CONCEPT
INVESTWELL
—CREATION OF WEALTH—

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Disclosure & Disclaimers

Purpose

This document has been prepared inter-alia in pursuant to Regulation 15 and 18 of the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, as amended from time to time (the Regulations) and the Circulars, Guidelines and instructions issued by SEBI thereunder from time to time. This document is intended only for the personal use of the prospective clients and clients to whom it is addressed or delivered and must not be reproduced or redistributed in any form to any other person without prior written consent of (name of the IA). This document does not purport to be all-inclusive / comprehensive, nor does it contain all the information which a prospective client may desire for making decisions for engaging the Investment Adviser.

History, Present Business and Background

Concept Investwell Private Limited provides Investment Advisory Services under the brand Investwell Advisory Services, under SEBI registration number INA000018337. Concept Investwell Private Limited is a Portfolio Manager with SEBI vide registration number INP 000006323.

Directors:

* Mr. Hemantkumar Ishwarlal Desai – Mr. Hemant Desai is a senior citizen. He has almost 5 decades of experience. He has a post-graduate qualification in business management. In his career, he has worked in the fields of banking, management consultancy, real estate, and investment services. He has been associated with the Chamber of Commerce for more than 25 years. He is the founder trustee of Shri Goverdhan Trust. He has traveled widely in India and Abroad.

* Mrs. Varsha Desai – Mrs. Varsha Desai qualifies Commerce. She has job experience serving in a nationalized bank for about 9 years. She is the whole time director and looks after the administration of the company. She was at the center of this business right from day one and has contributed extensively to well being of the company. She is working as the Director of the Group Company since its inception.

* Mr. Shaival Desai – Mr. Shaival H Desai has done his Post Graduate Diploma in Business Management (Family Business) from Narsee Monjee Institute of Management Studies, Mumbai. After completing his Post Graduate Diploma in Business Management (Family Business), he joined the group company in April 2012. He is tech-savvy and looks after digital marketing of the company.

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* Mr Jenish Rana - Mr. Jenish Rana is working with CONCEPT since 2014 and having experience of 9 years in capital market and MBA with specialization in Finance, He was designated as Wealth Manager in CONCEPT and leading marketing and sales team. He is managing Business Development for PMS and serving HNI/UHNI/Associate segments for Investments particularly. He is very passionate for the job and has commitment of continuity.

Other Disclosures

- We are not affiliated with any other intermediaries, nor do receive any brokerage or commission from any third party.
- No penalties/directions have been issued by the SEBI under the SEBI Act or any other regulatory body. There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority.
- We do not recommend any stockbroker or other intermediary to a client. Nor do we receive any consideration by way of remuneration or compensation or in any other form whatsoever from a stockbroker or other intermediary.
- Investments in debt instruments are subject to reinvestment risks as interest rates prevailing on interest amount or maturity due dates may differ from the original coupon of the bond, which might result in the proceeds being invested at a lower rate.
- If client wants opinion in the specific positions made by him only, we will be able to suggest appropriate view on the securities. Such suggestion/view under any circumstances shall be considered as an opinion (not advice) from our side and we advise the client to consider our opinion and not consultancy to make his/her final decision. We are not liable for any losses whatsoever our client may incur in accepting this opinion.
- Concept Investwell Private Limited, its directors, associates, and employees might have positions or might have recommended to clients which might be in-line with the recommendations made from time to time. Concept Investwell Private Limited or directors or employees or their family members may or may not trade or may have investments in the same recommendations. We may or may not have a similar position as scheme/approach/advise in its other products/services where it acts as investment manager/portfolio manager/investment adviser.
- The names of the products/nature of investments do not in any manner indicate their prospects or returns. The performance of the equity products may be adversely affected by the performance of individual companies, changes in the market place and industry specific and macro-economic factors.

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- The performance of the model advisory portfolio will depend upon the business performance of the portfolio entities and companies and its prospects. We focus on studying the business and the sustainability in mitigating these sector or company risks.

- We will assess the portfolio entities from varied valuation parameters in order to establish whether the valuations are reasonable while creating the model portfolio and reassess the same from time to time.

- While recommending to invest in equities and portfolio entities, liquidity constraints are potential near-term risk while investing and disinvesting the portfolio entities.

