

OHM PORTFOLIO EQUI RESEARCH PVT. LTD.

CIN No.: U67120MH2003PTC140019
SEBI Regn. No: PM/ INP000001389

PORTFOLIO MANAGEMENT SERVICES

Disclosure Document
MARCH, 2024.

Disclosure Document for Portfolio Management Services
by Ohm Portfolio Equi Research Private Limited

1. This document has been filed with the Board along with a certificate in the prescribed format in terms of Regulation 14 of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993.
2. The purpose of this document is to provide essential information about the portfolio services in a manner to assist and enable the investors in making decisions for engaging a Portfolio Manager.
3. The document contains necessary information about the Portfolio Manager. Investors should carefully read the entire document before making a decision and should retain it for future reference.
4. Investor may also like to seek further clarifications or obtain further changes after the date of this document from the services provider.
5. All the intermediaries involved are registered with SEBI as on the date of the document.
6. The Principal Officer designated by the Portfolio Manager is:

Name	:	Mr. Jigar Valia
Tel	:	022 – 6132 5552.
E-mail	:	ohmpms@gmail.com

7. This disclosure document is dated 31-03-2024.

Ohm Portfolio Equi Research Private Limited
CIN No.: U67120MH2003PTC140019; SEBI Regn. No: PM/ INP000001389
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FORM C

SECURITIES AND EXCHANGE BOARD OF INDIA
(PORTFOLIO MANAGERS) REGULATIONS, 1993

(Regulation 14)

Name of Portfolio Manager: Ohm Portfolio Equi Research Private Limited.

Address of the Portfolio Manager: **Regd. Office Address:-**
504/504A, 5th Floor, Plot No. 268,
F Block, Ceejay House, Shivsagar Estate,
Dr. A.B. Road, Worli, Mumbai : 400 018
Tel: 61325555, 61325500. Fax: 61325598.
Email: ohmpms@gmail.com

We Confirm That

- i) The disclosure document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 1993 and the guidelines and directives issued by the Board from time to time;
- ii) The disclosure made in this document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of the portfolio to us /investment in the Portfolio Management Investment approach;
- iii) The Disclosure Document has been duly certified by an independent Chartered Accountant viz. Mr. Pranav Bastawala (Membership No.100468) Partner of M/s Bastawala and Associates, Chartered Accountants, 501, Opulence, 6th Road, R. K. Hospital Lane, Opp. Nandan Maternity Hospital, Santacruz (East), Mumbai – 400 055. Tel: +91 22 26130819, +91 22 26133884, email: ca.bastawala@gmail.com.


(Jigar Valia)
Principal Officer (PMS)



Current Address
Ohm Portfolio Equi Research Pvt. Ltd.
504/504A, 5th Floor, Plot No. 268
F Block, Ceejay House, Shivsagar Estate,
Dr. A.B. Road, Worli, Mumbai - 400 018
Ph: 022-61325552, Fax: 022-61325598.

Place: Mumbai
Date: 24-05-2024.

Registered Office : 504/504A, 5th Floor, Plot No. 268, F Block, Ceejay House, Shivsagar Estate, Dr. A.B. Road, Worli, Mumbai -400018. Tel: (Board) (022) 61325500 Fax: (022) 61325596 Email: ohmpms@gmail.com
Correspondence: 301-A, Poonam Chambers, "B" wing, 3rd Floor, Dr. A.B. Road, Worli, Mumbai – 400 018.

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Contents of Disclosure Document

1. DISCLAIMER CLAUSE

The particulars given in this document has been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 1993 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 the documents.

2. DEFINITIONS

Unless the context or meaning otherwise requires, in this agreement (including in the recitals hereinabove and the annexure and schedules, if any, hereto) the following expressions shall have the meanings assigned to them respectively hereafter, viz:-

- 2.1 “Act” means the Securities and Exchange Board of India Act, 1992.
- 2.2 “Board” means the Securities and Exchange Board of India.
- 2.3 “Client” or “Investor” means any person who registers with the Portfolio Manager for availing its services of portfolio management.
- 2.4 “Company” means Ohm Portfolio Equi Research Pvt. Ltd.
- 2.5 “Discretionary Portfolio Management Services” means Portfolio Management Services where the Portfolio Manager exercises or may under a Contract relating to portfolio management, exercise any degree of discretion as to the investments or management of the portfolio of securities and/ or the funds of the Client, as the case may be.
- 2.6 “Funds” means the moneys placed by the Client with the Portfolio Manager and any accretions thereto.
- 2.7 “Ohm Absolute”, “Ohm Long Term Portfolio” and “Ohm Growth” Investment Approach means discretionary Portfolio Management Service Investment approaches launched by the Company.
- 2.8 “PM Regulations” means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 1993 and any amendments thereto.
- 2.9 “PM Rules” means the Securities and Exchange Board of India (Portfolio Managers) Rules, 1993 and any amendments thereto.
- 2.10 “Portfolio” means Securities and Funds belonging to the Client and lying with the Portfolio Manager.
- 2.11 “Portfolio Manager” means Ohm Portfolio Equi Research Private Ltd., a company incorporated under the Companies Act, 1956 having its registered office at 504/504A, 5th Floor, Plot No. 268, F Block, Ceejay House, Shivsagar Estate, Dr. A.B. Road, Worli, Mumbai -400018 (Old Registered Office at R-507, 5th Floor, Rotunda Building, B. S. Marg, Fort, Mumbai – 400 001) and correspondence address 301-A, Poonam Chambers, “B” Wing, Dr. Annie Besant Road, Worli, Mumbai – 400 018

Registered Office : 504/504A, 5th Floor, Plot No. 268, F Block, Ceejay House, Shivsagar Estate, Dr. A.B. Road, Worli, Mumbai -400018. Tel: (Board) (022) 61325500 Fax: (022) 61325598. Email: ohmpms@gmail.com
Correspondence: 301-A, Poonam Chambers, “B” wing, 3rd Floor, Dr. A.B. Road, Worli, Mumbai – 400 018.

