

DISCLOSURE DOCUMENT

(As required under Regulation 14 of SEBI (Portfolio Managers) Regulations, 1993)

INDEX

Number	Particulars	Page Numbers
1	Disclaimer	2
2	Definitions	2
3	Description	3
4	Penalties, pending litigation or proceedings etc	5
5	Services Offered	5
6	Risk factors	7
7	Client Representation	9
8	The Financial Performance of the Portfolio Manager	9
9	Performance of the Portfolio Manager	9
10	Nature of Expenses	10
11	Taxation	13
12	Accounting Policies	13
13	Audit	13
14	Firm's Policy of Prevention of Money Laundering	13
15	Investors Services	14

1. DISCLAIMER

All the particulars given in this Document have been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 1993 and filed with SEBI. This Document has neither been approved or disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the Document.

2. DEFINITIONS

- a) "Custodian" means Bonanza Portfolio Limited (Depository Participant with NSDL & CDSL).
- b) "Net Asset Value" includes [(Market Value of Equity Investments + NAV of Mutual Funds + Debt or Fixed Income Securities on face value plus accrued interest + Cash + Balances with Broker) + (Dividend + Interest + any other receivables) + mark to market debit/credit of derivatives + margin money] less [(Accrued Expenses like brokerages/taxation/ Depository Charges + other Statutory Liabilities)].
- c) "Party or Parties" means the Client and/or the Portfolio Manager as the case may be or as the context may require.
- d) "Portfolio Manager" means "Bonanza Portfolio Limited" PMS Regn: (INP000000985).
- e) "PMS" means Portfolio Management services.
- f) Portfolio means a collection of investments or financials
- g) "SEBI" means Securities and Exchange Board of India.
- h) "Securities" means Securities as defined under Section 2(b) of Securities Contracts and Regulation Act, 1956.
- i) Mutual fund means Mutual funds as defined under the Securities and Exchange Board of India (Mutual Fund) Regulations, 1996.
- j) "Return" means NAV at the end of the quarter minus the NAV at the end of quarter at which Portfolio Management Fee was charged.
- k) "Quarter" means a period of 3 successive calendar months ending on the last date of the month of March or of the month of June or of the month of September or of the month of December.
- l) "Non Resident Indian (NRI)" shall have the meaning as defined under Foreign Exchange Management (Deposit) Regulations, 2000 (FEMA Regulation 2000) framed by Reserve Bank of India under Foreign Exchange Management Act, 1999. (As on date as per FEMA Regulation 2000, "Non Resident Indian (INR)" means a person resident outside India, who is citizen of India or is a person of Indian origin. A person of Indian origin means, if he is a citizen of any country, other than Bangladesh or Pakistan and if (a) he at any time held Indian Passport; or (b) he or either of his parents or any of his grand parents or was a citizen of India by virtue of the Constitution of India or the Citizenship Act, 1955; or (c) the person is a spouse of an Indian Citizen or a person referred to in sub-clause (a) or (b) herein.)

- m) "Strategy" Means Portfolio Management products with strategic bias floated by the Portfolio Manager.
- n) "Profits Distributed" means any amount of money returned to the client over and above his own contribution /corpus/investments.
- o) "High water mark" is a concept of charging performance where the portfolio manager shall charge performance based fee only on increase in portfolio value in excess of the previously achieved high water mark.

3. DESCRIPTION

I. History, Present Business and Background of the Portfolio Manager

- Retail Broking House since 1994.
- Has presence with over 1600+ outlets spread across more than 560 Cities.
- Emphasis on Client Servicing.
- Online and Offline trading facility.
- Technology backed Delivery Mechanism & servicing capabilities.
- Bonanza Portfolio Ltd. along with its subsidiary companies has membership of
 - National Stock Exchange of India Ltd.
 - Bombay Stock Exchange Ltd.
 - Metropolitan Stock Exchange Ltd.
 - United Stock Exchange Ltd.
 - National Commodity & Derivatives Exchange Ltd. (NCDEX)
 - Multi Commodity Exchange (MCX)
 - National Multi Commodity Exchange & India Ltd. (NMCE)
- Depository Participant
 - National Securities Depository Ltd. (NSDL)
 - Central Depository Services Ltd (CDSL)

