

#### M B Y & Associates Chartered Accountants

617, 6th Floor, ILD Trade Centre, Subhash Chowk, Sohna Road, 122018

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We have verified the Disclosure Document ("the Document) for Portfolio Management Services prepared by Pace Financial Investment Adviser Private Limited, a Portfolio Manager registered with the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020 (SEBI Regn. No. INP000006998), dated 03<sup>rd</sup> July, 2020 having its registered office at A-1/291, Safdarjung Enclave, New Delhi-110029.

The disclosure made in the document is made on the model disclosure documents as stated in Schedule V of Regulation 22 of the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020.

Our certification is based on examination of documents, records and other data as on 10<sup>TH</sup> December, 2024 made available and information & explanations provided to us.

### Based on such examination, we certify that:

- 1. The Disclosure made in the document is true, fair and correct and
- II. The information provided in the Disclosure Document is adequate to enable the investors to make well-informed decisions.

The enclosed document is stamped and signed by us for the purpose of identification.

For MBY & Associates

Chartered Accountants

FRN:0022905N

Name of Auditor: Bala Yadav

Membership No:533776

Date: 10.12.2024

Udin: 24533776BKAHZK3867

## PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED

PORTFOLIO MANAGEMENT SERVICES

DISCLOSURE DOCUMENT



#### Key Information

- This Disclosure Document has been filed with the Securities and Exchange Board of India (SEBI) along
  with the certificate in the prescribed format in terms of Schedule V of SEBI (Portfolio Managers)
  Regulations, 2020.
- The purpose of the Document is to provide essential information about the portfolio services in a
  manner to assist and enable the investors in making informed decisions for engaging Pace Financial
  Investment Adviser Private Limited as a Portfolio Manager.
- This disclosure document sets forth concisely the necessary information about Pace Financial Investment Adviser Private Limited that is required by a prospective investor before investing.
- All the intermediaries involved with Portfolio Manager are registered with SEBI as on date of the document.
- The investor should carefully read the entire disclosure document prior to making a decision to avail
  of the Portfolio Management Services and should retain this Disclosure document for future reference.

#### Principal Officer

#### **Amit Goel**

Director

Tel no. +91-11-47421001

Email:portfoliomanager@pace360.in

#### PORTFOLIO MANAGER

#### Pace Financial Investment Adviser Private Limited

SEBI PMS Registration No.: INP000006998 CIN NO. U65999DL2019PTC348078

Registered Office: A-1/291, Safdarjung Enclave New Delhi-

110029, India

Tel No: +91 11 40587001

E-mail: clientservicepms@pace360.in

Website: www.pace360.in

The Disclosure document is dated :10-12-2024



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#### 1. Disclaimer Clause

This Disclosure Document has been prepared in accordance with the Securities and Exchange Board of India (Portfolio Managers) Regulations 2020 as amended till date and filed with SEBI. This Document has neither been approved nor disapproved by SEBI nor has SEBI certified the accuracy or adequacy of the contents of this Document.

#### Definitions

In this disclosure document, the following words and expressions shall have the meanings specified herein, unless the context otherwise requires:

Act	means the Securities and Exchange Board of India Act, 1992 (15 of 1992)
Board	means the Securities and Exchange Board of India
Accreditation Agencies	means one or more subsidiaries of a recognized Stock Exchange or a Depository, or any other institution which meet the eligibility criteria specified by the Board as an 'Accreditation Agency' for the purpose of carrying out the accreditation process.
Accredited Investors	means investors who are considered to be capable of dealing in relatively riskier investment products due to their financial capacity and ability to absorb possible financial losses and fulfill following eligibility criteria and is granted a certification of accreditation by an Accreditation agency:  A. Individuals, HUFs, Family Trusts and sole proprietorships, which meet the criteria as under:  (i) Annual Income >= INR 2 Crore; OR  (ii) Net Worth >= INR 7.5 Crore, out of which at least INR 3.75 Crore is in the form of financial assets; OR  (iii) Annual Income >= INR 1 Crore+ Net Worth >= INR 5 Crore, out of which at least INR 2.5 Crore is in the form of financial assets;
	B. Partnership Firms set up under the Indian Partnership Act, 1932 in which each partner independently meets the Accredited Investor criteria for individuals.
	C. Trusts (other than family trusts) Assets under Management greater than or equal to INR 50 Crore.
	D. Body Corporates with net worth greater than or equal to INR 50 Crore.
	E. Joint Accounts held by individuals to be considered as Accredited Investor accounts, if: (i) The Joint holders are parent(s) & child(ren), and at least one member is independently fulfilling the eligibility criteria for Accredited Investor, or (ii) The Joint holders are spouses, and their combined income/ net worth meets eligibility criteria.



