

DISCLOSURE DOCUMENT

**DOVETAIL INVESTMENT MANAGEMENT INDIA
(IFSC) PRIVATE LIMITED (“DIMI”)**

PORTFOLIO MANAGEMENT SERVICES

DISCLOSURE DOCUMENT

(As per the requirement of Regulation 74 of Part A of Chapter VI of International Financial Services Centres Authority (Fund Management) Regulations, 2025)

- i) The Disclosure Document (hereinafter referred as **"The Document"**) has been prepared with reference to the International Financial Services Centres Authority (**"IFSCA"**) in the format as prescribed in terms of Regulation 74 of the International Financial Services Centres Authority (Fund Management) Regulations, 2025 (**"FME Regulations"**).
- ii) The purpose of the Document is to provide essential information about the Portfolio Management Services (PMS) in a manner to assist and enable the investors in making informed decision for engaging Dovetail Investment Management India (IFSC) Private Limited (**"DIMI"** or **"Portfolio Manager"**) as a Portfolio Manager.
- iii) The Document contains the necessary information about the Portfolio Manager, required by an investor before investing, and hence, the investor may be advised to retain the document for future reference.
- iv) Investors are encouraged to seek clarifications on this document from the Portfolio Manager.
- v) The name, phone number, e-mail address of the Principal Officer as designated by the Portfolio Manager are as follows:

PORTFOLIO MANAGER-

Name of the Portfolio Manager	Dovetail Investment Management India (IFSC) Private Limited (DIMI).
IFSCA Registration Number	IFSCA/FME/II/2023-24/031
Registered Office Address	Unit No.1130, Signature Building, Block 13-B, Zone 1, GIFT SEZ, GIFT City, Gandhinagar, Gujarat- 382050.
Phone	+91 7069022585.
Website	www.dovetailindia.com.

PRINCIPAL OFFICER-

Name of the Principal Officer	Mr. Parag Asher.
Phone	+91 9833860152.
Email	parag.asher@dovetailindia.com .

We confirm that: (A) The disclosure document is drafted as per Regulation 74 of IFSCA (Fund Management) Regulations, 2025 and the guidelines and directives issued by IFSCA from time to time in this regard; and (B) 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 their portfolio to us/ investment in the Portfolio Management Services.

For and behalf of Dovetail Investment Management India (IFSC) Private Limited



**Parag Asher.
Principal Officer**



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1) **Disclaimer clause:**

The particulars given in the Document have been prepared in accordance with the International Financial Services Centres Authority ("IFSCA") (Fund Management) Regulations, 2025, as amended till date and filed with IFSCA. The Document has neither been approved nor disapproved by IFSCA nor has IFSCA certified the accuracy or adequacy of the contents of the document. This document is not for public distribution and has been furnished to you solely for your information and may not be reproduced or redistributed to any other person.

The Disclosure Document and its contents are for information only and do not constitute a distribution, an endorsement, an investment advice, an offer to buy or sell or the solicitation of an offer to buy or sell any Portfolio Strategies/Option or any other securities or financial products/investment products mentioned in the Disclosure Document or an attempt to influence the opinion or behaviour of the Clients. Any use of the information / any investments and investment-related decisions of the Clients are at their sole discretion & risk, and the Portfolio Manager shall not be responsible/liable for the same in any manner whatsoever, to any person/entity. The investments may not be suited to all categories of Clients. As with any investment in any securities, the value of the portfolio under any Portfolio Strategies/Option can go up or down depending on the factors and forces affecting the capital market and Clients are advised to read this Disclosure Document carefully.

Clients must make their own investment decisions based on their own specific investment objectives, their financial position and using such independent professional advisors for seeking independent legal, investment and tax advice as they believe necessary, before acting on any information in the Disclosure Document or any such other documents or before making any investments in such Portfolio Strategies/Option, as applicable. Any use of the information contained in the Disclosure Document, any investments in the Portfolio Strategies/Option and any investment-related decisions pertaining to such Portfolio Strategies/Option of the Clients are at their sole discretion & risk. There may be changes in the legal, tax and regulatory regimes (including, without limitation, political changes, government regulations, social instability, stock market fluctuations, diplomatic disputes, or other similar developments), which could adversely affect the Client's investments in the Portfolio Strategies/Option. Investments in the Portfolio Strategies/Option stand a risk of loss of capital and the Clients should be aware that they may lose all or any part of their investments in such Portfolio Strategies/Option.

2) Definitions:

Unless the context or meaning thereof otherwise requires, the following shall have the meaning assigned to them hereunder respectively: -

Sr.no	Expressions	Meaning
1.	Accredited investor	Any person who fulfils the eligibility criteria as specified by the IFSCA;
2.	Act	The International Financial Services Centres Authority (Fund Management) Regulations, 2025
3.	Agreement	Agreement between Portfolio Manager and its Client and shall include all Schedules and Annexures attached thereto.
4.	Assets	(i) the Portfolio and/or (ii) the Funds.
5.	Associates	(i) Company, Limited Liability Partnership or a body corporate in which a director or trustee 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 Company, Limited Liability Partnership or 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.
6.	Body Corporate	Shall have the meaning assigned to it in or under clause (11) of section 2 of the Companies Act, 2013.
7.	Bank Account	One or more accounts opened, maintained and operated by the Portfolio Manager with any of the Banks as specified in Regulation 77(2) of FME Regulations and in accordance with the agreement entered into with the Client.
8.	Authority	The International Financial Services Centres Authority established under sub-section (1) of Section 4 of The International Financial Services Centres Authority Act, 2019.
9.	Client	The person who enters into an Agreement with the Portfolio Manager for managing its portfolio and /or funds.
10.	Custodian	Any person who carries on or proposes to carry on the business of providing custodial services in accordance with the regulations issued by IFSCA from time to time.
11.	Depository Account	One or more account or accounts opened, maintained and operated by the Portfolio Manager with any depository or depository participant in accordance with the agreement entered into with the Client.
12.	Discretionary Portfolio Management Services	The portfolio management services rendered to the Client by the Portfolio Manager on the terms and conditions contained in the agreement, where under the Portfolio Manager exercises any degree of discretion in the investments or management of assets of the Client.
13.	Discretionary Portfolio Manager	A Portfolio Manager who 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 or the funds of the Client, as the case may be.
14.	Diversification Policy	The details of diversification of portfolio as stated below in this Disclosure Document.

15.	The Document	The Disclosure Document issued by the Portfolio Manager, Dovetail Investment Management India (IFSC) Private Limited.
16.	Financial Year	The year starting from April 1 and ending on March 31 of the following year.
17.	Funds	The monies managed by the Portfolio Manager on behalf of the Client pursuant to Portfolio Investment Management Agreement and includes the monies mentioned in the Application, any further monies placed by the Client with the Portfolio Manager for being managed pursuant to Portfolio Investment Management Agreement, the proceeds of the sale or other realization of the Portfolio and interest, dividend or other monies arising from the Assets, so long as the same is managed by the Portfolio Manager.
18.	Investment Approach	Portfolio Managers shall, inter-alia, include (i) investment objective (ii) description of types of securities e.g. equity or debt, listed or unlisted, convertible instruments, etc. (iii) basis of selection of such types of securities as part of the investment approach (iv) allocation of portfolio across types of securities (v) appropriate benchmark to compare performance and basis for choice of benchmark (vi) indicative tenure or investment horizon (vii) risks associated with the investment approach (viii) other salient features, if any.
19.	Investee company	The same meaning as assigned to it in clause (u) of regulation 2 of the International Financial Services Centres Authority (Fund Management) Regulations, 2025;
20.	Fund Manager	Individual who is appointed by the FME to manage investments by whatever name called;
21.	Money Market Instruments	Commercial Paper, Trade Bill, Treasury Bills, Certificate of Deposit and Usance Bills.
22.	NISM	The National Institute of Securities Market established by the Board.
23.	Non-discretionary Portfolio Management Services	A portfolio management services under which the Portfolio Manager, subject to express prior instructions issued by the Client from time to time in writing, for an agreed fee structure and for a definite described period, invests in respect of the Client's account in any type of security entirely at the Client's risk and ensure that all benefits accrue to the Client's Portfolio.
24.	NRI	A Non-Resident Indian or a person of Indian origin residing outside India.
25.	Parties	The Portfolio Manager and the Client; and "Party" shall be construed accordingly.
26.	Person	An individual, a Hindu Undivided Family, a corporation, a partnership (whether limited or unlimited), a limited liability company, a body of individuals, an association, a proprietorship, a trust, an institutional investor and any other entity or organization whether incorporated or not, whether Indian or foreign, including a government or an agency or instrumentality thereof.
27.	Portfolio	The Securities and/or Investment Products managed by the Portfolio Manager under the Agreement on behalf of the Client pursuant to this Agreement and includes any Securities mentioned in the Application, any further Securities that may be

		placed by the Client with the Portfolio Manager from time to time, for being managed pursuant to the Agreement, Securities acquired by the Portfolio Manager through investment of Funds and bonus and rights shares in respect of Securities forming part of the Portfolio, so long as the same is managed by the Portfolio Manager.
28.	Portfolio Manager	Dovetail Investment Management India (IFSC) Private Limited registered with International Financial Services Centres Authority ("IFSCA") as a Registered Fund Management Entity (Non-Retail)
29.	Principal Officer	An employee of the Portfolio Manager who has been designated as such by the portfolio manager under sub-regulation (1) of regulation 7 of FME Regulations;
30.	Securities	shall mean and include in case of Discretionary Portfolio Management Services, securities listed or to be listed or traded on a recognized stock exchange, money market instruments, units of investment scheme and other financial products issued in IFSC, India or Foreign Jurisdiction or such other securities as may be specified by the IFSCA from time to time. In case of Non-Discretionary Portfolio Management and Advisory Services, the term Securities shall mean to include all the permissible securities and financial products which are listed, unlisted, to be listed, including but not limited to equity, debt, etc., and such other financial products in IFSC, India or a Foreign Jurisdiction. Notwithstanding the generality of the meaning ascribed above, the term 'Securities' shall have the meaning ascribed to the term under Section 2(h) of the Securities Contracts (Regulation) Act, 1956. It is clarified herein that the Portfolio Manager shall be permitted to invest in securities and financial products in an IFSC or a foreign jurisdiction.

