



# SHAH SHAH THAKKAR & Co. LLP

Chartered Accountants

To,  
Securities and Exchange Board of India (SEBI)

We have Verified the Disclosure Document prepared by Bonanza Portfolio Limited (SEBI PMS Regn: INP000000985), having its office at "Bonanza House", Plot No M-2, Cama Industrial Estate, Walbhat Road, Behind "The Hub", Goregaon (East), Mumbai – 4000 063. Based on the document, information and explanation produced before us, we hereby certify that the disclosures made in the document are true, fair and adequate to enable the investor to make a well-informed decision.

For Shah Shah Thakkar & Co. LLP  
Chartered Accountant  
Firm Registration No 137247W



(Tejas Pravin Damania)  
Partner  
Membership No.: 137958  
UDIN: 24137958BKBY2V2796

Place: Mumbai

Date: 27/09/2024

# DISCLOSURE DOCUMENT

PORTFOLIO MANAGEMENT SERVICES

OFFERED BY



# INDEX

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**Key Information**

- a) The Disclosure Document (hereinafter referred as the “**Document**”) has been filed with the Securities and Exchange Board of India (“**SEBI**”) along with the certificate in the prescribed format in terms with the SEBI (Portfolio Managers) Regulations, 2020 (“**Regulations**”).
- b) The purpose of this document is to provide essential information about the PMS services offered by Bonanza Portfolio Limited, in a manner to assist and enable investors and/or their nominees in making informed decisions for engaging Bonanza Portfolio Limited as a Portfolio Manager.
- c) The document provides the necessary information about Bonanza Portfolio Limited required by a prospective investor before investing. The investors should carefully read the entire disclosure document prior to making a decision to avail all the Portfolio Management Service and the investor should retain the Disclosure Document for future reference.
- d) All the intermediaries involved with Portfolio Managers are registered with SEBI as on date of the document.
- e) The name, phone number, e-mail address of the principal officer as designated by the Portfolio Manager along with the address of the Portfolio Manager is as follows:

<b>PRINCIPAL OFFICER</b>	<b>PORTFOLIO MANAGER</b>
<b>Name: Mr. Achin Goel</b>	<b>Bonanza Portfolio Limited, (INP000000985)</b>
<b>Tel: 022- 68363531</b>	<b>Address:</b> “Bonanza House: Plot No. M-2, Cama Industrial Estate, Walbhat Road, Behind “The Hub”, Goregaon (E), Mumbai - 400 063
<b>Email: achin@bonanzaonline.com</b>	<b>Email: <a href="mailto:pmscustomercare@bonanzaonline.com">pmscustomercare@bonanzaonline.com</a></b>
	<b>Website: <a href="http://www.bonanzawealth.com">www.bonanzawealth.com</a></b>

# Bonanza Portfolio Ltd.

Portfolio Management Services (Disclosure Document)

## 1. DISCLAIMER

The Disclosure Document has been prepared in accordance with the SEBI (Portfolio Managers) Regulations, 2020 as amended till date and filed with SEBI. This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of the Document.

## 2. DEFINITIONS

<b>Act</b>	means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
<b>Agreement</b>	means Portfolio Management Services Agreement entered between the Portfolio Manager and the Client/ investor, as amended, modified, supplemented or restated from time to time together with all annexure, schedules and exhibits, if any.
<b>Accreditation Agency</b>	means a subsidiary of a recognized stock exchange or a subsidiary of a depository or any other entity as may be specified by the Board from time to time.
<b>Accredited Investor</b>	means any person who has been granted a certificate by the accreditation agency who <ol style="list-style-type: none"><li>1. in case of an individual, HUF, family trust or sole proprietorship<ol style="list-style-type: none"><li>i. annual income of at least two crore rupees; or</li><li>ii. net worth of at least seven crore fifty lakh rupees, out of which not less than three crores seventy-five lakh rupees is in the form of financial assets; or</li><li>iii. annual income of at least one crore rupees and minimum net worth of five crore rupees, out of which not less than two crore fifty lakh rupees is in the form of financial assets.</li></ol></li></ol>
	1. in case of a body corporate, has net worth of at least fifty crore rupees;
	2. in case of a trust other than family trust, has net worth of at least fifty crore rupees;
	3. in case of a partnership firm set up under the Indian Partnership Act, 1932, each partner independently meets the eligibility criteria for accreditation: Provided that the Central Government and the State Governments, developmental agencies set up under the aegis of the Central Government or the State Governments, funds set up by the Central Government or the State Governments, qualified institutional buyers as defined under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category I foreign portfolio investors, sovereign wealth funds and multilateral agencies and any other entity as may be specified by the Board from time to time, shall deemed to be an accredited investor and may not be required to obtain a certificate of accreditation.

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<b>Large Value Accredited Investor</b>	means an accredited investor who has entered into an agreement with the portfolio manager for a minimum investment amount of ten crore rupees.
<b>Board</b>	means the Securities and Exchange Board of India established under sub-section (1) of Section 3 of the Securities and Exchange Board of India Act, 1992.
<b>Client(s)/ Investor(s)</b>	means any person / entity that enter into an agreement/ arrangement for availing the Portfolio Management Services with the Portfolio Manager by executing the Agreement.
<b>Custodian</b>	means one or more custodian appointed by the Portfolio Manager, from time to time, for maintaining custody of funds and/or Securities of the Client in compliance of the provisions of SEBI (Portfolio Managers) Regulations, 2020.
<b>Depository Account or DP Account</b>	means one or more Demat accounts opened, maintained, and operated by the Portfolio Manager in the name of the Client to keep the securities of all clients before they are transferred to individual client DP accounts.
<b>Related Party</b>	in relation to Portfolio Manager shall mean
	1. a director, partner or his relative;
	2. a key managerial personnel or his relative;
	3. a firm, in which a director, partner, manager or his relative is a partner;
	4. a private company in which a director, partner or manager or his relative is a member or director;
	5. a public company in which a director, partner or manager is a director or holds along with his relatives, more than 2 (Two) percent of its paid-up share capital
	6. anybody corporate whose board of directors, managing director or manager is accustomed to act in accordance with the advice, directions or instructions of a director, partner or manager
	7. any person on whose advice, directions or instructions a director, partner or manager is accustomed to act: Provided that nothing in sub-clauses (vi) and (vii) shall apply to the advice, directions or instructions given in a professional capacity;
	8. any body corporate which is - i. a holding, subsidiary or an Associate company of the Portfolio Manager; OR ii. a subsidiary of a holding company to which the Portfolio Manager is also a subsidiary iii. an Investing company or the Venturer of the Portfolio Manager;
	9. a related party as defined under applicable accounting standards
10. such other person as may be specified by SEBI from time to time: Provided that, a. any person or entity forming a part of the promoter or promoter group of the listed entity; or	