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- 2.12 “SEBI” means the Securities & Exchange Board of India established under sub-section (1) of Section 3 of the Securities and Exchange Board of India Act, 1992.
- 2.13 “Securities” include shares, scrips, stocks, bonds, debentures, or other marketable securities of a like nature in or of any incorporated company or other body corporate, derivatives, units or any other instrument issued by any collective investment plans to the investors in such plans, government securities, and such other instruments as may be declared by the Central Government to be ‘Securities’ provided that securities shall not include any securities which the Portfolio Manager is prohibited from investing in under the PM Rules, PM Regulations or any other law for the time being in force.
- 2.14 Such of those expressions as are used and not defined in the Agreement, but defined in the Act or PM regulations and PM Rules shall carry the same meaning herein as are assigned to them therein respectively.

3. DESCRIPTION

- i) History, Present business and Background of the Portfolio Manager.
Ohm Portfolio Equi Research Pvt. Ltd. was incorporated on 11th April 2003. Initially the Company was incorporated with the name Ohm Portfolio Managers Pvt. Ltd. The name of the Company was changed from “Ohm Portfolio Managers Pvt. Ltd.” to “Ohm Portfolio Manager Pvt. Ltd.” in February 2007 and again the name of the Company was changed from “Ohm Portfolio Manager Pvt. Ltd.” to “Ohm Portfolio Equi Research Pvt. Ltd.” on 09-05-2007.

The Company has a strong team of professionals with extensive industry knowledge and strong hand's on experience in asset management, Stock Broking, Banking, Finance and Capital Market Industry.

- ii) Promoters and Directors of the Portfolio Manager
The details of the promoters of the Portfolio Manager are as follows:

Name of the Shareholder	Type of holdings	Holding
Mr. Amal N. Parikh	Equity	99.56

MANAGEMENT

The affairs of the company are managed under the guidance and supervision of a highly professional Board, which consists of adequate number of independent directors of eminence and experts of the respective fields. The following persons constitute the Board of Directors of the company as on date:

1. Mr. Amal N. Parikh (Non Executive Director)
2. Mrs. Viral A. Parikh
3. Mr. Jignesh G. Pandya (Resignation W.e.f. 20-Nov-2023)
4. Mr. Bimal N Parikh (Appoint W.e.f. 23-Nov-2023)

The company has professionals as heads at all operational levels to manage its day-to-day affairs.

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The details of directors of the Portfolio Manager are as follows:

Name of the Director	Address	Present Status / Directorship
Mr. Amal N. Parikh	63, 16th Floor, Silverene Terrace, Abdul Gaffar Khan Road, Near S.B.I Bank, Worli Sea Face, Mumbai – 400030.	Ohm Stock Broker Private Limited, Ohm Educom Foundation Private Limited Ohm Edubridge Private Limited. Ohm Dovetail Private Limited. Ohm Foodland Private Limited Abha Exports Private Limited. Lenden Club Techserve Private Limited Raphe Mphibr Private Limited
Mrs. Viral A. Parikh	63, 16th Floor, Silverene Terrace, Abdul Gaffar Khan Road, Near S.B.I Bank, Worli Sea Face, Mumbai – 400030.	Ohm Stock Broker Private Limited, Ohm Educom Foundation Private Limited Ohm Edubridge Private Limited. Abha Exports Private Limited.
Mr. Bimal N Parikh	1801, 81 AUREATE CTS NO 791(PT), K C MARG, NEAR RANGSHARDA HALL, BANDRA WEST- 400050	Ohm Stock Broker Private Limited, Abha Exports Private Limited. Ohm Foodland Private Limited

(iii) **Top 5 Group companies/firms of the Portfolio Manager on Turnover basis.**

- 1) Ohm Enterprise. *
- 2) Ohm Core Investment Corp. *
- 3) Ohm Investment Corporation. *
- 4) Ohm Stock Broker Private Limited. *
- 5) Ohm Edubridge Private Limited. *

(Note : * No Transactions done by above entities with Ohm Portfolio Equi Research Pvt. Ltd. during FY 2023-2024.)

(iv) **Details of the services offered by the Portfolio Manager:**

a) **Discretionary Services:**

Under these services, the choice as well as timing of the investment decisions rest solely with the Portfolio Manager. In other words the Portfolio Manager shall have the sole and absolute discretion to invest Clients' Funds in any type of Securities and in any market as he deems fit. The Securities invested/disinvested by the Portfolio Manager for Clients in the same Investment approach may differ from Client to Client. The right of the Portfolio Manager shall be exercised strictly in accordance with the provisions of the Act or PM regulations and PM Rules and the guidelines and notifications issued there under from time to time.

b) **Non-Discretionary Services:** The Portfolio Manager is not offering non-discretionary services.

