

## **DISCLOSURE DOCUMENT**

The particulars given in this Disclosure Document have been prepared in accordance with SEBI (Investment Advisers) Regulations, 2013, as amended vide SEBI (Investment Advisers) (Amendment) Regulations, 2020.

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

For the purpose of this Disclosure Document, Investment Adviser is Multi-Act Trade and Investments Private Limited ("MATI").

This document has been prepared in pursuant to regulation 15 and 18 of the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, as amended. This document has neither been approved nor disapproved by SEBI, nor has SEBI certified the accuracy or adequacy of the contents of this Document.

### **A. Descriptions about Multi-Act Trade and Investments Private Limited ("MATI")**

- **History, Present business and Background:**

Multi-Act Trade and Investments Private Limited was incorporated on July 21, 1997, having CIN: U65920MH1997PTC109513.

Since inception, the company has been engaged in creating a process for stock-selection and valuation in order to help clients construct a portfolio of investments in Indian capital markets. This process uses tools from fundamental, technical and quantitative analysis, and is set against backdrops of behavioral finance and Austrian economics. The fundamental analysis seeks to separate the universe of stocks into two pools based on the characteristics of the businesses that underlie them. It uses appropriate valuation tools to arrive at an expected business valuation for the stock. This valuation is an interval valuation defining a range within which the "true" value of the business is estimated to reside. Technical analysis uses stock price patterns in an attempt to harness tailwinds in market momentum - and avoid headwinds. All technical analysis is done in the context of the valuation arrived at through fundamental analysis. Quantitative techniques use statistical tools for assessing trends that obtain in certain asset classes. All analysis is done keeping in mind behavioral biases that are attendant to the investment profession. The accent is therefore on a process driven approach that defines entry and exit points as well as position sizing before any investment is made.

The company is currently a SEBI registered Investment Adviser under SEBI Registration No. INA000008589 and provides investment advisory and research services on Indian equities. The Company is also registered with the Reserve Bank of India as an NBFC under the Category Investment Companies (ICs – new Categorization – Investment and Credit Company (NBFC-ICC)) having registration No. 13.01121) for the purpose of managing the Company's own proprietary books, with clear segregation of its Investment Advisory division.

- **Services Offered:**

MATI shall provide non-binding investment advisory services to the Client, including but not limited to advice relating to investing in, purchasing, selling or otherwise dealing in securities or investment products, and advice on investment portfolio containing securities or investment products, whether written, oral or through any other means of communication for the benefit of the client.

In the capacity as advisers, MATI aligns its interests with those of the client and seeks to provide the best suited advice based on clients risk profile. MATI first tries to understand the client's return expectations, risk taking ability & goals, which in turn helps to arrive at an asset allocation suitable for the client. MATI conducts frequent portfolio reviews and suggests any corrective action/s if required.

While MATI will render investment advisory services, the discretion to execute the transactions and responsibility for execution /settlement of the transactions will lie solely with the Client.

- **Terms & conditions for advisory services:**

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

- **Disciplinary history:**

- i. No penalties / directions have been issued by SEBI under the SEBI Act or Regulations made there under against the Investment Adviser relating to Investment Advisory services.
- ii. There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority against the Investment Adviser or its Directors, or employees.

- **Affiliations with other intermediaries:**

MATI is a part of the Multi-Act Group. Multi-Act Equity Consultancy Private Limited ("MAECL") is the wholly owned subsidiary of MATI. Currently MAECL provides portfolio management Services under SEBI (Portfolio Managers) Regulations, 2020 under SEBI Registration No. INP000002965.

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

MATI do not have any distribution or execution arrangement with the issuers of the securities, that MATI advises on.

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

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

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

Although MATI is registered as a NBFC-ICC with RBI, it is not actively and directly engaged into any proprietary trading. However, MATI may have positions in various securities/mutual funds/liquid products through other intermediaries on discretionary basis without having any say on such direct investments.

The activities are segregated into separate division and such segregation will ensure avoidance of conflict of interest with regard to the investment advisory and related business of the Company. The proprietary investment transactions may at times be contrary to the investment advice or other related business or actions.