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## Portfolio Management Services (Disclosure Document)

	<p>b. any person or any entity, holding equity shares:</p> <ul style="list-style-type: none"><li>i. of twenty percent or more;</li><li>ii. of ten percent or more, with effect from April 1, 2023;</li></ul>
<b>Discretionary Portfolio Management Services</b>	means the portfolio management services rendered to the Client, by the Portfolio Manager on the terms and conditions contained in the Agreement with respect to the Assets (including the Portfolio and Funds) of the Client, where the Portfolio Manager exercises its sole and absolute discretion with respect to investments or management of the Assets of the Client, entirely at the Client's risk, in such manner as the Portfolio Manager may deem fit.
<b>Non-discretionary Portfolio Management Services</b>	means a portfolio management services under which the Portfolio Manager, subject to express prior instructions issued by the Client from time to time in writing or verbal mode, 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.
<b>Disclosure Document</b>	means this document filed by the Portfolio Manager with SEBI as required under the Regulations and as may be amended by the Portfolio Manager from time to time.
<b>Financial Year</b>	means the year starting from April 1 and ending on March 31 of the following year.
<b>Investment Approach</b>	is a broad outlay of the type of securities and permissible instruments to be invested in by the Portfolio Manager for the Client, taking into account factors specific to Clients and securities and includes any of the current investment approach or such investment approach that may be introduced by the Portfolio Manager, from time to time
<b>Portfolio</b>	means the total holdings of funds/securities belonging to any person or investor
<b>Portfolio Manager</b>	shall have the same meaning as given in regulations of the SEBI (Portfolio Managers) Regulations, 2020 as amended from time to time.
<b>Regulations</b>	means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020, as may be amended from time to time and including any circulars/notifications issued pursuant thereto.
<b>Securities</b>	Security as defined in Section 2(h) of the Securities Contract (Regulation) Act, 1956, provided that securities shall not include any securities which the Portfolio Manager is prohibited from investing in or advising on under the Regulations or any other applicable law.

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.

**3. DESCRIPTION****I. History, Present Business and Background of the Portfolio Manager**

Bonanza Portfolio Limited is one of the fastest-growing companies in the financial services space in India with a trust of more than 2.5 decades. Since its inception in 1994, Bonanza has been helping millions of investors to navigate their investing journey with ease. Bonanza offers a one-stop solution for all investing needs ranging from equity, mutual funds, and insurance and depository services. With over 1700 outlets and service in over 500 cities across India, Bonanza has a widespread presence which is increasing every year

Bonanza Portfolio Ltd. along with its subsidiary companies has membership of-

- National Stock Exchange of India Ltd.
- Bombay Stock Exchange Ltd.
- Metropolitan Stock Exchange Ltd.
- National Commodity & Derivatives Exchange Ltd. (NCDEX)
- Multi Commodity Exchange (MCX)

Depository Participant

- National Securities Depository Ltd. (NSDL)
- Central Depository Services Ltd (CDSL)

**II. Promoters of the Portfolio Manager, Directors and their background**

Director's Name	Background
Mr. Shiv Kumar Goel	Chief Promoter of the Bonanza group. Mr. Goel is a Chartered Accountant by profession and also a qualified Company Secretary. He has more than 30 years experience in managing finance and business. Prior to venturing into business he was Chief Executive of SRF Finance Ltd., Delhi. He has been a pioneer in innovating technological advancement and its implementation methodologies.
Mr. Satya Prakash Goel	Director and a qualified Chartered Accountant by profession, operating from the country's financial capital, Mumbai, is credited of having represented on the Board of Directors of OTC Exchange of India (OTCEI). Mr. Goel has also represented various prestigious committees like SEBI constituted Dr. J. R. Verma Committee for Development Derivatives in India, Executive Committee of NSCCL for Development of Derivatives, the Committees on Settlement Issues (COSI), a policy making body at the National Stock Exchange of India Ltd and Dispute resolution Committee (DRC), of NSCCL & the Divestment and Privatization Committee of the Indian Merchant's Chamber (IMC).



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Mr. Vishnu Kumar Aggarwal	Also, promoter director of the group, is a real estate developer & consultant by profession. He has been credited of setting up various trading and investment channels in the field of Commodity futures trading for Indian residents and Investors.
Mr. Surendra Kumar Goel	A qualified Chartered Accountant with experience of more than 27 yrs. And in past has worked with leading industrial houses like Modis & Oswals. He is one of the founders of the group. Based in Delhi, looks after the group's operations in North India.

### III Group company information (i.e. information related to top 10 Group Companies / firms of the Portfolio Manager on turnover basis)

1. Bonanza Commodity Brokers Pvt. Ltd, (Member: MCX, NCDEX)
2. Sunglow Fin invest Private Limited
3. Bonanza Build Tech Private Ltd.
4. Bonanza Medical Tourism Private. Ltd.
5. Bonanza Portfolio (IFSC) Private Limited
6. Bonanza Bullion Pvt Ltd.
7. Endura soft solution private Limited

### IV Details of the services being offered: Discretionary/Nondiscretionary/Advisory

Bonanza Portfolio Limited provides portfolio management services to the investors directly without any intermediation of any persons engaged in distribution services. It may appoint distributor / intermediaries for the purpose of distribution of its PMS products in which case also investors will have the option to be on-boarded directly without any intermediation. Further, Bonanza Portfolio Limited as a portfolio manager has appointed Orbis Financial Corporation and ICICI Bank as a Custodian for securities/funds managed and administered by it. Further, with respect to decision relating to investment in securities under the portfolio is taken by fund managers.

#### 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 managers' decision (taken in good faith) in deployment of the Clients' account is absolute and final and cannot be called in question or be open to review at time during the currency of the agreement or any time thereafter except on the ground of malafide, 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. Periodical statements in respect to Client's Portfolio shall be sent to the respective Client.

**Non-Discretionary Services:**

Under the Non-Discretionary Portfolio Management Services, the portfolio of the Client shall be managed in consultation with the Client. Under this service, the Assets will be managed as per express prior instructions issued by the Client from time to time. The Client will have complete discretion to decide on the investment (Stock Quantity and Price or amount). Under this service, 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.

**V) Material Changes after the last Disclosure Documents filed**

- a) Introduced BONANZA PULSE - SECTOR FUND, BONANZA PRUDENTIA & BONANZA OPTIMA FUND

**4. PENALTIES, PENDING LITIGATION OR PROCEEDINGS ETC.**

As per enclosed - Annexure I.