II. Promoters of the Portfolio Manager, Directors and their Background

Sr. No.	Director's Name	Background
1	Mr. Shiv Kumar Goel	Chief Promoter of the Bonanza group. Mr. Goel is a Chartered Accountant by profession and also a qualified Company Secretary. He has more than 30 years experience in managing finance and business. Prior to venturing into business he was Chief Executive of SRF Finance Ltd., Delhi. He has been pioneer in innovating technological advancement and its implementation methodologies.
2	Mr. Satya Prakash Goel	Director and a qualified Chartered Accountant by profession, operating from the country's financial capital, Mumbai, is credited of having represented on the Board of Directors of OTC Exchange of India (OTCEI). Mr. Goel has also represented various prestigious committees like SEBI constituted Dr. J. R. Verma Committee for Development Derivatives in India, Executive Committee of NSCCL for Development of Derivatives, the Committees on Settlement Issues (COSI), a policy making body at the National Stock Exchange of India Ltd and Dispute resolution Committee (DRC), of NSCCL & the Divestment and Privatisation Committee of the Indian Merchant's Chamber (IMC).
3	Mr. Vishnu Kumar Aggarwal	Also promoter director of the group, is a real estate developer & consultant by profession. He has been credited of setting up various trading and investment channels in the field of Commodity futures trading for Indian residents and Investors.
4	Mr. Surendra Kumar Goel	A qualified Chartered Accountant with experience of more than 27 yrs. And in past has worked with leading industrial houses like Modis & Oswals. He is one of the founders of the group. Based in Delhi, looks after the group's operations in North India.
5	Mr. Anand Prakash Goel	Director and a practicing Chartered Accountant with experience of over 23 years in taxation and bank audit

III) Top 10 Group companies/firms of the Portfolio Manager on Turnover Basis:

1. Bonanza Portfolio Limited, (Member: NSEIL, BSE, MCX-SX, USE)
2. Bonanza Commodity Brokers Pvt. Ltd, (Member: MCX & NCDEX, NMCE)
3. Bonanza Insurance Broker Private Limited
4. Sunglow Fininvest Pvt. Ltd.
5. Bonanza Corporate Solutions.
6. Bonanza Bulidtech Pvt. Ltd.
7. Bonanza Medical Tourism Pvt. Ltd.
8. Bonanza Bullion Pvt. Ltd

IV) Details of the services being offered:

Nature of Service : Portfolio Management Service - Discretionary , Non - Discretionary & Advisory .

3 A. Material Changes after the last Disclosure Documents filed.

Minimum Investment 25 Lacs.

4. PENALTIES, PENDING LITIGATION OR PROCEEDINGS ETC.

As per enclosed *Annexure I*.

5. SERVICES OFFERED

The Portfolio Manager may provide Discretionary, Non Discretionary and advisory Portfolio Management Services. Discretionary Portfolio Management indicates that, the Portfolio Manager has full discretion to manage the Client's Portfolio, however investment will be made taking in consideration the risk profile of the Client. In case of Non Discretionary Portfolio, the Client directs the Portfolio Manager to the avenues of investments while the Portfolio Manager Passively manages and executes transactions based on the Client's decision. Under a Non Discretionary Portfolio, the Portfolio Manager executes the investment instructions and follows up with payments, settlements, custody and other back office functions. Under the Advisory option the Portfolio Manager, based on the risk profile of the Client, offers his advise from time to time, however the final decision and execution of the transaction rests with the Client.

Bonanza is a full service brokerage house with expertise in Equity & Debt Markets. With over 20 years of experience in financial markets, our strong client focus and deep commitment to research have established our reputation as one of India's leading brokerage Houses.

Our investment management team follows a very disciplined process of fundamental & technical analysis of equity instruments to create a comprehensive range of disciplined risk controlled strategies. Each open position is closely monitored on daily basis to ensure it remains within strict stock and sector limits.

The Portfolio Manager may invest the Clients' Funds in the listed securities issued by the associate/group companies of the Portfolio Manager. The Portfolio Manager shall ensure that the investment of the individual Client's funds under management with the Portfolio Manager shall not exceed 5% of the paid up equity capital of the associate/group company. Provided however that necessary disclosures are made to the client and that the consent of the Client has been taken for the exceeding this limit of 5%.

