OLD BRIDGE CAPITAL MANAGEMENT
PRIVATE LIMITED

Portfolio Management Services
SEBI Registration Number INP000005174

DISCLOSURE DOCUMENT

FORM C

Securities & Exchange Board of India (Portfolio Managers) Regulations, 2020
(Regulation 22)

Name of the Portfolio Manager:	Old Bridge Capital Management Private Limited
Address:	1405, ONE BKC, B Wing, G Block, Bandra Kurla Complex, Bandra (East), Mumbai 400051
Phone:	022 – 62449191
E-mail:	info@oldbridgecapital.com

We confirm that:

1. The Disclosure Document forwarded to the Board is in accordance with 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 through the Portfolio Manager;

3. The Disclosure Document has been duly certified by an independent Chartered Accountant as on. The details of the Chartered Accountant are as follows:

Name of the Firm	:	Manohar Chowdhry & Associates
Partner	:	Mitsu Dalal Membership No.: 139219
Address	:	116, Udyog Mandir No. 1, 7-C, Bhagoji Keer Marg, Mahim West, Mumbai 400016
Telephone No.	:	022-31519863

The copy of the certificate is enclosed herewith.

For **Old Bridge Capital Management Private Limited**

OLD BRIDGE CAPITAL MANAGEMENT PVT. LTD. MUMBAI

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:22:43 +05'30'

Saakasha

Saakasha Mantoo
Principal Officer
1405, ONE BKC, B Wing, G Block, Bandra Kurla Complex, Bandra (East), Mumbai 400051

Date: 30th April, 2025
Place: Mumbai.

To,
The Directors,
Old Bridge Capital Management Private Limited,
Corporate Office,
1405, One BKC, B wing, G Block,
Bandra Kurla Complex,
Bandra – East, Mumbai 400051.

Dear Sirs,

We, Manohar Chowdhry & Associates, Mumbai, have verified the Disclosure Document and other relevant records and documents of Old Bridge Capital Management Private Limited for the year ended 31st March, 2025 and unaudited accounts as on 31st March, 2025. Based on our verification and information and explanations given to us, we hereby certify that the disclosures made in the disclosure document and annexed hereto are true, fair and adequate to enable the investors to make a well-informed decision. We further certify that disclosure document complies with the requirements specified in the Schedule V of Regulation 22 of Securities and Exchange Board (Portfolio Managers) Regulations, 2020.

Management Responsibility

The preparation of the information contained therein is the responsibility of the management of the Company including the preparation and maintenance of all accounting and other records supporting its contents. This responsibility includes design, implementation and maintenance of internal control relevant to the preparation and presentation of the same and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.

Auditors' Responsibility

The auditor's responsibility is to provide a reasonable assurance whether the above calculations and information in the statements enclosed have been accurately extracted from the books and records produced before us. We conducted our examination of the information required to be furnished herein in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

We have complied with the relevant applicable requirements of the Standard on Quality Control (SQC) 1, Quality Control for Firms that Perform Audits and Reviews of Historical Financial

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:23:55 +05'30'

Information, and Other Assurance and Related Services Engagements. A reasonable assurance engagement includes performing procedures to obtain sufficient appropriate audit evidence on the applicable criteria. The procedures selected depend on the auditor's judgement.

The certificate is issued as per the requirement specified in Form C of Schedule I of Regulation 22 of the Securities and Exchange Board (Portfolio Managers) Regulations, 2020. The Disclosure Document forms an integral part of certificate.

Thanking you,

Yours faithfully,

For **Manohar Chowdhry & Associates**
Chartered Accountants
FRN: 001997S

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:24:52 +05'30'

Mitsu Dalal
Partner
M. No. 139219
UDIN: 25139219BMIHFR6855
Place: Mumbai
Date: 30th April, 2025

PORTFOLIO MANAGEMENT SERVICES – DISCLOSURE DOCUMENT

This 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.

The purpose of this Document is to provide essential information about the portfolio services in a manner to assist and enable you in making informed decision for engaging Old Bridge Capital Management Private Limited as a Portfolio Manager.

This document gives necessary information about Old Bridge Capital Management Private Limited as a 'Portfolio Manager' required by you as an investor before investing. You are advised to read this document and retain this document for future reference.

The details of Principal Officer are as follows:

Name of the Principal Officer:	Ms. Saaksha Mantoo
Address:	1405, ONE BKC, B Wing, G Block, Bandra Kurla Complex, Bandra (East), Mumbai 400051
Phone number:	022 – 62449191
E-mail address:	info@oldbridgecapital.com

The Disclosure Document is dated 30th April, 2025

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:25:21 +05'30'

Table of contents:

I. **Disclaimer** 5
II. **Definitions** 5
III. **Description** 7
1. History, Present Business and Background of the Portfolio Manager 7
2. Promoters, Directors and Key Management Personnel of the Portfolio Manager and their background 7
3. Group Companies 9
4. Services being offered 9

IV. **Net worth of the Portfolio Manager** 9
V. **Penalties, pending litigation or proceedings, findings of inspection or investigations for which action has been taken or initiated by any regulatory authority** 10
VI. **Services Offered by the Portfolio Manager** 10
i. Investment Objectives and Policies 10
ii. OBCMPL Investment Approach 11
iii. Old Bridge Capital Management "All Cap Strategy" 11
iv. Policies for investments in Group Companies of the Portfolio Manager 12

VII. **Risk Factor** ------ 12
VIII. **Client Representation** 13
IX. **Financial Performance of the Portfolio Manager** 15
X. **Portfolio Management Performance** 16
XI. **Audit Observations for preceding three years** 16
XII. **Nature of expenses** 17
1. Management Fees 17
2. Exit Fees 17
3. Other Expenses 17
4. The list of approved custodians and Depository Participants, share brokers, fund accountant, involved for Portfolio Management activities is as follows 18

XIII. **Taxation** 19
XIV. **Accounting Policy** 20
1. Contribution to portfolio 20
2. Portfolio investments 20
3. Revenue 21
4. Expenses 21

XV. **Investor Services** 21
1. Name, address and telephone number of the investor relations officer who shall attend to the Client's queries and complaints 21

   Grievance Redressal and Dispute Settlement mechanism 21
2. SEBI Scores Platform 22

XVI. **Investments in the securities of associates/related parties of Portfolio Manager** 23
XVII. **Diversification Policy** 23

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:26:30 +05'30'

I. Disclaimer

This document has been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and filed with SEBI. This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of this Document.