**5. SERVICES OFFERED****1) Discretionary Services:**

- a) Under the Discretionary Portfolio Management Services, the Portfolio Manager shall deploy Assets brought in by a Client by investing or divesting suitably in the capital markets as per the Act and Regulations. The Portfolio Manager shall be acting in a fiduciary capacity, as a trustee, with regard to the Client's account consisting of investments, accruals, benefits, allotments, calls, refunds, returns, privileges, entitlements, substitutions and / or replacements or any other beneficial interest including dividend, interest, rights, bonus as well as residual cash balances, if any (represented both by quantity and in monetary value). Discretionary Portfolio Management Services shall be in the nature of investment management, and may include the responsibility of managing, renewing and reshuffling the portfolio, buying and selling the securities, keeping safe custody of the securities and monitoring book closures, dividend, bonus, rights etc. so that all benefits accrue to the Client's Portfolio, for an agreed fee structure and for a definite period as described, entirely at the Client's risk.
- b) The Portfolio Manager shall have the sole and absolute discretion to invest on behalf of the client in any type of security as per executed Agreement and make such

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## Portfolio Management Services (Disclosure Document)

changes in the investments and invest some or all of the Funds in such manner and in such markets as it deems fit. The Portfolio Manager's decision (taken in good faith) in deployment of the Clients' account is absolute and final and cannot be called in question or be open to review at any time during the tenure of the Agreement or any time thereafter except on the ground of malafide, fraud, conflict of interest or gross negligence.

- c) This right of the Portfolio Manager shall be exercised strictly in accordance with the relevant acts, rules and regulations, guidelines and notifications in force from time to time.
- d) M/s. Bonanza Portfolio Limited. (Portfolio Manager) has appointed M/s. Badjate Stock & Shares Private Limited and Bonanza Portfolio Limited as its executing broker and Orbis Financial Corporation and ICICI Bank as Custodian.
- e) **INVESTMENT APPROACHES / STARTEGIES OFFERED:**

### Bonanza Growth

#### Investment Approach:

Bonanza Growth aims to provide growth-oriented approach to portfolio by cherry picking securities we believe have high potential based on both fundamental and technical research. Bonanza Growth investment philosophy is highly disciplined and follows well defined set of rules that focus on conserving and building wealth consistently across market cycles.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Up to 100% asset allocation in listed equities</li><li>➤ Diversified Portfolio.</li><li>➤ Portfolio balancing with Derivatives.</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

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Portfolio Management Services (Disclosure Document)

## Bonanza Value

### Investment Approach:

Bonanza Value aims to provide long term capital appreciation primarily by selecting and investing in securities perceived to be deeply undervalued with strong fundamentals and growth prospect. In this investment mandate, we pick an idea which would be next multi-bagger and where company's product/service have potential to command niche in its segment.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Up to 100% asset allocation in listed equities</li><li>➤ Diversified portfolio.</li><li>➤ Large cap/ Midcap / Small cap bias</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

## Bonanza Edge

### Investment Approach:

This strategy aims to generate long term capital gains by investing primarily in mid and small cap stocks. Investment strategy focuses on stocks having superior earning growth potential or offers special opportunity in near term.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Up to 100% in equities</li><li>➤ Not more than 10% in particular stock and 25% in particular sector</li><li>➤ Diversified Portfolio.</li><li>➤ Timely profit booking and stop-loss policy</li></ul>

## Bonanza Portfolio Ltd.

Portfolio Management Services (Disclosure Document)

Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

### **Bonanza Multicap**

#### **Investment Approach:**

Bonanza Multicap aims to invest into companies targeting long term appreciation with GARP approach. The focus is to seek out securities with growth prospects that are quoting at reasonable valuations. The fund will follow a mix of top-down and Bottom up approach.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Upto 70% - Large Cap</li><li>➤ Upto 70% - Mid Cap</li><li>➤ Upto 70% - Small Cap</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

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## Bonanza Aegis

### Investment Approach:

Bonanza Aegis aims to identify and invest in business ideas having strong potential to outperform the market and its peers in near future by virtue of its inherent fundamental and technical strength. This strategy has been curated keeping risk management at the forefront. Strategy has been structured to benefit from tactical and momentum picks along with Value picks through use of proprietary tools

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Upto 70% - Large Cap</li><li>➤ Upto 70% - Mid Cap</li><li>➤ Upto 70% - Small Cap</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

## Bonanza Prima Fund - Aggressive

### Investment Approach:

The primary objective of Bonanza Prima is to blend investments across different asset classes by investing primarily in mutual funds, direct stocks and other securities having growth potential.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Equity stocks up to 50%</li><li>➤ Equity oriented mutual funds up to 100%</li><li>➤ Debt oriented mutual funds up to 20%</li><li>➤ Other mutual funds up to 30%</li></ul>
Horizon	5 years (Tenure)
Risk	High

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Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

## **Bonanza Prima Fund - Moderate**

### **Investment Approach:**

The primary objective of Bonanza Prima is to blend investments across different asset classes by investing primarily in mutual funds, direct stocks and other securities having growth potential.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Equity stocks up to 30%</li><li>➤ Equity oriented mutual funds up to 90%</li><li>➤ Debt oriented mutual funds up to 30%</li><li>➤ Other mutual funds up to 30%</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

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## Bonanza Prima Fund - Conservative

### Investment Approach:

The primary objective of Bonanza Prima is to blend investments across different asset classes by investing primarily in mutual funds, direct stocks and other securities having growth potential.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Equity stocks up to 20%</li><li>➤ Equity oriented mutual funds up to 70%</li><li>➤ Debt oriented mutual funds up to 50%</li><li>➤ Other mutual funds up to 50%</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

## Bonanza Optima Fund

### Investment Approach:

The investment objective of the Strategy is to generate income and capital appreciation from a portfolio primarily investing in mutual funds to achieve optimal portfolio construction.

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Equity oriented mutual funds up to 100%</li><li>➤ Debt oriented mutual funds up to 50%</li><li>➤ Other mutual funds up to 50%</li><li>➤ Cash and Cash equivalents up to 50%</li></ul>
Horizon	5 years (Tenure)
Risk	High



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Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

## **Bonanza Pulse - Sector fund**

### **Investment Approach:**

The primary investment objective of the Sector Fund is to generate alpha returns by actively rotating investments across various sectors and industries, with a focus on identifying emerging trends and opportunities. This is sector or mcap agnostic strategy aimed to capitalize short term opportunities existing in sectors

Investment Strategy	Listed Equity
Benchmark	Nifty 50 TRI
Indicative Assets Allocation	<ul style="list-style-type: none"><li>➤ Upto 100% Equities</li><li>➤ Max. upto 20% in a stock</li><li>➤ Upto 50% in a particular sector</li></ul>
Horizon	5 years (Tenure)
Risk	High
Basis of selection of such types of securities as part of the investment approach	Selecting securities is a multifaceted process that requires a careful balance of quantitative and qualitative analyses, aligned with the strategy objectives and market conditions. Regular reviews and adjustments to the portfolio can help optimize performance and manage risk effectively.
Appropriate benchmark to compare performance and basis for choice of benchmark	The NIFTY 50 TRI is an appropriate benchmark as it represents the largest and most liquid companies in India's equity market. This aligns with our portfolio's exposure to equities, making it a relevant and widely recognized standard for performance comparison.