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- c) **Advisory Services:** The Portfolio Manager will provide Advisory Portfolio Management Service in terms of the SEBI (Portfolio Manager) Regulations 1993, which shall be in the nature of investment advisory and shall include the responsibility of advising on the Portfolio Investment approach and investment and divestment of individual securities on the Client's Portfolio. The Portfolio Manager shall be solely acting as an advisor to the Portfolio of the Client and shall not be responsible for the investment/divestment of securities and/ or administrative activities on the Client's Portfolio. The Portfolio Manager shall, provide advisory services in accordance with such guidelines and / or directives issued by the regulatory authorities and/ or the Client, from time to time, in this regard.

4. PENALTIES, PENDING LITIGATIONS OR PROCEEDINGS, FINDINGS OF INSPECTION OR INVESTIGATIONS FOR WHICH ACTION MAY HAVE BEEN TAKEN OR INITIATED BY ANY REGULATORY AUTHORITY

(i) WTM, SEBI vide his order dated 08-09-2004 debarred Mr. Amal N. Parikh, Mr. Uday S. Shah and Viram Investment Pvt. Ltd. from dealings in securities market for a period of 6 months for their dealing in the scrip of Intelvision Software Ltd. The said Order was quashed and set-aside by the Hon'ble Securities Appellate Tribunal by their order dated 11-02-2005.

(ii) We confirm that there are no penalties imposed for any economic offence and / or for violation of any securities laws.

(iii) We confirm that there are no pending material litigation / legal proceedings against the portfolio manager/ key personnel regarding pending criminal cases.

(iv) We received letter on 21st Jan 2023 from SEBI highlighting noncompliance of the provisions of Circular SEBI/HO/IMD/DF1/CIR/P/2020/26 dated February 13, 2020 which stipulates that charges for all transactions in a financial year (Broking, Demat, Custody, etc) through self or associates shall be capped at 20% by value by associate (including self) per service earlier to FY 2023-24 the Portfolio Manager executed all its trade through M/s Ohm Stock Broker Private Limited, (having commenced as a director and shareholders). Appropriate actions have been taken to address the matter. Empanelment of other brokers to trade for PMS client is now completed and 100% orders for FY 2023-2024 have been placed with external brokers.

(v) We confirm there are no enquiries / 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, Rules or Regulations made there under.

5. SERVICES OFFERED

Currently under the discretionary services, the following investment approaches are offered to investors:

- **(i) OHM ABSOLUTE INVESTMENT APPROACH**

Investment objective:

“Ohm Absolute” is an equity investment approach aiming to provide long term capital appreciation by primarily investing into aggressive growth opportunities available across all market caps. Since the objective of the approach is to pursue aggressive opportunities, the approach is designed for those investors who hold a long-term investment view and who accept undergoing of significant fluctuation in the value of their investments in order to achieve fair enough long term returns. It is primarily intended that the underlying investments made will be on a diversified basis. The Investment Approach will be directly investing mainly in equities and equity-related investments. The portfolio under this approach may also include bonds, short term and long term deposits and other investments. The intended asset allocation as aforesaid is for reference only and may be changed as and when the Portfolio Manager deems appropriate.

For efficient portfolio management, the portfolio of any underlying investments of this approach may acquire or sell, financial futures contracts and financial option contracts for hedging purpose, may engage in security lending, enter into repurchase agreements and may invest in other allowable instruments as investment.

Investment approach:

The Portfolio will be investing in potential growth companies with market capitalization that may range from and between the smallest to the largest companies.

This approach primarily identifies and invests in companies that have potentials and continue to grow due to new, improved or upgraded products, services or business operations or volume expansion or due to changes in fiscal or monetary policies or economic developments.

The Portfolio Manager will look for companies that are already recognized as leaders in their respective industry and try to find out new innovators within their field.

The companies in which this approach invests may be in the developmental stage or may be old companies undergoing significant changes. As a result, they may be subject to greater business risks and more sensitive to changes in economic conditions than larger, more established companies.

The Portfolio Manager may also seek value unlocking opportunities in companies which may be out of favor by street for any reason. The Portfolio Manager watch out for any catalyst, that might be either change in management, or potential sells business / any units or any other value unlocking opportunities etc.

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Other Features of the Approach:

Preference will be given to businesses with high RoE. However, companies which may improve their RoE over next 2-3 yrs may also be added. Money may also be invested in IPO's which come at reasonable valuations.

PEG ratio will be a major tool to select companies. Active research will be major backbone for this approach. Companies with long term business models will be preferred. Companies with higher future cash flows and ability to deploy this cash flow will be looked after.

Benchmark:

SEBI, vide circular SEBI/HO/IMD/IMD-PoD-2/P/CIR/2022/172 dated December 16, 2022 ("B&V Circular") specified various modalities related to performance benchmarking, valuation of securities and reporting of performance by the Portfolio Managers. The APMI circular of 23rd March 2023, issued as per instructions of SEBI has prescribed the benchmarking options for each strategy.

Ohm Absolute Investment Approach falls under Strategy "Equity" and the benchmark approved by the board is Nifty50 TR.