The distribution of this document in certain jurisdictions may be restricted or totally prohibited and accordingly, persons who come into possession of this document are required to inform themselves about and to observe any such restrictions.

II. Definitions

In this Disclosure Document, unless the context otherwise requires, the following words and expressions shall have the meaning assigned to them:

1. **Act** means the Securities and Exchange Board of India Act, 1992.
2. **Accreditation Agency** means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by SEBI from time to time.
3. **Accredited Investor** means any person who fulfils the following eligibility criteria or such other criteria as may be specified by SEBI from time to time and is granted a certificate of accreditation by an accreditation agency
   The persons fulfilling the following criteria, or such other criteria as may be specified by SEBI from time to time, will be eligible to be considered as Accredited Investors:
   (i) Individuals, HUFs, Family Trusts and Sole Proprietorships, which meet the criteria as under:
   a. Annual Income >= INR 2 Crore; OR
   b. Net Worth >= INR 7.5 Crore, out of which at least INR 3.75 Crore is in the form of financial assets; OR
   c. Annual Income >= INR 1 Crore+ Net Worth >= INR 5 Crore, out of which at least INR 2.5 Crore is in the form of financial assets;
   (ii) Partnership Firms set up under the Indian Partnership Act, 1932 in which each partner independently meets the criteria for accreditation.
   (iii) Trusts (other than family trusts) with net worth greater than or equal to INR 50 Crore.
   (iv) Body Corporates with net worth greater than or equal to INR 50 Crore.

4. **Associate** means: (i) a body corporate in which a director or partner of the Portfolio Manager holds either individually or collectively, more than twenty percent of its paid-up equity share capital or partnership interest, as the case may be; or (ii) a body corporate which holds, either individually or collectively, more than twenty percent of the paid-up equity share capital or partnership interest, as the case may be of the Portfolio Manager

5. **Board or SEBI** means the Securities and Exchange Board of India.

6. **Client(s) / Investor(s)** means any person who enters into an agreement with the Portfolio Manager for availing the services of portfolio management as provided by the Portfolio Manager.
7. **Depository Account** means an account of the Client or for the Client with an entity registered as a depository participant under the SEBI (Depositories and Participants) Regulations, 1996.
8. **Document -** Document refers to the risk disclosure document.
9. **Distributor** means a person/entity who may refer a client to avail services of Portfolio Manager in lieu of

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:26:57 +05'30'

commission/charges (whether known as Channel Partners, Agents, Referral Interfaces or by any other name)

10. **Financial Year** means the year starting from April 1 and ending on March 31 in the following year.
11. **Funds** means the moneys placed by the Client with the Portfolio Manager and shall include all accretions thereto.
12. **Group Company** means a company under the same management or control as the Portfolio Manager.
13. **HUF**- HUF shall mean the Hindu undivided family as defined in Section 2(31) of the Income Tax Act, 1961.
14. **Initial Corpus** means the value of the Funds and the market value of Securities brought in by the Client and accepted by the Portfolio Manager at the time of entering into an agreement with the Portfolio Manager to avail its portfolio management services.
15. **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 at any time in future by the Portfolio Manager.
16. **Large Value Accredited Investor** means an Accredited Investor who has entered into an agreement with the Portfolio Manager for a minimum Capital Contribution of ten crore rupees
17. **Portfolio** means the total holdings of all investments, Securities and Funds belonging to the Client.
18. **Portfolio Manager** means Old Bridge Capital Management Private Limited, a company incorporated under the Companies Act, 2013 and registered with SEBI as a portfolio manager
19. **PMS** shall mean Portfolio Management Services offered by Old Bridge Capital Management Private Limited
20. **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
21. **Regulations** means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020.
22. **Related Party** means:
    - (i) a director, partner or his relative;
    - (ii) a key managerial personnel or his relative;
    - (iii) a firm, in which a director, partner, manager or his relative is a partner;
    - (iv) a private company in which a director, partner or manager or his relative is a member or director;
    - (v) a public company in which a director, partner or manager is a director or holds along with his relatives, more than two per cent. Of its paid-up share capital;
    - (vi) any body corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager;
    - (vii) any person on whose advice, directions or instructions a director, partner or manager is accustomed to act:

      Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
    - (viii) any body corporate which is — (A) a holding, subsidiary or an associate company of the portfolio manager; or (B) a subsidiary of a holding company to which the portfolio manager is also a subsidiary; (C) an investing company or the venturer of the portfolio manager. The investing company or the venturer of the Portfolio Manager means a body corporate whose investment in the portfolio manager would result in the portfolio manager becoming an associate of the body corporate. (ix) a related party as defined under the applicable accounting standards; (x) such other person as may be specified by the Board: Provided that,

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:27:27 +05'30'

(a) any person or entity forming a part of the promoter or promoter group of the listed entity; or (b) any person or any entity, holding equity shares: (i) of twenty per cent or more; or (ii) of ten per cent or more, with effect from April 1, 2023; in the listed entity either directly or on a beneficial interest basis as provided under section 89 of the Companies Act, 2013, at any time, during the immediate preceding financial year; shall be deemed to be a related party.

23. **Securities** means security as defined under the Securities Contracts (Regulation) Act, 1956, and includes any other instruments or investments (including borrowing or lending of securities) as may be permitted by Applicable Law from time to time.
24. **NRI -** NRI shall mean Non-resident Indian as defined in Section 2 (30) of the Income Tax Act, 1961.
25. **NAV -** NAV shall mean Net Asset Value, which is the price; that the investment would ordinarily fetch on sale in the open market on the relevant date, less any receivables and fees due.

Words and expressions used in this Disclosure Document and not expressly defined shall be interpreted according to their usage in the Regulations and the SEBI Act, 1992. The definitions are not exhaustive. They shall also carry the meaning assigned to them in the Regulations governing Portfolio Management Services.

III. Description

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

Old Bridge Capital Management Private Limited ("**OBCMPL**") is a Private Limited Company incorporated under the Companies Act, 2013 on December 15, 2015. OBCMPL has its Registered Office situated at 1705, ONE BKC, C Wing, G Block, Bandra Kurla Complex, Bandra East, Mumbai 400051.

