

Disclosure Document Portfolio Management Services
(Updated as of 24th October 2024)

NEW BERRY CAPITALS PRIVATE LIMITED
SEBI Registration No: INP000005323



NEW BERRY CAPITALS PRIVATE LIMITED

A-602, Level 6, Marathon Next Gen Innova, Ganpatrao Kadam Marg, Lower Parel (West), Mumbai - 400 013

PORTFOLIO MANAGEMENT SERVICES DISCLOSURE DOCUMENT

1. The Disclosure Document (**the Document**) has been filed with the Securities and Exchange Board of India (**SEBI**) along with the certificate in the prescribed format in terms of Regulation 22 of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020.
2. The Purpose of the Document is to provide essential information about the Portfolio Management Services to assist and enable the investors in making informed decision for engaging a Portfolio Manager.
3. The Document contains necessary information about the Portfolio Manager required by an investor before investing. Investors are advised to retain this Document for future reference. The Investor should carefully read the Document prior to making a decision to avail the portfolio management services and retain the Document for future reference.

This Disclosure Document is dated October 24, 2024

Details of the Portfolio Manager

Name	: New Berry Capitals Private Limited
CIN	: U67190MH2007PTC174445
SEBI Registration Number	: INP000005323 (Portfolio Manager)
Registered Office Address	: A-602, Level 6, Marathon Next Gen Innova, Ganpatrao Kadam Marg, Lower Parel (West), Mumbai - 400 013
Tel. Nos.	: 022 – 4881 8442
Fax No.	: 022 – 4881 8485
Email id	: info@newberry.in
Website	: www.newberry.in

Details of the Principal Officer

Name	: Mr. Karan Surajkumar Saraogi
Designation	: Principal Officer
Address	: A-602, Level 6, Marathon Next Gen Innova, Ganpatrao Kadam Marg, Lower Parel (West), Mumbai - 400 013
Tel. Nos.	: 022 – 4881 8442
Email id	: karan@newberry.in

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1. DISCLAIMER CLAUSE:

The particulars of this Document have been prepared by the Management of New Berry Capitals Private Limited ("New Berry Capitals" or "Company") in accordance with the SEBI (Portfolio Managers) Regulations, 2020. This Document has neither been approved nor disapproved by the SEBI nor has the SEBI certified the accuracy or adequacy of the contents of the Document.

Pursuant to Regulation 22 of the SEBI (Portfolio Managers) Regulations, 2020, New Berry Capitals hereby declares that the Portfolio Management Services rendered in accordance with the contents hereof, are rendered without guaranteeing or assuring, either directly or indirectly, any returns.

Notwithstanding anything contained in the Disclosure Document, the provisions of SEBI (Portfolio Managers) Regulations, 2020 and the circulars / guidelines issued from time to time there under shall be applicable.

This Disclosure Document along with certificate in form C is to be given to the prospective client along with the account opening form prior to signing of the Portfolio Management Agreement.

2. DEFINITIONS:

- (i) "Accounting Year" shall mean financial year of New Berry Capitals Private Limited which is reckoned from 1st April of a year to 31st March of the next year.
- (ii) "BSE" means BSE Limited.
- (iii) "Chartered Accountant" means a Chartered Accountant as defined in Clause (b) of sub-section 2 of the Chartered Accountant Act, 1949 (38 of 1949) and who has obtained a certificate of Practice under sub-section (1) of Section 6 of the Act.
- (iv) "Client(s)/ Investor(s)" means any person / entity that enters into an agreement / arrangement for availing portfolio management service with the portfolio manager by executing the Portfolio Management Agreement.
- (v) "Discretionary Portfolio Manager" means 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.
- (vi) "Fund Manager" means the manager appointed for day-to-day management and administration of the funds managed under portfolio management service.
- (vii) "Net Asset Value" or "NAV" means the net asset value of the portfolio which is the sum of (a) the value of the securities in the portfolio of the Client, determined in accordance with the valuation policies of the portfolio manager forming a part of the accounting policies as disclosed herein; and (b) the cash balance to the credit of the Client, less (c) accounts payable by the Client.
- (viii) "Portfolio Management Agreement" means the agreement entered or to be entered into between the Client and the portfolio manager for availing the portfolio management services rendered by the portfolio manager.
- (ix) "Portfolio Manager" means New Berry Capitals Private Limited (NBCPL) acting through its personnel, specifically designated for the portfolio management service.

