

## RIA Disclosure Document

**Release Date: 1<sup>st</sup> November, 2023**

### **KEY INFORMATION AND DISCLOSURE DOCUMENT FOR INVESTMENT ADVISORY SERVICES UNDERTAKEN BY TRUFID ADVISORS PRIVATE LIMITED**

The purpose of the Key Information and Disclosure Document is to provide essential information about the investment advisory services in a manner to assist and enable the Investors in making decisions for engaging an investment advisor.

- The necessary information about the Investment Advisor is disclosed in this Disclosure Document and the Investor is advised to carefully read the entire document and is advised to retain it for future reference.
- Investors may view this updated document at <https://advisory.trufid.com/> in the **disclosure** tab

#### **Disclaimer**

This Key Information and Disclosure Document has been prepared inter-alia in pursuant to regulation 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 investors to whom it is addressed or delivered and must not be reproduced or redistributed in any form to any other person without prior consent of Trufid Advisors Private Limited (the “Investment Advisor”). This document does not purport to be all-inclusive / comprehensive, nor does it contain all the information which a prospective investor may desire for making decisions for engaging the Investment Advisor.

#### **History, Present Business and Background**

Trufid Advisors Private Limited is a SEBI registered Investment Advisor and offers advisory services to clients vide SEBI registration No. INA000016889. Trufid Advisors Private Limited is a Wholly Owned subsidiary of Trufid Services Private Limited. Trufid Services is registered with AMFI as a Corporate Distributor and is involved in distribution of mutual fund and other investment products.

#### **Directors Name: (i) Mr. Shreenivas Hegde**

Shreenivas has 20 years of experience in financial services sector. He was the Investment Strategist at HSBC Private Bank India and was responsible for product selection and recommendations on Funds, Bonds, Direct Equity, Foreign Exchange, Structured products & Alternative products. He brings across a rich experience in formulation of multi asset class advisory and research. He was also instrumental in managing the direct equity and bond advisory in the private bank. Prior to HSBC he was with HDFC Bank Private Banking as a research analyst and also worked in HDFC in their retail asset operations. Shreenivas is a member of the Institute of

Chartered Accountants of India and has also completed a Certification course in Private Banking from the Wealth Management Institute, Singapore.

**(ii) Mr. Abhishek Singhvi**

Abhishek has over 20 years of experience in the financial services sector, a large part of which has been into the wealth business. Prior to Trufid Advisors, he worked for over 7 years with Kotak Wealth Management, managing UHNI client relationships and family office accounts besides spending over a decade with HDFC Private banking in various roles, including team management and product. He started his career as an equity research analyst. Abhishek is a Post Graduate in Management from Bombay University and a Bachelor in Business Studies from Delhi University.

**(iii) Mr. Tanveer Monga**

Tanveer has over 16 years of experience in managing multi asset class portfolios for wealthy families. Prior to Trufid, he worked for over 10 years with Kotak Wealth Management, building & managing UHNI client portfolios. Prior to that, Tanveer had worked with HSBC for a short stint. He started his career with HDFC Bank as an Executive Trainee from campus and started off in the Retail Banking Group, and then moved to HNI Relationship & Wealth Management role. Tanveer did his Master's in Business Administration- Finance from The Institute for Technology & Management, Mumbai & Bachelors In Commerce from CRMJ College, Hisar.

**(iv) Mr. Makarand Khandekar**

Makarand has over 20 years of experience in the financial services sector, a large part of which has been into the wealth business. Prior to Trufid, he worked for 5 years with HDFC Bank Private Banking, managing UHNI client relationships. He started his career with the consulting arm of a Chartered Accounting firm and has 5 years of experience in debt markets. Makarand is MFM from Jammalal Bajaj and a rank holder in Production Engineering from University of Pune.

**(v) Mr. Gaurav Singhvi**

Gaurav has over 15 years of experience in managing multi asset class portfolios for wealthy families. Prior to Trufid, he worked for over 6 years with Aditya Birla Wealth Management, building & managing UHNI client portfolios. Gaurav has also worked with HDFC AMC Ltd. for about 8 years, where he started his career. Gaurav is an MBA with dual specialization in Marketing and Finance.

**Affiliation with other intermediaries**

There are no affiliations with other intermediaries

**Disciplinary History**

No penalties / directions have been issued by SEBI under the SEBI Act or Regulations made there under against the Investment Advisor relating to Investment Advisory services. 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 Advisor or its directors or employees.