Being an experienced player in Broking field, Bonanza Portfolio Ltd. (PMS) has appointed M/s. Bonanza Portfolio Ltd. as its broker.

BONANZA PORTFOLIO MANAGEMENT SERVICES INVESTMENT STRATEGIES:**a. Bonanza Growth****Investment Objective:**

Bonanza Growth aims to provide a growth oriented approach to investment management which is based on both fundamental and technical research. Bonanza Growth investment philosophy is highly disciplined and process driven and follows a set of rules that focuses on conserving and building wealth consistently across market cycles.

Indicative Asset Allocation

- Up to 100% asset allocation in equities.
- Diversified Portfolio.
- Portfolio balancing with Derivatives.

b. Bonanza Value

Investment Objective:

Bonanza Value Plan aims to provide long-term capital appreciation primarily from a diversified portfolio of equity and equity related instruments of small cap & Mid cap companies.

The Investment Philosophy is highly focused on picking up stocks offering high growth potential, good fundamentals of the business, the industry, management quality, the financial strength of the company and the key earning drivers..

Indicative Asset Allocation

- Up to 100% asset allocation to equities.
- Diversified portfolio.
- Largecap/ Midcap / Small cap bias.

c. Bonanza Pragmatic Shariah

Investment Objective:

The objective of the strategy is to secure long term gains from the investments in the combination of large and mid size companies which are shariah compliant. It excludes investments in the industries like Banking, Liquor, Tobacco, Entertainment, NBFCs and Securities trading business.

Indicative Asset Allocation:

- Up to 100% asset allocation in equities which are Shariah Fund.
- Diversified Portfolio

d. Bonanza Wealth

Investment Objective:

Bonanza wealth focuses on long term capital growth through carefully chosen wealth creation ideas. The Strategy researches countless sectors and companies to select handpicked stocks for your portfolio. The investment philosophy will aim to deliver long term growth while managing and monitoring risk on an ongoing basis.

Indicative Asset Allocation

- Up to 100% asset allocation in equities
- Diversified Portfolio focuses on building wealth over the long haul
- Low turnover of Portfolio,
- Performance based fee,
- Portfolio balancing with Derivatives.

e. Bonanza Opportunity**Investment Objective:**

Bonanza Opportunity is positioned to capture value in the opportunities thrown up by the fast changing economics and market outlook. The Strategy aims to capitalize on value opportunities thrown up by sudden price changes. It will also target event-based opportunities.

Indicative Asset Allocation

- Up to 100% asset allocation in equities
- Aggressive Diversified Portfolio
- More active management of portfolio, high churning
- Portfolio balancing with Derivatives

However, BONANZA shall not leverage or borrow in respect of investments in derivatives.

Bonanza shall offer above "Discretionary" Portfolio Management products with strategic bias and clients may participate in the same, viz, Wealth, Opportunity, Growth, Value and Pragmatic Shariah Fund.

6. RISK FACTORS

- a) Securities investments are subject to market and other risks and consequently, the Portfolio Manager makes no guarantee or assurance that the objective of investments shall be achieved.
- b) The value of the Portfolio may increase or decrease depending upon various market forces and factors affecting the Capital Markets such as de-listing of Securities, market closure, relatively small number of scrips accounting for large proportion of trading volume. Consequently, the Portfolio manager makes no assurance of any guaranteed returns on the Portfolio.
- c) Past performance of the Portfolio Manager does not indicate nor guarantee the future performance of the same.
- d) The Client stands a risk of loss due to lack of adequate external systems for transferring, pricing, accounting and safekeeping or record keeping of Securities. Transfer risk may arise due to the process involved in registering the shares, physical and demat, while price risk may arise on account of availability of share price from Stock Exchanges during the day and at the close of the day.
- e) Equity and Equity Related Risks: Equity instruments carry both company specific and market risks and hence no assurance of returns can be made for these investments. While the Portfolio Manager shall take all reasonable steps to invest the funds in a prudent manner in such instruments, such decisions shall not always prove to be profitable or correct. Consequently, any loss arising from such decisions shall be a risk assumed by the Client.
- f) Macro-Economic risks: Overall economic slowdown, unanticipated corporate performance, environmental or political problems, changes to monetary or fiscal policies,

