

Disclosure Document

The particulars given in this Disclosure Document have been prepared in accordance with SEBI (Investment Advisers) Regulations, 2013.

The purpose of the Document is to provide essential information about the Investment Advisory Services in a manner to assist and enable the prospective client/client in making an informed decision for engaging Investment Advisor before investing.

For this Disclosure Document, Investment Adviser is **Devraj Dhagat** ("Investment Advisor")

A) Descriptions about Devraj Dhagat

- **History, Present Business and Background**

Devraj Dhagat is registered with SEBI as an Investment Advisor with Registration No. INA000017888. Devraj Dhagat got its registration on April 24, 2023.

The focus of Investment Advisor is to provide investment advice to the clients. Advisor aligns its interests with those of the client and seeks to provide the best suited advice based on client's risk profile. Investment Advisor first tries to understand the client's return expectations, risk taking ability & goals, which in turn helps to arrive at an asset allocation suitable for the client. Investment Advisor conducts frequent portfolio reviews and suggests any corrective action/s if required.

- **Terms & conditions for advisory services**

Investment Advisor will provide Advisory Services which shall be in the nature of investment advice and may include buying and selling the securities for an agreed fee structure and which may be for a definite period of time and which may vary / change from time to time, entirely at the Client's risk. The detailed terms and conditions are as per the agreement executed between client and Investment Advisor.

- **Disciplinary history**

1) No penalties / directions have been issued by SEBI under the SEBI Act or Regulations made there under against the Investment Adviser relating to Investment Advisory services.

2) There are no pending material litigations or legal proceedings, findings of inspections or investigations for which action has been taken or initiated by any regulatory authority against the Investment Adviser or its Directors, or employees.

- **Affiliations with other intermediaries Terms & conditions for advisory services**

Investment Advisor has no affiliation with any other SEBI registered intermediaries.

B) Disclosures with respect to Investment Advisor's own holding position in financial products / securities:

Investment Advisor may hold position in the financial products/ securities advised in its personal portfolio. Details of the same may be referred through the disclosures made at the time of advice.

C) Disclosures with respect to any actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services.

There are no actual or potential conflicts of interest arising from any connection to or association with any issuer of products/ securities, including any material information or facts that might compromise its objectivity or independence in the carrying on of investment advisory services. Such conflict of interest shall be disclosed to the client as and when they arise.

D) Disclosure of all material facts relating to the key features of the products or securities, particularly, performance track record, warnings, disclaimers

Clients are requested to go through the detailed key features, performance track record of the product, or security including warnings, disclaimers etc before investing as and when provided by the Investment Advisor. Such product materials may also be available to www.sebi.gov.in or www.nseindia.com or respective issuers website.

E) Drawing client's attention to warnings, disclaimers in documents, advertising materials relating to investment

Investment Advisor draws the client's attention to the warnings, disclaimers in documents, advertising materials relating to an investment product/s which are being recommended to the client/s. A brief regarding the risk associated with the investment products are available in client agreement, same may be referred before investing in advised product or securities.