Exit:

Since this approach is meant for investors with longer term horizon, it is expected that minimum holding period will be at least three years. To discourage any earlier withdrawal of money, Portfolio Manager has decided to have an exit load if money is withdrawn before 1 year.

Exit Load Structure	Exit Load
Withdrawal	
< 1 year	2 % of outstanding NAV
> 1 year	No exit load

Risk Profile:

Aggressive Investor

To summarize the essential features of the above Investment approach are as under:

1. Minimum Portfolio Size: Rs.50 lakhs cash or approved securities per client. (Earlier 25 Lakhs)
2. Valuation Report (NAV Report) / Holding Statement is being sent on monthly basis.
3. Transaction statement is being sent every month.
4. Contract notes (if any) would be sent regularly or as agreed with the client.
5. Ledgers and Bank statements (if any) would be sent quarterly or as and when required by the client.

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Registered Office : 504/504A, 5th Floor, Plot No. 268, F Block, Ceejay House, Shivsagar Estate, Dr. A.B. Road, Worli, Mumbai -400018. Tel: (Board) (022) 61325500 Fax: (022) 61325598. Email: ohmpms@gmail.com
Correspondence: 301-A, Poonam Chambers, "B" wing, 3rd Floor, Dr. A.B. Road, Worli, Mumbai – 400 018.

(ii) OHM Long Term Portfolio Investment Approach

OHM Long Term Portfolio Investment Approach have been closed with effect from 26-03-2024.

• (iii) OHM GROWTH INVESTMENT APPROACH

Investment objective:

“Ohm Growth” investment approach aim to provide active short & long term capital appreciation by primarily investing into aggressive growth opportunities available across all market caps. The objective is to pursue aggressive and opportunistic investment opportunities, the approach is designed for those investors who accept undergoing of significant fluctuations in the value of their investments in order to achieve investment returns. It is primarily intended that the underlying investments made will be on a diversified basis. The Approach will be directly investing mainly in equities and equity-related investments. The portfolio under this approach may also include bonds, short term and long term deposits and other investments. The intended asset allocation as aforesaid is for reference only and may be changed as and when the Portfolio Manager deems appropriate.

For efficient portfolio management, the portfolio of any underlying investments of this approach may acquire or sell, financial futures contracts and financial option contracts for hedging purpose, may engage in security lending, enter into repurchase agreements and may invest in other allowable instruments as investment.

Investment approach:

The Portfolio will be investing in potential growth companies with market capitalization that may range from and between the smallest to the largest companies.

This approach primarily identifies and invests in companies that have fundamental potentials for growth in the medium & long term and deliver reasonable returns. The Portfolio Manager will look for companies that are mispriced as well as those which are reasonably priced with healthy growth outlook.

This approach may invest in the developmental stage or maybe new age fintech companies based on expected future cashflows or may be older companies undergoing significant changes. As a result, they may be subject to greater business risks and more sensitive to changes in economic conditions than larger, more established companies.

The Portfolio Manager may also seek value unlocking opportunities in companies which may be out of favor by street for any reason. The Portfolio Manager watch out for any catalyst, that might be either a change in management, or potential sells business / any units or any other value unlocking opportunity etc.

Other Features of the Approach:

The approach will focus on companies with strong growth outlook, positive momentum on improving earnings, reducing leverage & improving return ratios. The approach will also look at turn around and special situations play.

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Since this is a relatively higher risk approach, the focus will be on eventual diversification and be limited to clients with higher risk-taking potential.

Benchmark:

SEBI, vide circular SEBI/HO/IMD/IMD-PoD-2/P/CIR/2022/172 dated December 16, 2022 ("B&V Circular") specified various modalities related to performance benchmarking, valuation of securities and reporting of performance by the Portfolio Managers. The APMI circular of 23rd March 2023, issued as per instructions of SEBI has prescribed the benchmarking options for each strategy.

Ohm Growth Investment Approach falls under Strategy "Equity" and the benchmark approved by the board is Nifty50 TR

Exit: Since this approach is meant for investors with high-risk appetite, the time horizon can be dynamic too; the exit load rate is kept at NIL.

Exit Load Structure

Withdrawal

< 1 year

> 1 year

Exit Load

No exit load

No exit load

Risk Profile: Aggressive Investor

To summarize the essential features of the above Investment approach are as under:

1. Minimum Portfolio Size: Rs.1 Cr cash or approved securities per client.
2. Valuation Report (NAV Report) / Holding Statement is being sent on monthly basis.
3. Transaction statement is being sent every month.
4. Contract notes (if any) would be sent regularly or as agreed with the client.
5. Ledgers and Bank statements (if any) would be sent quarterly or as and when required by the client.

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Notes:

- (a) Investment in all Investment approach and approach shall be in accordance with the Act, the PMS Rules and the PMS Regulations.
- (b) In respect of all the above Investment approach, the un-invested amount in all the above Investment approach may be deployed in liquid funds, debt oriented of mutual funds, gilt, bank deposits and other short term avenues for investments.
- (c) The Portfolio Manager, with consent of the Client, may lend the securities through an approved intermediary, for interest.
- (d) The Portfolio Manager would not invest in any of the associate / group companies of the portfolio manager.