- changes in government policies and regulations with regard to industry and exports may have direct or indirect impact on the investments, and consequently on the growth of the portfolio.
- g) **Liquidity Risk:** Liquidity of investments in equity and equity related securities are often restricted by factors such as trading volumes, settlement periods and transfer procedures. If a particular security does not have a market at the time of sell, then the investment may have to bear an impact depending on its exposure to that particular security. While securities that are listed on a Stock Exchange generally carry a lower liquidity risk, the ability to sell these investments is limited by overall trading volume on the stock exchange. Money market securities, while fairly liquid, lack a well developed secondary market, which may restrict the selling ability of such securities thereby resulting in a loss to the portfolio until such securities are finally sold.
 - h) **Credit Risk:** Debt securities are subject to the risk of the issuer's inability to meet the principal and interest payments on the obligations and may also be subject to the price volatility due to such factors as interest sensitivity, market perception, or the credit worthiness of the issuer and general market risk.
 - i) **Interest Rate Risk:** Interest Rate Risk is associated with the movements in interest rates, which depend on various factors such as government borrowing, inflation, economic performance etc. The value of investments will appreciate/depreciate if the interest rates fall / rise. Fixed income investments are subject to the risk of interest rate fluctuation, which may accordingly increase or decrease the rate of return there on.
 - j) Acts of State or sovereign action, acts of nature, acts of war, civil disturbance.
 - k) The Client stand the risk of total loss of value of an asset which forms part of the Portfolio or its recovery only through an expensive legal process due to factors which by way of illustration include default or non performance of a third party, company's refusal to register a security due to legal stay or otherwise, disputes raised by the third party.
 - l) **Derivative Risks:** The derivative will entail a counter party risk to the extent of amount that can become due from the party. The cost of hedge can be higher than adverse impact of market movements. An exposure to derivatives in excess of hedging requirements can lead to losses. An exposure to derivatives can also limit the profits from a genuine investment transaction. Efficiency of a derivatives market depends on the development of a liquid and efficient market for underlying securities and also on the suitable and acceptable benchmarks.
 - m) **Reinvestment Risk:** This risk arises from the uncertainty in the rate at which cash flows from and investment may be reinvested. This is because bond will pay coupons, which will have to be reinvested. The rate at which the coupons will be reinvested will depend upon prevailing market rates at the time the coupons are received.
 - n) **Non-Diversification Risks:** The risk arises when the portfolio is not sufficiently diversified by investing a wide variety of instruments.
 - o) **Mutual fund Risk:** This risk arises from investing in units of Mutual funds. Risk factors inherent to equities and debt securities are also applicable to investments in mutual fund units. In addition, events like change in fund manager of the scheme, take over and mergers of mutual funds, foreclosure of Schemes or plans, change in government policies could affect performance of the investment in mutual fund units.
 - p) **Portfolio Manager Risk** refers to the risk that the manager will not achieve its performance objectives or produce returns that compare favorably against its peers.

7. CLIENT REPRESENTATION

Category of clients	No. of Clients	Funds Managed (Rs. Cr)	Discretionary / Non Discretionary/Advisory (if available)
Associates /Group Companies Last 3 years	Nil	Nil	Nil
Others			
As on 31 st March, 2015	118	36.97	Discretionary
As on 31 st October, 2014	77	23.71	
As on 31 st March, 2014	55	7.96	
As on 31 st March, 2013	64	7.44	

Disclosure as per Balance Sheet as on 31/03/2014 in respect of transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India:

As per enclosed "Notes on Financial Statements for the year ended 31st March, 2014"

Related Parties Disclosure:

Mr. Shiv Kumar Goel, chief promoter of the Bonanza group has invested Rs 10lacs (Initial Amount) in Portfolio Management Service since 2005, in the capacity of Shivkumar Goel HUF.

*Details of the Subsidiary Company, Key Management Personal and Relatives of Key Management Personal, Enterprise in which the Key Management Personnel exercise significant influence is available with the management.