**Services offered and terms of offerings**

CIN: U74999MH2020PTC347245 Email ID: [advisory@trufid.com](mailto:advisory@trufid.com) | Contact: +91 22 62396060  
Trufid Advisors Pvt. Ltd., 409A, Kanakia Wall Street, Andheri Kurla Road, Andheri E, Mumbai – 400093

- (a) The Investment Adviser provides investment advice to the Clients relating to investing, purchasing, selling or dealing in securities or investment products / asset classes such as shares, debentures, bonds, derivatives, securities instruments, structured products, units of MF / AIF / REIT / InvIT / ETF / PMS, private equity, alternative asset class such as real estate, commodities, angel investment, offshore investment etc. based on their investment objective, risk profile and overall needs.
- (b) The Investment Adviser caters to various Client segments such as FPIs, SWFs, PFs, trusts, corporate houses, senior corporate executives, professionals, family offices, businessmen, entrepreneurs, celebrities, sports persons, HNIs and NRIs / PIOs / OCIs among others. The investment advice would be as per the risk profile and overall needs of the Client.
- (c) The Investment Adviser provides advice on investment portfolio containing or any other investment product suitable to the Client's needs and on-going monitoring, periodic review, asset allocation and financial planning including analysis of Clients' financial position, identification of its financial goals and developing and recommending financial strategies to realise such goals
- (d) The performance related information provided by the Investment Advisor from time to time is on a consolidated basis which has neither been verified nor approved by SEBI. The performance / returns of the stock across advised individual portfolios may vary significantly from the data depicted by Investment Advisor. No claims may be made or entertained for any variances between the performance depictions and that of the stock within individual client portfolios. Neither the Investment Adviser, nor its directors, employees, affiliates shall in any way be liable for any variation noticed in the returns of individual portfolios. Performance of the Investment Advisor shall have no bearing on the expected performance of an Individual Client Portfolio. The Investment Advisor also does not guarantee or assure any minimum or risk-free returns. Past performance of the financial products, instruments and the portfolio may or may not be sustained in future and should not be used as a basis for comparison with other investments.

### **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 portfolio will depend upon the business performance of the portfolio entities and companies and its prospects. Investment Advisor 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.

**Valuation Risk:** Investment Advisor 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 Advisor endeavours to create a portfolio of Entities /Companies using bottomup fundamental research rather than trying to time the markets. However, in order to mitigate Market Risk, the Investment Advisor 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 nearterm risk while investing and disinvesting the portfolio entities. The Investment Advisor endeavours to mitigate the risks by investing creating a portfolio with a medium to long term time horizon.

**Service Provider Risk:** Investment Advisor 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 Investment Advisor. These issues could result in unauthorized transactions or the inability to transact business as expected. The Investment Advisor endeavours to mitigate these risks by entering into the arrangement with regulated entities, incorporating indemnity clause in agreement entered with service providers.

**Other Risks:** The Investment Advisory does not offer any assured / guaranteed returns. Investments in securities is subject to market risk. Please read the Key Information and Disclosure Document carefully before investing.

The Investment Advisor is not liable or responsible for any loss or shortfall resulting on account of nondiscretionary investment advice. This document represents the views of the Investment Advisor and should not be taken as the basis for an investment decision.

### **Holdings and Disclosure of Interest**

The Investment Advisor or its affiliates or employees/directors may have same or contra positions in personal or fiduciary capacity in the securities/stocks advised. Investors should take caution while executing the advice based on their risk/return profile and suitability.

### **Conflict of Interest**

- (i) Client understands that subject to the applicable laws, the Investment Advisor may give advice or take action in performing its duties to other clients, or for its own accounts, that may or may not differ from advice given to or acts taken for the Client, the Investment Advisor is not obligated to recommend to the Client, any security or other investment that, the Investment Advisor may buy, sell, or recommend for any other client or for its own accounts.
- (ii) The Investment Advisor or its directors or affiliates may be involved in other financial, investment or other professional activities which may on occasion cause conflicts of interest with the investment advisory services being provided to the Client. These include serving as directors, officers, advisers, or agents of other companies.
- (iii) The Parties may have to govern themselves by the terms and conditions as may be laid down or applicable in case of the aforementioned activities subject to the following:

- As an entity: The Investment Advisor, for its own proprietary purposes may invest / divest in various securities / investments, 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 related business of the Company. Such proprietary investment transactions may at times be contrary to the investment advice or other related business or actions inter-alia due to reasons such as different risk profile, returns expectation, investment objective or risk perception of the entity being advised.

- As its business activities: In connection with any advice on securities or investment products so serviced, the Investment Advisor may earn fees or remuneration in form of advisory fees or any other fees by whatever name called.
- As its directors or employees: The Investment Advisor, its directors or employees may also advice or be connected with any fund house, portfolio manager, mutual fund/asset management company, alternative investment funds, broking company or any other entity or its directors or employees offering any financial product (which may be part of investment advice) or undertake any execution services and accordingly they may earn management fees, for the same. Further, there may be common directors between Trufid Advisors Private Limited and Trufid Services Private Limited.
- Future business activity: During the course of business, as part of normal business activity, the Investment Advisor, its director or its affiliates may undertake any other business or register with SEBI or any other regulator or body for conducting business activities that may be directly or indirectly connected with its long-term business objectives in line with its object clause inter alia including corporate advisory etc.