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Correspondence: 301-A, Poonam Chambers, "B" wing, 3rd Floor, Dr. A.B. Road, Worli, Mumbai – 400 018

6. RISK FACTORS

The investments made in the securities are subject to market risk and there is no assurance or guarantee that the value of or return on investments made will always appreciate, it could depreciate to an unpredictable extent. Following are the risk factors as perceived by management:

- Investment in equities, derivatives and mutual funds are subject to market risks and there is no assurance or guarantee that the objective of the Investment approach / plans will be achieved.
- As with any investment in securities, the NAV of the Portfolio can go up or down depending upon the factors and forces affecting capital markets. The performances of the Investment approach/ Plans may be affected by changes in Government Policies, general levels of interest rates and risk associated with trading volumes, liquidity and settlement systems in equity and debt markets.
- The past performance of the Portfolio Manager does not indicate the future performance of the same Investment approach / Plans in future or any other future Investment approach / Plans of the Portfolio Manager. Investors are not being offered any guaranteed returns through these Investment approach / Plans.
- The names of the Investment approach / Plans are not indicative of their prospects or returns. The performance in the equity Investment approach / plan may be adversely affected by the performance of individual companies, changes in the market place and industry specific and macro economic factors.
- Investment in debt instruments and other fixed income securities are subject to default risk, liquidity risk and interest rate risk. Interest rate risk result from changes in the demand and supply for money and other macroeconomic factors and creates price changes in the value of the debt instruments. Consequently, the NAV of the portfolio may be subject to fluctuation.
- Investment in debt instruments are subject to reinvestment risks as interest rates prevailing on interest amount or maturity due dates may differ from the original coupon of the bonds, which might result in the proceeds being invested at a lower rate.
- The Investment approach/ Plans may invest in non- publicly offered debt securities and unlisted equities. This may expose the Investment approach/ Plans to liquidity risks.
- Engaging in securities lending is subject to risks related to fluctuations in collateral value/settlement/liquidity/counter party. The Investment approach / plan may use derivative instruments like index futures, stock futures and option contracts, warrants, convertible securities, swap agreements or any other derivative instruments for the purpose of hedging and portfolio balancing, as permitted under the regulations and guidelines. Usage of derivatives will expose the plan to certain risks inherent to such derivatives. Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the investor. Execution of such Investment approach depends upon the ability of the fund manager to identify such opportunities. Identification and execution of the Investment approach to be pursued by the fund manager involve uncertainty and decision of fund manager may not always be profitable. No

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assurance can be given that the fund manager will be able to identify or execute such Investment approach. The risks associated with the use of derivatives are different from or possibly greater than, the risks associated with investing directly in securities and other traditional investments. As and when Investment approach/ Plans trades in the derivatives market there are risk factors and issues concerning the use of derivatives that investors should understand.

- The Portfolio Manager is not responsible or liable for any loss resulting from the operations of the Investment approach/ Plans. All Investment approach/ Plans under portfolio management are subject to change at anytime at the discretion of the Portfolio Manager in accordance with the Act, PM Rules/Regulations and agreements entered into with the Clients.
- Risk arising out of non –diversification, if any.
Diversified portfolios (allocated across companies and broad sectors) may be less volatile than non-diversified portfolios.

7. CLIENT REPRESENTATION

The Portfolio Manager has initially launched Investment approach/ Plans namely “Ohm Absolute” under discretionary portfolio management services through this disclosure document.

For the year ended 31-03-2024

Category of Clients	No of Clients	Funds Managed (Rs. In Crores)	Discretionary/ Non Discretionary (if available)
Associate/ Group Companies	NIL	NIL	NOT APPLICABLE
Others	08	531.85	DISCRETIONARY
Total	08	531.85	

For the year ended 31-03-2023

Category of Clients	No of Clients	Funds Managed (Rs. In Crores)	Discretionary/ Non Discretionary (if available)
Associate/ Group Companies	NIL	NIL	NOT APPLICABLE
Others	07	343.50	DISCRETIONARY
Total	07	343.50	

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For the year ended 31-03-2022

Category of Clients	No of Clients	Funds Managed (Rs. In Crores)	Discretionary/ Non Discretionary (if available)
Associate/ Group Companies	NIL	NIL	NOT APPLICABLE
Others	07	347.85	DISCRETIONARY
Total	07	347.85	

The Portfolio Manager has introduced and launched new Investment approach namely “Ohm Long Term Portfolio Investment approach” (Old Name: “Ohm Long Term Portfolio Strategy”) w.e.f 01-10-2016, under discretionary portfolio management services through this disclosure document. This Investment approach namely “Ohm Long Term Portfolio Investment approach” (Old Name: “Ohm Long Term Portfolio Strategy”) has been closed w.e.f. 26-03-2024.

The Portfolio Manager has introduced and launched new Investment approach namely “Ohm Growth Investment approach” w.e.f 01-05-2022, under discretionary portfolio management services through this disclosure document.

*Note: Others clients includes Director/ Relatives of Directors of the Portfolio Management Company. Only corporate is considered as Associates and group companies.

Related parties with whom transactions has been taken place for the period ended 31-03-2024 are given as “**Annexure – I**”.