8. THE FINANCIAL PERFORMANCE OF THE PORTFOLIO MANAGER
Rupees in Lacs

Year ending	31/03/2010 (Audited)	31/03/2011 (Audited)	31/03/2012 (Audited)	31/03/2013 (Audited)	31/03/2014 (Audited)
Income	13,990.82	14746.14	11,161.99	9,132.04	9,266.51
Expenditure	12,122.35	13789.08	10,789.22	8,781.54	8,569.51
Exceptional Items	-	-	-	-	818.36
Net Profit Before Tax	1,868.47	957.06	372.77	350.50	(121.36)
Prov. for Taxation	608.87	339.19	90.92	122.19	(63.62)
Profit After Taxation	1,259.59	617.87	281.85	228.32	(57.74)

9. PERFORMANCE OF THE PORTFOLIO MANAGER FOR THE LAST 3 YEARS

Strategy wise Performance		Current Year	2014-2015	2013-2014	2012-2013
Portfolio Performance (%), Net of all fees and charges levied by the Portfolio Manager	Bonanza Growth	(0.72)	60.29	26.83	14.76
	Bonanza Wealth	(1.20)	26.40	16.98	2.74
	Bonanza Opportunity	(1.01)	76.00	32.85	13.64
	Bonanza Pragmatic Shariah	(2.96)	22.85	(6.22)	12.28
	Bonanza Value	(0.73)	61.19	76.06	93.06
Benchmark Performance %	BSE Sensex	(0.46)	24.89	18.85	8.23
	NSE Nifty	(0.68)	26.65	17.98	7.31

Note: Returns calculated on weighted average basis as per SEBI guidelines.

10. NATURE OF EXPENSES

The client agrees to pay to the Portfolio Manager, Portfolio Management Fee in the form of a Fixed Fee or a Performance Based Fee or a combination of both at the rates and in the manner provided in Fees Schedule forming part of the PMS agreement and as revised and mutually agreed to by both the Parties from time to time.

1. Fixed Fee: The Portfolio Management Fee may be Fixed Fee as provided in the Schedule which shall be independent of the returns accrued to the Client on the performance of the Discretionary Portfolio Management/ Non-discretionary services/advisory Services by the Portfolio Manager.
2. Performance Fee: The Portfolio Manager is also permitted to charge Portfolio Management Fees on the basis of the return or a share of the return on the Portfolio / Assets generated by the Portfolio Manager rendering Discretionary Portfolio Management Services.
3. The Client agrees to pay to the Portfolio Manager, an entry load or exit load on the inflow/ withdrawal of assets, as may be decided by the Portfolio Manager from time to time. Charging of entry load/exit load shall be at the sole discretion of the Portfolio Manager.
4. The Client agrees that the fee payable (as per the Fees Schedule) to the Portfolio Manager shall be billed and set-off against the Accounts on a Monthly / Quarterly/Half Yearly/ Yearly basis or any other manner as may be mutually agreed and the same will be incorporated in the periodic Reports sent to the Client by the Portfolio Manager.
5. Brokerage and transaction cost shall be payable to the broker as per the agreement (Bonanza Portfolio Ltd -appointed as broker).
6. Notwithstanding anything contained in the fee schedules mutually agreed to between the Parties, all costs, fees, charges and expenses of whatsoever nature including but not limited to the Depository charges incurred by the Portfolio Manager on behalf of the Client, shall be paid/reimbursed by the Client.
7. The Parties agree that all functions in relation to the Discretionary Portfolio Management/Non-discretionary services/advisory Services or otherwise pursuant to this Agreement shall be performed by the Portfolio Manager or its delegates, including inter alia custodian, advisors, brokers, for and on behalf of, and at the risk and cost of the Client and all liabilities concerning the Assets or the Discretionary Portfolio Management Services shall be to the account of the Client. In addition to the Portfolio Management Fee, all costs, fees, charges and expenses of whatsoever nature incurred by the Portfolio Manager or any other person appointed by the Portfolio Manager arising out of or in connection with or in relation to the management, acquisition, holding, custody, sale and/or transfer, of the Assets or the rendering of the Discretionary Portfolio Management Services or the performance of any act pursuant to or in connection with this Agreement including, without limitation to the generality of the aforesaid, the expenses and cost of safe keeping of Assets, charges of any Depository Participant, advisor, custodian, Registration and Transfer, Research, charges in respect of Securities, audit and attestation fees including legal fees incurred on behalf of the Client, brokerage and stamp duty, costs to be paid for the execution of this Agreement all other incidental

and ancillary documentation pursuant to this Agreement, shall be paid or reimbursed by the Client.