**Bonanza Prudentia****Investment Approach:**

The primary goal of Bonanza Prudentia strategy envisages to invest primarily across equity and debt asset class through mutual funds. By maintaining higher exposure to debt asset class, the strategy seeks capital appreciation while adjusting to market fluctuations, helping to minimize volatility and capitalize on broader economic growth opportunities.

Investment Strategy	Hybrid (multi assets - Investment in Mutual Funds)
Benchmark	Nifty 50 Hybrid Composite Debt 50:50 Index
Indicative Assets Allocation	Upto 90% Debt Mutual Funds and Upto 40% Equity Mutual Funds
Horizon	5 years (Tenure)
Risk	Medium to Low

**2) Non – Discretionary Services**

The main features under Non-Discretionary Portfolio Management Services are:

- Any Strategy/ product under Non-Discretionary Portfolio Management Services shall invest in listed securities subject to regulations
- Minimum Portfolio Size: Rs.50 Lakhs or any amount not less than the statutory minimum as may be specified by the SEBI from time to time.
- Non-binding advice from Portfolio Manager.
- Investment in unlisted securities, if any, will not exceed 25% of the assets under management.

**Bonanza SPOP Strategy****Investment Objective:**

To invest in the companies which appear to be turnaround stories or a valuation unlocking by virtue of some corporate action thereby presenting attractive growth opportunities. The fund will follow a mix of a top-down and bottom-up approach.

**6. DIRECT ON-BOARDING - PORTFOLIO MANAGEMENT SERVICES**

As per SEBI Circular dated February 13, 2020 on Guidelines for Portfolio Managers, clients have an option to be on-boarded directly by the Portfolio Manager without intermediation of persons engaged in distribution services. For more details, please refer our website: [www.bonanzawealth.com](http://www.bonanzawealth.com) or email us at [support@bonanzawealth.com](mailto:support@bonanzawealth.com) or call us on +91 022 68363531.

## 7. RISK FACTORS

### a) General Risk Factors applicable to investments:

- Securities investments are subject to market risks and there is no assurance or guarantee that the objective of investments will be achieved.
- Past performance of the portfolio manager does not indicate its future performance.
- Investors are not being offered any guaranteed or assured return/s i.e. either of Principal or appreciation on the portfolio.
- Investors may note that Portfolio Manager's investment decisions may not be always profitable, as actual market movements may be at variance with anticipated trends.
- We strongly believe that the behavior of an investor impacts the returns more than anything else as people tend to take wrong decisions at both extremes – optimism and pessimism
- History suggests that the probability of Capital loss is as high as 50% if a client's time horizon is one year or less. Hence, clients should NOT invest with us if their time horizon is lesser than 5 years.
- According to us volatility is a part of long-term investing and anyone who can't see markdowns of 25% on the portfolio is not suited for investing in equities
- Risk arising from the investment approach, investment objective, investment strategy and asset allocation
- The PMS is subject to risk arising out of non-diversification at times, portfolios of individual Clients may be concentrated in certain companies / industries. The performance of the portfolios would depend on the performance of such companies / industries / sectors of the economy.
- Cyber Security Risk: The Portfolio and its service providers are susceptible to operational and information security and related risks of cyber security incidents. In general, cyber incidents can result from deliberate attacks or unintentional events. Cyber security attacks include, but are not limited to, gaining unauthorized access to digital systems (e.g., through hacking or malicious software coding) for purposes of misappropriating assets or sensitive information, corrupting data or causing operational disruption. Cyber attacks also may be carried out in a manner that does not require gaining unauthorized access, such as causing denial of service attacks on websites (i.e., efforts to make services unavailable to intended users). Cyber security incidents affecting the Portfolio Manager, Registrar and Transfer Agents, Custodian or other service providers such as financial intermediaries have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, including by interference with a Portfolio's ability to calculate its Net Asset Value; impediments to trading for a Portfolio's investment; violations of applicable privacy, data security or other laws; regulatory fines and penalties; reputational damage;

reimbursement or other compensation or remediation costs; legal fees; or additional compliance costs. Similar adverse consequences could result from cyber security incidents affecting issuers of securities in which a Portfolio invests, counterparties with which a Portfolio engages in transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies and other financial

**b) Risks related to Equity and Equity Linked Investments:**

- The liquidity of the portfolio investment is inherently restricted by trading volumes in the Securities in which it invests.
- The valuation of the Portfolio's investments, may be affected generally by factors affecting securities markets, such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in policies of the Government, taxation laws or any other appropriate authority policies and other political and economic developments which may have an adverse bearing on individual securities, a specific sector or all sectors including equity and debt markets. There will be no prior intimation or prior indication given to the Clients when the composition/ asset allocation pattern changes.

**c) Risks related to investments in debt and debt related instruments:**

- Interest Rate Risk: As with all debt securities, changes in interest rates may affect valuation of the Portfolios, as the prices of securities generally increase as interest rates decline and generally decrease as interest rates rise. Prices of long-term securities generally fluctuate more in response to interest rate changes than prices of short-term securities. Indian debt markets can be volatile leading to the possibility of price movements up or down in fixed income securities and thereby to possible movements in the valuations of Portfolios.
- Liquidity or Marketability Risk: This refers to the ease with which a 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. Liquidity risk is today characteristic of the Indian fixed income market.
- Credit Risk: Credit risk or default risk refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). 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 as

any actual event of default. The greater the credit risk, the greater the yield required for someone to be compensated for the increased risk.

- **Reinvestment 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.
- The Portfolio Manager may, considering the overall level of risk of the portfolio, invest in lower rated/ unrated securities offering higher yields. This may increase the risk of the portfolio. Such investments shall be subject to the scope of investments as laid down in the Agreement.

### **D. Risks related to investments in derivatives instruments:**

- 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 mispricing 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.

### **8. CONFLICTS OF INTEREST**

The portfolio manager, its employees may purchase/ sell securities in ordinary course of business and in that manner, there may arise conflict of interest with

# Bonanza Portfolio Ltd.

## Portfolio Management Services (Disclosure Document)

transactions in any of the client's portfolio. Such conflict of interest shall be dealt with in accordance of the Conflict of Interest Policy of the Company.

