

Terms & conditions for advisory services

Ankur Kapur will provide Advisory Services which shall be in the nature of investment advice, and may include buying and selling the securities for an for an agreed fee structure and which may be for a definite period of time and which may vary / change from time to time, entirely at the Client's risk. The detailed terms and conditions are as per the agreement executed between client and Ankur Kapur.

Disciplinary history

No action has been taken against the Investment Adviser by any regulator.

Affiliations with other intermediaries

There are no affiliations.

B. Disclosures with respect to receipt of any consideration by way of remuneration or compensation or in any other form whatsoever, received or receivable by Ankur Kapur or any of its associates or subsidiaries for any distribution or execution services in respect of the products or securities for which the investment advice is provided to the client:

Ankur Kapur does not have any distribution arrangement with the issuers of the securities, that Ankur Kapur advises on.

C. Disclosure of consideration by way of remuneration or compensation or in any form whatsoever with respect to recommending the services of a stock broker or other intermediary to a client:

Ankur Kapur does not recommend services of any stock broker or intermediary to a client. Ankur Kapur does not have any commission sharing agreement with any intermediary for recommending the services either as a stock broker or as other intermediary.

D. Disclosures with respect to Ankur Kapur's own holding position in financial products / securities:

Ankur Kapur is not actively engaged into any proprietary trading. He does not invest in any financial products / securities. However Ankur Kapur may have positions in various mutual funds/liquid products.

E. Actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services:

Ankur Kapur provides independent Investment Advisory services. He maintains an arm's length relationship with any stock broking, depository, research, portfolio management and distribution of mutual funds and third party products. Appropriate Chinese walls are also maintained in the manner as expected under SEBI IA Regulations.

F. Disclosure of all material facts relating to the key features of the products or securities, particularly, performance track record, warnings, disclaimers etc.

Clients are requested to go through the detailed key features, performance track record of the product, or security including warnings, disclaimers etc. before investing as and when provided by the Investment Advisor. Such product materials may also be available to www.sebi.gov.in or www.nseindia.com or www.bseindia.com.

G. Drawing client's attention to warnings, disclaimers in documents, advertising materials relating to investment products.

Ankur Kapur shall draw the client's attention to the warnings, disclaimers in documents, advertising materials relating to an investment product/s which he/she/they is/are recommending to the client/s.

H. Standard Risk Factors as perceived by Investment Adviser:

1. Investments in equities, derivatives and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the investment / products will be achieved.
2. The past performance does not indicate its future performance. There is no assurance that past performances will be repeated. Investors are not being offered any guaranteed or indicative returns.
3. As with any investment in securities, the NAV of the portfolio can go up or down depending upon the factors and forces affecting the capital market.
4. The performance of the investments/products may be affected by changes in

Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.

5. Investments in the products which the Clients have opted are subject to wide range of risks which inter alia also include but not limited to economic slowdown, volatility & illiquidity of the stocks, poor corporate performance, economic policies, changes of Government and its policies, acts of God, acts of war, civil disturbance, sovereign action and /or such other acts/ circumstance beyond the control of advisor.

6. The names of the products/nature of investments do not in any manner indicate their prospects or returns. The performance in the equity products may be adversely affected by the performance of individual companies, changes in the market place and industry specific and macro-economic factors.

7. Investments in debt instruments and other fixed income securities are subject to default risk, liquidity risk and interest rate risk. Interest rate risk results from changes in demand and supply for money and other macroeconomic factors and creates price changes in the value of the debt instruments. Consequently, the NAV of the portfolio may be subject to the fluctuation.

8. Investments in debt instruments are subject to reinvestment risks as interest rates prevailing on interest amount or maturity due dates may differ from the original coupon of the bond, which might result in the proceeds being invested at a lower rate.

9. The product may invest in non-publicly offered debt securities and unlisted equities. This may expose the investment/product to liquidity risks.

10. Engaging in securities lending is subject to risks related to fluctuations in collateral value /settlement/ liquidity/counter party.

11. The product may use derivatives instruments like index futures, stock futures and options contracts, warrants, convertible securities, swap agreements or any other derivative instruments. Usage of derivatives will expose portfolio to certain risk inherent to such derivatives.

12. The use of derivative requires a high degree of skill, diligence and expertise. Thus, derivatives are highly leveraged instruments. Small price movement in the underlying security could have a large impact on their value. Other risks in using derivatives include the risk of mis-pricing or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices.

13. The NAV may be affected by changes in settlement periods and transfer procedures.

14. The Investment Advisor may, considering the overall level of risk of the portfolio, advice for investment in lower rated/unrated securities offering higher yield. This may increase the risk of the portfolio. Such investments shall be subject to the scope of investments as laid down in the Agreement.

General Risks:

We trust that, before executing on the advice of the Investment Adviser, you have gone through all the relevant information about the product being advised and have sought requisite clarification about the same.

Advisor shall maintain complete confidentiality of all information provided by the client/s and shall not disclose any such information, without your prior consent except if such disclosure is required to be made in compliance with any applicable law or regulatory direction. Advisor will obtain information pertaining to your orders/transactions/portfolio/funds

availability/securities availability etc. from the individual Investment Adviser to enable us to provide you with informed and appropriate advice.

Investors Services:

The detail of investor relation officer who shall attend to the investor queries and complaints is mentioned below:

Name of the Advisor: Ankur Kapur

Designation: Compliance Officer

Address: **N281, DLF Park Place, DLF Phase 5, Sector 54, Gurgaon, Haryana 122009**

Telephone: (+91) 70425 84947

Email: ankur@plutuscapital.co