The Portfolio Manager shall have a right to appropriate the amounts payable to it under this Clause or under any other provision of this Agreement from the Assets of the Client and the Portfolio Manager may for this purpose sell or otherwise liquidate the Portfolio or any part thereof. The Portfolio Manager shall have a right of lien and set off on the Assets for such amounts and any right of the Client to withdraw the Assets or any part thereof shall be subject to the Portfolio Manager having first received all such amounts.

Illustration for Annexure on Fees and Charges

This computation is for illustrative purpose only. Portfolio Managers may suitably modify this to reflect their fees and charges.

The assumptions for the illustration are as follows:

- a. Size of sample portfolio: Rs.25 Lacs over.
- b. Entry Load: 1%
- c. Period: 1quarter (3 Months).
- d. Hurdle Rate: 8% p. a. of net amount invested (charges quarterly).
- e. Management fee 1% p.a (charged @ 0.25% per quarter)
- f. Performance fee 15% (charged on AUM above hurdle rate)
- g. The frequency of calculating all fees is Quarterly and hence hurdle rate is 2% per quarter.

Amount in Rupees

Illustration - Fees calculation	For 1 quarter		
	Gain of 10%	Loss of 10%	No Change
Initial Capital Contribution	25,00,000	25,00,000	25,00,000
Less: Upfront fees (Entry Load) @ 1% on initial contribution)	-25,000	-25,000	-25,000
Amount available for investment	24,75,000	24,75,000	24,75,000
Profit/ Loss during the quarter	2,47,500	-2,47,500	0
Gross value of portfolio after 1st quarter	27,22,500	22,27,500	24,75,000
Fixed management fees @ 0.25% per quarter	-6,806	-5,569	-6,188
Performance fees @ 15% per annum after considering hurdle rate*	-29,700	-	-
Net portfolio value at the end of quarter	26,85,994	22,21,931	24,68,813
% change over capital contributed	7.44	-11.12	-1.25

	Calculation of Performance fees*	Amount in Rupees
A	Profit for the quarter	2,47,500
B	Less: Minimum Profit level (Hurdle rate @2% per quarter on NAV as per high watermark concept)	49,500
C	Amount on which profit sharing fees to be calculated	1,98,000
D	Performance fees @ 15% of C	29,700

Suppose at the end of 2nd Quarter, profits are not distributed and at the end of the 3rd quarter profits are distributed.

Then the Hurdle rate would be 4% (2% for each quarter) and only on the balance, fees will be charged.

Note : *Performance fees will be charged on PRO-RATA basis if agreement is terminated and also at the end of the first quarter to streamline the operations.*

Performance fees will be charged on High Watermark basis as per SEBI Guidelines

11. TAXATION

The Client shall plan and pay any tax (long term or short term capital gains, income tax, etc.) and other governmental liabilities that may arise as a consequence of the portfolio transactions on its account. The Portfolio manager shall during its meeting with the Client be available to help the Client plan its tax outflows. However it should be clearly understood that tax considerations shall not be allowed to supersede investment decisions even though the Portfolio Manager recognizes the desirability of maximizing post tax returns.

12. ACCOUNTING POLICIES

The Accounting Policies to be followed by the Portfolio Manger will be in line with the generally accepted accounting principles followed in the similar kind of Industry segment.

13. AUDIT

Bonanza Portfolio Ltd. is/shall maintaining separate client-wise portfolio accounts. The PMS Accounts of the Clients are duly audited by an independent Chartered Accountant appointed by Bonanza Portfolio Ltd. and thereon a copy of the Audit Report is a provided to client. It is clarified that the aforesaid is not applicable to clients who have availed only Advisory Portfolio Management Services.

If any client wants to get PMS Account audited at his end such appointment of an Independent Chartered Accountant will be at the cost of the client and Bonanza Portfolio Ltd. shall be entitled to a copy of the Audit Report. It is clarified that the aforesaid is not applicable to clients who have availed only Advisory Portfolio Management Services.