However, the client shall not be under any obligation to avail the execution, or any other such services offered by the Investment Advisor. All fees and charges, wherever applicable, for such services shall be paid directly to execution service providers and not through the Investment Advisor.

### **Other Disclosures**

The information shared by the Investment Advisor from time-to-time should not be construed as any form of advice, recommendation, or suggestion, to buy or sell any securities or financial instruments or avail any services to any individual or entity. Investment Adviser shall not be responsible for the loss or damage (financial or otherwise) caused due to incorrect, inaccurate, or erroneous information, details or data stated in the document(s).

The Investment Advisor retains all the rights in relation to all information contained in the document(s) shared from time to time.

The Investment Advisor operates from within India and is subject to Indian laws and any dispute shall be resolved in the courts of Mumbai, Maharashtra only.

The Investment Advisor declare that the data and analysis provided by Investment Adviser by time to time shall be for informational purposes. The information contained in the analysis shall be obtained from various sources and reasonable care would be taken to ensure sources of data to be accurate and reliable. The Investment Advisor will not be responsible for any error or omission in the data or for any losses suffered on account of information contained in this analysis. While the Investment Advisor will take due care to ensure that all information provided is accurate however Trufid neither guarantees/warrants the sequence, accuracy, completeness, or timeliness of the aforesaid report(s) shared from time to time. Neither the Investment Advisor nor its affiliates or their directors, employees, agents, or representatives, shall be responsible or liable in any manner, directly or indirectly, for views or opinions expressed in this analysis or the contents or any systemic errors or discrepancies or for any decisions

or actions taken in reliance on the analysis. The Investment Advisor does not take any responsibility for any clerical, computational, systemic, or other errors in comparison analysis.

The Investment Advisor warrants that the contents of this Key Information and Disclosure Document are true to the best of the knowledge, belief, and information of the directors of the Investment Advisor, however, assume no liability for the relevance, accuracy, or completeness of the contents herein.

The Investment Advisors (including its affiliates) and any of its directors, officers, employees, and other personnel will not accept any liability, loss, damage of any nature, including but not limited to direct, indirect, punitive, special, exemplary, consequential, as also any loss of profit in any way arising from the use of this document in any manner whatsoever.

This document may include certain forward-looking statements which contain words or phrases such as “believe” “expect” , “anticipate” , “estimate” , “intend” , “plan” , “objective” , “goal” , “project” , “endeavor” and similar expressions or variations of such expressions that are forward-looking statements. Actual results may differ materially from those suggested by the forward-looking statements due to risks, uncertainties, or assumptions. The Investment Advisor takes no responsibility of updating any data/information.

This document cannot be copied, reproduced, in whole or in part or otherwise distributed without prior written approval of the Investment Advisor.

Prospective clients are advised to review this document, Advisory Agreement, presentation(s), and other related documents carefully and in its entirety. Prospective clients should make an independent assessment, and consult their own counsel, business/investment advisor and tax advisor as to legal, business and tax related matters concerning this document, the Advisory Agreement, and the other related documents before becoming interested in the Advisory Portfolio.

The information contained in this document has been prepared for general guidance and does not constitute a professional advice /assurance and no person should act upon any information contained herein without obtaining specific professional advice/assurance. Neither the Investment Advisor nor its Affiliates or advisors would be held responsible for any reliance placed on the content of this document or for any decision based on it. Each existing / prospective client, by accepting delivery of this document agrees to the foregoing. The Investment portfolio are subject to several risk factors including but not limited to political, legal, social, economic, and overall market risks. The recipient alone shall be fully responsible/are liable for any decision taken on the basis of this document. The Investment Advisor, its directors, employees, may have existing exposure to the stocks that form part of the investment advisory portfolio. Further, in view of the investment objective there may be situations where Trufid may be selling a stock which is part of the advisory portfolio.

The Investment Advisory does not offer any assured / guaranteed returns. Investments in securities is subject to market risk.

The information can be no assurance that future results or events will be consistent with this information. Any decision or action taken by the recipient based on this information shall be solely and entirely at the risk of the recipient. The distribution of this information in some jurisdictions may be restricted and/or prohibited by law, and persons into whose possession this information comes should inform themselves about such restriction and/or prohibition and observe any such restrictions and/or prohibition. Unauthorized disclosure, use, dissemination or

copying (either whole or partial) of this information, is prohibited. The Investment Advisor will not treat recipient/user as customer by virtue of their receiving/using this report. Neither the Investment Advisor nor its affiliates, directors, employees, agents, or representatives, shall be responsible or liable in any manner, directly or indirectly, for the contents or any errors or discrepancies herein or for any decisions or actions taken in reliance on the information. The person accessing this information specifically agrees to exempt the Investment Advisor or any of its affiliates or employees from, any and all responsibility/ liability arising for any such misuse and further agrees to hold the Investment Advisor or any of its affiliates and employees free and harmless from all losses, costs, damages, expenses that may be suffered by the person accessing this information due to any errors and delays.