8. FINANCIAL PERFORMANCE OF THE PORTFOLIO MANAGER

Financial performance of Ohm Portfolio Equi Research Pvt. Ltd. for the last 3 years (based on audited financial statements) is given under:

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FINANCIAL PERFORMANCE OF THE PORTFOLIO MANAGER

Summarized Financial Statement – Balance Sheet			
Particulars	31/03/2024	31/03/2023	31/03/2022
	Amt. (Rs.)	Amt. (Rs.)	Amt. (Rs.)
	(Unaudited)	(Audited)	(Audited)
<u>I. EQUITIES AND LIABILITIES</u>			
<u>(1) Shareholder's Funds</u>			
(a) Share Capital	2,25,00,000	2,25,00,000	2,25,00,000
(b) Reserves and Surplus	9,68,05,021	6,09,86,368	5,17,08,247
<u>(2) Current Liabilities</u>			
(a) Short-term borrowings	--	--	--
(b) Trade payables	--	11,57,982	5,40,987
(c) Other current liabilities	85,96,914	9,81,487	15,17,403
(d) Short-term provisions	---	2,826,319	18,60,000
TOTAL	127,901,935	8,84,52,156	7,81,26,637
<u>II. ASSETS</u>			
<u>(1) Non-current assets</u>			
(a) Fixed assets			
(i) Tangible Assets	3,41,72,896	2,46,24,914	2,54,48,891
(b) Non-current investments	6,89,64,259	5,24,36,213	3,93,25,268
<u>(2) Current assets</u>			
(a) Current Investments	--	--	--
(b) Trade receivables	1,29,15,303	65,27,596	87,79,188
(c) Cash and cash equivalents	41,32,275	14,40,055	21,94,149
(d) Short-term loans and advances	---	12,487	1,06,968
(e) Other Current Assets	77,17,202	34,10,891	22,72,174
TOTAL	127,901,935	8,84,52,156	7,81,26,637

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Summarized Financial Statement – Profit and Loss Account (Rs. In Lakhs)

Particulars	Year ended 31-03-2024 (Unaudited)	Year ended 31-03-2023 (Audited)	Year ended 31-03-2022 (Audited)
Profit/(Loss) Before Depreciation	408.09	130.13	104.92
Less : Depreciation	49.90	10.95	15.75
Profit / (Loss) for the year before tax	358.19	119.18	89.17
Less: Provision for Taxation	---	28.52	18.60
Less / (Add) : Deferred Tax Liability / (Deferred Tax Liability Written Back)	--	--	--
Profit / (Loss) for the year after tax	358.19	90.66	70.57

9. **Portfolio Management performance of the portfolio manager** for the last three years and in case of discretionary Portfolio Manager disclosure of performance indicators calculated using weighted average method in terms of Regulation 14(2)(b)(iv) of the SEBI (Portfolio Managers) Regulations, 1993.

Performance comparison to relevant benchmark indices (Yearly Performance)

Particulars	Current Year	Year 1	Year 2	Year 3
Portfolio & Benchmark Performance	01-04-2023 to 31-03-2024	01-04-2022 to 31-03-2023	01-04-2021 to 31-03-2022	01-04-2020 to 31-03-2021
Ohm Absolute	23.91%	4.94%	60.36%	120.68%
- Nifty50 TR ^	29.99%	0.59%	20.26%	72.54%
Ohm Growth (* wef 2nd Feb 2023)	58.54%	-1.88%	N.A.	N.A.
- Nifty50 TR ^	29.99%	10.68%	N.A.	N.A.

Note: *Returns displayed are on TWRR method.
^Nifty50 TR Benchmark w.e.f. FY 2023-2024

Disclaimer: The performance related information as stated above are NOT verified by SEBI.

"Please note that performance of your portfolio may vary from that of other investors and that generated by the Investment Approach across all investors because of

- 1) the timing of inflows and outflows of funds; and
- 2) differences in the portfolio composition because of restrictions and other constraints."

10. NATURE OF EXPENSES FOR CLIENTS

(i) Investment Management and Advisory Fees:

Management and advisory fee charged by the Portfolio Manager may be a fixed fee or a return based fee or a combination of both as detailed in the annexure to the Portfolio Management Services agreement.

(ii) Custodian Fee:

The charges relating to opening and operation of depository 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 may vary from time to time and clients would be required to bear the costs.

(iii) Registrar & Transfer Agent Fees:

The charges payable to R & T agents in connection with related investments and related charges would be recovered from the clients.

(iv) Brokerage and Transaction cost:

The investment under the Portfolio Management Investment approach/ Plans would be done through registered members of stock exchange who charge brokerage upto maximum of 2.5% of contract value. In addition to brokerage, transaction cost like turnover charges, stamp duty, transaction costs, turnover tax, service tax, securities transaction tax or any other tax levied by statutory authorities, foreign transaction charges (if any) and other charges on the purchase and sales of shares, stocks, bonds, debt, deposits, other financial instruments would also be levied by the broker and clients will be required to bear the costs. Any entry or exit loads (if any) on units of mutual funds will also be charged from clients.

(v) Service Tax/ GST/ IGST: As applicable from time to time.

(vi) Certification and professional charges:

Charges payable for outsourced professional services like accounting, auditing, taxation and legal services etc., for documentation, notarizations, certifications, attestations required by bankers or regulatory authorities including legal fees etc would be recovered from the client.

(vii) Incidental Expenses:

Charges in connection with day to day operations like courier expenses, stamp duty, service tax, postal, telegraphic, opening and operation of bank account or any other out of pocket expenses as may be incurred by the Portfolio Manager and recovered from the clients.