Words and expressions used in this disclosure document and not expressly defined shall be interpreted according to their general meaning and usage. The definitions are not exhaustive. They have been included only for the purpose of clarity and shall in addition be interpreted according to their general meaning and usage and shall also carry meanings assigned to them in regulations governing Portfolio Management Services. Any term used in this Document but not defined herein (but defined in the Regulations) shall have the same meaning as assigned to it in the Regulations.

3) **Description of Portfolio Manager:**

i) **History, Present Business and Background of the Portfolio Manager:**

Dovetail Investment Management India (IFSC) Private Limited ("DIMI") is a company incorporated under the Companies Act, 2013 on 01st December 2021, having its office at Unit No.1130, Signature Building Block 13-B, Zone-1, GIFT SEZ GIFT City, Gandhinagar-382050, Gujarat, India. The Company is a wholly owned subsidiary of Dovetail Capital Private Limited, which is company limited by shares incorporated on 21st September, 2016 and domiciled in Mumbai.

DIMI is registered with IFSCA under the Applicable Laws as a Registered FME (Non-Retail) vide Registration Number: IFSCA/FME/II/2023-24/031 dated August 14, 2023. DIMI as a Fund Management Entity and is responsible for the overall management and control of the Funds/Schemes. DIMI has received IFSCA's approval for offering

Portfolio Management Services on April 8, 2024.

ii) **Promoters of the Portfolio Manager, Directors and their background:**

a) **Promoter:**

Dovetail Capital Private Limited is company limited by shares incorporated on 21st September 2016 and domiciled in Mumbai. The Company is engaged in the business of management consultancy services, financial consultancy operational consultancy, Fund Accounting Services, Investment Advisory Services and back-office services to any person or entity. DIMI is a wholly owned subsidiary of Dovetail Capital Private Limited

Dovetail Capital Private Limited the holding company of DIMI acquired DIMI on 29th January 2025 from Dovetail Investment Management, a Company incorporated under the laws of Mauritius.

b) **Directors and their background:**

Vivek Singhania, Director

Vivek has over 20 years of total work experience in Banking and Financial Industry. He has major expertise in Investment Portfolio Management, Fund Management, Securities Services (Custody, Clearing and Fund Accounting), Foreign Exchange Management and Strategic Planning. Vivek holds high academic professional degrees of Chartered Accountant from Institute of Chartered Accountant of India along with Company Secretary from Institute of Company Secretaries of India. He has cleared examination prescribed by NSE from NISM for Series X-A Investment Adviser (Level-1) and (Level-2) Certification Examination. He is currently Director of regulated entities, Ohm Dovetail Pvt Ltd and Dovetail Financial Service Pvt Ltd respectively. In his previous experience he has served Kotak Mahindra Bank and Citi Bank as vice president and assistant vice president respectively. His Experience summary is as follows:

Sr. No	Name of Organization	Designation And Qualification	Period	Work Profile
1.	Dovetail Group – India	Director	April 2017– Till date	• Designated Director of Ohm Dovetail Pvt Ltd, SEBI registered Trading cum Clearing member • Director of Dovetail Financial Service Pvt Ltd, RBI registered

				NBFC • Designated Partner of Dovetail Advisers LLP - providing non-binding advisory services to offshore Funds and has worked as the Principal Officer for Investment Advisory Services • Director of OHM Dovetail Global Services (IFSC) Private Limited, IFSCA – Registered Fund Administrator providing fund related ancillary services at GIFT City. • Dovetail Capital Private Limited – Engaged in Management Consultancy Services and flagship company of Dovetail group. • Overall Management of all group companies and businesses including Consultancy, Trading and Clearing, Financing and Administration business
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2.	Kotak Mahindra Bank, India	Assistant Vice President	September 2015 – March 2017	• Global Custodians and Network Management • Setting up and managing relationship across Global Custodians in multiple geographies • Supervision and Management of FPI client relationships as Custodian & PCM
3.	Citibank, India	VP and Co-Head – DCC Operations	January 2014 – September 2015	• Handling due diligence and RFPs in association with business • Assessment and Implementation of new / change in regulations • Participation in PFP and Implementation of foreign marquee clients
		Vice President Account Manager – Platinum Inflow Clients	February 2012 – January 2014	• Managing high service levels for key FII clients under wealth management • Supporting clients with their exceptional transactions requiring regulatory and business acumen • Conducting regular service reviews with clients to analyze

				the service standards vis a vis their requirements
		Vice President TTS Operations & Service Head	April 2010 – February 2012	• Mentoring a team of 21 employees working in Cash Management, Trade Services and Clearing Operations related activities. • Handling process re-engineering and System enhancements ensuring automation. • Demonstrated excellence in product development in conjunction with product team.
		Manager - Securities and Fund Services Operations	March 2009 – April 2010	• Managed Foreign Exchange Unit: FX for FII clients for their investments in India. • MF outflow team: facilitated complete settlement process for Mutual Funds investing abroad. • Instructions Team: Responsible for receipt and distribution of all instructions in SFS & regulatory reporting
		Assistant Manager -	September 2006 –	• Handled day-to-day processing

		Corporate Branch Operations	March 2009	of clients imports related transactions. • Extensive interaction with client, legal, product and the credit teams for process flow on new system enhancements. • Efficiently handled receivables and payables solutions for the corporate clients.
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Dev Sampat, Director

Dev brings over 20 years of experience in the banking industry, specializing in Capital Markets and Securities Services with a focus on offshore business. He has cultivated strong relationships across various sectors, including Mutual Funds, Foreign Portfolio Investors (FPIs), Non-Banking Financial Companies (NBFCs), and both domestic and offshore Asset Managers. He is an MBA from Symbiosis Institute of Business Management and he has done Business Economics (honours), University of Delhi

Dev possesses a deep understanding of industry practices, fund structures, and advisory services. His core competency lies in Securities Services, and he is known for his thought leadership and meticulous planning in new business development. Throughout his career, Dev has a proven track record of successfully building businesses from the ground up. Additionally, he excels in communication and interpersonal skills, ensuring effective collaboration and client relationships.

Sr. No	Name of Organization	Designation and Qualification	Period	Work Profile
1	Dovetail Group – India	Director	April 2017– Till date	• Designated Director of Ohm Dovetail Pvt Ltd, SEBI registered Trading cum Clearing member • Director of Dovetail Financial Service Pvt Ltd, RBI registered NBFC • Designated Partner of Dovetail Advisers LLP- providing non-binding advisory services to offshore Funds.

				• Management of day to day Operations and Controls
2	Kotak Mahindra Bank Ltd	Head-Custody & Clearing Business	April 2005 – March 2017	• Managing relationship with Fund and Fund Managers across the globe • Developing the Custody & Clearing business for the Bank • Managed India Broker relationships • Instrumental in managing Public offers by Indian entities from the Banking side • Supported Due Diligence by Global Custodian and Investors investing in India • Providing Fund Structure advice to Offshore Investors

Mahesh Shekdar, Director

A Post-Graduate in Business Management from Mumbai University, Mahesh has previously worked with Kotak Mahindra Bank as head of Domestic Asset Management Company relationships with Financial Institutions Group. Prior to Kotak, he worked with Standard Chartered and HDFC Bank in Transaction Banking division. He has more than 30 years of total work experience. In his experience Mr. Mahesh has gained extensive knowledge of Financial Eco-system with strong hold on designing Financial Products and Strategies along with client relationship management.

Sr. No	Name of Organization	Designation and Qualification	Period	Work Profile
1	Dovetail Group, India	Director / Designated Partner of Dovetail Group entities	Nov 2017 – till date	• Designated Director of Ohm Dovetail Private Limited, SEBI Registered Trading cum Clearing member • Director of Dovetail Financial Services Private Limited, RBI registered NBFC • Designated Partner of Dovetail Advisers LLP – SEBI registered Investment Adviser also providing non binding advisory services to offshore Funds. • Director of OHM Dovetail Global Services (IFSC) Private Limited, IFSCA –

				Registered Fund Administrator providing fund related ancillary services at GIFT City. • Product Development and Strategy Formulation for Dovetail Group businesses along management of day to day Operations and Controls.
2	Kotak Mahindra Bank Limited	Vice President – Financial Institutional Group	Apr 2010 – Oct 2017	Mutual Funds: • Managing banking relationship across 40 Mutual Funds • Developing Banking business in Mutual Fund Sector Insurance: • Managing banking relationship across Insurance Sector • Handling relationship and ensuring business
		Associate Vice President – Transaction Banking Group	Apr 2007 – Mar 2010	Bankers to the Issue: • Identifying opportunities and pitching for acting as bankers to the issue for corporate coming up with an Initial Public Offer • Working closely with the Investment Bank through the whole process • Liaising with other intermediaries such as Lead Managers, Brokers, Registrar
		Chief Manager – Transaction Banking Group	Apr 2005 – Mar 2007	• Directly responsible for the Western Region sales for Cash Management Services
		Senior Manager – Cash Management Services	Apr 2004 – Mar 2005	• Designing the products and formulating the procedural / operational aspects of the same
		Product / Sales Manager – Cash Management Services	Aug 2003 – Mar 2004	• Offer product support at national level to various business groups