- (x) "Principal Officer" means an employee of the NBCPL, who has been designated as such by the portfolio manager.
- (xi) "SEBI" 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, as amended from time to time
- (xii) "Securities" mean (i) Securities as defined under the Securities Contracts (Regulation) Act, 1956 as amended from time to time including shares, scrip, bonds, debentures, debenture stock or other marketable securities of a like nature in or of any incorporated Company or other body corporate; (ia) derivative; (ib) units or any other instrument issued by any collective investment scheme to the investors in such schemes; (ic) security receipt as defined in clause (zg) of Section 2 of the Securitization and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002; (id) units or any other such instrument issued to the investors under any mutual fund scheme; (ie) any certificate or instrument (by whatever name called), issued to an investor by any issuer being a special purpose distinct entity which possesses any debt or receivable, including mortgage debt, assigned to such entity, and acknowledging beneficial interest of such investor in such debt or receivable, including mortgage debt as the case may be; (ii) Government Securities; (iia) such other instruments as may be declared by the Central Government to be securities (iii) rights or interest in securities; provided that securities shall not include any securities which the portfolio manager is prohibited from investing under the SEBI (Portfolio Managers) Regulations, 2020 or any other law for the time being in force.

Any references to laws and regulations in this Document shall be deemed to include such laws and regulations as may be amended, revised, updated and/or supplemented from time to time.

Words importing singular shall include the plural and all reference to masculine gender shall include the feminine gender and vice-versa.

3. DESCRIPTION

I. HISTORY, PRESENT BUSINESS AND BACKGROUND OF THE PORTFOLIO MANAGER:

New Berry Capitals Private Limited (NBCPL) (CIN: U67190MH2007PTC174445) is a private limited company incorporated under the provision of the Companies Act, 1956 having its registered office at A-602, Level 6, Marathon NextGen Innova, Ganpatrao Kadam Marg, Veer Santaji Lane, Lower Parel (W), Mumbai-400 013.

New Berry Capitals Private Limited was originally incorporated as Saffron Global Markets Private Limited to undertake business of stock broking in capital markets. The company is member at National Stock Exchange of India Limited and Bombay Stock Exchange (SEBI Registration Number: INZ000004838). It is also a Depository Participant at CDSL (DP ID- 58900). And has a valid certificate of registration with SEBI as a Merchant Banker under the Regulations (SEBI Registration Number INM000012999). NBCPL provide discretionary portfolio management services.

NBCPL has a valid certificate of registration with SEBI as a portfolio manager under the Regulations

(SEBI Registration Number INP000005323). NBCPL provide discretionary portfolio management services.

