

## **DISCLOSURES**

1. The Investment Adviser is inter alia in the business of providing investment advice to individuals and corporates regarding investments. Investment Adviser has obtained registration from SEBI under the SEBI (Investment Advisers) Regulations, 2013 and is duly authorized by SEBI to provide Investment Advisory Services within the purview of SEBI (Investment Advisers) Regulations, 2013, any amendments thereto from time to time vide Registration No. INA000016463.
2. Investment Advisor role it to deliver investment advisory services to the Client(s). Hence the role is limited to advisory by carrying out portfolio review and financial planning based on risk profiling. The general objective is to formulate and device investment philosophy to achieve long term growth of capital or generate income or both, by investing in assets, which generate reasonable return and to advice client in line with each client profile with regard to their risk tolerance levels and specific preferences or concerns and to advice clients in line with each client's goals on the basis of risk tolerance levels and other constraints if any.
3. The Investment Adviser does not provide any promise or assurance of favorable view for a particular industry or sector or business group in any manner. The client/s is/are requested to take into consideration all the risk factors including their financial condition, suitability to risk-return profile, and take professional advice before investing. The analysts for various products or reports created by the investment adviser certify that all information/ material therein accurately reflect his or her personal views about the subject investment or companies and its or their securities, and no part of his or her compensation was, is, or will be, directly or indirectly related to the company(ies) in various products or reports created by the company. No part of this material may be duplicated in any form and/ or redistributed without the prior written consent of the Company.
4. The Investment Adviser has a contractual arrangement with a vendor - Smallcase Technologies Private Limited (STPL); whereby STPL provides technology solutions and related back-end infrastructure along with support for back office related operations and processes.
5. Terms and conditions of advisory services are detailed in the Investment Adviser Agreement. Please refer to the same for details.
6. The Investment Adviser has neither been suspended nor debarred from doing business by any Stock Exchange/ SEBI or any other authorities; nor has its certificate of registration been canceled by SEBI at any point of time.
7. No penalties / directions have been issued by SEBI under the SEBI Act or Regulations made there under against the Investment Adviser relating to Investment Advisory services.
8. There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority against the Investment Adviser or its Directors, or employees.
9. Investment Advisor is also registered with SEBI as a Stock Broker and Portfolio Manager and throughout the tenure Investment Advisor shall maintain arm's length relationship between its Investment Adviser activity and other activities.

10. Investment Adviser and its Associates, Officers, Directors, and Employees, Research Analyst (including relatives) worldwide may: (a) from time to time, have long or short positions in, and buy or sell the securities thereof, of the company(ies) forming part of the products or reports created by the Investment Adviser or (b) may have other potential/ material conflict of interest with respect to any company(ies) in various products or reports created by the Investment Adviser. Any such positions of conflict of interest will be appropriately disclosed and dealt with in accordance with applicable law.
11. The advisor has no connection or association of any sort with any issuer of products/ securities advised herein. The advisor has no actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services. Such conflict of interest shall be disclosed to the client as and when they arise.
12. To access the key features of the securities, particularly, performance track record please go to the below links: [www.moneycontrol.com](http://www.moneycontrol.com) , [www.bseindia.com](http://www.bseindia.com) , [www.nseindia.com](http://www.nseindia.com).
13. Clients are requested to go through the detailed key features, performance track record of the product, or security including warnings, disclaimers etc. before investing as and when provided by the Investment Advisor. Such product materials may also be available to [www.sebi.gov.in](http://www.sebi.gov.in) or [www.nseindia.com](http://www.nseindia.com) or respective issuers' website.
14. Investment Advisor draws the client's attention to the warnings, disclaimers in documents, advertising materials relating to an investment product/s which are being recommended to the client/s. A brief regarding the risk associated with the investment products are available in Investment Adviser Agreement, same may be referred before investing in advised product or securities.
15. Neither the Investment Adviser nor any of its holding company, associate concerns or affiliates or their respective directors, employees, or representatives shall be liable for any direct, indirect, special, incidental, consequential, punitive, or exemplary damages, including lost profits arising in any way from the information contained in this disclosure.
16. For any grievances, kindly contact by writing an email to Mr. Shailendra Kumar Sahu ([shailendra.sahu@esteadvisors.com](mailto:shailendra.sahu@esteadvisors.com)), Contact No. +91 124 463 7700, Principal Officer or approach compliance officer Mr. Shalabh Rakyan ([shalabh.rakyan@esteadvisors.com](mailto:shalabh.rakyan@esteadvisors.com)).

**Estee Advisors Private Limited (Formerly Estee Fincap Private Limited)**

Registration Number: INA000016463

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