- We are reliant upon the performance of third-party service providers for our functions. Weak control over technology used in the third-party arrangement may result in threats to security and the integrity of systems and resources, which can have materially detrimental impact upon our operations. These issues could result in unauthorized transactions or the inability to transact business as expected. We do not have any association in any manner with any issuer of products/ securities . This also ensures that objectivity or independence in the carrying on of investment advisory services is not compromised.

- Investment in the market is subject to market risk. Read all the related documents carefully before investing. Though the best attempts are made to predict markets, but no surety of return or accuracy of any kind is guaranteed.

- The information on the website is updated from time to time. Concept Investwell Private Limited however excludes any warranties (whether expressed or implied), as to the quality, consistency, efficacy, completeness, performance, fitness, or any of the contents of the website.

- Considering Concept Investwell Private Limited is acting as Portfolio Manager and also providing advisory services, a potential conflict of interest could be perceived between the investments and disinvestments undertaken through various investment approach(es) under the Portfolio Management Services (PMS) and investments and disinvestments advise (RIA) provided to investment advisory clients.

- We maintain and operate effective organisational and administrative arrangements with the view of taking all reasonable steps to identify, continuously monitor and manage conflicts of interest. Some of the potential conflicts of interest situations are provided below. It is not intended to provide a comprehensive list of conflicts of interest or account of the processes and procedures which we adopt in connection with the management of conflicts of interest but is instead intended to be a statement of principles with which we seek to manage foreseeable conflicts of interest. We may identify additional conflicts of interest situations from time to time, which will be managed/mitigated with the help of the principles identified herein and by also taking into account further processes which we may develop over the period of time. The following are the potential conflicts of interest situations that may arise

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- The relevant parties providing services to the client will have, in addition to their responsibilities for the client, responsibilities for other companies, projects and clients. Accordingly, they may have conflicts of interests in allocating management time and other resources amongst our various activities and such other projects and clients.

- We, while managing the funds of client/providing advice, may from time-to-time effect transactions in securities in which we may have a financial or other business interest.

- We and/or our advisory clients may have existing similar or contra positions in the stocks/ recommended in the client's account and may execute their trades at different timeline based on their execution strategy which may not match with trade execution in the PMS/RIA.

- Our directors or employees may also serve as employees or partner(s) /director(s) of the other company. In such situations, the employee or partner is considered to be in a "dual hat" situation, which may result in conflicts of interest due to duties to differing entities.

- The attorneys, accountants, and other professionals, who perform services for us may, and in some cases do, also perform services for the relevant parties.

- Client is always advised to read, understand, and agree of terms & conditions & disclaimer of service.

- We do not guarantee any profit/return.

- The performance of the investments/products may be affected by changes in Government policies, general levels of interest rates and risks associated with trading volumes, liquidity and settlement systems in equity and debt markets.

- We do not provide any profit/loss sharing services, guaranteed profit services and Demat services.

Risk Factors

The value of the investments and the expected returns may be affected generally by factors affecting financial and securities markets, such as price and volume, volatility in interest rates, currency exchange rates, changes in regulatory and administrative policies of the Government or any other appropriate authority (including tax laws) or other political, economic, and other developments as detailed below:

- **Portfolio Entities/ Companies Risk**: The performance of the model advisory portfolio will depend upon the business performance of the Portfolio Entities and Companies and its prospects. Investment Adviser focuses on studying the business and the sustainability with focus on studying the balance sheet will help the Investment Advisor in mitigating these sector or company risks.

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- **Valuation Risk**: Investment Adviser will assess the Portfolio Entities from varied valuation parameters in order to establish whether the valuations are reasonable while creating the model portfolio and reassess the same from time to time.

- **Market Risk**: Investment Adviser endeavors to create a portfolio of Entities /Companies using bottom-up fundamental research rather than trying to time the markets. However, in order to mitigate Market Risk, the Investment Adviser will monitor and analyse the market and economic circumstances from time to time that may affect the performance of the Portfolio Entities.

- **Liquidity Risk**: While investing in equities and Portfolio Entities, liquidity constraints are potential near-term risk while investing and disinvesting the Portfolio Entities. The Investment Advisor endeavors to mitigate the risks by investing creating a portfolio with a medium to long term time horizon.

