

INVESTOR CHARTER FOR  
FUNDS MANGED BY  
NABVENTURES LIMITED



## **INVESTOR CHARTER FOR FUNDS MANAGED BY NABVENTURES LIMITED**

### **A. Vision and Mission Statement:**

#### **Vision:**

1. To develop the Alternative Investment Fund ("AIF") industry on professional and ethical lines and maintain high standards of governance and transparency.

#### **Mission:**

2. Maintain high professional and ethical standards within the AIF industry.
3. Comply with all applicable regulations and cooperate with the regulators in all aspects of the AIF activity.
4. Act in a fiduciary capacity towards the investors.

### **B. Details of business transacted by the organisation concerning the investors:**

1. To execute an agreement with the client providing all details, including fee details, aspects of Conflict of interest disclosure and maintaining the confidentiality of information.
2. To do a proper and unbiased risk–profiling and suitability assessment of the client.
3. Get registration with Know Your Client Registration Agency (KRA) and Central Know Your Customer Registry (CKYC).
4. Conduct audits annually.
5. To disclose the status of complaints on its website.
6. To disclose the name, proprietor name, type of registration, registration number, validity, complete address with telephone numbers and associated SEBI regional/local Office details on its website.
7. To employ only qualified and certified employees.
8. To deal with clients only from the official number
9. To maintain records of interactions with all clients, including prospective clients (before onboarding), where any conversation related to advice has taken place.



## **C. Details of services provided to investors**

### **1.1 Onboarding of investors.**

- 1.1 Sharing of Private Placement Memorandum (PPM).
- 1.2. Completing KYC of investors
- 1.3. Sharing of copies of fund documents with investors.
- 1.4. Entering into a contribution agreement with an investor.

### **2.1 Obtaining investor consent for material changes to fund structure**

- 2.1. Change in the sponsor or the manager of the AIF.
- 2.2. Change in control of the sponsor or the manager of the AIF.
- 2.3. Material changes to terms of PPM viz:
  1. Term of Fund.
  2. Investment Strategy.
  3. Increase in fees/charges.
- 2.4. Intimation of winding up of Fund/ Scheme before the expiry of tenure.

### **3.1 Dissemination of financial information of Fund.**

- 3.1. Net Asset Value of Fund/ Scheme.
- 3.2. Financial information of investee companies.
- 3.3. Information on the performance of the scheme/fund.

### **4.1 Disclosures concerning material risks associated with the Fund and its portfolio investments.**

- 4.1. Report any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction.
- 4.2. Report any material liability arising during the tenure of the Fund.
- 4.3. Inform about any breach of provision of the PPM or any other fund documents/ agreements made with the investor
- 4.4. Provide intimation regarding any conflict of interest.
- 4.5. Disclose the risks associated with the portfolio, such as concentration, foreign exchange, leverage, realisation, strategy, reputation, and extra-financial risks, such as social and corporate governance risks, at the fund and investee company level.

### **5.1 Intimation of any non-material changes in the operations of the Fund.**

- 5.1. Non-material changes such as
  - i. Bank account details



- ii. Address of AIF or its Manager or Sponsor
- iii. Contact details such as email-id, contact number, etc., of AIF or its Manager or Sponsor

## 6.1 Grievance redressal

6.1. Redressal of investor complaints received directly from investors and SEBI / SCORES.

### D. Timelines of the activity/services provided to investors:

Sr. No	Description of activity/services provided by Alternative Investment Funds (AIFs) to its Investors	Timeline
<b>1.</b>	<b>Valuation-related disclosures:</b>	
<b>a.</b>	Valuation of investment by Category II Alternative Investment Fund.	At least once every six months. (Within 120 calendar days of the end of the relevant period)
<b>b.</b>	Disclosure of NAV of the scheme(s)	Quarterly Basis
<b>2.</b>	<b>Transparency-related disclosures:</b>	
<b>a.</b>	Disclosure of financial information of investee Companies.	To be provided within 120 days from the close of the financial year
<b>b.</b>	Disclosure of Material risks: Concentration risk, foreign exchange risk at the fund level and leverage risk, realisation risk, strategy risk, reputation risk at an investee company level, extra financial risks such as social and corporate governance risks at the fund and investee company level.	To be provided within 120 days from the close of the financial year
<b>c.</b>	Financial, risk management, operational, portfolio, and transaction information regarding fund investments.	To be disclosed periodically to the investors.
<b>d.</b>	Any fees ascribed to the Manager or Sponsor; and any fees charged to the Alternative Investment Fund or any investee company.	To be disclosed periodically to the investors .
<b>e.</b>	Any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction.	As and when it occurs
<b>f.</b>	Any material liability arising during the Alternative Investment Fund's tenure.	As and when it occurs



Sr. No	Description of activity/services provided by Alternative Investment Funds (AIFs) to its Investors	Timeline
g	Any breach of a provision of the placement memorandum or agreement made with the investor or any other fund documents	As and when it occurs
h	Intimation regarding Conflict of interest in any transaction	As and when they arise or seem likely to arise
i.	Change in control of the Sponsor or Manager or Investee Company	As and when they arise or seem likely to arise
j.	Any change in terms of Private Placement Memorandum /fund documents	On a consolidated basis, within one month of the end of each financial year
<b>3.</b>	<b>Complaint handling related services:</b>	
a.	Response to complaints received from investors	Within 30 days from the date of receipt of complaint
b	Redressal of investor complaints received from SEBI/SCORES	Within 30 days from the date of receipt of complaint

**E. The details of the grievance redressal mechanism and how to access it.**

1. Alternative Investment Funds are required to redress all investor complaints promptly.
2. An Alternative Investment Fund, by itself or through the Manager or Sponsor, is required to lay down the procedure for resolving disputes between the investors and AIF or Manager or Sponsor through arbitration or any such mechanism as mutually decided between the investors and the Alternative Investment Fund.
3. Investors can also approach SEBI to redress complaints through the SEBI SCORES platform. On receipt of complaints, SEBI takes up the matter with the concerned AIF.
4. Investors may send their complaints to the Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan, Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.

**F. Responsibilities of investors**

**1. Responsibility to inform and educate yourself**

- 1.1 Read all fund documents, including the Private Placement Memorandum, Contribution Agreement, sales literature, and newsletters thoroughly, and understand the product.
- 1.2 Carefully consider all investment risks, fees, and/or other factors detailed in these documents.
- 1.3 Ensure and make certain that the proposed investment in the Fund meets your investment objective and is in alignment with your risk appetite.
- 1.4 Review your portfolio holdings, account statements and transaction confirmation regularly to ensure you know all transactions and securities where you are invested.

**2. Investors are responsible for updating their KYC and information with the Intermediary**

- 2.1 Provide complete and accurate information in your KYC documents,
- 2.2 Timely updation of KYC information.

**3. The investor's responsibility is to abide by the contribution agreement.**

- 3.1 The investor needs to read carefully, understand the agreement they are entering into with the Alternative Investment Fund, and abide by its terms.
- 3.2 Investors should know that investment terms are not a guarantee of future performance or the

Fund/ Scheme returns.

**4. Investors are responsible for using the right financial intermediaries, consultants and advisors.**

4.1 Carefully consider the validity and reliability of investment information obtained from all sources, especially unsolicited information obtained over the Internet.

**5. Responsibility to maintain the confidentiality of information.**

5.1 Investors shall not disclose any material non-public information received under being investors of the Fund, except as may be guided by the terms of the fund documents.

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