II. PROMOTERS, DIRECTORS AND THEIR BACKGROUND

➤ **Particulars of Promoters and Directors:**

Mr. Surajkumar Saraogi (Promoter and Managing Director)													
Address	Tower C 1501, Indiabulls Blu Estate and Club Gate No 2, Ganpatrao Kadam Marg, Opp Shreeram mills Near Worli Circle, Worli Mumbai-400013												
Qualification	<ul style="list-style-type: none"> • B.Com. from Mumbai University • CTA (Conferred by Institute of Chartered Accountants of India) • L.L.B. from Mumbai University • DBA 												
Experience: General & Specific (In Brief)	<ul style="list-style-type: none"> • 2013-Till date: (New Berry Capitals Private Limited) Mr. Surajkumar Saraogi is Promoter of New Berry Capitals Private Limited (earlier known as Saffron Global Markets Private Limited). He is holding the position of Managing Director. • 1996-2013: In Keynote Capitals Limited he have been involved with the company since inception as a Whole time Director and later as the Managing Director. As the head of the organization over the years, and built-up relationships with Bankers, Regulators, Exchanges Officials, Clients, Institutions, FII, etc. to help the company achieve its objectives. By virtue of having stock broking experience of over 16 years. 												
Ownership Details in NBCPL	36.89%												
Date of Appointment	August 12, 2013												
Other Directorships	<table border="1"> <thead> <tr> <th>Company/Body Corporate</th> <th>Position</th> </tr> </thead> <tbody> <tr> <td>HHB Real Estate Private Limited</td> <td>Director</td> </tr> <tr> <td>Mayanagri Entertainment Private Limited</td> <td>Director</td> </tr> <tr> <td>Mayanagri World One Private Limited</td> <td>Director</td> </tr> <tr> <td>Prime India Insurance Brokers Private Limited</td> <td>Director</td> </tr> <tr> <td>SONAJURI TEA LLP</td> <td>Partner</td> </tr> </tbody> </table>	Company/Body Corporate	Position	HHB Real Estate Private Limited	Director	Mayanagri Entertainment Private Limited	Director	Mayanagri World One Private Limited	Director	Prime India Insurance Brokers Private Limited	Director	SONAJURI TEA LLP	Partner
Company/Body Corporate	Position												
HHB Real Estate Private Limited	Director												
Mayanagri Entertainment Private Limited	Director												
Mayanagri World One Private Limited	Director												
Prime India Insurance Brokers Private Limited	Director												
SONAJURI TEA LLP	Partner												

Mr. Sangeet Lakkar (Whole Time Director)	
Address	A-902 Twin Tower, Manish Park, Pump house, Andheri East, Mumbai- 400 093
Qualification	<ul style="list-style-type: none"> • Chartered Financial Analyst (CFA) • Chartered Accountant (CA) • Company Secretary (CS) • B.Com. from Mumbai University

Experience: General & Specific (In Brief)	<ul style="list-style-type: none"> • 2013-Till date: (New Berry Capitals Private Limited) Mr. Sangeet Lakkar is Compliance Officer of New Berry Capitals Private Limited (earlier known as Saffron Global Markets Private Limited). He is also holding the position of Whole Time Director. • 2007-2013: He joined Keynote Capitals Limited as “Associate” and was promoted to Vice President w.e.f. January 2010. • 2004-2007: He was Intern with Price Waterhouse, Mumbai in Assurance division dealing with varied clients and varied nature of Assurance assignments including not limited to statutory audits, Tax Audits, Sarbanes Oxley Audit of MNC’s, Indian Companies • 2010-2017: As Director on the Board of New Berry Advisors Limited 	
Ownership Details in NBCPL	NIL	
Date of Appointment	August 12, 2013	
Other Directorships	Company/Body Corporate	Position
	Mayanagri Entertainment Private Limited	Director
	Mayanagri World One Private Limited	Director

III. GROUP COMPANIES / FIRMS OF THE PORTFOLIO MANAGER ON TURNOVER BASIS (BASED ON LATEST AUDITED FINANCIAL STATEMENTS AVAILABLE OF THE FOLLOWING COMPANIES):

NEW BERRY ADVISORS LIMITED.

IV. DETAILS OF SERVICES BEING OFFERED

New Berry Capitals Private Limited offers following types of Services:

Category of Clients	Type of Services
Individual Clients	<ul style="list-style-type: none"> • Discretionary Portfolio Management Services

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

(i)	All cases of penalties imposed by the SEBI or the directions issued by the SEBI under the Act or Rules or Regulations made there under.	None
(ii)	The nature of the penalty/direction.	None
(iii)	Penalties imposed for any economic offence and/or for violation of any securities laws.	None

(iv)	Any pending material litigation/legal proceedings against the portfolio manager, key personnel with separate disclosure regarding pending criminal cases, if any.	None
(v)	Any deficiency in the systems and operations of the portfolio manager observed by the SEBI or any regulatory agency.	None
(vi)	Any enquiry/ adjudication proceedings initiated by the SEBI 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 Rules or Regulations made there under.	None

5. SERVICES OFFERED BY THE PORTFOLIO MANAGER

The various products / Investment Approach offered by the Portfolio Manager under its Discretionary Portfolio Management services are:

(i) Investment Objectives and Policies

The objective of Portfolio Management Service is to provide the client with consistent risk-adjusted returns on investment based on his/her stated objectives over a longer period of time by investing in asset classes of equities, fixed income products, derivatives, mutual funds, private equity and venture capital denominated in local/foreign currencies and any other instrument as may be permitted by SEBI / RBI / such other Regulatory Authority from time to time.