Corporate Address:
1405, ONE BKC, B Wing, G Block, Bandra Kurla Complex, Bandra East, Mumbai 400051.
Business Activity:
Investment Management and Advisory Services

OBCMPL has a valid certificate of registration with SEBI as a Portfolio Manager under the Regulations (**Registration Code INP000005174**). OBCMPL seeks to provide Portfolio Management Services and offer Advisory Services to its clients which may include offshore funds, pension funds, provident funds, venture capital funds, and management of insurance funds, financial consultancy and exchange of research on commercial basis. OBCMPL acts as a Sponsor and Investment Manager to Old Bridge Capital AIF a SEBI registered Alternative Investment Funds (AIF) (**Registration number IN/AIF3/17-18/0373**). Till date, Old Bridge Capital AIF has two schemes i.e., Micro Strategies Fund and Long-Term Equity Fund. OBCMPL is also registered with Securities and Exchange Commission ('SEC') as an Investment Advisor. Further, OBCMPL acts as a Sponsor to Old Bridge Mutual Fund a SEBI registered Mutual Fund **(Registration number MF/ 081/23/07**) having received registration on 01 September, 2023.

2. Promoters, Directors and Key Management Personnel of the Portfolio Manager and their background

OBCMPL is promoted by Mr. Kenneth Andrade. The promoter has been associated in the field of financial services, equity research and funds management for over 33 years. The Directors of OBCMPL are Mr. Kenneth Andrade ,-Mr. Amit K. Jasani and Ms. Ruchi Pandey (Additional Director).

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:32:41 +05'30'

Mr. Kenneth Andrade, Founder, Director
OBCMPL is promoted by Mr. Kenneth Andrade. He is also the majority shareholder in the business. Kenneth has over 33 years of work experience in equity research and funds management.

At his previous assignment with IDFC Asset Management Company, he oversaw the investment business of the firm. He was designated as Chief Investment Officer. At the end of his tenure, in September 2015, AUM of the firm stood at Rs. 55,000 crores.

Kenneth has a Bachelor of Commerce degree from N. M. College of Commerce & Economics, Mumbai University and Post-Graduate Diploma in Financial Management.

Mr. Amit K. Jasani, Director
Mr. Amit K. Jasani has been associated with the financial services industry since 1990. He is the Director of OBCMPL. He has over 30 years of experience in Capital Markets and in distribution of financial products.

Ms. Ruchi Pandey, Additional Director
Ms. Ruchi Pandey is one of the founding members of Old Bridge Capital Group, where she has handled several roles for development of domestic and offshore business. She currently serves as Chief Executive Officer for Old Bridge Asset Management Private Limited.

Ruchi has almost two decades of experience in Financial Industry, with over 15 years in Asset Management Industry. Over the last two decades of her career, she has worked closely with Investment Teams to understand the portfolio strategies in detail, worked on building relevant products, enhance their communication and interacted with investors. Her core strength lies in understanding investor needs and behaviour which she has garnered over the years through her client interactions in her AMC roles, managing client relationships and in her Investment Counselling and Relationship Management roles. Her previous assignment was Investment Specialist at Old Bridge Capital Management. Her experience cuts across Business Development, Sales & Distribution, Marketing and Product Management. Over the years she has worked with firms like HSBC Global Asset Management, IDFC Asset Management, Prudential ICICI on the AMC side and in her initial years with Banks like ABN Amro NV and IDBI Bank.

Ms. Saaksha Mantoo, Principal Officer
Ms. Saaksha Mantoo has more than eight years of experience in equity markets research, both on the buyside and sell-side. She enjoys drilling down on businesses to identify key moats and align these with filtered nitty-gritties. She aspires to be a learned investor and wishes to make a positive social impact. She is an engineering graduate, and holds an MBA in Finance

.

Ms. Jyoti Moitra , Compliance Officer

Ms. Jyoti Moitra is a Commerce Graduate from the University of Mumbai and an Associate member of the Institute of Company Secretaries of India (ICSI). She is also graduate member of the Institute of Cost Accountants of India - ICMAI

Ms. Moitra brings with her 16 years of professional experience. During her professional stint she has worked as Company Secretary for Non-Banking Finance Companies (NBFCs), Debenture Listed Companies and Public

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:35:03 +05'30'

Limited Companies. She has also worked as Company Secretary and Compliance Officer for Pension Fund Managers registered with the Pension Fund Regulatory and Development Authority (PFRDA). She joined Old Bridge Capital Management Private Limited on November 11, 2024. She has been appointed as Compliance Officer with effect from February 19, 2025.

Prior to Old Bridge Capital, Ms. Moitra has worked with the Companies viz: DSP Pension Fund Managers Private Limited, SBI Pension Funds, Sustainable Agro-Commercial Finance Limited, Lotus Capital Financial Services Ltd, Siro Clinpharm Private Limited, Essel Infraprojects Ltd.

Mr. Divyesh Bhuptani, Senior Financial Officer
Mr. Divyesh Bhuptani has 24 years of vast experience in the fields of accounts and finance and has worked across various sectors like exports, manufacturing, trading. Prior to Old Bridge Capital, Divyesh was working with Frsh Ventures Private Limited, a subsidiary of Scentials Beautycare and Wellness Private Limited as a senior manager.

Divyesh has completed his Post Graduate Diploma in Management (Finance Management).

3. Group Companies

a. Old Bridge Mutual Fund Trustee Private Limited
b. Old Bridge Asset Management Private Limited
c. Old Bridge Capital Management Australia Pty Limited

4. Services being offered

A. OBCMPL provides Portfolio Management Services and Advisory Services to following client category:

Client Category	Nature of Services
Resident Individual, Non-Resident Indian, Resident Corporate	Discretionary/ Non-Discretionary/Advisory
Foreign Portfolio Investors	Discretionary/ Non- Discretionary/Advisory

Refer point no. (V) for details of services provided by the OBCMPL.

On-Boarding of Clients: OBCMPL may on-board the Client (a) directly (b) through empaneled Distributor

B. Services offered to Accredited Investors and Large Value Accredited Investors:

The below regulatory concessions are available to Accredited Investor and Large Value Accredited Investor under SEBI (Portfolio Managers) Regulations, 2020:

Particulars	Applicability
Contents of agreement specified under Schedule IV of SEBI (Portfolio Managers) Regulations, 2020 shall not apply to the agreement between the Portfolio Manager and Large Value	Large Value Accredited Investor

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:43:22 +05'30'

Accredited Investor	
The requirement of minimum investment amount per client shall not apply	Accredited Investor
The Portfolio Manager may offer discretionary or non-discretionary or advisory services for investment up to hundred percent of the assets under management in unlisted securities subject to the terms agreed between the client and the Portfolio Manager	Large Value Accredited Investor
The quantum and manner of exit load applicable to the client of the Portfolio Manager shall be governed through bilaterally negotiated contractual terms	Large Value Accredited Investor

The detailed framework for Accredited Investors and Large Value Accredited Investors is available on the website of the Portfolio Manager at https://oldbridgecapital.com/downloads-page.