11. TAXATION

Tax implications for clients

- (i) **General:** The information given hereinafter is only for general information purposes and is based on the law and practice currently in force in India the law and practice should be aware that the relevant fiscal rules or their interpretation may change from time to time. The portfolio gains in an account could be in the nature of capital gains (either short term or long term depending upon the holding period) or business income depending on the status and intent of the client at the time of entering into agreement for portfolio management. In view of the above and since the individual nature of tax consequences may differ in each case on its merits and facts, each investor is advised to consult his/her or its professional tax advisor with respect to the specific tax implications arising out of its participation in the PMS Investment approach/ Plans / option, as an investor.
- (ii) **Tax Deduction at source:** If any tax is required to be withholding on account of any future legislation, the portfolio manager shall be obliged to act in accordance with the regulatory requirements in this regard. Interest and dividend would be subject to tax as per the provisions of the Income tax Act, 1961.
- (iii) **Advance Tax installment obligations:** It shall be the client's responsibility to meet the advance tax obligation installments payable on the due dates under the Income tax Act, 1961.
- (iv) **Capital Gains:** Long term capital gains and short term capital gains would be taxed as per applicable provisions of the Income Tax Act, 1961, from time to time.
- (v) **Income from business & Profession:** In case gains are treated as "Income" from Business & Profession, the same is taxable at normal rates prevailing from time to time.

12. ACCOUNTING POLICIES

The following accounting policy will be applied for the investments of the clients:

- (a) Investments in Equities, Mutual Funds and Debt instruments will be valued at closing market prices of the exchange (BSE or NSE as the case may be) or the Repurchase Net Asset Value declared for the relevant Investment approach/ Plans on the date of the report or any cut off date. Alternatively, the last available prices on the exchange or the most recent NAV will be reckoned.
- (b) Realized gains/losses will be calculated by applying the first in/ first out and/ or weighted average principle.
- (c) For derivatives and futures and options, unrealized gains and losses will be calculated by marking mark to market the open positions.
- (d) Unrealized gains/losses are differences in between the current market values/ NAV's and the historical cost of securities.
- (e) Dividends on shares, units in mutual funds, interest etc shall be accounted on accrual basis.
- (f) The Portfolio Manager and the Client can adopt any specific norms or methodology for valuations of investments or accounting the same as may be mutually agreed between them on a case specific basis.

13. INVESTORS SERVICES

(i) Contact Information

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

Name of the Person: Mr. Hiren Vasant Sheth

Designation: Compliance Officer

Address: Ohm Portfolio Equi Research Pvt. Ltd.

504/504A, 5th Floor, Plot No. 268

F Block, Ceejay House, Shivsagar Estate,

Dr. A.B. Road, Worli, Mumbai - 400 018.

Telephone: (022) – 61325555, Fax: (022) 6132 5598 Email: ohmpms@gmail.com,

hirensheth@gmail.com

(ii) Grievances redressal and dispute settlement mechanism.

Grievances, if any, that may arise pursuant to the Portfolio Management services provided by the Portfolio Manager shall as far as possible be redressed through the administrative mechanism by the Portfolio Manager and are subject to PM Regulations and any amendments made thereto from time to time. However, all the legal actions and proceedings are subject to the jurisdiction of court in Mumbai only and are governed by Indian Laws.

The Portfolio Manager will endeavor to address all the complaints regarding service deficiencies or causes for grievance, for whatever reason, in a reasonable manner and time. If the investor remain dissatisfied with the remedies offered or the stand taken by the Portfolio Manager, all disputes, differences, claims and questions whatsoever arising between the Client and the Portfolio Manager and/or their respective representatives shall be settled in accordance with the provision of the Arbitration and Conciliation Act, 1996 or any statutory requirement, modification or reenactment thereof the time being in the force. Such arbitration proceedings shall be held at Mumbai.

(iii) Direct Complaint to SEBI.

There will be occasions when investors have a complaint against intermediary registered with SEBI. In the event of such complaint investor should first approach the concerned Intermediary against whom investor has a complaint. However, if investor may not be satisfied with their response, then investor may lodge their complaint online with SEBI in SCORES. The following is the link of the same: <http://scores.gov.in>

SCORES facilitates investors to lodge their complaint online with SEBI and subsequently view its status.

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14. General

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

The Portfolio Manager has outsourced Custodian services to Kotak Mahindra Bank.

The PMS Client's liability in any case will not be more than the amount of Corpus they have given to Portfolio Manager and Accrual to the corpus.

The Portfolio Manager may vary, differentiate, charge at lower rate or completely waive off PMS fees to group companies/Directors and/ or its associates or any of the existing or future client(s).

For Ohm Portfolio Equi Research Private Limited.

HV Sheth

Hiren V Sheth
Compliance Officer

Valia

Jigar Valia
Principal Officer



Place: Mumbai:
Date: 24-05-2024.

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Related Parties with whom Transactions have taken place during the last financial year 2022-23 (i.e. from 01-04-2023 to 31-03-2024).

Annexure – I.