3	HDFC Bank Limited	Relationship Manager – Cash Management Services	Jan 2001 – Jul 2003	- Solely responsible for the sales in Mumbai for CMS - Cross selling of other products offered by the Group - Setting up of DSA for managing sales in Mumbai
		Product Management / Sales – Current Accounts	Dec 1999 – Dec 2000	
4	Standard Chartered Bank	Business Manager	Sep 1994 – Nov 1999	- Responsible for setting up of direct Sales Team - Was exposed to direct marketing as an Asst Manager (Mar 1996 – Dec 1996) and Business Manager (Dec 1996 – Nov 1999) across a variety of market regions and profiles within Mumbai

iii) **Group company information (i.e. information related to top 10 Group Companies / firms of the Portfolio Manager on turnover basis) (as per the audited financial statements for the year ended March 2025):**

1. Dovetail Capital Private Limited (“DCAP”)

iv) **Details of the services being offered:**

a) **Discretionary Services:**

Under these services, the choice as well as the timings of the investment decisions rest solely with the Portfolio Manager, and the Portfolio Manager can exercise any degree of discretion in the investments or management of assets of the Client. The Securities invested / disinvested by the Portfolio Manager for Clients may differ from Client to Client. The Portfolio Manager’s decision (taken in good faith) in deployment of the Client’s fund’s is absolute and final and can never be called in question or be open to review at any time during the currency of the agreement or at any time thereafter except on the grounds of fraud,, conflict of interest or gross negligence. This right of the Portfolio Manager shall be exercised strictly in accordance with the relevant Acts, Regulations, guidelines and notifications in force from time to time. statements in respect to Client’s Portfolio shall be sent to the respective Client at a frequency not less than as determined by law.

Based on the Client’s profile, overall investment objective and other relevant factors, the Portfolio of the Clients are at present managed under one or more of the following Investment Strategies:

b) **Non - Discretionary Services:**

Under the Non-Discretionary Portfolio Management Services, the portfolio of the

Client shall be managed in consultation with the Client and in accordance with the instructions of the Client. Under this service, the Assets will be managed as per express prior instructions issued by 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 or corporate benefits, valuation and reporting aspects on behalf of the Client entirely at the Client's risk.

c) **Advisory Services:**

Under these services, the Portfolio Manager advises 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.

4) **Penalties, pending litigation or proceedings, findings of inspection or investigations for which action may have been taken or initiated by any regulatory authority:**

1. All cases of penalties imposed by the IFSCA or the directions issued by the IFSCA under the Act or Regulations made there under relating to Fund Management Services.

None

2. The nature of the penalty/direction.

None

3. Penalties imposed for any economic offence and/or for violation of any securities laws relating to Portfolio Management Services.

None

4. Any pending material litigation/legal proceedings against the Portfolio Manager/key personnel with separate disclosure regarding pending criminal cases, if any.

None

5. Any deficiency in the systems and operations of the Portfolio Manager observed by the Authority or any regulatory agency in relation to Portfolio Management Services for which action may have been taken or initiated.

None

6. Any enquiry/adjudication proceedings initiated by IFSCA 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 Regulations made thereunder relating to Portfolio Management Services.

None

5) Services offered:

The Portfolio Manager manages the following Strategies of Discretionary Portfolio of the Client:

1. Long Short Portfolio

- **Investment Objective:** The Strategy aims to generate alpha by maintain both long and short positions reducing the exposure to broad market swing.
- **Description of types of securities:** Listed equities and indices (derivative/cfds)
- **Basis of selection of such types of securities as part of the investment approach:** The selection criteria is based on the security under consideration.
 - For the purpose of investment in **debt securities** the selection shall be based on factors such as yield offered by the security, comparative yield of similar securities trading in the market, key terms of the security like fixed/floating rate, maturity profile, seniority in the capital structure of issuing agency, strength of credit & liquidity ratios of the company/institution issuing the paper and strength of rating issued by various rating agencies.
 - For the purpose of investment in equity instruments the various valuations parameters like: price to book value, price to earnings, return on equity, expected return on investment, future earnings potential, etc will be considered.
- **Allocation of portfolio across types of securities:** The strategy seeks to primarily invest in a mix of listed and debt, quasi equity and equity shares in developed, emerging and frontier markets. The Company may also invest in partnerships, management participations and joint ventures and other non-corporate investments, although no such investments are currently anticipated.
- **Strategy:** Asset Mix.
Model Portfolio:
 - **Long Short Portfolio :**
 - Equities : Growth sectors benefit from AI & clean energy trends; shorting sectors facing structural decline. or stretched valuations – ~~US Mega Caps~~.
 - Indices : Market view/direction & Hedging - All Global Indices (S&P, Dow Jones, Russell, nasdaq, nifty).
 - Commodities: Hedge macro uncertainty & Defensive hedge - Gold, silver, natural gas, crude oil.
 - ETFs : Broad market exposure- Global Indices/ Sector ETFs/Thematic ETFs/Commodities.
- **Indicative tenure or investment horizon:** Medium to Short term.
- **Risks associated with the investment approach:**

Equity risk is the financial risk involved in holding equity in a particular investment. Equity risk often refers to equity in companies through the purchase of stocks, and does not commonly refer to the risk in paying into real estate or building equity in properties.

Credit Risk refers to the possibility that the issuer of the debt instrument may fail to meet its obligations, either by delaying or defaulting on interest or principal payments. This risk is higher for instruments issued by entities with lower credit

ratings. A downgrade in the issuer's credit rating can also lead to a decline in the market value of the instrument.

Systematic Risk refers to the risk inherent to the entire market or market segment. Systematic risk, also known as "undiversifiable risk," "volatility" or "market risk," affects the overall market, not just a particular stock or industry. This type of risk is both unpredictable and impossible to completely avoid. It cannot be mitigated through diversification, only through hedging or by using the correct asset allocation strategy.

Liquidity Risk refers to the risk when an investor is unable to sell the debt instrument quickly at a fair price. Certain debt instruments, especially those issued by smaller entities or structured products, may have limited secondary market trading, making it difficult to exit the investment without incurring a loss.

Concentration risk is the potential for a loss in value of an investment portfolio or a financial institution when an individual or group of exposures move together in an unfavorable direction. The implication of concentration risk is that it generates such a significant loss that recovery is unlikely. The portfolio will be liquidated or the institution will face bankruptcy.

Model portfolio risk: Model Portfolio is a concept where the fund manager constructs a portfolio with a certain number of scripts and allocation for each. The same is replicated in terms of scripts and allocation for all future clients. Clients may for certain interim periods have portfolios which are different from the model portfolio i.e. that some stocks may be different or may have a lesser weight compared to the model portfolio. This is a function of many factors like liquidity, organisation level risk practices or other investment decision making considerations.

Mismatch risk occurs when an investor chooses investments that are not suitable for their circumstance and risk tolerance. Investors experience mismatch risk when transactions in which they engage or assets they hold are not aligned with their needs. Mismatch between investment type and investment horizon can be a source of mismatch risk. For example, mismatch risk would exist in a situation where an investor with a short investment horizon (such as one who is near retirement) invests heavily in smallcap funds. Typically, investors with short investment horizons should focus on less volatile investments.

Execution Risk is that a transaction won't be executed within the range of recent market prices or within the stop order limits that have been set by an investor. Execution risk exists on virtually all financial instruments.

The selection of the stocks will be based on the criteria of strategy at the time of initial ideation and investment made as per the model portfolio of the strategy.

2. ETF Long Only Strategy:

- **Investment Objective:** The Strategy aims to provide its Shareholders with capital appreciation via investments in a combination of Equity, Fixed income, Commodities and other exchange-trade funds (ETFs)
- **Description of types of securities:** Equity, fixed income securities, commodities and Exchange Traded Funds (ETFs).
- **Basis of selection of such types of securities as part of the investment approach:** The Fund will follow a top-down strategy in investing in ETFs through

active asset allocation. The investment set shall comprise approximately 2000 ETF/ETP listed in US markets with combined AUM of \$ 4.4 T.

- **Allocation of portfolio across types of securities:** The Fund will follow a top-down strategy in investing in ETFs through active asset allocation. The investment universe comprises approximately 2000 ETF/ETP listed in US markets
- The Fund will be investing at least 80% in ETF/ETP where the AUM is more than USD 500 million for ensuring sufficient liquidity and 0-20% will be invested in some theme-based ETF where the AUM is less million but have sufficient liquidity.
- **Strategy:** An absolute return approach focused on capital appreciation through diversified investments in U.S. listed ETFs across equities, fixed income, and commodities, using active top-down asset allocation while prioritizing liquidity and risk-adjusted returns.
- **Model Portfolio:**
ETFs : Broad market exposure - Global Indices/ Sector ETFs/Thematic ETFs/Commodities.
- **Indicative tenure or investment horizon:** Medium term to long term.
- **Risks associated with the investment approach:**

Equity risk is the financial risk involved in holding equity in a particular investment. Equity risk often refers to equity in companies through the purchase of stocks, and does not commonly refer to the risk in paying into real estate or building equity in properties.

Credit Risk refers to the possibility that the issuer of the debt instrument may fail to meet its obligations, either by delaying or defaulting on interest or principal payments. This risk is higher for instruments issued by entities with lower credit ratings. A downgrade in the issuer's credit rating can also lead to a decline in the market value of the instrument.

Systematic Risk refers to the risk inherent to the entire market or market segment. Systematic risk, also known as "undiversifiable risk," "volatility" or "market risk," affects the overall market, not just a particular stock or industry. This type of risk is both unpredictable and impossible to completely avoid. It cannot be mitigated through diversification, only through hedging or by using the correct asset allocation strategy.