The Portfolio Manager may utilize the services of the Group Companies and / or any associate company established or to be established at a later date, in case such a company is in a position to provide requisite services to the Portfolio Manager. The group and associate companies of the Portfolio Manager are engaged in providing various financial services and in connection with the investments made or advised by the Portfolio manager, the said group companies may receive fees or remuneration in the form of arranger fees, distribution fee, depository fee, referral fee, management fee, trustee fee, commission, brokerage, transaction charges, underwriting charges and other fees. The Portfolio Manager will conduct its business with the aforesaid companies (including their employees or relatives) on commercial terms and on arm's length basis and at mutually agreed terms and conditions and to the extent permitted under SEBI Regulations after evaluation of the competitiveness of the pricing offered and the services to be provided by them.

The Portfolio Manager has adopted certain policies and procedures intended to protect the interest of investors in the Portfolio against any adverse consequences arising from potential conflicts of interest. The protection of the investors' interests is Portfolio Manager's priority

### 9. CLIENT REPRESENTATION

Category of clients	No. of Clients	Funds Managed (Rs. Cr)	Discretionary / Non Discretionary/ Advisory (if available)
Associates /Group Companies Last 3 years	Nil	Nil	Nil
<b>Others</b>			
As on 31 <sup>st</sup> March 2024	146	107.97	Discretionary
As on 31 <sup>st</sup> March 2023	119	48.54	
As on 31 <sup>st</sup> March 2022	111	50.54	
As on 31 <sup>st</sup> March 2021	128	42.077	
As on 31 <sup>st</sup> March 2020	177	34.953	
As on 31 <sup>st</sup> March 2019	324	72.929	
As on 31 <sup>st</sup> March 2018	385	99.66	
As on 31 <sup>st</sup> March, 2017	221	81.31	
As on 31 <sup>st</sup> March, 2016	158	50.31	
As on 31 <sup>st</sup> March 2024	51	56.03	Non - Discretionary
As on 31 <sup>st</sup> March 2023	5	3.07	

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## Related Parties Disclosure:

\*Details of the Subsidiary Company, Key Management Personal and Relatives of Key Management Personal, Enterprise in which the Key Management Personnel exercise significant influence is available with the management.

Mrs. Megha Goel, Mr. Ankit Goel & Mrs. Alka Goel are relative's of Mr. Achin Goel and they have invested in various Portfolio Management Services strategies of Bonanza Portfolio Ltd.

## 10. THE FINANCIAL PERFORMANCE OF THE PORTFOLIO MANAGER

(Rupees in Lacs)

Year ending	31/03/2021 (Audited)	31/03/2022 (Audited)	31/03/2023 (Audited)	31/03/2024 (Audited)
Income	12446.17	14828.45	11331.44	16243.89
Expenditure	10973.26	13178.53	10606.68	14407.88
Exceptional Items	-	-	-	-
Net Profit Before Tax	1472.91	1649.92	724.76	1836.01
Prov. for Taxation	255.27	420.93	195.79	453.19
Profit After Taxation	1217.64	1228.99	528.91	1382.82

## 11. PERFORMANCE OF THE PORTFOLIO MANAGER FOR THE LAST 3 YEARS

Strategy wise Performance		2023-2024	2022-2023	2021-2022
Portfolio Performance (%), Net of all fees and charges levied by the Portfolio Manager	Bonanza Growth	36.59	-2.10	20.51
	Bonanza Value	85.01	-11.24	22.57
	Bonanza Edge	72.00	-0.68	59.15
	Bonanza Multi cap	77.75	-8.088	49.88
	Bonanza Aegis	61.71	4.02	-
	Bonanza SPOP (*)	50.91	-4.34	-
Benchmark	Nifty 50 TRI	30.08	0.58	18.83

Note: Returns calculated on Time weighted average return (TWRR) basis as per SEBI guidelines.

(\*) indicates Non-Discretionary PMS Strategy. Inception date of Bonanza Aegis is 11-May-2022.

Inception date of Bonanza SPOP (\*) is 21-Dec-2022

## 12. NATURE OF EXPENSES

The client agrees to pay to the Portfolio Manager, Portfolio Management Fee in the form of a Fixed Fee or a Performance Based Fee or a combination of both at the rates and in

the manner provided in Fees Schedule forming part of the PMS agreement and as revised and mutually agreed to by both the Parties from time to time.

- a) Management Fee: The Portfolio Management Fee may be Fixed Fee as provided in the Schedule which shall be independent of the returns accrued to the Client on the performance of the Discretionary Portfolio Management/Non-discretionary services/advisory Services by the Portfolio Manager.
- b) Performance Fee: The Portfolio Manager is also permitted to charge Portfolio Management Fees on the basis of the return or a share of the return on the Portfolio / Assets generated by the Portfolio Manager rendering Discretionary Portfolio Management Services.
- c) Exit Load: The Client agrees to pay to the Portfolio Manager, exit load on the inflow/ withdrawal of assets, as may be decided by the Portfolio Manager from time to time. Charging of exit load shall be at the sole discretion of the Portfolio Manager.
- d) The Client agrees that the fee payable (as per the Fees Schedule) to the Portfolio Manager shall be billed and set-off against the Accounts on a Monthly / Quarterly/Half Yearly/ Yearly basis or any other manner as may be mutually agreed and the same will be incorporated in the periodic Reports sent to the Client by the Portfolio Manager.
- e) Brokerage and transaction cost shall be payable to the broker as per the agreement **(M/s Badjate Stock and Share Private Limited & Bonanza Portfolio Limited-appointed as broker)**. All other incidental charges including Custody charges shall be payable to the Custodian. **(Orbis Financial Corporation and ICICI Bank)**.
- f) Notwithstanding anything contained in the fee schedules mutually agreed to between the Parties, all costs, fees, charges and expenses of whatsoever nature including but not limited to the Depository charges incurred by the Portfolio Manager on behalf of the Client, shall be paid/reimbursed by the Client.
- g) The Parties agree that all functions in relation to the Discretionary Portfolio Management/Non-discretionary services/advisory Services or otherwise pursuant to this Agreement shall be performed by the Portfolio Manager or its delegates, including inter alia custodian, advisors, brokers, for and on behalf of, and at the risk and cost of the Client and all liabilities concerning the Assets or the Discretionary Portfolio Management Services shall be to the account of the Client. In addition to the Portfolio Management Fee, all costs, fees, charges and expenses of whatsoever nature incurred by the Portfolio Manager or any other person appointed by the Portfolio Manager arising out of or in connection with or in relation to the management, acquisition, holding, custody, sale and/or transfer, of the Assets or the rendering of the Discretionary Portfolio Management Services or the performance of any act pursuant to or in connection with this Agreement including, without limitation to the generality of the aforesaid, the expenses and cost of safe keeping of Assets, charges of any Depository Participant, advisor, custodian, Registration and Transfer, Research, charges in respect of securities, audit and attestation fees including legal fees incurred on behalf of the client, brokerage and stamp duty, costs to be paid for the execution of this agreement all other incidental and ancillary



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documentation pursuant to this agreement, shall be paid or reimbursed by the Client.

