SAMVITTI CAPITAL

Partners in Wealth Creation

DISCLOSURE DOCUMENT – INVESTMENT ADVISORY

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 clients in making an informed decision for engaging Investment Advisor before investing.

Name of Investment Advisor	Samvitti Capital Pvt Ltd
Type of Registration	Non-Individual
SEBI RIA Registration Number	INA000019169
BASL Membership ID	2164
Registered Address	16/100(2), Kalasha Nivasa, Harihara Nagara, Karnad, Mulki 574154 Mangaluru, Karnataka
Telephone	0824 2983541
Principal Officer, Contact No, email id	Mr. V Shivaram Kamath, 9845082607, svkamath@samvitticapital.com
Compliance Officer, Contact No, email id	Mr. V Shivaram Kamath, 9845082607, svkamath@samvitticapital.com
Grievance Officer, Contact No, email id	Gauri Bhandarkar, 0824 2427788 gauri@samvitticapital.com
Website link	https://samvitticapital.in
Corresponding SEBI regional/local office address	Securities & Exchange Board of India (‘SEBI’), SEBI Bhavan, Plot No. C4-A “G” Block, Bandra Kurla Complex, Mumbai

Disclaimer: Investment in securities market are subject to market risks. Read all the related documents carefully before investing. “Registration granted by SEBI, membership of BASL, and certification from NISM in no way guarantee performance of the IA or provide any assurance of returns to investors.”

Business, Disciplinary History, Terms and Conditions, Affiliations with other intermediaries and other information

Samvitti Capital Private Limited is a private limited company incorporated on 24th December, 2014, under the provisions of the Companies Act, 2013. Samvitti Capital Private Limited has been established with the objective of offering investment management, portfolio management services and advisory services.

Samvitti Capital Private Limited acts as the sponsor and investment manager to Samvitti Capital Alpha Fund which is set up as a contributory determinate trust under a deed of indenture dated July 31, 2015. Samvitti Capital Alpha Fund is registered with SEBI as open-ended Category III Alternative Investment Fund with registration number IN/AIF3/15-16/0182

Samvitti Capital Pvt Ltd is registered with SEBI as a Portfolio Manager having the registration number INP000004847 and also registered with APMI with Membership ID 0181

Samvitti Capital Pvt Ltd is registered with SEBI as an Investment Advisor under the SEBI (Investment Advisory) Regulations 2013 bearing the registration number INA000019169 and also registered with BASL with membership id 2164

Disciplinary History

There are no penalties/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 Advisor relating to Investment Advisory services.

Terms and Conditions for Advisory Services

The terms and conditions on which Investment Advisor offers advisory services are specified in the agreement

Affiliations with other intermediaries

Samvitti Capital provides mutual fund distribution services in compliance with the applicable SEBI regulations governing investment advisors. We also ensure strict segregation of advisory and distribution activities, as mandated under the SEBI regulatory framework. Further, external execution platforms such as NSE-MF Invest and Smallcase etc. are utilized for the execution of mutual fund transactions, order processing, and client notifications in connection with its investment advisory services.

Disclosure of Holdings

Samvitti Capital or its employees/directors may have same holdings in personal or fiduciary capacity in the stocks advised to the Clients. Investors should take caution while executing the advice based on their risk/return profile and suitability. To mitigate potential conflicts of interest, all employees and directors are subject to the Insider Trading Policy and Code of Conduct adopted by the Company. They are required to comply with the prescribed trading restrictions and periodically disclose their holdings to the Compliance Officer in accordance with the Company's compliance framework.

Conflict of Interest

Samvitti Capital or its group entities, along with their respective directors, partners and employees are engaged in a broad spectrum of financial services. Consequently, potential conflicts of interest may arise across their various professional and personal activities.

Samvitti Capital is a Portfolio Manager and also manages a Category III Alternative Investment Fund (AIF), and provides Investment Advisory Services. A potential conflict of interest may be perceived regarding the timing of transactions undertaken across these funds (PMS, AIF, and Advisory). Furthermore, the Investment Advisor, its employees, and their immediate relatives may personally hold, buy, or sell the same stocks recommended under the investment strategies offered to investors. They may also exit these holdings based on their own independent financial needs while simultaneously recommending those same stocks to clients. Clients must be aware of and acknowledge these potential conflicts before investing.

There is a clear segregation of activities and arm's length relationship from other investment activities managed by Investment Advisor. Samvitti Capital for its own proprietary purposes may invest in various stocks from time to time at its own discretion which will be undertaken by a separate and dedicated team. The said segregation will ensure avoidance of conflict of interest with regard to the investment advisory and other related businesses of the Company. Such proprietary investment transactions may at times be contrary to the investment advice. This may also happen in the investments carried out in PMS and AIF.

Samvitti Capital has adopted appropriate Chinese Walls in their operations as expected under SEBI Regulations to avoid such potential conflicts.

Disclosures about key features of the Product and Performance track record.

Samvitti Capital offers an actively advised direct equity portfolio designed for investors seeking long term capital appreciation, in accordance with SEBI Investment Advisory regulations. This product is tailored for investors with a minimum investment horizon of 3-5 years and who are comfortable with the inherent volatility of equity markets. It is crucial to note that, as with all equity investments, there is a potential risk of capital loss. The Advisory Services provides investment recommendations primarily in mid and large cap companies, with selective exposure to other market segments based on investment opportunities, market conditions, and portfolio objectives. Investors are advised to keep this in mind while evaluating their risk appetite as well as performance expectations.

In addition to investment advisory services, we provide advice on mutual fund investments to clients based on their respective risk profiles and financial goals. A clear segregation shall be maintained between clients onboarded under the Direct Mode and those onboarded under the Distribution Mode. No client, including any member of the client's family, shall be onboarded under both modes simultaneously. A strict Chinese Wall shall be maintained between the Direct Mode and Distribution Mode activities so as to ensure regulatory compliance and to avoid any conflict of interest. Under no circumstances shall fees be levied on the same client under both modes.

The past performance does not indicate future performance. There is no assurance that past performances will be repeated and Investors are not being offered any guaranteed or indicative returns.

Disclaimer

The Investment Advisor reiterates the client to read the conflicts, risks, warnings, disclaimers etc provided in this document as well as provided on the portal and also refer the disclaimers provided in Product Note prior to on-boarding.

The Investment Advisor provides advice to its clients only in SEBI regulated products.

The Investment Advisor hereby represents that it may use Artificial Intelligence (AI) to track and analyze the results and performance of its Investment Advisory services, provided further that the Investment Advisor shall solely be responsible for security, confidentiality and integrity of data or any other results or services generated by AI which is relied upon by the Investment Advisor.

Investor Grievance

In case of any support, grievance, or complaint, you may write to us on below mentioned email ids
Support: support_ia@samvitticapital.com Grievance Redressal : ia@samvitticapital.com

If you are not satisfied with the resolution provided or if your grievance remains unaddressed, you may escalate your complaint to SEBI via the SEBI Complaint Redressal System (SCORES) at https://scores.sebi.gov.in Should you still remain dissatisfied, you can initiate a formal dispute resolution process through the Online Dispute Resolution (ODR) portal by visiting https://smartodr.in