IV. Net worth of the Portfolio Manager

The net worth of the Portfolio Manager as on March 31, 2025 is INR-387 Crores, based on the unaudited financials for the year ended March 31, 2025.

V. Penalties, pending litigation or proceedings, findings of inspection or investigations for which action has been taken or initiated by any regulatory authority.

a)	All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made thereunder.	None
b)	The nature of penalty/direction.	Not Applicable
c)	Penalties imposed for any economic offence and/or for violation of any securities laws.	None
d)	Any pending material litigation/legal proceedings against the portfolio manager/key personnel with separate disclosure regarding pending criminal cases, if any.	None
e)	Any deficiency in the systems and operations of the portfolio manager observed by the Board or any regulatory agency.	None
f)	Any enquiry/adjudication proceedings initiated by the Board against the Portfolio Manager or its Directors, Principal Officer or employee or any person directly or indirectly connected with the Portfolio Manager or its Directors, Principal Officer or employee, under the Act or Rules or Regulations made thereunder.	None

VI. Services Offered by the Portfolio Manager

i. Investment Objectives and Policies

The investment objective is to seek long term capital appreciation through various Approaches by investing in asset classes of equities, fixed income products, mutual funds, private equity and venture capital denominated in local/foreign currencies and any other asset classes and Securities as permissible under the

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:45:17 +05'30'

Regulations. Though reasonable endeavour will be made to achieve the objectives of each Approach, there is no guarantee or assurance that the investment objective will be achieved. No guaranteed returns are being offered under these services.

The Portfolio Manager offers the following three types of services:

i. **Discretionary Services:** The Portfolio Manager exercises its discretion in managing the Funds/Securities in the Client's portfolio. Subject to such investment objective and restrictions as may be contained in the agreement with the Client, the Portfolio Manager will have complete discretion to manage, invest and re-invest the Client's account, including to buy, sell or otherwise deal in any Securities, as permissible under the Regulations, effect transactions in such manner and in such markets, as it deems fit, and take day to day decisions in respect of the portfolio of the Client. The Client may, under these services, authorize or restrict the Portfolio Manager to invest the Client's Portfolio in specific financial instruments or Securities or a mix of specific instruments or Securities. The Portfolio Manager, may at its discretion, adhere to the views of the Client pertaining to the investment/ disinvestment decisions of the Client's Portfolio. The Portfolio Manager's decision in deployment of the Client's Portfolio is absolute and final and is not open to review or question by the Client during the currency of the agreement or at any time thereafter, except on the grounds of *malafide*, fraud, conflict of interest or gross negligence. The Portfolio Manager shall send periodical statements to the Client.

ii. **Non-Discretionary Services:** Under the Non-Discretionary Portfolio Management Services, the Portfolio of the Client shall be managed in consultation with the Client. Under this service the Assets will be managed as per express prior instructions issued from the Client from time to time. The Client will have complete discretion to decide on the investment (Stock Quantity and Price or amount). The Portfolio Manager inter-alia manages transaction execution, accounting, recording of corporate benefits, valuation and reporting aspects on behalf of the client entirely at client's risk.

iii. **Advisory Services:** OBCMPL will offer Clients Advisory Services in relation to the Clients' Portfolio. Under these services, the Portfolio Manager advices the Client on investments in general or any specific advice required by the clients and agreed upon in the client agreement. The Portfolio Manager will render the best possible advice to the client having regard to the client's needs and the environment, and his own professional skills. The same can be binding or non-binding in nature or in such terms as mentioned in the client agreement. For such services, the Portfolio Manager charges the client a fee for services rendered mentioned in the client agreement. The advice may be either general or specific in nature and may pertain to a particular portfolio. Entry/exit timing, execution and settlement are solely the client's responsibility.

At present OBCMPL offers Discretionary Portfolio Management and Advisory Services.

The minimum investment amount per Client as prescribed by SEBI under the Regulations is Rs. 50 lakhs.

ii. OBCMPL Investment Approach

The key factors of OBCMPL's Investment Approach are as follows: -

-Owning a diversified portfolio of Securities
-Identifying attractive opportunities and taking concentrated sectoral/ thematic exposures
-Emphasis on stock selection with the following criteria:

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:53:10 +05'30'

-Capital efficient nature of the business
-Companies with low leverage
-Profit making with low capex scheduled
-Low value of business

iv. Investment Approaches under OBCMPL's Discretionary Portfolio Management Services are as follows:

Old Bridge Capital Management 'All Cap Strategy'

Ms. Saaksha Mantoo - Principal Officer

Sr. No.	Particulars	Description
1	Strategy	Equity
2	Investment Objective	The objective of this approach is to align to the segments of the economy that are emerging and companies that have characteristics which make them the dominant participants in their industry
3	Description of types of Securities	Underlying asset class will be equity. Investment in liquid funds/fixed term papers will be made for liquidity purposes
4	Basis of selection of such types of securities as part of the investment approach	This is a buy and hold approach with a low churn. Low debt and high capital efficient businesses are some of the financial parameters that form the key selection criteria of companies in this approach. The portfolio created under 'All cap strategy' will be a diversified portfolio
5	Allocation of portfolio across types of securities	Largely allocation will be in listed equity. Investment in liquid funds/fixed term papers will be made for liquidity purposes
6	Appropriate benchmark to compare performance and basis for choice of benchmark	BSE 500 TRI. It is a broad index that covers the breadth of the market
7	Indicative tenure or investment horizon for each investment allocation	3 to 5 years
8	Risk associated with Investment Approach	The strategy is suitable for an investor who is aware of the risks associated with investing in equity shares and seeking higher-than-market returns offered by actively managed long-term portfolios. Investments in equity and equity-related securities are volatile and subject to daily price fluctuations, with liquidity potentially limited by trading volumes and settlement periods. Their value can be impacted by factors such as interest rates, currency exchange rates, government policies, taxation laws, and economic or political events. These investments carry inherent risks, and investors should only invest if they can afford potential losses. Similarly, liquid mutual funds are not risk-free; they carry interest rate, credit, and inflation risks, requiring careful consideration before investing.
9	Other Salient Features	
a	Investment Allocation	As per PMS regulations INR 50 lacs
b	Fees	Fixed Fees of upto 2.25 % p.a of AUM

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:54:04 +05'30'

c	Terms of Redemption	- For exit within 12 months from the date of each investment allocation-3% - For exit from 13 months upto 18 months from the date of each investment allocation- 2%

V. Policies for investments in Group Companies of the Portfolio Manager

There will not be any investments in group companies.