The Portfolio Manager exercises its discretion in managing the Funds /Securities in the Client's portfolio. Subject to such investment objective and restrictions as may be contained in the agreement with the Client, the Portfolio Manager will have complete discretion to manage, invest and re-invest the Client's account, including to buy, sell or otherwise deal in any Securities, as permissible under the Regulations, effect transactions in such manner and in such markets, as it deems fit, and take day to day decisions in respect of the portfolio of the Client. The Client may, under these services, authorize or restrict the Portfolio Manager to invest the Client's Portfolio in specific financial instruments or securities or a mix of specific instruments or securities. The Portfolio Manager, may at its discretion, adheres to the views of the Client pertaining to the investment/ disinvestment decisions of the Client's Portfolio.

The Portfolio Manager's decision in deployment of the Client's Portfolio is absolute and final and is not open to review or question by the Client during the currency of the agreement or at any time thereafter, except on the grounds of malafide, fraud, conflict of interest or gross negligence. The Portfolio Manager shall send periodical statements to the Client.

The minimum investment amount per Client as prescribed by SEBI under the Regulations is Rs. 50 lakhs.



(ii) NBCPL Investment Strategy

The Key factors of the investment strategy:

- ✓ Growth at reasonable price (GARP)
- ✓ Quality bias

Strategies offered under NBCPL's portfolio management services:

• **New Berry Capitals Pvt Ltd 'Seeking Alpha' Strategy:**

- a) The objective of this strategy is to deliver a superior risk adjusted return.
- b) We invest in businesses that exhibit:
 - Market leadership in products or services offered.
 - Ability to sustain market position.
 - Significant growth opportunities.
 - High returns on invested capital.
 - Management with integrity & history of efficient capital allocation.
 - Margin of safety on valuations.
- c) Benchmark- BSE MSEI SX 40 (TRI)
- d) Asset Allocation- As per SEBI (Portfolio Managers) regulations, 2020.
- e) The strategy may also selectively use derivatives for hedging/ rebalancing purposes.
 - The term hedging is fairly clear. It would cover derivative market positions that are designed to offset the potential losses from existing cash market positions.
 - The use of derivatives for portfolio rebalancing covers situations where a particular desired portfolio position can be achieved more efficiently or a lower cost using derivatives rather than cash market transactions. The basic idea is that the fund has a fiduciary obligation to its holders to buy assets at the best possible price. The general principle here would be that a fund is permitted to do using derivatives whatever it could have done directly - no more and no less. For example, a fund's position in a stock -underlying and derivatives taken together - should be within the fund's maximum permissible limit in the stock.

(iii) Policies for investments in Group Companies of the Portfolio Manager:

The Portfolio Manager shall not invest in the Associate/ Group Companies.

6. RISK FACTORS

- (i) Investment in securities, whether on the basis of fundamental or technical analysis or otherwise, is subject to market risks which include price fluctuations impact cost, basis risk etc. The Portfolio Manager does not assure that the objectives of any of the model strategies will be achieved and investors are not being offered any guaranteed returns. The investments may not be suitable to all the investors.
- (ii) Past performance of the Portfolio Manager does not indicate the future performance of the same or any other model portfolio in future or any other future model portfolio of the Portfolio Manager. There is no assurance that the past performances will be repeated in future.
- (iii) The names of the model portfolios do not in any manner indicate their prospects or returns.
- (iv) Investments in equity may be adversely affected by the performance of companies, changes in the economy, government policy, the market place, credit ratings and industry specific factors.
- (v) Debt and other fixed income investments may be subject to changes in interest rates and/or liquidity, credit and reinvestment risks.
- (vi) Liquidity in the investments and performance of portfolio may be affected by trading volumes, settlement periods and transfer procedures.
- (vii) Industry specific stocks, like technology stocks, may be subject to volatility, high valuations, obsolescence and low liquidity.
- (viii) Appreciation in any of the model portfolio can be restricted in the event of a high asset allocation to cash, when stock appreciates. The performance of any model portfolio may also be affected due to any other asset allocation factors.
- (ix) When investments are restricted to a particular or few sector(s) under any model portfolio; there arises a risk called non-diversification or concentration risk. If the sector(s), for any reason, fails to perform, the portfolio value will be adversely affected.
- (x) In the case of stock lending, risks relate to the defaults from counterparties with regard to securities lent and the corporate benefits accruing thereon. The Portfolio Manager is not responsible for any loss resulting from stock lending.
- (xi) Each portfolio will be exposed to various risks depending on the investment objective, investment strategy and the asset allocation. The investment objective, investment strategy and the asset allocation may differ from client to client. However, generally, highly concentrated portfolios with lesser number of stocks will be more volatile than a portfolio with a larger number of stocks.
- (xii) The values of the portfolio may be affected by changes in the general market conditions and factors and forces affecting the capital markets, in particular, level of interest rates, various market related factors, trading volumes, settlement