Liquidity Risk refers to the risk when an investor is unable to sell the debt instrument quickly at a fair price. Certain instruments, especially those issued by smaller entities or structured products, may have limited secondary market trading, making it difficult to exit the investment without incurring a loss.

Concentration risk is the potential for a loss in value of an investment portfolio or a financial institution when an individual or group of exposures move together in an unfavourable direction. The implication of concentration risk is that it generates such a significant loss that recovery is unlikely. The portfolio will be liquidated or the institution will face bankruptcy.

Commodity Risk refers to the possibility of losing money due to changes in the prices of commodities like oil, gold, or agricultural products. These prices can be very volatile because they depend on factors such as global supply and demand, weather conditions, political events, and trade policies. A sudden drop in prices or a disruption in supply chains can significantly affect the value of commodity-based investments like ETFs.

Minimum Investment Amount.

The minimum value of funds / investments which will be accepted towards initial corpus would be decided by the Portfolio Manager from time to time and the minimum sum will not be less than any amount as may be stipulated by the IFSCA Regulations from time to time.

Currency risk is the risk of losing money because of changes in exchange rates between two currencies. Since your investments are in U.S. listed ETFs, if your home currency weakens or strengthens against the U.S. dollar, it can affect your returns.

Model portfolio risk: Model Portfolio is a concept where the fund manager constructs a portfolio with a certain number of scripts and allocation for each. The same is replicated in terms of scripts and allocation for all future clients. Clients may for certain interim periods have portfolios which are different from the model portfolio i.e. that some stocks may be different or may have a lesser weight compared to the model portfolio. This is a function of many factors like liquidity, organisation level risk practices or other investment decision making considerations.

Mismatch risk occurs when an investor chooses investments that are not suitable for their circumstance and risk tolerance. Investors experience mismatch risk when transactions in which they engage or assets they hold are not aligned with their needs. Mismatch between investment type and investment horizon can be a source of mismatch risk. For example, mismatch risk would exist in a situation where an investor with a short investment horizon (such as one who is near retirement) invests heavily in smallcap funds. Typically, investors with short investment horizons should focus on less volatile investments.

Execution Risk is that a transaction won't be executed within the range of recent market prices or within the stop order limits that have been set by an investor. Execution risk exists on virtually all financial instruments.

- **Other salient features, if any.:** Maximize post tax return due to Low Churn, "Buy & Hold"

The selection of the stocks will be based on the criteria of strategy at the time of initial ideation and investment made as per the model portfolio of the strategy

3. Multi Asset Long Only Strategy.

- **Investment Objective:** The Strategy aims to Capital preservation and growth through unconstrained investing across (i) all global markets and (ii) all asset classes, including but not limited to stocks, bonds, real estate, precious metals, alternatives and cash.
- **Description of types of securities:** Equity, fixed income securities, debt securities, government commodities, real estate, mutual funds, money market instruments, derivatives and Exchange Traded Funds (ETFs) etc.
- **Basis of selection of such types of securities as part of the investment approach:**
- **Allocation of portfolio across types of securities:** USD-denominated, global, multi-asset strategy.

- **Strategy:** USD-denominated, global, multi-asset strategy. Long only with the discretion to hedge mainly for downside protection. Long only investments generally include but are not limited to direct investments, ETFs, index funds, mutual funds, listed trusts and other structured products. Hedge via any instrument, including but not limited to inverse ETFs, derivatives and other structured products.
- **Model Portfolio:**
 - Equities : Growth sector's benefits
 - ETFs : Broad market exposure - Global Indices/ Sector ETFs/Thematic ETFs/Commodities/Crypto
 - Bonds
- **Indicative tenure or investment horizon:** Long term.
- **Risks associated with the investment approach:**

Equity risk is the financial risk involved in holding equity in a particular investment. Equity risk often refers to equity in companies through the purchase of stocks, and does not commonly refer to the risk in paying into real estate or building equity in properties.

Credit Risk refers to the possibility that the issuer of the debt instrument may fail to meet its obligations, either by delaying or defaulting on interest or principal payments. This risk is higher for instruments issued by entities with lower credit ratings. A downgrade in the issuer's credit rating can also lead to a decline in the market value of the instrument.

Systematic Risk refers to the risk inherent to the entire market or market segment. Systematic risk, also known as "undiversifiable risk," "volatility" or "market risk," affects the overall market, not just a particular stock or industry. This type of risk is both unpredictable and impossible to completely avoid. It cannot be mitigated through diversification, only through hedging or by using the correct asset allocation strategy.

Liquidity Risk refers to the risk when an investor is unable to sell the debt instrument quickly at a fair price. Certain instruments, especially those issued by smaller entities or structured products, may have limited secondary market trading, making it difficult to exit the investment without incurring a loss.

Concentration risk is the potential for a loss in value of an investment portfolio or a financial institution when an individual or group of exposures move together in an unfavourable direction. The implication of concentration risk is that it generates such a significant loss that recovery is unlikely. The portfolio will be liquidated or the institution will face bankruptcy.

Commodity Risk refers to the possibility of losing money due to changes in the prices of commodities like oil, gold, or agricultural products. These prices can be very volatile because they depend on factors such as global supply and demand, weather conditions, political events, and trade policies. A sudden drop in prices or a disruption in supply chains can significantly affect the value of commodity-based investments like ETFs.

Currency risk is the risk of losing money because of changes in exchange rates between two currencies. Since your investments are in U.S. listed ETFs, if your home currency weakens or strengthens against the U.S. dollar, it can affect your

returns.

Model portfolio risk: Model Portfolio is a concept where the fund manager constructs a portfolio with a certain number of scripts and allocation for each. The same is replicated in terms of scripts and allocation for all future clients. Clients may for certain interim periods have portfolios which are different from the model portfolio, i.e. that some stocks may be different or may have a lesser weight compared to the model portfolio. This is a function of many factors like liquidity, organisation level risk practices or other investment decision making considerations.

Mismatch risk occurs when an investor chooses investments that are not suitable for their circumstance and risk tolerance. Investors experience mismatch risk when transactions in which they engage or assets they hold are not aligned with their needs. Mismatch between investment type and investment horizon can be a source of mismatch risk. For example, mismatch risk would exist in a situation where an investor with a short investment horizon (such as one who is near retirement) invests heavily in small cap funds. Typically, investors with short investment horizons should focus on less volatile investments.

Geographical risk means the risk of losses due to events or conditions in specific countries or regions where you invest. These risks can include political instability, changes in government policies, economic downturns, trade restrictions, or even natural disasters. For example, if you invest in emerging markets and that country faces a financial crisis or imposes capital controls, your investments there could lose value or become hard to sell.

Execution Risk is that a transaction won't be executed within the range of recent market prices or within the stop order limits that have been set by an investor. Execution risk exists on virtually all financial instruments.

- **Other salient features, if any.:** Maximize post tax return due to Low Churn, "Buy & Hold"

The selection of the stocks will be based on the criteria of strategy at the time of initial ideation and investment made as per the model portfolio of the strategy

Investment Objective: The Strategy seeks to generate income and capital appreciation to its shareholders by investing in a diversified portfolio of equity, debt and related securities across developed, emerging and frontier markets, including listed and unlisted instruments and AIF structures, subject to applicable regulations.

Description of types of securities: Equity, Debt, Quasi – equity, Units of AIF, Structured Instruments and Hybrid Securities

Basis of selection of such types of securities as part of the investment approach: The Fund will pursue a multi-asset approach, integrating fundamental equity selection with active fixed-income and credit analysis.

Allocation of portfolio across types of securities: The Fund will follow multi – asset approach covering debt (60%), equity and quasi-equity (40%), and alternative or indirect investments (20%), selected for credit quality, valuation, and risk-return potential.

Strategy: The Fund has income-generating fixed income with growth-oriented equities,

allows tactical adjustments based on market conditions, and may include selective exposure to unlisted or alternative structures through direct or indirect investments. Risk management emphasizes diversification, credit quality, liquidity, and disciplined valuation, though market fluctuations and macroeconomic risks may affect returns.

Indicative tenure or investment horizon: Medium term.

Investment Objective : The Strategy aims to achieve capital preservation and growth for its shareholders through unconstrained investing across global markets and multiple asset classes, with a focus on risk-adjusted returns and downside protection.

Description of types of securities : Equity, Debt Instruments, Cash and money Market Instruments, Exchange-traded products, Derivatives, CFDs.

Basis of selection of such types of securities as part of the investment approach : The fund will follow a Global Multi-Asset Absolute Return Strategy, investing in equities, alternatives, debt, and structured products with a focus on fundamentals, credit, risk-return, and downside protection to optimize returns while managing risk and liquidity.

Allocation of portfolio across types of securities: The fund will follow a Global Multi – Asset Absolute Return Strategy the portfolio will allocate roughly 40% to equities, 30% to debt, and 30% to alternatives or structured products, with tactical adjustments based on market conditions and risk-return objectives.

Strategy: The Portfolio follows a long-only, actively managed, global multi-asset approach with discretion to hedge for downside protection. Investments are diversified across asset classes, geographies, and instruments, including direct and indirect exposures.