- h) The Portfolio Manager shall have a right to appropriate the amounts payable to it under this Clause or under any other provision of this Agreement from the Assets of the Client and the Portfolio Manager may for this purpose sell or otherwise liquidate the Portfolio or any part thereof. The Portfolio Manager shall have a right of lien and set off on the Assets for such amounts and any right of the Client to withdraw the Assets or any part thereof shall be subject to the Portfolio Manager having first received all such amounts.

### Illustration for Annexure on Fees and Charges (Discretionary PMS)

This computation is for illustrative purpose only. Portfolio Managers may suitably modify this to reflect their fees and charges.

The assumptions for the illustration are as follows:

- Size of sample portfolio: Rs.50 Lac and above.
- Performance fees Period: charged Half yearly (6 Months)
- Hurdle Rate: 8% p. a. of net amount invested (charged half yearly).i.e. 4% every half yearly
- Management fee 1% p.a. (charged @ 0.25% per quarter calculated on daily weighted average basis)
- Performance fee 15% (charged on AUM above hurdle rate on half yearly basis)

Illustration - Fees calculation	At the end of 1st Half year (in Rs.)		
	Gain of 10%	Loss of 10%	No Change
Initial Capital Contribution	50,00,000	50,00,000	50,00,000
Profit/ Loss at the end of 1st Half year	5,00,000	-5,00,000	-
Gross value of portfolio at the end of 1st half year	55,00,000	45,00,000	50,00,000
Fixed management fees @ 0.50% at the end of 1st half year (0.25% for 2 quarters)	-27,500	-22,500	-25,000
Performance fees @ 15% per annum after considering hurdle rate*	-45,000	-	-
Net portfolio value at the end of 1st half year	54,27,500	44,88,750	49,87,500
<b>% change over capital contributed</b>	<b>8.55%</b>	<b>-10.23%</b>	<b>-0.25%</b>

	Calculation of Performance fees*	Amount in Rupees
A	Profit at the end of half year	5,00,000
B	Less: Minimum Profit level (Hurdle rate @4% on half yearly basis on NAV as per high watermark concept)	2,00,000
C	Amount on which profit-sharing fees to be calculated	3,00,000
D	Performance fees @ 15% of C	45,000

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*#This illustration is based on management fee and performance fees being calculated on **half yearly basis**.*

**Note:** Performance fees will be charged on PRO-RATA basis. Performance fees will be charged after the Fixed Management fees. Performance fees will be charged on High Watermark basis as per SEBI guidelines. Fixed Fees and/or Performance fees will be charged based on Portfolio Management Services agreement.

### **Illustration for Annexure on Fees and Charges (Non - Discretionary PMS)**

This computation is for illustrative purpose only. Portfolio Managers may suitably modify this to reflect their fees and charges.

The assumptions for the illustration are as follows:

- a. Size of sample portfolio: Rs.50 Lac and above.
- b. Period: 1 quarter (3 Months).
- c. Hurdle Rate: NIL
- d. Management fee: 1.50% p.a. (charged @ 0.375% per quarter)
- e. Performance fee: NIL

<b>Illustration - Fees calculation</b>	<b>Quarter 1</b>	<b>Quarter 2</b>	<b>Quarter 3</b>	<b>Quarter 4</b>
Initial Capital Contribution	50,00,000	5,479,100	5,757,139	5,237,162
Profit/ Loss during the quarter	5,00,000	300,000	(500,000)	150,000
Gross value of portfolio at quarter end	5,500,000	5,779,100	5,257,139	5,387,162
Management fees @ 0.375% per quarter	20,625	21,672	19,714	20,202
Net portfolio value at the end of quarter	<b>5,479,375</b>	<b>5,757,428</b>	<b>5,237,425</b>	<b>5,366,960</b>

*#This illustration is based on management fee being calculated on **calendar quarter end**.*

### **13. TAXATION**

Clients will be responsible and liable for taxes under the provisions of the Income Tax Act, 1961 for any income generated out of the investment made in the portfolio management scheme. Bonanza Portfolio Limited will not deduct any tax on the capital gains or dividend or interest or any other income generated out of the investment made/to be made in the portfolio management scheme. However, the investee company/fund/trust/bank may deduct tax at source on income generated out of the investment made/to be made in the portfolio management scheme. Bonanza Portfolio Limited shall provide adequate statements to the clients for accounting & taxation purpose.

# **Bonanza Portfolio Ltd.**

## **Portfolio Management Services (Disclosure Document)**

In view of the individual nature of tax benefits, each prospective client/investor is advised to consult his or her own tax consultant with respect to the specific tax implications arising out of their availing Portfolio management services, in terms of the provisions of the Income-tax Act, 1961. The Portfolio Manager shall not be responsible for fulfillment of the client's tax obligations. The provisions of the Income Tax Act, 1961 shall apply to the Client and the Portfolio Manager in respect of their individual income.

In case, the investments are made by non-resident Indians, then such Beneficiaries are entitled to be governed by the special tax provisions under Chapter XII-A of the ITA and If such Beneficiaries opt to be governed by these provisions, the same needs to be evaluated separately on a case-to-case basis.

### **14. ACCOUNTING POLICIES**

Profit or Loss on sale of investment will be calculated by using the FIFO method. Bonanza Portfolio Limited will comply with the accounting standards issued to the extent applicable to us by the Institute of Chartered Accountants of India. Revenue arising from interest and dividend are accounted in accordance with Accounting Standard-9 on 22 Revenue Recognition. Investments will be accounted in accordance with the Accounting Standard-13 on accounting for investments.

### **15. AUDIT**

There were no significant audit observations from the last three financial year respectively.

### **16. FIRM'S POLICY OF PREVENTION OF MONEY LAUNDERING**

The Prevention of Money Laundering Act, 2002 (PMLA) came into force with effect from 2<sup>nd</sup> July, 2005, forming the core of the legal framework to combat money laundering. As per the Provisions of the Act, Intermediaries, including portfolio managers, have certain obligations regarding verification of the identity of their clients, maintaining records and furnishing information to the Financial Intelligence Unit - India (FIU - IND). SEBI has vide various circulars issued directed all Intermediaries, including portfolio managers to formulate and implement policies and procedures for dealing with money laundering and adoption of 'Know Your Customer' (KYC) Policy. The client should ensure that the amount invested in the Portfolio Management Service is through legitimate sources only and does not involve and is not designed for the purpose of any contravention or evasion of any Act, Rules, Regulations, Notifications or Directions of the provisions of The Prevention of Money Laundering Act, 2002, The Prevention of Money Laundering Rules, 2005, Income Tax Act, Anti Money Laundering Guidelines, Anti-Corruption Act, SEBI Act and or any other applicable laws enacted by the Government of India from time to time.