periods, transfer procedures, currency exchange rates, foreign investments, changes in government policies, taxation, political, economic and other developments, closure of stock exchanges, etc.

- (xiii) Risk may also arise due to an inherent nature/risk in the stock markets such as, volatility, market scams, circular trading, price rigging, liquidity changes, de-listing of Securities or market closure, relatively small number of scrip's accounting for a large proportion of trading volume among others.
- (xiv) All transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations shall be disclosed if found having conflict of interest with the transactions in any of the client's portfolio.
- (xv) A disclosure of conflict of interest related to services offered by group companies of the portfolio manager if an
- (xvi) The Portfolio Manager may use derivatives instruments like index futures, stock futures and options contracts for the purpose of hedging and portfolio balancing.
- (xvii) Derivative products are specialized instruments that require investment techniques and risk analyses different from those associated with stocks. The use of a derivative requires an understanding not only of the underlying instrument but of the derivative itself.
- (xviii) 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 involve 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:
 - a. An exposure to Derivatives, when used for hedging purpose, can also limit the profits from a genuine investment transaction.
 - b. Derivatives carry the risk of adverse changes in the market price.
 - c. 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.

7. CLIENT REPRESENTATION

i. Fund management business details:

Category of clients	Number of clients	Funds managed (Rs. In crs)	Discretionary/ Non-Discretionary (if available)
Associate/Group Companies			
F.Y 2023	N.A	N.A	N.A
F.Y 2022	N.A	N.A	N.A
F.Y 2021	N.A	N.A	N.A
Others			
F.Y 2024	11	7.22	Discretionary
F.Y 2023	10	5.07	Discretionary
F.Y 2022	10	3.56	Discretionary

2. Disclosure for details of Transaction with related party as per AS-18 "Related Party Disclosure" issued by ICAI is provided, as there are related party transactions (**Details of material contracts or arrangement or transactions at arm's length basis**) by the Company as follows:

Name of the Related Party	New Berry Advisors Limited	Team India Managers Limited	Surajkumar Saraogi
Nature of Relationship	Public Company in which director relative is director and member and hold more than 2% of its paid-up share capital	Public Company in which director is member and hold more than 2% of its paid-up share capital	Managing Director
Nature of contracts/arrangements/transactions	Loan taken	Loan taken	Loan taken
Duration of the contracts / arrangements/transactions	As per the mutual agreed terms with the Board	As per the mutual agreed terms with the Board	As per the mutual agreed terms with the Board

Salient terms of the contracts or arrangements or transactions including the value, if any	Rs.77,90,230/-Interest payable on the Loan which was taken as unsecured loan during the year.	Rs. 16,39,11,480/- Interest payable on the Loan which was taken as unsecured loan during the year.	Rs. 5,03,00,000/- Loan taken during the year
Date(s) of approval by the Board, if any,	01st April 2023	01st April 2023	01st April 2023
Amount paid as advances, if any	NIL	NIL	N.A