VII. Risk Factors

1. Investment in Securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations, impact cost, basis risk etc.
2. The Portfolio Manager does not assure that the objectives of any of the Investment Approach will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
3. Past performance of the Portfolio Manager does not indicate the future performance of the same or any other portfolio in future or any other future portfolioof the Portfolio Manager.
4. The name of the portfolios do not in any manner indicate their prospects or returns.
5. Investments in equity may be adversely affected by the performance of companies, changes in the economy, government policy, the market place, credit ratings and industry specific factors.
6. Debt and other fixed income investments may be subject to changes in interest rates and/or liquidity, credit and reinvestment risks.
7. Liquidity in the investments and performance of portfolio may be affected by trading volumes, settlement periods and transfer procedures.
8. Industry specific stocks, like technology stocks, may be subject to volatility, high valuations, obsolescence and low liquidity.
9. Appreciation in any of the portfolio can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any portfolio may also be affected due to any other asset allocation factors.
10. When investments are restricted to a particular or few sector(s) under any portfolio; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the portfolio value will be adversely affected.
11. In the case of stock lending, risks relate to the defaults from counterparties with regard to securities lent and the corporate benefits accruing thereon. The Portfolio Manager is not responsible for any loss resulting from stock lending.
12. Each portfolio will be exposed to various risks depending on the investment objective, Investment Approach and the asset allocation. The investment objective, Investment Approach and the asset allocation may differ from client to client. However, generally, highly concentrated portfolios with lesser number of stocks will be more volatile than a portfolio with a larger number of stocks.
13. The values of the portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.
14. Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:54:52 +05'30'

number of scrip's accounting for a large proportion of trading volume among others.

15. The Portfolio Manager and its employees directly involved in investment operations may trade in securities in their personal account which may result in a conflict with transactions in any of the Client's portfolio. However, to mitigate the said conflict in relation to employees, the Portfolio Manager has implemented the personnel securities transaction guidelines. The employees of the Portfolio Manager are required to abide by the said policy as may be applicable to them. The Portfolio Manager has guidelines for managing conflicts of interest in place to achieve and maintain discipline and transparency in all investment activities and to avoid any potential or actual conflict of interests. There are no transactions of purchase and/or sale of securities by OBCMPL and employees who are directly involved in investment operations that conflicts with transactions in any of the client's Portfolio.
16. The Portfolio Manager and its employees who are directly involved in investment operations shall abide by high level principles on avoidance of conflicts of interest while entering into its / their transactions and that of the client.
17. There are no transactions with Group Companies that conflicts with the Portfolio Management Services
18. OBCMPL acts as the Investment Manager and Sponsor to the Old Bridge Capital AIF. OBCMPL shall exercise due diligence in monitoring its services to ensure that all clients are treated fairly and equitably, and that appropriate measures are in place to identify and manage any potential or actual conflicts of interest in accordance with applicable regulatory requirements..
19. Consultation of a registered investment advisor may be done on suitability of equities and suitability of OBCMPL as a PMS provider. However, all final investment decisions shall be made solely at the discretion of the Portfolio Manager, in accordance with the Applicable Laws.

VIII. Client Representation

i. Fund management business details:

Category of Clients	**No. of Clients**	**Funds Managed (Rs. in Crores)**	**Discretionary/ Non-Discretionary**
Associates/ Group Companies			
As on March 31, 2025	N.A	N.A	N.A
F.Y 2024- 2025	N.A	N.A	N.A
F.Y 2023- 2024	N.A.	N.A.	N.A.
F.Y 2022-2023	N.A.	N.A.	N.A.
Others			
As on March 31, 2025			Discretionary
F.Y 2024- 2025	308	1281.34	Discretionary
F.Y 2023- 2024	414	1372.43	Discretionary
F.Y 2022-2023	340	1070.04	Discretionary

ii. Disclosures in respect of transactions with related parties as per Accounting Standard 18 "Related Party Disclosure" issued by the Institute of Chartered Accountants of India

Transactions with Related Parties (based on unaudited financials for the year ended March 31, 2025):
RELATED PARTY DISCLOSURES

1. **Directors as on March 31, 2025**
   - **a.** Mr. Kenneth Andrade, Founder Director
   - **b.** Mr. Amit K. Jasani, Director

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:55:37 +05'30'

c. Ms. Ruchi Pandey, Additional Director

2. **Other related parties: Key employees (Including relative of Key employees) as on March 31, 2025**

   NIL

3. **Companies over which Key managerial personnel having controlling interest**
   a. Amit Jasani Financial Services Pvt. Ltd, Mr. Amit K. Jasani is a Promoter and Director
4. **Subsidiary Companies**
   a. Old Bridge Asset Management Pvt Ltd.
   b. Old Bridge Mutual Fund Trustee Pvt. Ltd.
   c. Old Bridge Capital Australia Pte Ltd

Details of related party transaction: (based on unaudited accounts for the year ended March 31, 2025):

(in Rupees)

Particulars	**Key Managerial Personnel**	**Key employees of the company able to exercise significant influence/associate with Investment decision (Including Relatives of Key Employees)**	**Companies over which Key Managerial Personnel /company having controlling interest**	**Total**
Revenue & Expenses				
Directors Remuneration *	-	-	-	-
Distributor Fees	-	-	42,49,933	**42,49,933**
Brokerage	-	-	5,02,343	**5,02,343**
Loan given by directors	-	-	-	-
Loan returned to Directors	-	-	-	-
Issue of Preference Shares	-	-	-	-
Investments	-	-	-	-
Receivables	-	-	-	-
Trade Payables	-	-	3,21,745	**3.21,745**
Investment in PMS Approach by related parties	-	-	-	-
Advance Salary	-	-	-	**-**