- **Service Provider Risk:** Investment Adviser is reliant upon the performance of third-party service providers for their functions. Weak control over technology used in the third-party arrangement may result in threats to security and the integrity of systems and resources, which can have materially detrimental impact upon the operations of the Concept Investwell Private Limited. These issues could result in unauthorized transactions or the inability to transact business as expected. The Investment Adviser endeavors to mitigate these risks by entering into the arrangement with regulated entities and/or incorporating indemnity clause in agreement entered with service providers.

- **Other Risks**: The Investment Advisory does not offer any assured / guaranteed returns.

Concept Investwell Private Limited is not liable or responsible for any loss or shortfall resulting on account of Non-Discretionary Investment Advice. This document represents the views of (name of IA) and should not be taken as the basis for an investment decision.

Other details:

Type of Registration - Non-Individual

SEBI Registration no. INA000018337

Validity of Registration: -Perpetual

BSE Enlistment No.: 2036

Corporate Identification Number (CIN): U67200GJ2017PTC100065

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Registered Office Address: 10/A, Union Heights, Maharana Pratap Road, Rahul Raj Mall Lane, Dumas Road, Surat - 395007. Gujarat, INDIA

Contact: +91- 0261- 2206000

Logo/brand name/Separate Identifiable division of IA/Trade name: Concept Investwell Advisory

Details of Principal Officer:

Jenish Rana

Phone: +91 – 0261 - 2206007

E-mail:

Details of Compliance Officer:

Parth Parekh

Phone: +91 – 0261 - 2206026

E-mail: compliance@conceptinveswell.com

Details of Investor Grievance Redressal Officer:

Parth Parekh

Phone: +91 – 0261 - 2206026

E-mail: compliance@conceptinvestwell.com

SEBI Head Office: SEBI Bhavan, Plot No. C-4 A, G Block, Bandra Kurla Complex, Bandra East, Mumbai 400 051

Disclaimer: Investment in securities market are subject to market risks. Read all related documents carefully before investing.

Disclaimer: Registration granted by SEBI, enlistment as IA with Exchange and certification from NISM in no way guarantee performance of the intermediary or provide any assurance of returns to clients.

Redressal of client grievances

A complaint can be directly lodged with the Investment Adviser in writing, orally or telephonically at any of the following:

Address:

10/A, Union Heights, Maharana Pratap Road, Rahul Raj Mall Lane, Dumas Road, Surat - 395007. Gujarat, INDIA

Email-id: compliance@conceptinvestwell.com

Tel. No.: +91- 0261- 2206026;

Alternatively, client may also use SCORES 2.0 (https://scores.sebi.gov.in/) to submit the complaint or grievance directly to the Investment Adviser for resolution.

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The Investment Adviser shall endeavor to redress the client complaint(s) within 21 days without any intervention of SEBI, failing which the complaint shall be registered on SCORES 2.0. It is mandatory for the client having a grievance to take up the matter directly with the Investment Adviser.

If client(s) are not satisfied with the response from the Investment Adviser, they can lodge their grievances with SEBI at https://scores.sebi.gov.in/ or to SEBI office. The complaint shall be lodged on SCORES 2.0 within one year from the date of cause of action, where:

- The complainant has approached the Investment Adviser, for redressal of the complaint and, Investment Adviser has rejected the complaint or,
- The complainant has not received any communication from Investment Adviser or,
- The complainant is not satisfied with the reply received or the redressal action taken by Investment Adviser.

If the client is not satisfied with the extent of redressal of grievance by the Investment Adviser, there is a one-time option for 'review' of the extent of the redressal, which can be exercised within 15 days from the date of closure of the complaint on SCORES 2.0.

If the client is not satisfied with the grievance redressal by the Investment Adviser, they can initiate dispute resolution through the Online Dispute Resolution Portal (ODR) at https://smartodr.in/login.

Alternatively, the client can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Investment Adviser is not satisfactorily resolved or at any stage of grievance redressal.

Any Dispute shall be redressed by the Investment Adviser within 21 (Twenty-one) calendar days from the date of receipt of the complaint.

The process on Online Dispute Resolution Mechanism is available at https://www.conceptinvestwell.com/grievance-redressal.php.

Annual Audit

Sr. No.	Financial Year	Compliance Audit Status	Remarks, if any
1	FY 2022-23	Not Applicable	Not Applicable
2	FY 2023-2024	Will be completed within regulatory timelines	-

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CONCEPT INVESTWELL PVT. LTD. * SURAT