8. FINANCIAL PERFORMANCE OF THE PORTFOLIO MANAGER FOR THE LAST 3 YEARS
(Based on the audited financial statements)

Financial Year	Income (Rs.)	Expenditure (Rs.)	Profit Before Tax (Rs.)	Profit After Tax (Rs)	Paid up	Reserves and Surplus	Gross Total	(Deffered Expenditures not written off)	Net worth
Ended March 31, 2024	697891067	133272061	564619007	412158114	13350000	626035788	639385788	0289068	637296598
Ended March 31, 2023	137853661	100572232	37281429	27365579	13350000	213877674	227227674	1769207	225458467
Ended March 31, 2022	112115612	79203009	32912603	26094109	9850000	137512095	147362095	1419527	145942568
Ended March 31, 2021	107888588	70694250	37194338	28336815	9850000	111417986	121267986	1343221	119924765

Notes:

Details of Financial Performances are as per audited accounts [as per regulation 22 of SEBI(Portfolio Managers) Regulations, 2020. The Accounts are last audited up to 31st March 2024.

9. PORTFOLIO MANAGEMENT PERFORMANCE OF THE PORTFOLIO MANAGER FOR THE LAST THREE YEARS, AND IN CASE OF DISCRETIONARY PORTFOLIO MANAGER DISCLOSURE OF PERFORMANCE INDICATORS CALCULATED USING TIME WEIGHTED RATE OF RETURN METHOD IN TERMS OF REGULATION 22 OF THE SEBI (PORTFOLIO MANAGERS) REGULATIONS, 2020

Portfolio Management Performance of the Portfolio Manager for last 3 financial years

Particulars	Name of Portfolio	Returns (%)		
		31-03-2024	31-03-2023	31-03-2022
Portfolio	Investment Portfolio	56.47	18.40	43.75

10. AUDIT OBSERVATIONS OF THE PRECEDING 3 YEARS

There were no audit observations in the last 3 years.

11. NATURE OF EXPENSES

The following are indicative types of expenses. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Services Agreement which will be entered into between the Portfolio Manager and the Client, and the agreements in respect of each of the services availed at the time of execution of such agreements.

i. Management Fees

No Management fees would be charged on the daily average portfolio value.

ii. Fund Accounting/Custodian/Depository Fees

The charges pertaining to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization, re-materialization and other charges in connection with the operation and management of the Depository Accounts.

iii. Registrar and Transfer Agent Fee

Charges payable to registrar and transfer agents in connection with effecting transfer of Securities, including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges, etc.

iv. Brokerage and Transaction Costs

The brokerage charges and other charges like GST, service tax, securities transaction tax, service charges, stamp duty, transaction costs, turnover tax, exit and entry loads on the purchase and sale of shares, stocks, bonds, debt, deposits, units and other financial instruments.

v. Performance Fee

Fees linked to portfolio returns/out performance achieved, the fee structure will be mutually decided as per the client agreement.

vi. The list of approved Custodian, Depository Participants, Share Brokers, Fund Accountant, involved for Portfolio Management activities is as follows:

a. Custodian and Depository Participants

- I. Custodian – Axis Bank Ltd.
- II. NSDL Depository IDs – IN300484

b. Share Brokers

New Berry Capitals Pvt Ltd
SEBI Regi. No. INZ000004838

M.J. Patel share and stock brokers Ltd
SEBI Regi. No. INB230989239

c. Fund Accountant

Axis Bank Ltd.

d. Banker

Axis Bank Ltd.

- The Portfolio Manager may empanel additional service providers as and when the need arises.

vii. Certification and Professional Charges

Charges payable for outsourced professional services like accounting, taxation and legal services, notarization, etc. for

certification, attestation required by bankers, intermediaries and regulatory authorities.

viii. Incidental Expenses

Courier charges, stamp duty, service tax, postal stamps, opening and operation of bank accounts, etc

12. TAXATION

In view of the individual nature of tax consequences, each Client is advised to consult his/her respective tax advisor with respect to the specific tax consequences to the Client arising from participation in the model strategies under portfolio management.

Clients are best advised to take independent opinion from their tax advisors / experts for any income earned from such investments.

The Portfolio Manager shall not be responsible for assisting in or completing the fulfilment 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.