Bonanza Portfolio Ltd. reserves all the rights to take all steps and actions, including recording clients' telephonic calls, and /or obtain and retain Documentation for establishing the identity of the client, proof of residence, source of funds, etc. in accordance with the applicable laws, form the client/custodian, as may be required to ensure appropriate

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identification / verification/ re-verification of the client, the sources of fund etc. under the KYC policy. If at any time Bonanza Portfolio Ltd. believes that the transaction is suspicious in nature within applicable laws, Bonanza Portfolio Ltd. shall have the absolute discretion to report the suspicious transaction to FIU – IND and/or to reject any application, freeze the account, compulsorily close the account of the client and the termination proceeds shall be paid to the client at NAV subject to payment of fees and expenses, if any, of the Portfolio Manager. Bonanza Portfolio Ltd. shall have no obligation to inform / advise the client or its agents / power of attorney holder of such reporting.

Bonanza Portfolio Ltd. and its directors, employees, agents and persons acting on its behalf shall not be responsible/liable for any loss to the client in any manner whatsoever due to reporting to the FIU-IND, the rejection of any application or freezing of the accounts or compulsory closure of a the account or termination of the agreement entered into between the client and Bonanza Portfolio Ltd., due to non-compliance by the client with the provisions of the laws, rules, regulations, KYC policy etc. and / or where Bonanza Portfolio Ltd. makes reporting to FIU – IND of suspicious transaction.

### 17. INVESTORS SERVICES

#### i) Investor Relation Officer:

<b>Name</b>	Mrs. Vinita Vinayak Mayekar
<b>Designation</b>	Sr. Manager - Operation
<b>Mailing Address</b>	Bonanza House, Plot No. M-2, Cama Industrial Estate, Walbhat Road, Behind The Hub, Goregaon (E), Mumbai - 400 063
<b>Telephone Number</b>	☎ D - 022 68363520   B - 022 68363766   Cell 9821944646
<b>Email ID</b>	<a href="mailto:pmscustomercare@bonanzaonline.com">pmscustomercare@bonanzaonline.com</a>

#### ii) Grievance redressal and dispute settlement mechanism.

The Portfolio Manager will endeavor 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: -

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

## Bonanza Portfolio Ltd.

### Portfolio Management Services (Disclosure Document)

Client can also login on SCORES (SEBI Grievances handling website) and register his/her complaints, if any, against the Portfolio Manager on [www.sebi.gov.in](http://www.sebi.gov.in)

After exhausting all aforementioned options for resolution, If the client is not satisfied with the outcome, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at <https://smartodr.in/login> subject to the provisions of the Arbitration and Conciliation Act, 1996, or any statutory modification or re-enactment thereof for the time being in force.

#### 18. Complaint Escalation Matrix:

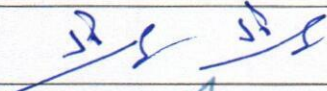

Complaint	Escalation	Time frame
The Client complaints over phone or email or in person.	Complaint Solved at operational level	Within 1-2 days
Complaint passed to investor Relation Officer	Complaint Solved at investor Relation Officer	Within a week
Complaint could not be resolved at investor Relation Officer level hence escalated to Compliance Officer	Complaint Solved at Compliance Officer level	15 working days
Complaint could not be resolved at Compliance Officer level hence escalated to Principal Officer	Complaint Solved at Principal Officer level	Within three weeks
If the complaints is not resolved at principal office level then it is put before the board for discussion	Complaint Solved by Board	Within one month

If still the complaints are not resolved by the board the client can file arbitration in respective Jurisdiction.



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Name and Signature of two Directors of the Portfolio Manager

Sr. No.	Name of Director	Signatures
1	Mr. Satya Prakash Goel	
2	Mr. Shiv Kumar Goel	

Place : Mumbai

Date : 27-09-2024

# Bonanza Portfolio Ltd.

Portfolio Management Services (Disclosure Document)

## FORM C

### SECURITIES AND EXCHANGE BOARD OF INDIA (PORTFOLIO MANAGERS) REGULATIONS, 2020

#### BONANZA PORTFOLIO LTD.

Dear Investor,

We confirm that:

- I. The Disclosure Document forwarded to SEBI is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
- II. The disclosures made in the document are true, fair and adequate to enable the investors to make a well-informed decision regarding entrusting the management of the portfolio to us / investment in the Portfolio Management Services;
- III. The Disclosure Document has been duly certified by an Independent Chartered Accountants, a copy of chartered Accountant certificate is enclosed

Bonanza Portfolio Ltd.



Achin Goel  
Principal Officer

Date: 27/9/2024

Place: MUMBAI

**ANNEXURE - I**

**SEBI Investigation-Scrip-Wise**

Sr.no.	Date/Period	Regulatory Authority	Reference no.	Deviation	Present status	Corrective Steps(in case of adverse observation)	Penalty levied
1	14/12/2009	SEBI (Member-NSE)	IVD/ID4/KVRR/JKA/10175/2004 dated 19/05/2004	Did not exercise due care and diligence in conduct of its Business as a Broker. Radaan Mediaworks India Pvt. Ltd.	As a Applicant, agreed to deposit Rs. 15,50,000/- as per consent order. Rs. 14,50,000/- as Legal Expenses and Rs. 75,000/- vide consent order.	Ensured due care and due diligence in conduct of its Business as a Broker.	15,50,000/-
2	24/12/2008	SEBI (Member-BSE, NSE & OTC)	IVD/ID2/PKN/ADP/32587/2005 Dated 2/02/2005	Did not exercise due Skill, Care and Diligence while dealing with Clients in Scrip of Shukun Consutrction Ltd.	Complied.	Ensured due care and due diligence in conduct of its Business as a Broker.	1,00,000/- each
3	20-08-2008	SEBI	IVD/ID-1/SRP/359/2004 dates 06/01/2004	INDULGED IN CREATION OF ARTIFICIAL VOLUME IN SCRIP OF SHREE YAAX PHARMA & COSMETICS LTD.	complied.	Vide its letter Ref no:IVD/ID1/PS/AH/35933/2008 dated August 25,2008 SEBI had conveyed their order wherein Bonanza was "advised to be careful in future " in the conduct of its affairs as a capital market intermediary. The same is being followed diligently.	Warning
4	28-06-2007	sebi (Member - NSE and OTC)	IVD/ID5/MSR/PB/3299/2004 dated 13/02/2004	DID NOT EXERCISE DUE SKILL, CARE AND DILIGENCE WHILE DEALING WITH CLIENTS IN SCRIP OF INFORMATION TECHNOLOGIES (INDIA) LTD.	complied.	Vide its Order dated June 28,2007 SEBI Member had dropped the instant proceedings against Bonanza and directed it to be careful and cautious in its dealings in Securities market. This has been noted and being followed.	Warning
5	17-04-2013	SEBI	WTM/RKA/ID-4/17/2013	Violation under Secton 12(3) of the Act read with regulations 27 and 28 of the Intermediaries Regulations in the matter of Shiv Raj Puri-Relationship Manager-Citibank Gurgaon & Others (April 2009 to December 2010)	complied.	As per the Award of SEBI dated April 17, 2013, it was stated that considering the facts and circumstances, the case is not considered fit for taking action under section 12(3) of the Act read with regulations 27 and 28 of the Intermediaries Regulations. Further, the show cause notice no. IVD/ID4/SKS/SL/20823/2012 dated September 17, 2012 is accordingly disposed of.	Show Cause notice disposed off by SEBI.