A. List of Related Parties:

Sr. No.	Name of the Related Party	Description of the relationship
1	Mr. Amal N. Parikh	Director (Non Executive Director)
2	Mrs. Viral A. Parikh	Director
3	Mr. Bimal N. Parikh	Director
4	Mr. Hiren V Sheth	Compliance officer
5	Mr. Mayur S. Gathani	Portfolio Manager and Relative of Director
6	Ohm Stock Broker Pvt. Ltd.	Common director and shareholders
7	Mr. Jigar Valia	Principal Officer
8	Mr. Mitesh Shah	Portfolio Manager

B. Transactions during the financial year 2023 – 24 :

Sr. No	Name of the Related Party	Relation	Nature of Payment / Transaction	Amount
1	Mr. Mayur S. Gathani	Key Management Personnel (portfolio manager) & Relative of Director	Salary paid *	29,95,292/-
2	Ohm Stock Broker Pvt. Ltd.	Common director and shareholders	Brokerage paid	NIL
3	Mr. Jigar Valia	Principal Officer	Salary Paid *	47,85,116/-
4	Mr. Mitesh Shah	Portfolio Manager	Salary Paid *	58,34,220/-

(* Salary does not include Employer's Contribution to PF)

The Portfolio Manager may vary, differentiate, charge at lower rate or completely waive off PMS fees to group companies/Directors and/ or its associates or any of the existing or future client(s). The Portfolio Manager will have discretionary powers to appoint broker for executing trades and mutual fund transactions.



Ohm Portfolio Equi Research Pvt. Ltd.

A SEBI REGISTERED PORTFOLIO MANAGER; SEBI REGN. NO. INP000001389

CIN NO. : U67120MH2003PTC140019

CERTIFICATE OF COMPLIANCE BY PRINCIPAL OFFICER

For Disclosure Document for Portfolio Management Services for the year ended 31-03-2024
by Ohm Portfolio Equi Research Private Limited

1. The Portfolio Manager has complied with PMS regulations and circulars issued there under from time to time subject to point number 2 hereunder.
2. NISM Series XXI-B Certification Examination was not cleared by the Principal Officer & the Fund Management team before the deadline of 6th September 2023 as per the Gazette No CG-MH-E-07092021-229479. The Principal Officer cleared the NISM Series XXI-B Certification Examination on 29th September 2023. Two other fund management team members have obtained the NISM Series XXI-B Certifications during April & May 2024. One team member who was part of Investment committee had appeared for the exams but has not cleared the NISM certification and has been excluded from the Investment committee by the Board.

For OHM PORTFOLIO EQUI RESEARCH PRIVATE LIMITED.


Jigar Valia
Principal Officer



Name : Mr. Jigar Valia.
Designation : Principal Officer.
Telephone : 022 - 6132 5552.
E-mail : ohmpms@gmail.com

Regd. & Corporate Office : 504/504A, 5th Floor, Plot No. 268, F Block, Ceejay House, Shivsagar Estate,
Dr. Annie Besant Road, Worli, Mumbai - 400 018.

Tel. : +91-22-6132 5555 • Fax : +91-22-6132 5598 • E-mail : ohmpms@gmail.com

To,
Ohm Portfolio Equi Research Pvt. Ltd
504/504A, 5th Floor, Plot No. 268
F Block, Ceejay House, Shivsagar Estate,
Dr. Annie Besant Road, Worli,
Mumbai - 400 018.

AUDITOR'S CERTIFICATE

We have verified the information provided in the **Disclosure Document** for **31.03.2024** of M/s. Ohm Portfolio Equi Research Pvt. Ltd having its registered office at, 504/504A, 5th Floor, Plot No.268, F Block, Ceejay House, Shivsagar Estate, Dr. Annie Besant Road, Worli, Mumbai 400018.

The disclosure made in the document is made on the model disclosure document as stated in schedule V of Regulation 22 of securities and Exchange Board of India (Portfolio managers) Regulations 2020. With regard to TWRR calculation method, we have been informed by the management that the TWRR has been calculated by their software as per the logic specified by SEBI.

Based on our verification of the Books of Accounts & other records of the Company made available to us and the information and explanations provided to us, we hereby certify that the information provided in the **Disclosure Document** as required by the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 and subsequent amendments thereto, is true, fair, and adequate to enable the investors to make a well-informed decision.

Management's Responsibility

The preparation of the Statement is the responsibility of the Company's Management including the preparation and maintenance of all accounting and other relevant supporting records and documents. This responsibility includes the design, implementation and maintenance of internal control relevant to the preparation and presentation of the Statement and applying an appropriate basis of preparation; and making estimates that are reasonable in the circumstances.

Certifier's Responsibility

Pursuant to the requirements of the maintenance of relevant records with respect to Disclosure Document of Portfolio Management Services, we carried out examination of records which was limited to the procedures adopted by the Company for ensuring verification of and maintenance of Books of Accounts, Records and Financial Information.

We conducted our examination as per the Guidance Note on Reports or Certificates for Special Purposes (Revised 2016) issued by the Institute of Chartered Accountants of India ("ICAI"). The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the ICAI.

Restriction of Use

This Certificate has been solely issued for the purpose of SEBI Compliance of Portfolio Management Services.



For Bastawala And Associates
Chartered Accountants
FRN: 121789W

P.V. Bastawala

Pranav V. Bastawala
Partner
(Membership No: 100468)
UDIN: 24100468BKETIE6117

Place: Mumbai
Date: 27th May, 2024