Indicative tenure or investment horizon: medium- to long-term

NOTE:

- Investment under Portfolio Management Services will in accordance with the International Financial Services Centres Authority (Fund Management) Regulations, 2025
- The amounts forming part of the Client's Assets may be at the discretion of the Portfolio Manager be held in cash or deployed in Liquid fund schemes, Exchange Traded Index Funds, debt oriented schemes of Mutual funds, Gilt schemes, Bank deposits and other short term avenues for Investment.
- The Portfolio Manager may, with the Client's consent, lend securities through an Approved Intermediary to earn interest and invest in derivatives; however, the FME shall invest client portfolios in derivatives only with the clients' express consent.
- Portfolio Manager will, before investing in the securities of its associate / group companies, evaluate such investments, the criteria for the evaluation being the same as is applied to other similar investments to be made under the Client's Portfolio. The investments in securities of the associate / group companies including in schemes of DIMI would be within the overall framework of Regulations and in terms of PMS Agreement executed with the Client.
- The Portfolio Manager and its group companies/associates are engaged in a broad spectrum of activities in the financial services sector. The Portfolio Manager may utilize the services of its group companies or associates may utilize services of its Associates/ Group Companies for activities like Depository Participant, braking,

distribution etc. relating to Portfolio Management Services. Such utilization will be purely on arm's length & purely on commercial basis and at a mutually agreed terms and conditions to the extent and limits permitted under the Regulations.

- As per employee dealing policy of DIMI, employees are prohibited from dealing in securities that are held by any Schemes of DIMI (other than securities forming part of the index of ETFs), PMS Strategies and Schemes of AIF. In exceptional cases the disclosure as required by the regulations shall be made. However, as on date there is no conflict of interest with the transactions in any of the client's portfolio.
- The Client shall deposit with the Portfolio Manager an initial corpus consisting of Securities and /or funds of an amount prescribed by Portfolio Manager for a Portfolio, subject to minimum amount as specified under FME Regulations, as amended from time to time. Currently the minimum investment amount is USD 75000. The Client may on one or more occasion(s) or on a continual basis, make further placement of Securities and/ or funds under the service.
- The Portfolio Manager provides the facility to the Client for Direct onboarding with us without any involvement of a broker/distributor/agent engaged in distribution services.
- The Client can sign up for our services by writing to us at product@dovetailindia or parag.asher@dovetailindia.com
- Further, under this facility the Portfolio Manager may levy statutory charges to the client. Accordingly, the Portfolio Manager will not charge any Distribution related fees to the Client.

Apart from Discretionary Portfolio Management Services. Further the Portfolio Manager also offers Advisory Portfolio Management Services wherein the Portfolio Manager only renders investment advice to the Client in respect of securities. Discretion to execute the transactions and responsibility for execution /settlement of the transactions lies solely with the Client.

6) **Risk Factors:**

- The investments made in securities are subject to market risk and there is no assurance or guarantee that the objectives of investments will be achieved and the Portfolio Manager has no liability for any losses resulting from the Client availing of Portfolio Management Services. Following are the current risk factors as perceived by management of the Portfolio Manager. This list is not intended to be exhaustive in nature and is merely intended to highlight certain risks that are associated with investing in Securities:
- Securities investment is subject to market risks and there is no assurance or guarantee that the objective of investments of the Client will be achieved.
- Investment in securities that are traded in stock exchanges outside India are exposed to risks associated with the country that stock exchange is situated in. Investing in such securities is significantly risky when compared with Indian securities due to geographical and other issues.
- Investment in equities, derivatives and mutual funds and Exchange Traded Index Funds are subject to market risks and there is no assurance or guarantee that the objective of investments 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 the capital markets.
- The performance of the portfolio 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.
- The past performance of the Portfolio Manager does not indicate its future performance. Investors are not being offered any guaranteed returns.

- The performance of the Assets of the Client may be adversely affected by the performance of individual securities, changes in the marketplace and industry specific and macro-economic factors. The investment strategies are given different names for convenience purpose, and the names of the Strategies do not in any manner indicate their prospects or returns.
- Investments in debt instruments and other fixed income securities are subject to default risk, liquidity risk and interest rate risk. Interest rate risk results from changes in demand and supply for money and other macroeconomic factors and create price changes in the value of the debt instruments. Consequently, the NAV of the portfolio may be subject to fluctuation.
- Investments in debt instruments are subject to reinvestment risks as interest rates prevailing on interest amount or maturity due dates may differ from the original coupon of the bond, which might result in the proceeds being invested at a lower rate.
- The Portfolio Manager may invest in non-publicly offered debt securities and unlisted equities. This may expose the Client's portfolio to liquidity risks.
- Engaging in securities lending is subject to risks related to fluctuations in collateral value/settlement/liquidity/counter party.
- The Portfolio Manager may use derivatives instruments like index futures, stock futures and options 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 Portfolio to certain risks inherent to such derivatives. As and when the Portfolio Manager deals in the derivatives market on behalf of the Client, there are risk factors and issues concerning the use of derivatives that investors should understand.
- Derivative products are specialized instruments that require investment techniques and risk analyses different from those associated with stocks and bonds. The use of a derivative requires an understanding not only of the underlying instrument but of the derivative itself. Derivatives require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative adds to the portfolio and the ability to forecast price or interest rate movements correctly. There is the possibility that a loss may be sustained by the portfolio as a result of the failure of another party (usually referred to as the "counter party") to comply with the terms of the derivatives contract. Other risks in using derivatives include the risk of misprice or improper valuation of derivatives and the inability of derivatives to correlate perfectly with underlying assets, rates and indices. Thus, derivatives are highly leveraged instruments. Even a small price movement in the underlying security could have a large impact on their value.
- Re-investment Risk: This risk refers to the interest rate levels at which cash flows received from the Securities under a particular portfolio are reinvested. The additional income from reinvestment is the "interest on interest" component. The risk is that the rate at which interim cash flows can be reinvested may be lower than that originally assumed.
- There are inherent risks arising out of investment approach, investment objectives, investment strategy, asset allocation and non-diversification of portfolio.
- Prepayment risk: there may be unscheduled return of the principal on a particular Security, which may result in a reinvestment risk.
- Credit Risk: Credit risk or default risk refers to the risk that an issuer of a fixed income Security may default. Because of this risk corporate debentures are sold at a higher yield above those offered on Government Securities which are sovereign obligations and free of credit risk. Normally, the value of a fixed income security will fluctuate depending upon the changes in the perceived level of credit risk as well any actual event of default.
- The NAV may be affected by changes in settlement periods and transfer procedures.
- Risks related to index linked Securities: Performance of the reference index will have

a direct bearing on the performance of the strategy. In the event the reference index is dissolved or withdrawn by the Index Provider; in case of Securities such as debentures, the debenture trustees upon request by the issuer may modify the terms of issue of the debentures so as to track a different and suitable index. Tracking errors are also inherent in any equity linked security and such errors may cause the equity index-linked security to generate returns which are not in line with the performance of the reference index or one or more Securities covered and/or included in the reference index

- Exchange Rate Risk: The Client's portfolio may be heavily influenced by fluctuations in foreign exchange rates since the Client's portfolio shall be invested in international Securities that are traded in different and multiple jurisdictions. Performance of the Client's Portfolio may be strongly influenced by movements in foreign exchange rates because currency positions held by the Client's portfolio may not correspond with the Securities positions held.
- In case of investments in mutual fund, the Client bear the recurring expenses of the Portfolio Manager in addition to the expenses of the underlying mutual fund schemes. Hence, the Client may receive lower pre-tax returns compared to what the Client may have received had he invested directly in the underlying Securities of the mutual fund schemes.
- After accepting the corpus for management, the Portfolio Manager may not get an opportunity to deploy the same or there may be a delay in deployment. In such a situation the Client may suffer an opportunity loss and the Portfolio Manager shall not be held liable for the same.
- Risks associated with investment in equity instruments using Quantitative Analysis/ Quant Model: Some of the Risks attached with Quantitative Analysis are: (i) Market Risk: Like any other equity investments, these are subject to market risk. (ii) Modeling Error: Quant models are subject to price and volume inputs. It is possible that some of these inputs are entered incorrectly. The quant model selected by the Portfolio Manager may not perform as tested; such a scenario is entirely possible and would result in a loss. (iii) Deviation from theoretical model: A quant model is theoretical in nature, however at times the market may act unexpectedly resulting in a loss, the quant model cannot account for any such market behavior. The quant model may initiate a sell signal; however, the stock may not have adequate liquidity at that moment, forcing the portfolio manager to further drive down the stock price.
- Spread risk: Investments in corporate bonds are exposed to the risk of widening of the Spread between corporate bonds and gilts. Prices of corporate bonds tend to fall if this spread widens which will affect the Strategy accordingly.
- Liquidity or Marketability Risk: This refers to the ease with which security can be sold at or near to its valuation yield-to-maturity (YTM). The primary measure of liquidity risk is the spread between the bid price and the offer price quoted by a dealer.
- Risks related to Special Situations: Special situation trades are subject to all risks under equity; however, in certain cases the risks can be specific as are mentioned: (i) The promoter may choose not to accept the discovered prices (ii) Regulatory hurdles may delay any specific corporate action.
- Risk Associated with Securitized Debt: Securitized debt may suffer credit losses in the event of the delinquencies and credit losses in the underlying pool exceeding the credit enhancement provided. As compared to normal corporate or sovereign debt, securitized debt is normally exposed to a higher level of reinvestment risk.
- Risk factor specifically while using Options: The Portfolio Manager might buy options to enhance yield. In buying options the profit potential is unlimited, whereas the maximum risk is the premium paid to buy the options. The Portfolio Manager may use Derivatives instruments like equity futures C options, or other Derivative instruments as permitted under the Regulations and guidelines. Usage of Derivatives will expose the strategies to liquidity risk, open position risk, and opportunities risk etc. Such risks

include the risk of mispricing or improper valuation and the inability of Derivatives to correlate perfectly with underlying assets, rates and indices. In case of the Derivative strategies, it may not be possible to square off the cash position against the corresponding Derivative position at the exact closing price available in the Value Weighted Average Period.