Details under FATCA/Foreign Tax Laws

Tax regulations require us to collect information about each investor's tax residency. If you have any questions about your tax residency, please contact your tax advisor. Foreign Account Tax Compliance provisions (commonly known as FATCA) are contained in the US Hire Act 2010. Applicants (Including joint holders, Guardian, POA holder) are required to refer and mandatorily fill/sign off a separate "FATCA declaration form". Applications without this information /declaration being filled/signed off will be deemed as incomplete and are liable to be rejected. Investors are requested to note that the contents of the information to be provided/ declaration in the application form may undergo a change on receipt of communication/guidelines from SEBI.

13. ACCOUNTING POLICIES

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

(i). Contribution to portfolio

Contribution to portfolio by way of securities is recorded at the previous day closing market value from the date the securities are received by the portfolio manager.

(ii). Portfolio investments

Portfolio investments are stated at market/fair value prevailing as on year end, and the difference as compared

to book value is recognized as accrued gain/loss in the statement of affairs for the year.

Market value/fair value of portfolio investments is determined as follows:

Investments in listed equity shares are valued at the closing quoted price on BSE Ltd. / National Stock Exchange.

Investments in units of a mutual fund are valued at Net Asset Value of the relevant scheme.

Purchase and sale of investments are accounted for on trade date basis. Cost of purchase and sale includes consideration for scrip and brokerage (including service tax thereon) but excludes securities transaction tax paid on purchase / sale of securities.

Consideration received against fractional entitlements on account of corporate actions is entirely considered as revenue under other income.

(iii). Revenue

Realized gain/loss on sale of investments is accounted on trade date basis by comparing sale consideration with the cost of investment. The cost of investment is identified following First-in-First Out (FIFO) method.

Corporate dividend income is recognized on ex-dividend date.

(iv). Expenses

Investment Management fees and Performance based fees will be determined as per schedule B in Portfolio Management agreement.

Securities transaction tax paid on purchase / sale of securities is treated as expenditure shown under other expenses in the statement of affairs.

Other expenses like depository charges, transaction charges, audit fees are recorded on cash basis.

(v). The Client may contact the customer services official of the Portfolio Manager for the purpose of clarifying or elaborating on any of the above policy issues.

14. INVESTOR SERVICES

(i). Name, address and telephone number of the investor relations officer who shall attend to the Client's queries and complaints:

Name : Mr. Amit Dubey



Address : A 602, Level 6, Marathon Next Gen Innova, G K Marg, Lower Parel (West), Mumbai - 400 013.

Phone Number : 022 48818442

E-mail Address : research@newberry.in

The official mentioned above will ensure prompt investor services. The Portfolio Manager will ensure that this official is vested with the necessary authority, independence and the wherewithal to handle investor complaints

(ii). **Grievance Redressal and Dispute Settlement mechanism**

- I. 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.
- II. All Clients are advised to send their complaints at the email id designated for receiving client complaints i.e., pms@newberry.in.
For any queries/clarifications and for timely and prompt redressal of grievances, the Clients may contact the above-mentioned executive of the Portfolio Manager.

As a part of the firm's clients' grievance redressal and dispute settlement mechanism, all the disputes arising in connection with the Client's Portfolio Management Agreement shall, to the extent possible be settled amicably by prompt negotiations between the representatives of the parties at the earliest.

In the event of failure to settle the disputes by mutual negotiations, it may be referred to and finally resolved by arbitration in accordance with and 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 or any other arbitration law or rules of arbitration as mentioned in the Portfolio Management Agreement.

The place of arbitration shall be Mumbai, India unless specified otherwise in the Portfolio Management Agreement or any Supplemental Agreement thereto and be conducted in English language. The costs of arbitration shall be borne, as the arbitrators shall decide on a majority of votes. The Parties agree that any award of the arbitrator shall be final and binding on them from the date it is made.

(iii). **SEBI Complaints Redressal System (SCORES):**

SEBI has set up a centralized web-based complaints redress system (SCORES) for easy retrieval and tracking of complaints of the investors.