**Redressal of client grievances:**

Clients can seek clarification regarding their queries and are further entitled to make a complaint in writing, verbally or telephonically. An email may be sent to: [advisory@trufid.com](mailto:advisory@trufid.com)

Alternatively, the Client may call on +91 22 62396060

A letter may also be written with their query/complaint and posted at the below mentioned address:  
Office No.409 4th Floor A Wing, Kanakia Wall Street Chakala, Andheri- Kurla Road, Andheri East, Mumbai, Maharashtra, 400093.

It is mandatory for the Client having grievance to take up the matter directly with the Investment Adviser. The Investment Adviser shall redress the grievance within 21 (Twenty-one) calendar days from the date of receipt of the complaint. In case the Client is still not satisfied with the response, grievance can be lodged with SEBI at <https://scores.gov.in/scores/Welcome.html> or one may also write to any of the offices of SEBI or contact SEBI Office on Toll Free Helpline at [1800 266 7575/ 1800 22 7575](tel:18002667575). The complaint shall be lodged on SCORES within one year from the date of cause of action, where,

- The complainant has approached 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.

SCORES may be accessed through SCORES mobile application as well, same can be downloaded from below link:  
<https://play.google.com/store/apps/details?id=com.ionicframework.sebi236330>  
<https://apps.apple.com/in/app/sebiscores/id1493257302>

If the Client is not satisfied with the extent of redressal of grievance by the Investment Adviser, there is a one-time option for “Compliant review Facility” of the extent of the redressal, which can be exercised within 15 days from the date of closure of the complaint on SCORES. Thereafter, the complaint shall be escalated to the supervising official of the dealing officer of SEBI.

After exhausting all the aforementioned options for resolution, if the client(s) is still not satisfied, they can initiate dispute resolution through the Online Dispute Resolution Portal (‘ODR Portal’) at <https://smartodr.in/login>.

Alternatively, the client(s) can also directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Investment Adviser is not satisfactorily resolved at any stage of the subsequent escalations mentioned above.

The dispute resolution through the ODR Portal can be initiated when the complaint/dispute is not under consideration in SCORES guidelines or not pending before any arbitral process, court, tribunal or consumer forum or are non-arbitrable in terms of Indian law.

The process on Online Dispute Resolution Mechanism is available at <https://advisory.trufid.com/disclosure/> (Under this Disclosure Tab, the link for the SEBI Master Circular on Online Dispute Resolution is available)

**Statutory Details:**

Name of the Investment Adviser: Trufid Advisors Private Limited

Type of Registration - Non-Individual

SEBI Registration no. INA000016889

Validity of Registration: – May 25, 2022- Perpetual

BASL Membership ID: 1833

Corporate Identification Number (CIN): U74999MH2020PTC347245

**Details of Principal Officer**

Mr. Shreenivas Hegde

Phone: +91 22 62396060

E-mail: [shreenivashegde@trufid.com](mailto:shreenivashegde@trufid.com)

**Details of Compliance Officer/Grievance Redressal Officer**

Mr. Gaurav Singhvi

Phone: +91 22 62396060

E-mail: [gaurav@trufid.com](mailto:gaurav@trufid.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.



Registration granted by SEBI, membership of BASL and certification from NISM in no way guarantee performance of the intermediary or provide any assurance of returns to investors.

**Contact us:**

Website: <https://advisory.trufid.com/> | Email: [advisory@trufid.com](mailto:advisory@trufid.com) | Tel: +91 22 62396060

**Corporate and Registered Address:** 409, A Wing, Kanakia Wall Street, Andheri Kurla Road, Andheri E, Mumbai:400093

**For Queries/ Grievances Email-** [advisory@gmail.com](mailto:advisory@gmail.com)

**For Trufid Advisors Private Limited**

A handwritten signature in blue ink that reads "Shreenivas Hegde".

Shreenivas Hegde

**(Principal Officer)**

CIN: U74999MH2020PTC347245 Email ID: [advisory@trufid.com](mailto:advisory@trufid.com) | Contact: +91 22 62396060  
Trufid Advisors Pvt. Ltd., 409A, Kanakia Wall Street, Andheri Kurla Road, Andheri E, Mumbai – 400093

SEBI Registered Investment Adviser

Website: <https://advisory.trufid.com/>