IX. Financial Performance of the Portfolio Manager

(in Rupees) **Abstract of Balance Sheet**

Particulars	**FY 24-25 (Unaudited)**	**FY 23-24 (Audited)**	**FY 22-23 (Audited)**	**FY 21-22 (Audited))**
Sources of Funds:				
Shareholder's Funds	1,84,00,000	1,92,00,000	1,92,00,000	1,92,00,000
Loan Funds	-	-	-	-

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal Date: 2025.04.30 16:56:51 +05'30'

Reserves and Surplus	3,85,93,83,992	2,94,76,38,727	2,14,44,84,610	1,68,43,09,745
Non Current Liabilities and provisions	19,33,237	13,87,071	28,25,267	-
Deferred Tax Liabilities	-	-	27,54,251	11,55,189
Total Liabilities	**3,87,97,17,229**	**2,96,82,25,798**	**2,16,92,64,128**	**1,70,46,64,934**
Application of Funds:				
Net Fixed Assets	19,77,31,002	21,35,73,072	23,03,12,118	21,26,46,178
Investments	1,04,17,91,662	1,27,60,90,717	1,46,26,31,884	71,80,34,883
Non-Current Assets	26,88,98,007	18,26,912	4,51,26,740	4,48,21,914
Current Assets	2,75,97,50,816	1,52,56,19,132	48,58,79,999	78,52,43,222
Less: Current Liabilities and provisions	-38,84,54,258	-5,36,31,603	-5,46,86,613	-5,60,81,263
Net Current Assets	2,37,12,96,558	1,47,19,87,529	**43,11,93,386**	**72,91,61,959**
Deferred Tax Asset	-	47,47,568	-	-
Total Assets	**3,87,97,17,229**	**2,96,82,25,798**	**2,16,92,64,128**	**1,70,46,64,934**

Abstract of Profit & Loss Account
(in Rupees)

Particulars	**FY 24-25 (Unaudited)**	**FY 23-24 (Audited)**	**FY 22-23 (Audited)**	**FY 21-22 (Audited)**
Total Income	1,85,84,71,541	1,38,17,92,556	97,91,60,839	1,22,35,12,747
Total Expenses before depreciation	33,09,71,995	35,03,02,846	34,11,39,290	34,74,10,457
Profit/(Loss) before Depreciation & Tax	**1,52,74,99,546**	**1,03,14,89,709**	**63,80,21,549**	**87,61,02,290**
Depreciation	1,93,86,409	2,09,00,900	1,48,83,670	27,23,966
Profit/(Loss) before Tax	1,50,81,13,137	1,01,05,88,809	**62,31,37,879**	**87,33,78,324**
Provision for Tax	34,04,26,034	20,43,71,851	15,68,78,766	22,25,77,500
Deferred tax (Assets)/Liability	47,47,568	-75,01,819	15,99,062	24,89,518
Short/(Excess) provision relating to tax for prior years	51,24,101	1,05,64,660	6,45,185	- 20,43,107

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:57:52 +05'30'

Profit/(Loss) after Tax	1,15,78,15,434	80,31,54,117	46,40,14,866	65,03,54,413

Note: FY 24-25 data is based on unaudited provisional Balance Sheet and Profit & Loss Account

X. Portfolio Management Performance

Sr. No.		Portfolio Performance Returns (%)			
		F.Y. 2024-25	F.Y. 2023-24	F.Y. 2022-23	F.Y. 2021-22
1.	All Cap Strategy	14.15	49.85	-9.43	44.45
	BSE 500 TRI	5.96	40.16	-2.26	20.88

i. Portfolio Management Performance of the Portfolio Manager for last 3 Financial Years

Notes:

- OBCMPL-All Cap Strategy were launched on August 30, 2016
- The Benchmark of All Cap Approach was change to BSE 500 TRI to comply with the SEBI Circular dated December 16, 2022.
- Returns are calculated on Time Weighted Rate of Return (TWRR) based on Daily Valuation of all the clients combined together for each investment approach. This may differ from the individual client return as the Investment Approach returns are combined for all the clients in each Investment Approach.
- All cash holdings and investments in liquid funds have been considered for calculation of performance.
- Performance data is net of all fees and all expenses (including taxes)
- Performance data and Investment Approach provided is not verified by any regulatory authority

XI. Audit Observations for preceding three years

The details of PMS client audit observations are as follows:

Particulars	Audit Observations
FY 2024 -25	Audit is in progress
FY 2023 -24	No Observations
FY 2022-23	No Observations

XII. Nature of expenses

The following are indicative types of expenses. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Services Agreement which will be entered into between the Portfolio Manager and the Client, and the agreements in respect of each of the services availed at the time of execution of such agreements.

1. Management Fees

All fees and charges shall be levied on the actual amount of Clients' assets under management. In case of

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal Date: 2025.04.30 16:58:32 +05'30' interim contributions/withdrawals by Clients, performance fees may be charged on proportionate basis.

Management Fees relates to the portfolio management services offered to Clients. For managing a discretionary investment portfolio, the fixed management fee will be up to 2.25% plus applicable surcharges or a fixed fee and/or a variable charge as negotiated and agreed with the Client in the agreement.

Clients on-boarded without intermediary; the management fees shall be appropriately adjusted by the Portfolio Manager in such a manner that benefit of lower Fixed Fees is available to such Clients.

2.Exit Fees

Exit fees relate to exit charge(s) payable to the Portfolio Manager at the time of withdrawal or partial withdrawal.

3. Other Expenses

a. **Custodian/ Depository Fees** -The charges pertaining to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization, rematerialisation and other charges in connection with the operation and management of the Depository Accounts.

b. **Registrar and Transfer Agent Fee** - Charges payable to registrar and transfer agents in connection with effecting transfer of Securities, including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges, etc.

c. **Brokerage and transaction costs -** The brokerage charges and other charges like service tax/Goods and Service Tax (GST), securities transaction tax, service charges, stamp duty, transaction costs, turnover tax, exit and entry loads on the purchase and sale of shares, stocks, bonds, debt, deposits, units and other financial instruments.

d. **Performance Fee -** Performance fees may be charged upon exceeding a hurdle rate or benchmark as specified in the agreement between the Client and the Portfolio Manager.

e. **Certification and Professional Charges -** Charges payable for outsourced professional services like accounting, taxation and legal services, notarization, etc. for certification, attestation required by bankers, intermediaries and regulatory authorities.

f. **Incidental Expenses -** Courier charges, stamp duty, service tax, postal stamps, opening and operation of bank accounts, etc.

g. Goods and Service Tax will be extra as per Government rates

OBCMPL will not charge any mark-up on “other expenses” and these will be a complete pass through. Moreover, OBCMPL will endeavour to keep the cost bare minimum.