FIRM'S POLICY OF PREVENTION OF MONEY LAUNDERING

The Prevention of Money Laundering Act, 2002 (PMLA) came into force with effect from 2nd July, 2005, forming the core of the legal framework to combat money laundering. As per the Provisions of the Act, Intermediaries, including portfolio managers, have certain obligations regarding verification of the identity of their clients, maintaining records and furnishing information to the Financial Intelligence Unit - India (FIU - IND). SEBI has vide various circulars issued directed all Intermediaries, including portfolio managers to formulate and implement policies and procedures for dealing with money laundering and adoption of 'Know Your Customer' (KYC) Policy. The client should ensure that the amount invested in the Portfolio Management Service is through legitimate sources only and does not involve and is not designed for the purpose of any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of The Prevention of Money Laundering Act, 2002, The Prevention of Money Laundering Rules, 2005, Income Tax Act, Anti Money Laundering Guidelines, Anti-Corruption Act, SEBI Act and or any other applicable laws enacted by the Government of India from time to time.

Bonanza Portfolio Ltd. reserves all the rights to take all steps and actions, including recording clients' telephonic calls, and /or obtain and retain Documentation for establishing the identity of the client, proof of residence, source of funds, etc. in accordance with the applicable laws, form the client/custodian, as may be required to ensure appropriate identification / verification/ re-verification of the client, the sources of fund etc. under the KYC policy. If at any time Bonanza Portfolio Ltd. believes that the transaction is suspicious in nature within applicable laws, Bonanza Portfolio Ltd. shall have the absolute discretion to report the suspicious transaction to FIU - IND and/or to reject any application, freeze the account, compulsorily close the account of the client and the termination proceeds shall be paid to the client at NAV subject to payment of fees and expenses, if any, of the Portfolio

Manager. Bonanza Portfolio Ltd. shall have no obligation to inform / advise the client or its agents / power of attorney holder of such reporting.

Bonanza Portfolio Ltd. and its directors, employees, agents and persons acting on its behalf shall not be responsible/liable for any loss to the client in any manner whatsoever due to reporting to the FIU-IND, the rejection of any application or freezing of the accounts or compulsory closure of a the account or termination of the agreement entered into between the client and Bonanza Portfolio Ltd., due to non-compliance by the client with the provisions of the laws, rules, regulations, KYC policy etc. and / or where Bonanza Portfolio Ltd. makes reporting to FIU - IND of suspicious transaction.

INVESTORS SERVICES

i) Investor Relation Officer:

Name	Mr. Mithilesh Mehta
Designation	Senior Manager
Mailing Address	Bonanza House, Plot No. M-2, Cama Industrial Estate, Walbhat Road, Behind "The Hub", Goregaon (E), Mumbai - 400 063
Telephone Number	☎ D - 022 3086 3934 B - 022 3086 3700 Cell - 98206 81997
Email ID	operations.pms@bonanzaonline.com

ii) **Grievance redressal and dispute settlement mechanism.**

a) Complaint Escalation Matrix:

Complaint	Escalation	Time frame
The Client complaints over phone or email or in person.	Complaint Solved at operational level	Within 1-2 days
Complaint passed to investor Relation Officer	Complaint Solved at investor Relation Officer	Within a week
Complaint could not be resolved at investor Relation Officer level hence escalated to Compliance Officer	Complaint Solved at Compliance Officer level	15 working days
Complaint could not be resolved at Compliance Officer level hence escalated to Principal Officer	Complaint Solved at Principal Officer level	Within a month
If the complaints is not resolved at principal office level then it is put before the board for discussion	Complaint Solved by Board	Within 45 days

- b) If still the complaints is not resolved by the board the client can file arbitration in respective Jurisdiction.
- c) The client can directly complaint to Securities Exchange Board of India (SEBI) through SCORE's Mechanism (www.sebi.gov.in).

Name and Signature of two Directors of the Portfolio Manager

Sr. No.	Name of Director	Signatures
1	Mr. Satya Prakash Goel	
2	Mr. Shiv Kumar Goel	

Place : _____

Date : _____