- Risk factors associated with Derivatives: Derivative products are leveraged instruments and can provide disproportionate gains as well as disproportionate losses to the Investor. Execution of such strategies depends upon the ability of the Portfolio Manager to identify such opportunities. Identification and execution of the strategies to be pursued by the Portfolio Manager involves uncertainty and the decision of Portfolio Manager may not always be profitable. No assurance can be given that the Portfolio Manager will be able to identify or execute such strategies. 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. Trading in derivatives has the following risks: (i) An exposure to Derivatives in excess of the hedging requirements can lead to losses. (ii) An exposure to Derivatives, when used for hedging purposes, can also limit the profits from a genuine investment transaction. (iii) Derivatives carry the risk of adverse changes in the market price. (iv) Illiquidity Risk i.e., risk that a Derivative trade may not be executed or reversed quickly enough at a fair price, due to lack of liquidity in the market.
- The risks of investing in equity instruments include share price falls, receiving no dividends or receiving dividends lower in value than expected. They also include the risk that a company restructuring may make it less profitable.
- Equity instruments face market volatility risk: Stock market tends to be very volatile in the short term. Even if fundamentals of the underlying companies do not materially change in the short term, volatility in the broader stock market can result in volatility in share prices of stocks forming part of the Client's portfolio.
- Equity instruments face fundamental risk: If fundamentals of the companies chosen by the Portfolio Manager deteriorate over time, there is no guarantee or assurance that the Portfolio Manager's analysts and fund managers will be able to identify such deterioration in fundamentals and take appropriate action in a timely manner which could lead to higher volatility and a lower return from the portfolio companies.
- Equity instruments face macro-economic and geo-political risks: Sudden changes to the macro-economic and geo-political environment within which Portfolio Manager's companies operate, could lead to increase in volatility of share prices of these companies.
- Operational and IT Risk: there may be risks related to the exposure to loss due to human error or fraud, or from a system of internal controls that fails to adequately record, monitor and account for transactions or positions. There may also be risks related to hardware and software failure, human error, spam, viruses and malicious attacks, as well as natural disasters such as fires, cyclones or floods and other force majeure events.
- The investment opportunity size may be limited, leading to all investors not getting appropriate/proportionate/optimum allocation than desired. This may lead to less than expected performance of the account. Further, if Dovetail or its associates as well participate in such investment opportunities, the opportunity size available to clients might reduce. The investments in securities listed and traded outside India have a different tax treatment as compared to listed securities in India. The tax deduction might be significant as compared to Indian securities and income/gains.

Transactions with related parties as per the standards specified by the Institute of Chartered Accountants of India

Information on transactions with related parties:

A) Enterprises where control exists:

1. Dovetail Capital Private Limited– Holding Company.

B) Subsidiaries:

Nil

C) Group Subsidiaries:

1. Dovetail Financial Service Private Limited
2. Dovetail Investment Management India (IFSC) Private Limited
3. OHM Dovetail Capital (DIFC) Limited

• **Transactions with related parties for the year-ended March 31, 2025:**

(In Rupees)

(in Rupees)

Nature of transactions	Name of the Related party	Holding Company / Subsidiary Company / Fellow Subsidiary (A)(A)		Key Managerial Personnel / Relative of KMP (B)		Total (A+B)	
		Year ended as on March 31,					
		2025	2024	2025	2024	2025	2024
Reimbursements	Dovetail Capital Private Limited	60,00,000	36,000	0	0	60,00,000	36,000

(B) Outstanding balances of / with related parties:

(In Rupees)

Nature of transactions	Name of the Related party	Holding Company/Subsidiary Company/Fellow Subsidiary (A)	Key Managerial Personnel / Relative of KMP (B)		Total (A+B)		
		Year ended as on March 31,					
		2025	2024	2025	2024	2025	2024
Reimbursements (Payable)	Dovetail Capital Private Limited	1,67,950	2,04,000	1,67,950	2,04,000	1,67,950	2,04,000
Note: Income/receipts and payables are shown in brackets.							

7) **The Financial Performance of Portfolio Manager – DIMI (Based on Audited Financial Statements):**

(Rs. In Thousands)

Particulars	Year ended					
	31 st 2025	March,	31 st 2024	March,	31 st 2023	March,
Profit/(Loss) before depreciation & tax & After Exceptional & Extraordinary Items (Net of Tax)	(66.87)		(1303.15)		(1940.8)	
Other comprehensive income	0		0		0	
Less: Depreciation	(68.88)		(74.96)		0	
Add/(Less): Balance B/F from Previous year	(19.86)		-		-	
Less: Provision for tax	0		0		0	
Less: MAT credit utilised/(entitlement)	0		0		0	
Less/(Add): Deferred Tax	0		0		0	
Less: Fringe Benefit Tax	0		0		0	
Less: Wealth Tax	0		0		0	
Less: Provision for Tax (for previous year)	0		0		0	
Less: MAT credit (for previous year)	0		0		0	
Profit/(Loss) for the year after tax	(115.67)		(1378.11)		(1940.80)	
Changes in foreign currency translation reserve	709.39		1034.45		357.11	
Balance carried to Balance Sheet	593.71		(343.65)		(1583.69)	

8) **Details of Diversification Policy and the details of investment of client's fund in the securities of its related parties or associates.**

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 focus through a collection of core holdings and may or may not seek diversification across the various sectors of the equity market. Securities shall be chosen amongst a wide spectrum of market capitalizations, from SME to large capitalization equities. 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. The Portfolio Manager may also, from time to time, engage in hedging strategies by investing in derivatives and permissible securities/instruments as per 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 limits given.

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

The 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. With respect to investments in debt and hybrid securities, the Portfolio Manager shall ensure compliance with the following:

Under discretionary portfolio management services, the Portfolio Manager shall not make any investment in unrated and below investment grade securities.

Under non-discretionary portfolio management services, the Portfolio Manager shall not make any investment in unrated below investment grade listed securities.

However, Portfolio Manager may invest up to 10% of the assets under management of such clients in unlisted unrated securities of issuers other than associates/related parties of Portfolio Manager. The said investment in unlisted unrated debt and hybrid securities shall be within the maximum specified limit of 25% for investment in unlisted securities as per the PMS Regulations.

• **Investment 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 the 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-----					

9) **Audit Observations:**

There are no audit observations by Statutory Auditor of DIMI pertaining to PMS for the preceding three financial years.

10) **Nature of expenses:**

The following are indicative types of costs and expenses expected to be incurred by the Portfolio Manager for and on behalf of Clients availing the Portfolio Management Services and would be recovered by the Portfolio Manager from respective clients. All specifics of fees for an investment approach would be agreed with each Client and set out in more detail in the Fee Schedule of the portfolio management agreement

Portfolio Management : The fees charged by the Co-investment Portfolio Manager would be fixed fees or return based on a combination of both as per IFSCA (Fund Management) Regulations, 2025.

A. **Other operating expenses**

Apart from Portfolio Management Fees, the following are the general costs and expenses to be borne by the Client availing the Portfolio Management Services of the Portfolio Manager:

i. **Custodian Fees / Depository Fees :**

The charges relate to opening and operation of depository accounts, custody and transfer charges for securities, dematerialization and rematerialisation and other charges in connection with the operation and management of the depository accounts.

ii. **Registrar & Transfer Agent Fees:**

Charges payable to registrars and transfer agents in connection with transfer of securities including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges and other related charges.

iii. **Audit Fees, 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.

iv. **Services related expense**

Charges in connection with day to day operations like courier expenses, stamp duty, Goods and Services Tax, postal, telegraphic any other out of pocket expenses as may be incurred by the portfolio manager would be recovered.

v. **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, distribution charges or any other out-of-pocket expenses as may be incurred by the Portfolio Manager.

At the time of onboarding of clients directly, no charges except statutory charges shall be levied.

All the operational expenses excluding brokerage and related transaction costs, over and above the fees charged for Portfolio Management Service shall be in accordance with the Portfolio Management Service Agreement with the client

and as per the FME. Apart from operating expenses as mentioned above, the following will also be charged at actuals to Clients:

vi. Brokerage & Transaction Cost:

The investments under Portfolio Management would be made through registered members of the Stock Exchange who charge brokerage up to a maximum of 2.5% of contract value. In addition to the brokerage, transaction cost like network charges, turnover charges, stamp duty, transaction costs, turnover tax, Securities transaction tax or any other tax levied by statutory authority (ies), foreign transaction charges (if any) and other charges on the purchase and sale of shares, stocks, bonds, debt, deposits, other financial instruments would also be levied by the broker (including MOSL) Entry or exit loads (if any) on units of Mutual Funds will also be charged from Clients.

B. Entry Load /Exit Load.

Investors may note that, the fees/ expenses that may be charged to Clients mentioned below are indicative only. The same will vary depending upon the exact nature of the services to be provided to investors.

Distributor Commission.

The standard trail fee to be paid to distributor as commission shall be upto such amount as agreed with each distributor and shall be paid from of the fees earned from the respective client.

Note:

- a. The Portfolio Manager may also be entitled to recover transaction fee, brokerage charges, demat fees, and/or disbursement made in respect of the investments (and/or disbursements) and/or any incidentals in the form of stamp duties, registration charges, professional fees, legal fees, consultancy charges, service charges etc. and such other expenses, duties, charges incurred on behalf of the Client on account of the Service provided to him/her/it.

11) Taxation.

The general information stated below is based on the general understanding of direct tax laws in force in India as of the date of the Disclosure Document and is provided only for general information to the investor vis-à-vis the investments made through the portfolio management services of the Portfolio Manager. This information gives the direct tax implications on the understanding that the securities are/will be held for the purpose of investments as a capital asset. In case the securities are held as stock-in-trade, the tax treatment will substantially vary, and the issue of whether the investments are held as capital assets or stock-in-trade needs to be examined on a case-by-case basis. There is no guarantee that the tax position prevailing as on the date of the Disclosure Document/the date of making the investment shall endure indefinitely.