Clients may also lodge and follow up their complaints and track the status of such complaint from anywhere through SCORES by visiting www.scores.gov.in. NBCPL will receive and redress the complaints

FORM C

Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020
[Regulation 22]

Name of the Portfolio Manager : NEW BERRY CAPITALS PRIVATE LIMITED
Address : A-602, LEVEL 6, MARATHON NEXT GEN INNOVA, G K MARG, LOWER PAREL,
MUMBAI - 400013
Phone : 022 4881 8442
E-mail : sangeet@newberry.in
Website : <https://www.newberry.in/>

We confirm that:

- (i) the Disclosure Document forwarded to the Board 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;
- (iii) The Disclosure Document has been duly certified by an Independent Chartered Accountant as on 28-10-2024

The details are as follows:

Name of the Firm: DIXIT DATTATRAY & ASSOCIATES

Proprietor: CA Dixit Dattatray

Membership No: 040032

**Address: 1, Tara (Gretas) House, 166-B, Bhafat Lane,
Mahim Mumbai 4000016**

A copy of the chartered accountant's certificate has been enclosed herein.

**FOR NEW BERRY CAPITALS PVT LTD
SIGNATURE OF PRINCIPAL OFFICER
NAME OF PRINCIPAL OFFICER**

**DATE
PLACE**

Karan
: **KARAN SURAJKUMAR SARAOGI**
: **24.10.2024**
: **MUMBAI**



anywhere through SCORES by visiting www.scores.gov.in. NBCPL will receive and redress the complaints lodged against it by any of its client in accordance with the procedure prescribed by SEBI in this regard.

It would however, be advisable that Clients may initially take up their grievances for redressal with NBCPL's Investor Relation Officer mentioned above for handling issues relating to compliance and redressal of investor grievances.

15. DETAILS OF INVESTMENTS IN THE SECURITIES OF RELATED PARTIES OF THE PORTFOLIO MANAGER;

No client funds managed by the portfolio manager have been invested in the securities of its related parties or associates.

16. DETAILS OF THE DIVERSIFICATION POLICY OF THE PORTFOLIO MANAGER

The "Seeking Alpha" Strategy of NBCPL may, at certain times, involve a concentration risk of up to 50% in a specific identified stock.

For New Berry Capitals Pvt Ltd

Mr. Surajkumar Saraogi



Managing Director



Mr. Sangeet Lakkar



Compliance Officer and Whole Time Director

Date: 24.10.2024

Place: Mumbai

1, Tara (Gretas) House, 166-B, Bhagat Lane, Mahim, Mumbai-400 016. ☎ Off. 35931685
E-mail : cadbdixit@gmail.com

To,
The Board of Directors,
New Berry Capitals Private Limited,
A-602, Level 6, Marathon Next Gen Innova,
Ganpatrao Kadam Marg, Lower Parel (West),
Mumbai -400 013.

We have examined the Disclosure Document dated 24th October, 2024 of Portfolio Management prepared in accordance with Regulation 22 of SEBI (Portfolio Managers) Regulations, 2020 by New Berry Capitals Private Limited (Portfolio Manager), having its registered office A-602, Level 6, Marathon Next Gen Innova, Ganpatrao Kadam Marg, Lower Parel (West), Mumbai - 400 013.

Based on our examination of attached Disclosure Document, audited annual accounts of the Portfolio Manager and its other group companies and its other relevant records and information furnished by the Portfolio Manager, we certify that the disclosures made in the attached Disclosure Document for Portfolio Management are true, fair and adequate to enable the investors to make a well-informed decision. The Networth is calculated in the following manner [Shareholders Funds – Deferred Assets].

We have relied on the representations given by the Portfolio Manager about the penalties or litigations against the Portfolio Manager mentioned in the disclosure document. This certificate has been issued to New Berry Capitals Private Limited for submission to the Securities and Exchange Board of India for the sole purpose of certifying the contents of the Disclosure Document for Portfolio Management and should not be used or referred to for any other purpose without our prior written consent.

For DIXIT DATTATRAY & ASSOCIATES

Chartered Accountant

(Firm Reg. No.-

102665w



Proprietor

M. No. 040032

Place: Mumbai

Date: 28th October, 2024

UDIN: 24040032BKAMFT2035