6	17-01-2008	SEBI	IVD/ID8/BM/NS/TCIL/113817/08 dated 15/01/2008	TCI Industries Ltd ( August 31,2004 toDecember 31,2004)	complied.	vide its letter ref no: IVD/ID8/BM/RA/TCIL/138313/08 dated September 18,2008 SEBI had advised us to be cautious in future to avoid recurrence of such instances which is noted and followed by us.	Advise
7	13-01-2009	SEBI	IVD/IDI/PS/AH/VIPUL/148723 dated 29/12/2008	Vipul limited ( May 21, 2008 to Ju	complied.	vide its letter ref no. IVD/ID1/PS/AH/166152/09 dated June 10, 2009 , SEBI had advised Bonanza to be careful to avoid recurrence of such instances . It is further advised to take corrective steps and improve systems and to keep Board informed of this matter. All necessary action as advised has been taken by us.	Advise
8	06-04-2008	SEBI	IVD/IDS/BM/DM/BSEL-MSSSL/119404/2008 dated 03/2008	BSEL Information Systems Ltd & - Maharashtra Seamless Ltd ( Dec 1,2003 to March 31,2004)	complied.	Vide its letter ref no : IVD/ID/6/BM/BSELMSL/141434/2008 dated October 17,2008 SEBI had advised to be more careful in future to avoid recurrence of circular / reversal trades which were noted by us and steps have been taken .All necessary action as advised has been taken by us to ensure non - recurrence of the same.	Advise
9	30-11-2004	SEBI	IVD/ID7/SD/3369/2004 dated 17/02/2004	Oriental Trade Ltd (August 30,2002 to October 28,2002)	complied.	Vide its letter no : IVD/ID7/SG/KM/131599/2008 dated July 11,2008 SEBI had advised the Company to be careful in future to avoid recurrence of dealing in illiquid scrips . No further such violations taken place .	Advise

### SEBI Inspection-Operational Areas

Sr.No.	Period	Authority	Area of Inspection	Deviations/Observations	Penalty	Status
1	2009-2010	SEBI	Inspection of Books and Recrods	SEBI vide its letter MIRSD1/BNS/OW/25923/2011 dated August 11, 2011 advised to be careful in future to improve compliance standard and advised to place, finding of the inspection, corrective steps taken before the Board. Accordingly, the same was placed before the Board.	advise	complied.

2	2011-2012	SEBI	PMLA Operations and other operational areas.	SEBI vide its letter SEBI/INSP/VP/28603/2012 dated December 20, 2012 advised to ensure strict compliance of the provisions of Act, Rules, Regulations, issued thereunder.	advise	complied.
3	May-13	SEBI	Investor Grievances	Notice have been issued under rule 4 (1) SEBI ( Procedure for holding Inquiry and imposing penalties by adjudicating officer) rules , 1995. We have replied to Notice vide letter dated April 10, 2015 denying their contentions of any violations under Regulation 6A(1)(e) of the SEBI (Stock Brokers & Sub Brokers) Regulation, 1992 or clause A (1), (2) and (5) of Schedule II read with Regulation 7 of the SEBI (Stock Brokers & Sub Brokers) Regulation, 1992 (hereinafter referred to as the "Broker Regulation")	Penalty of Rs. 2000000/- levied for non redressal of 54 complaints upon 30 days & for not having prudent investor greivances redressal maechanism despite warning vide order dated March 03, 2016	Appeal filed in Sat. Judgement received.
4	1st April 2014 till date of Inspection, Inspection conducted in December 2016	SEBI for DP (NSDL and CDSL)	Depository Operations	There are twelve Observations in the areas of Depository operations and Investor grievances, according to Administrative Warning received as on 4th April 2019. First Observation letter was received on 10th March 2017 which was replied vide our letter dated 25th May 2017.	-	Appropriate corrective steps have been taken in the areas and the same has been placed before the Board during the Board meeting conducted on 28th June 2019. Reply has been sent to SEBI along with copy of Board Resolution as on 19th July 2019.
5	April 2017 till date of Inspection, Inspection conducted in May, June and July 2018	SEBI with NSE and BSE	Overall Inpspection of Books and Recrods	There are twenty five Observations according to Observation letter received as on 11th January 2019 related to operational areas.	-	We have replied to the Observations vide our reply letter dated 25th February 2019. SEBI Order dated 25th September 2020 received, imposing Penalty of Rs.20 lacs and the same has been paid.

6	April 2020 to July 2021 conducted during September 2021 to December 2021	SEBI with NSE and BSE and DP	Overall Inspection of Books and Recrods	Number of Observations are ten in Equity and two in DP.	Inspection was concluded and thereafter we have received observation letter from SEBI dated 19th January 2022 which was replied by us vide our letter dated 21st February 2022 to the observations raised in the said letter. Thereafter we received Adjudication Order dated 12th August 2022 which was replied by us vide letter dated 7th November 2022. Subsequently, hearing through Video Conferencing was conducted on 10th November 2022 and post hearing submission was done throguh Email dated 17th November 2022.	Final Order dated 17th November 2022 received, imposing Penalty of Rs.10 lacs and the same has been paid.
7	April 2020 to March 2021	SEBI Inspection - Research Analyst	Overall Inspection of Research Operations	Number of observations are nine.	Inspection was concluded and thereafter we have received observation letter from SEBI dated 19th July 2022 which was replied by us vide our letter dated 19th August 2022 to the observations raised in the said letter. Thereafter we received Adjudication Order dated 24th July 2024 was received, imposing Penalty of Rs. 9 lacs.	The Penalty of Rs. 9 lacs was paid on 04/09/2024 via NEFT 409049934647.