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:59:06 +05'30'

2. The list of approved custodians and Depository Participants, share brokers, fund accountant, involved for Portfolio Management activities is as follows

i. Custodians and Depository Participants

Custodians

a. IL&FS Securities Services Limited

b. Axis Bank Limited (wef 10^{th} October, 2019)

Depository Participants

- NSDL Depository IDs IN300095 (IL&FS SECURITIES SERVICES LIMITED)
- CDSL Depository IDs 16014800 (IL&FS SECURITIES SERVICES LIMITED)
- NSDL Depository IDs IN300484 (Axis Bank)
- CDSL Depository IDs 27500 (Axis Bank)

ii. Share Brokers

a. Jefferies India Private Limited
SEBI Registration No. INZ000243033

b. Kotak Securities Limited
SEBI Registration No. INZ000200137

c. Emkay Global Financial Service Ltd
SEBI Registration No. INZ000203933

d. ICICI Securities Limited
SEBI Registration No. INZ000183631

e. Anand Rathi Share &Stock Brokers Limited
SEBI Registration No. INZ000170832

f. Dhanki Securities Private Limited
SEBI Registration No. INZ000237338

g. Dalal & Broacha Stock Broking Private Limited
SEBI Registration No. INZ000210337

h. Nuwama Wealth Management Limited (Edelweiss)
SEBI Registration No. INZ000166136

i. Motilal Oswal Securities Limited
SEBI Registration No. INZ000158836

j. Equirus Securities Private Limited
SEBI Registration No. INZ000251536

k. IIFL Capital Services Limited (Only NRI's)
SEBI Registration No. INZ000164132

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 16:59:35 +05'30'

l. **Axis Capital Limited**
SEBI Registration No. INZ000189931

m. **Investec Capital Services (India) Pvt Ltd**
SEBI Registration No. INZ000007138

iii. **Fund Accountant**

a. Axis Bank Limited (wef 10th October, 2019)

iv. **Banker**

a. HDFC Bank Ltd.
b. Axis Bank Ltd.

The Portfolio Manager may, at its sole discretion, empanel additional service providers as and when the need arises.

XIII. Taxation

Clients will be responsible and liable for taxes under the provisions of the Income Tax Act, 1961 for any income generated out of the investment made in the portfolio management Investment Approach. OBCMPL will not deduct tax on the capital gains generated out of the investment to be made in the portfolio management Investment Approach. However, this will be subject to any of the provisions of the Income Tax Act, 1961 or the Finance Bill, as applicable. OBCMPL shall provide adequate statements to the clients for accounting purpose.

For non-resident clients, the tax on Capital Gains is deducted at source by the bank.

In view of the individual nature of tax benefits, each prospective client/investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their availing Portfolio management services, in terms of the provisions of the Income-tax Act, 1961.Clients are best advised to take independent opinion from their tax advisors / experts for any income earned from such investments. The Portfolio Manager shall not be responsible for assisting in or completing the fulfilment of the Client's tax obligations. The provisions of the Income Tax Act, 1961 shall apply to the Client and the Portfolio Manager in respect of their individual income.

Details under FATCA/Foreign Tax Laws

Tax regulations require us to collect information about each investor's tax residency. If you have any questions about your tax residency, please contact your tax advisor. Foreign Account Tax Compliance provisions (commonly known as FATCA) are contained in the US Hire Act 2010. Applicants (Including joint holders, Guardian, POA holder) are required to refer and mandatorily fill/sign off a separate "FATCA declaration form". Applications without this information /declaration being filled/signed off will be deemed as incomplete and are liable to be rejected. Investors are requested to note that the contents of the information to be provided/declaration in the application form may undergo a change on receipt of communication/guidelines from SEBI.

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 17:00:08 +05'30'

XIV. Accounting Policy

The following accounting policy will be applied for the Portfolio Investments of the Client:

1. Contribution to portfolio

Contribution to portfolio by way of securities is recorded at the previous day closing market value from the date the securities are received by the portfolio manager.

2. Portfolio investments

Portfolio investments are stated at market/fair value prevailing as on year end, and the difference as compared to book value is recognized as accrued gain/loss in the statement of affairs for the year.

Market value/fair value of portfolio investments is determined as follows:

Investments in listed equity shares are valued at the closing quoted price on BSE Ltd. / National Stock Exchange.

Investments in units of a mutual fund are valued at Net Asset Value of the relevant scheme. Provided investments in mutual funds shall be through direct plans only.

For the purpose of financial statements, the Portfolio Manager shall mark all the investments on mark to market. Investments in unlisted equities are valued at prices provided by independent valuer appointed by the Portfolio Manager basis the International Private Equity and Venture Capital Valuation (IPEV) Guidelines on a semi-annual basis.

Investment in debt and money market securities are valued as per the security level prices provided by the empaneled valuation agency.

In case of any other securities, the same are valued as per the standard valuation norms applicable to the Mutual Funds

Dividend income shall be tracked from the date of declaration and recognized on the date of the security being quoted on an ex-dividend basis. For unlisted investments, dividend income would be recognized on the date of declaration.

Bonus units shall be tracked from the date of declaration and recognized on the date of the Security being quoted on an ex-bonus basis. For unlisted investments, bonus units would be recognized on the date of declaration.

Purchase and sale of investments are accounted for on trade date basis. Cost of purchase and sale includes consideration for scrip and brokerage (including service tax thereon) but excludes securities transaction tax paid on purchase / sale of securities.

Consideration received against fractional entitlements on account of corporate actions is entirely considered as revenue under other income.

Mitsu Kashyap Dalal

Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 17:00:42 +05'30'

3. Revenue

Realized gain/loss on sale of investments is accounted on trade date basis by comparing sale consideration with the cost of investment. The cost of investment is identified following First-in-First out (FIFO) method.

Corporate dividend income is recognized on ex-dividend date.

The accounting policies and standards as stated above may be modified from time to time by the Portfolio Manager, subject to such modifications being in conformity with the applicable regulations.

4. Expenses

Portfolio Management fees are accounted on cash basis based on average of daily portfolio value at monthly interval.
Securities transaction tax paid on purchase / sale of securities is treated as expenditure shown under other operating expenses in the statement of affairs.