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

MATI is a separate legal entity which has an independent activity of providing the Investment Advisory services. The investment advisory services are being provided by Investment Advisory division of MATI and there is segregation of activities and arm's length relationship from all other activities; The Investment Advisory services shall be provided by MATI by maintaining an arm's length relationship with its subsidiary which is engaged in portfolio management services. Appropriate Chinese walls are also maintained in the manner as expected under SEBI IA Regulations.

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

Clients are requested to go through the detailed key features, performance track record of the product, or security including warnings, disclaimers etc. before investing as and when provided by the Investment Advisor.

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

MATI and the Investment Advisers of MATI who provide the investment advice to the clients, shall draw the client's attention to the warnings, disclaimers in documents, advertising materials relating to an investment product/s which he/she/they is/are recommending to the client/s.

#### **H. Standard Risk Factors as perceived by Investment Adviser:**

1. Investments in equities and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the investment / products will be achieved.
2. The past performance does not indicate its future performance. There is no assurance that past performances will be repeated. Investors are not being offered any guaranteed or indicative returns.
3. As with any investment in securities, the NAV of the portfolio can go up or down depending upon the factors and forces affecting the capital market.
4. The performance of the investments/products may be affected by changes in Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.
5. Investments in the products which the Clients have opted are subject to wide range of risks which inter alia also include but not limited to economic slow down, volatility & illiquidity of the stocks, poor corporate performance, economic policies, changes of Government and its policies, acts of God, acts of war, civil disturbance, sovereign action and /or such other acts/ circumstance beyond the control of MATI or any of its associates / subsidiaries.
6. The names of the products/nature of investments do not in any manner indicate their prospects or returns. The performance in the equity products may be adversely affected by the performance of individual companies, changes in the market place and industry specific and macro-economic factors.

#### **General Risks:**

We trust that, before executing on the advice of the Investment Adviser, our persons associated with the investment advice at MATI has provided you with all the information about the products, risk factors etc. and you have gone through all the relevant information about the product being advised and have sought requisite clarification about the same.

MATI shall maintain complete confidentiality of all information provided by the client/s and shall not disclose any such information, without your prior consent except if such disclosure is required to be made in compliance with any applicable law or regulatory direction. MATI will obtain information pertaining to your orders/transactions/portfolio/funds availability/securities availability etc. from the individual Investment Adviser to enable us to provide you with informed and appropriate advice.

#### **Investors / Client Services:**

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

Name of the person: Mr. Vikas Biyani / Mr. Krushi Parekh  
Designation: Principal Officer / Person associated with Investment Advice  
Address: 10<sup>th</sup> Floor, SC, The Ruby Tower, Senapati Bapat Marg, 29, Dadar West, Mumbai – 400 028  
Telephone: 91-22 -61408989  
Email: [advisor@multi-act.com](mailto:advisor@multi-act.com)

In case of any grievances the investors may email to:

Name of Compliance Officer: Mr. Sekar Ramasubramanian

Email: [compliance@multi-act.com](mailto:compliance@multi-act.com)

Address: 10<sup>th</sup> Floor, SC, The Ruby Tower, Senapati Bapat Marg, 29, Dadar West,  
Mumbai – 400 028

Telephone: 91-22 -61408992

The officials mentioned above will ensure prompt Investor services. The Investment Adviser will ensure that this official is vested with the necessary authority, independence and the wherewithal to handle Client queries and complaints.

### **Grievance Redressal and Dispute Settlement Mechanism**

The Investment Adviser has in place a dedicated system for addressing all complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time. If the Investor remains dissatisfied with the remedies offered or the stand taken by the Investment Adviser, the Investor may approach the regulator under whose purview the product is being regulated.

All disputes, differences, claims and questions whatsoever arising between the Client and the Investment Adviser and/or their respective representatives shall be settled in accordance with and subject to the provisions of The Arbitration and Conciliation Act, 1996, or any statutory requirement, modification or re-enactment thereof. Such Arbitration proceedings shall be held at Mumbai or such other place as the Investment Adviser thinks fit.