Further, the statements with regard to benefits mentioned herein are expressions of views and not representations of the Portfolio Manager to induce any investor, prospective or existing, to invest in the portfolio management services of the Portfolio Manager. Implications of any judicial decisions/ double tax avoidance treaties etc. are not explained herein. The investor should not treat the contents of this section of the

Disclosure Document as advice relating to legal, taxation, investment or any other matter. In view of individual nature of the tax benefits, interpretation of circulars for distinguishing between capital asset and trading asset, etc., the investor is advised to best consult its or his or her tax consultant, with respect to specific tax implications arising out of its or his or her portfolio managed by the Portfolio Manager.

It is the responsibility of all prospective investors to inform themselves as to any income tax or other tax consequences arising in the jurisdictions in which they are resident or domiciled or have any other presence for tax purposes, which are relevant to their particular circumstances in connection with the acquisition, holding or disposal of the securities.

Tax rates provided herein are based on the assumption that investment shall be made in securities listed on stock exchange outside India.

The following summary is based on the law and practice of the Income-tax Act, 1961 (the "IT Act"), the Income-tax Rules, 1962 (the "IT Rules") and various circulars and notifications issued thereunder from time to time. The IT Act is amended every year by the Finance Act of the relevant year and this summary reflects the amendments as per the Finance Bill, 2025 for financial year ('FY') 2025-26 (assessment year 2026-27) and are inclusive of surcharge and education cess as applicable, unless specified otherwise.

Taxation in hands of investors:

A. Characterization of income:

Traditionally, the issue of characterization of exit gains (whether taxable as business income or capital gains) has been a subject matter of litigation with the Indian Revenue authorities. There have been judicial pronouncements on whether gains from transactions in securities should be taxed as 'business income' or as 'capital gains'. However, these pronouncements, while laying down certain guiding principles have largely been driven by the facts and circumstances of each case.

Regarding characterization of income from transactions in listed shares and securities, the Central Board of Direct Taxes ("CBDT") had issued a clarificatory Circular No. 6 of 2016 dated February 29, 2016, wherein with a view to reduce litigation and maintain consistency in approach in assessments, it has instructed that income arising from transfer of listed shares and securities, which are held for more than twelve months would be taxed under the head 'Capital Gains' unless the taxpayer itself treats these as its stock-in-trade and transfer thereof as its business income.

In the context of the transfer of unlisted shares, the CBDT has issued a clarification vide Instruction No. F.No. 225/12/2016/ITA.II dated May 2, 2016, stating that income arising from the transfer of unlisted shares would be considered under the head 'Capital Gains' irrespective of the period of holding, with a view to avoiding dispute/litigation and to maintain a uniform approach. However, the above shall not apply in the following cases:

- The genuineness of transactions in unlisted shares itself is questionable; or

- The transfer of unlisted shares is related to an issue pertaining to the lifting of the corporate veil; or
- The transfer of unlisted shares is made along with the control and management of the underlying business.

The below tax rates have been provided on the assumption that the investments are held by the investors as capital assets.

B. Taxation of Resident Investors

The tax implications in the hands of resident investors on different income streams are discussed below:

- (i) **Dividend income** - Under the IT Act, Dividend income will be taxable in the hands of the resident-investors as under:

Dividend income received by	Basic Tax Rate	Effective Tax Rate*
Resident companies	30%/ 25%/22%/15%	25.17% (assumed 115BAA)
Firms / LLPs	30%	34.94%
Individuals & Others	Applicable slab rates	35.88%

* Basic Tax Rate + applicable Surcharge + 4% Health and Education Cess

* We have assumed the highest applicable surcharge in the above table. The effective tax rate will be different for investors with different levels of income. Investors may refer surcharge table given below for their reference.

No deduction shall be allowed from dividend income other than interest expense to the extent of 20% of the dividend income.

If the said dividend is taxed in the source country, subject to the conditions specified in the tax treaty entered into between India and source country and provisions pertaining to foreign tax credit (explained below) under the IT Act and IT Rules, the assessee may be able to claim a credit of taxes paid in the source country, while making payment of taxes in India.

- (ii) **Interest income:** Under the IT Act, interest income will be taxable in the hands of the resident investors as under:

Interest income received by	Basic Tax Rate	Effective Tax Rate*
Resident companies	30%/ 25%/22%/15%	25.17% (assumed 115BAA)
Firms / LLPs	30%	34.94%
Individuals & Others	Applicable slab rates	39% (New Tax Regime)

* Basic Tax Rate + applicable Surcharge + 4% Health and Education Cess

* We have assumed the highest applicable surcharge in the above table. The effective tax rate will be different for investors with different levels of income. Investors may refer surcharge table given below for their reference.

If the said interest is taxed in the source country, subject to the conditions specified in the tax treaty entered into between India and source country and provisions pertaining to foreign tax credit (explained below) under the IT Act and IT Rules, the assessee may be able to claim a credit of taxes paid in the source country, while making payment of taxes in India.

- (iii) **Capital gains:** Investors shall be liable to pay taxes on capital gains income as under:

Period of holding - Capital assets are classified as long-term assets ("LTCA") or short-term assets ("STCA"), based on the period of holding of these assets. The period of holding of the asset is computed from the date of acquisition to the date of transfer. Depending on the period of holding for which the shares and securities are held, the gains would be taxable as short-term capital gains ("STCG") or long-term capital gains ("LTCG"). This is discussed below:

Nature of Investment	STCA	LTCA
Securities Outside India	<24 months	=>24 months

C. Taxation of capital gains:

Depending on the classification of capital gains, the resident investors will be chargeable to tax as per the IT Act as under:

A) Unlisted Shares/ Foreign Mutual Funds, Foreign ETFs, Others:

Capital Gains received by	Basic Tax Rate		Effective Tax Rate*	
	STCG	LTCG	STCG	LTCG
Resident companies	30%/ 25%/22%/15%	12.50%	25.17% (assumed 115BAA)	14.30%
Firms / LLPs	30%	12.50%	34.94%	14.56%
Individuals & Others	Applicable slab rates	12.50%	39% (New Tax Regime)	14.95%

* Basic Tax Rate + applicable Surcharge + 4% Health and Education Cess

* We have assumed the highest applicable surcharge in the above table. The effective tax rate will be different for investors with different levels of income. Investors may refer surcharge table given below for their reference.

B) Unlisted Bonds/Debentures

Capital Gains received by	Basic Tax Rate		Effective Tax Rate*	
	STCG	LTCG	STCG	LTCG
Resident companies	30%/ 25%/22%/15%		25.17% (assumed 115BAA)	
Firms / LLPs	30%		34.94%	

Individuals & Others	Applicable slab rates	39% (New Tax Regime)
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* Basic Tax Rate + applicable Surcharge + 4% Health and Education Cess

* We have assumed the highest applicable surcharge in the above table. The effective tax rate will be different for investors with different levels of income. Investors may refer surcharge table given below for their reference.

FOREIGN TAX CREDIT

India has entered into double taxation avoidance agreements with many countries. The treaties allocate the taxing rights between the source country and the resident country. Many tax treaties contain provisions that the capital gains arising from the alienation of shares of a company shall be taxable in the source country. Thus, the capital gains arising to a person resident of India from the transfer of foreign shares shall be taxable both in the foreign country (on the basis of the source rule) and in India (on the basis of the residence rule). However, the foreign tax credit can be claimed in the country of residence for the taxes paid in the source state based on the foreign tax credit provisions under the IT Act and IT Rules.

As per Section 90(2) of the IT Act, the provisions of the IT Act would apply to the extent they are more beneficial than the provisions of the Double Taxation Avoidance Agreement ("Tax Treaty") between India and the country of source. However, no assurance can be provided that the Tax Treaty benefits would be available to the resident investor or that the terms of the Tax Treaty would not be subject to amendment or reinterpretation in the future. Where the income from foreign shares is taxable in both the countries (resident country and the source country) and the assessee has paid tax in the source country, he shall be allowed credit for the same in the country of residence, by way of deduction or otherwise. The credit shall be allowed in the year in which the assessee offered such income to tax or assessed to tax in India. A resident taxpayer shall be required to furnish a statement of income offered to tax and the foreign tax that has been deducted or paid on such income to claim the credit. Such statement shall be furnished in Form No. 67 electronically on or before the due date for furnishing the return of Income.

OTHER ASPECTS :

A. MAT/AMT.

I. Minimum Alternate Tax.

The IT Act provides for levy of Minimum Alternate Tax ('MAT') on corporates if the tax amount calculated at the rate of 15% (plus applicable surcharge and cess) of the book profits, as the case may be, is higher than the tax amount calculated under the normal provisions of the IT Act. Corporate assessee operating in the International Financial Services Centre (IFSC) shall be charged MAT at the concessional rate of 9%. For domestic companies exercising the option to pay tax at the rate of 22% (plus applicable surcharge and cess), MAT provisions do not apply. The MAT provisions are not applicable to a non-resident if, (a) the assessee is a resident of a country with which India has DTAA and the assessee does not have a permanent establishment in India; or (b) the assessee is a resident of a country with which India does not have a Tax Treaty and is not required to seek registration under the Indian corporate law.

II. Alternate Minimum Tax.

AMT at the rate of 18.5% (plus applicable surcharge and cess) is applicable to

persons, other than companies except in cases where option referred to in section 115BAC or section 115BAD of the Act are exercised, subject to certain exceptions, on the adjusted total income if the tax amount so calculated under AMT is higher than the tax amount calculated under the normal provisions of the IT Act. Further, a non-corporate assessee operating in the International Financial Services Centre ('IFSC') and which derives its income solely in convertible foreign exchange shall be charged AMT at the concessional rate of 9%.