Other expenses like depository charges, transaction charges, audit fees are recorded on cash basis.

The Client may contact the customer services official of the Portfolio Manager for the purpose of clarifying or elaborating on any of the above policy issues.

XV. Investor Services

OBCMPL shall ensure timely and prompt redressal of any grievances or dispute with the client.

1. Name, address and telephone number of the investor relations officer who shall attend to the Client's queries and complaints:

Name	Augustus Jeffy Grace
Designation	Investor Services
Address	1405, ONE BKC, B Wing, G Block, Bandra Kurla Complex, Bandra (East), Mumbai 400051
Telephone	022-62449191
E-mail	investorservices@oldbridgecapital.com

2. Grievance Redressal and Dispute Settlement mechanism

a. The Portfolio Manager will endeavour to address all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time.

b. It is Mandatory for the Client having grievance to take up the matter directly with the Portfolio Manager.

c. OBCMPL has designated Augustus Jeffy Grace to receive and redress all the queries. A designated e-mail address has been created **investorservices@oldbridgecapital.com.**

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 17:01:24 +05'30'

d. The internal deadline for resolving the complaints will be as follows:
   (a) Matters relating to OBCMPL's office, i.e., regarding portfolio performance and funds allocation: within 3 working days
   (a) Matters regarding to custodian: within 7 working days
   (b) Matters regarding dividend and other corporate actions: will be followed up vigorously with the agencies concerned under intimation to Clients.

   While, the Portfolio Manager shall endeavour to follow the internal deadline as mentioned above, it shall take adequate steps for redressal of grievances of the Client not later than twenty-one calendar days of the date of the receipt of the complaint.

e. OBCMPL will ensure that every complaint is attended immediately and an acknowledgement will be given immediately.

f. The Register of complaint and Grievance will be made available to the Internal/External Auditors during the time of Audit and to the Regulatory Authorities.

g. The soft copies / hard copies of the complaints received from the customers are preserved by the Client Relations Department for future reference, if required.

h. If Client/s are still not satisfied with the response from the Portfolio Manager, they can lodge their grievances with SEBI at https://scores.sebi.gov.in/ or may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at 1800 266 7575 / 1800 22 7575. The complaint shall be lodged on SCORES within one year from the date of cause of action, where,

   - The complainant has approached the Portfolio Manager, for redressal of the complaint and,
   - The Portfolio Manager has rejected the complaint or,
   - The complainant has not received any communication from the Portfolio Manager or,
   - The complainant is not satisfied with the reply received or the redressal action taken by the Portfolio Manager.

i. SCORES may be accessed through SCORES mobile application available in app store.

j. After exhausting all options as mentioned above for resolution, if the client is not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at https://smartodr.in/login .

k. Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Portfolio Manager is not satisfactorily resolved or at any stage of the subsequent escalations mentioned above.

l. The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCOREs guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.

m. The process on Online Dispute Resolution Mechanism is available at https://oldbridgecapital.com

3. SEBI Scores Platform

SEBI has launched a centralized web-based complaints redress system (SCORES), which enable investors to lodge and follow up their complaints and track the status of redressal of such complaints from anywhere. This also enables the market intermediaries and listed companies to receive the complaints from investors against

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 17:02:00 +05'30'

them, redress such complaints and report redressal. All the activities starting from lodging of a complaint till its disposal by SEBI would be carried online in an automated environment and the status of every complaint can be viewed online at any time. An investor, who is not familiar with SCORES or does not have access to SCORES, can lodge complaints in physical form. However, such complaints would be scanned and uploaded in SCORES for processing.

Investors can register/ lodge complaints online on the SCORES (SEBI Complaints Redress System) portal - https://scores.sebi.gov.in by clicking on "complaint registration"
For ODR portal - ***https://smartodr.in/login***
Records that will be maintained:

Complaints Register: where the date of receipt of complaint and action taken will be recorded and time taken for resolving the complaints will be mentioned.

A detailed report of complaints received and resolved and reasons for delay if any for resolution will be recorded.

XVI. 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	NIL

XVII. Diversification Policy:

Portfolio diversification is a strategy of risk management used in investing, which allows to reduce risks by allocating the funds in multiple asset types. It helps to mitigate the associated risks on the overall investment portfolio.

The Portfolio Manager shall invest in equity and equity related securities. However, from time to time on opportunistically basis, may also choose to invest in money market instruments, units of mutual funds, ETFs or other permissible securities/products in accordance with the Applicable Laws.

For investments in securities of Associates/ Related Parties, the Portfolio Manager shall comply with the following:

The Portfolio Manager shall invest up to a maximum of 30% of the Client's AUM in the securities of its associates/related parties. The Portfolio Manager shall ensure compliance with the following limits:

Security	Limit for investment in single associate/related party (as percentage of Client's AUM)	Limit for investment across multiple associates/related parties (as percentage of Client's AUM)
Equity	15%	25%
Debt and hybrid securities	15%	25%

Mitsu Kashyap Dalal
Digitally signed by Mitsu Kashyap Dalal
Date: 2025.04.30 17:02:32 +05'30'

Equity + Debt + Hybrid securities*	30%

*Hybrid securities includes units of Real Estate Investment Trusts (REITs), units of Infrastructure Investment Trusts (InvITs), convertible debt securities and other securities of like nature.

The aforementioned limits shall be applicable only to direct investments by Portfolio Manager in equity and debt/hybrid securities of its associates/related parties and not to any investments in the Mutual Funds.

The Portfolio Manager shall not make any investment in unrated and below investment grade securities.

For Old Bridge Capital Management Private Limited

KENNETH JOSEPH ANDRADE Digitally signed by KENNETH JOSEPH ANDRADE Date: 2025.04.30 15:43:43 +05'30'

Kenneth Andrade

Director

Amit Kanaiyalal Jasani Digitally signed by Amit Kanaiyalal Jasani Date: 2025.04.30 15:45:39 +05'30'

Amit Jasani

Director

Mitsu Kashyap Dalal Digitally signed by Mitsu Kashyap Dalal Date: 2025.04.30 17:03:10 +05'30'

Date: 30th April, 2025

Place: Mumbai.

OLD BRIDGE
CAPITAL MANAGEMENT

Old Bridge Capital Management Pvt. Ltd.
1705, C Wing, ONE BKC,G Block BKC, Bandra Kurla Complex, Bandra East, Mumbai – 400 051, India
Phone +91 22 69459999
www.oldbridgecapital.com