Assessee opting for the tax regime under section 115BAC or section 115BAD will not be required to pay AMT.

B. TCS on remittance made via liberalized remittance scheme (LRS') route.

Under clause (a) of section 206C(1G) of the IT Act, an authorised dealer who receives an amount for remittance out of India from a buyer, being a person remitting such amount out of India under LRS, shall at the time of debiting the amount payable by the buyer or at the time of receipt of such amount from the said buyer (by any mode) whichever is earlier, collect from the buyer TCS @ 20%. The TCS to be collected by an authorised dealer from the buyer shall be equal to 20% of the amount or aggregate of the amounts in excess of INR 10 lakh remitted by the buyer in a financial year, where the amount being remitted is for the purpose of investment.

For the purposes of the above provisions, authorised dealer means a person authorised by the Reserve Bank of India under sub-section (1) of section 10 of the Foreign Exchange Management Act, 1999 (42 of 1999) to deal in foreign exchange or foreign security.

C. Carry forward of losses and other provisions:

In terms of Section 70 read with Section 74 of the IT Act, short-term capital loss arising during a year can be set off against short-term as well as long-term capital gains. Balance loss, if any, shall be carried forward and set off against any capital gains arising during the subsequent 8 assessment years. A long-term capital loss arising during a year is allowed to be set off only against long-term capital gains. Balance loss, if any, shall be carried forward and set off against long-term capital gains arising during the subsequent 8 assessment years.

D. General Anti-Avoidance Rule ("GAAR").

GAAR may be invoked by the Indian income-tax authorities in case arrangements are found to be impermissible avoidance arrangements. A transaction can be declared as an impermissible avoidance arrangement if the main purpose of the arrangement is to obtain a tax benefit and it satisfies one of the 4 four tests mentioned below:

- (i) Creates rights or obligations which are ordinarily not created between parties dealing at arm's length;
- (ii) It results in direct/indirect misuse or abuse of the IT Act;
- (iii) It lacks commercial substances or is deemed to lack commercial substance in whole or in part; or
- (iv) It is entered into or carried out in a manner that is not normally employed for bona fide business purposes.

In such cases, the tax authorities are empowered to reallocate the income from such arrangement or recharacterize or disregard the arrangement. Some of the illustrative powers are:

- a. Disregarding or combining or re-characterizing any step of the arrangement or party to the arrangement;
- b. Ignoring the arrangement for the purpose of taxation law;
- c. Relocating the place of residence of a party, or the location of a transaction, or the situs of an asset, to a place other than provided in the arrangement;
- d. Looking through the arrangement by disregarding any corporate structure; or
- e. Reallocating and re-characterizing equity into debt, capital into revenue, etc.
- f. Disregarding or treating any accommodating party and the other party as one and the same person;
- g. Deeming persons who are connected to each other parties to be considered as one and the same person for the purposes of determining tax treatment of any amount.

The above terms should be read in the context of the definitions provided under the IT Act. The GAAR provisions shall be applied in accordance with such guidelines and subject to such conditions and manners as may be prescribed.

The provisions of GAAR are applicable with effect from the financial year 2017-18 and onwards.

E. Multilateral Instrument (MLI')

The Organization for Economic Co-operation and Development (OECD) released the Multilateral Convention to implement tax treaty-related measures to prevent Base Erosion and Profit Shifting. The MLI, amongst others, includes a "principal purpose test", wherein Tax Treaty benefits can be denied if one of the principal purposes of an arrangement or a transaction was to, directly or indirectly, obtain tax benefit. The MLI has also expanded the scope of permanent establishment to include an agent (excluding an independent agent) playing a principal role, leading to routine conclusion of contracts without material modification. For this purpose, an agent is not considered independent if it acts exclusively or almost exclusively on behalf of one or more closely related enterprises.

India has been an active participant in the entire discussion, and its involvement in the BEPS project has been intensive. In a ceremony held in Paris on 7 June 2017, various countries, including India, signed the MLI.

The Union Cabinet of India issued a press release dated 12 June 2019 approving the ratification of the MLI to implement tax treaty-related measures to prevent BEPS. The application of MLI to a tax treaty is dependent on ratification as well as positions adopted by both countries signing a tax treaty. On 9 August 2019, India had notified the provisions of the Multilateral Convention under section 90(1) of the IT Act and has specified the date of entry into force as 1 October 2019.

In order to prevent the granting of tax treaty benefits in inappropriate circumstances and to align it with the Multilateral Convention to implement Treaty related measures to prevent Base Erosion and Profit Shifting, the Finance Act, 2020 has

amended Section 90(1) to provide that the Central Government shall enter into agreement(s) for the avoidance of double taxation without creating opportunities for nontaxation or reduced taxation through tax evasion or avoidance (including through treaty shopping arrangements aimed at obtaining reliefs provided in the said agreement for the indirect benefit to residents of any other country or territory).

Once MLI evolves in the future, one would need to analyse its impact at that point in time on the existing tax treaties that India has entered into with other countries.

F. Goods and Services Tax (GST)

GST will be applicable on services provided by the Company to the investors. Accordingly, GST at the rate of 18% would be levied on fees, if any, payable towards the portfolio management fee to the Company. However, in respect of IFSC, there is a relaxation in respect of the levy of GST on services provided to offshore investors and entities set up in IFSC. Services provided to resident investors from IFSC are subject to GST at the rate of 18%.

G. Tax Rates

The tax rates applicable to different categories of assesses are as follows:

Resident Individuals	Applicable Rates [^]	Slab
Partnership Firms & Indian Companies (other than specified companies below)	30% + surcharge & cess	
Indian Companies having a turnover less than INR 400 crore during the financial year 2023-24	25% + surcharge & cess	
The company is opting for section 115BAA	22% + surcharge & cess	
The company is opting for section 115BAB	15% + surcharge & cess	

[^]For ease of reference, the tax slab rates (under the old regime) for individuals are provided below:

The new tax slabs under the new regime that are applicable from 1st April 2025 are as follows.

Surcharge Rates:

Surcharge Rates for various entities	Rate
Domestic Companies Companies opting for 115BAA or 115BAB will have a flat surcharge	10%
Companies not opting for 115BAA or 115BAB	7%
If Net Taxable Income > Rs.1 crore and < =Rs.10 crores	
If Net Taxable Income > Rs. 10 crores	12%
Firm/LLP If Net Taxable Income > Rs.1 crore	12%

Individual/HUF/Private Trust If Net Taxable Income < Rs.50 lakhs	0%
If Net Taxable Income > Rs.50 lakhs and < = Rs.1 crore	10%
If Net Taxable Income > Rs.1 crore and < = Rs.2 crores	15%*
If Net Taxable Income > Rs.2 crores and < =Rs.5 crores	25%
If Net Taxable Income > Rs.5 crores (NA if opted for the new tax regime)	37%

*Surcharge rate for dividend Income and long-term capital gains income is capped at 15%. Further, Health and Education Cess at the rate of 4% shall be leviable on the aggregate of tax and surcharge.

Under the PMS, the onus of income tax payable on capital gains, dividends, interest, or any other taxable income is on the Investor at applicable rates as mentioned above. The Portfolio Manager will provide adequate statements on a periodical basis, prior to the due dates of income tax payments, to enable the investor to meet their tax obligations under the Income Tax Act, 1961.

In the event of there being any withholding tax or tax deductible at source relating to any income received by the Portfolio Manager on behalf of the Client on the investments, the credit in respect thereof shall be passed onto the Investor if legally permissible and practicable to do so.

There can be no guarantee that the above position regarding taxation of the Client would necessarily be accepted by the income-tax authorities under the IT Act. No representation is made either by the Portfolio Manager or any employee, partner or agent of the Portfolio Manager in regard to the acceptability or otherwise of the above position regarding taxation of the Client by the income tax authorities under the IT Act. Prospective Investors are urged to consult their own tax advisers in this regard.

12) **Accounting Policies:**

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

Books and Records would be separately maintained for each Client to account for expenses and allocations in connection therewith, as provided by the IFSCA (Fund Management) Regulations, 2025.

Accounting under the respective Portfolios will be done in accordance with Generally Accepted Accounting Principles in India and shall be substantially similar to the policies being followed by the Portfolio Manager in respect of the investment funds that it acts an investment manager to.

13) **Investors Services:**

(i) **Details of investor relation officer who shall attend to the investor queries and complaints is mentioned below:**

Name of the person	Parag Asher
Designation	Principal Officer
Email	parag.asher@dovetailindia.com
Telephone	9833860152

Name of the person	Sumit Panjabi
Designation	Compliance Officer
Email	Sumit.panjabi@dovetailindia.com
Telephone	7841947969

ii) **Grievance Redressal and dispute settlement mechanism:**

- a) The objective of grievance The Investment Relation Officer(s) will be the interface between the Portfolio Manager and the Client. In case the Client is not satisfied with the redressal by the Portfolio Manager or otherwise, the Client may lodge the complaint with Senior Management of the Portfolio manager
- b) 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. If the Investor remains dissatisfied with the remedies offered or the stand taken by the Portfolio Manager, the investor and the Portfolio Manager shall abide by the following mechanisms: -
- c) All disputes, differences, claims and questions arising between the Client and the Portfolio Manager and/or their respective representatives shall be settled through Arbitration process as described in the Portfolio Investment Management Agreement or any Supplemental Agreement thereto.

Place: Gandhinagar

Date: September 30, 2025

For and behalf of Dovetail Investment Management India (IFSC) Private Limited



**Parag Asher
Principal Officer**