	F. Central and State Governments, Developmental Agencies set up under the aegis of Government(s) (e.g. SIDBI, NABARD, etc.), Funds set up by government(s), Qualified Institutional Buyers as defined under SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, Category Foreign Portfolio Investors, Sovereign Wealth Funds, Multilateral Agencies (e.g. Asian Development Bank, New Development Bank, International Monetary Fund, World Bank, International Finance Corporation, etc.) etc shall be deemed Accredited Investors.	
	G. The eligibility of foreign investors to be accredited shall be determined or the basis of the rupee equivalent of their income and/ or net worth and/ or AUM as evidenced by their documentary proof of income/ net worth/ AUM	
Client or Investor	means any person who signs an Agreement with the Portfolio Manager for availing portfolio management services.	
Co-Investment Portfolio	Means a Portfolio Manager who is Manager of a Category-I or Category-II	
Manager	Alternative Investment Fund(s) and:	
	(i) Provides services only to the investors of such Category-I or	
	Category-II Alternative Investment Fund(s) and:	
	(ii) makes investment only in unlisted securities of investee	
	companies where such Category-I or Category-II Alternative	
	Investment Fund(s) make investments:	
	Provided that the Co-Investment Portfolio Manager may provide	
	services to investor from any other Category-I or Category-II	
	Alternative Investment Fund(s) which are managed by them	
	and are also sponsored by the same Sponsor(s)	
Disclosure Document	This document issued by Pace Financial Investment Adviser Private Limited	
	for offering Portfolio management services, prepared in terms of Schedule V	
	of SEBI (Portfolio Managers) Regulations, 2020.	
Financial year	means the year starting from April 1 and ending on March 31 of the	
	following year.	
Funds	means the money and/or market value of securities placed by the Client	
	with the Portfolio Manager and any accretions thereto.	
Initial Corpus	means the value of the funds and the market value of readily realizable	
	securities brought in by the client at the time of registering as a client with	
	the Portfolio Manager and accepted by the Portfolio Manager.	
Large Value Accredited	Means an Accredited Investors who has entered into an agreement with the	
Investors	Portfolio Manager for a minimum Capital Contribution of 10 crore rupees.	
NRI	Non-Resident Indian as defined in Section 2(30) of the Income Tax Act, 1961	
Portfolio	Portfolio means the total holdings of funds/securities belonging to any person / investor	
Portfolio Manager	Pace Financial Investment Adviser Private Limited incorporated under the Companies Act, 2013, and registered with SEBI to act as a Portfolio Manager in terms of SEBI (Portfolio Managers) Regulations, 2020 vide Registration No.INP000006998	
RBI	Reserve Bank of India, established under the Reserve Bank of India Act, 1934, as amended from time to time.	



Regulations	means the Securities and Exchange Board of India (Portfolio Managers) Regulations, 2020
SEBI	means The Securities and Exchange Board of India.
The Agreement	The agreement executed between the Portfolio Manager and its clients.
"Securities"	Security as defined in Section 2(h) of the Securities Contract (Regulation) Act, 1956, provided that securities shall not include any securities which the Portfolio Manager is prohibited from investing in or advising on under the Regulations or any other applicable law.

Words and expressions used in this Disclosure Document and not expressly defined shall be interpreted according to their general meaning and usage. The definitions are not exhaustive. They have been included only for the purpose of clarity and shall in addition be interpreted according to their general meaning and usage and shall also carry meanings assigned to them in "Regulations."

#### 2. Description

#### (i) History, Present Business and Background of the Portfolio Manager

Pace Financial Investment Adviser Private Limited was incorporated on 1st April, 2019. It is engaged in the business of rendering investment advisory services, custodial services, asset management services and to act as Merchant Bankers, Portfolio Investment Managers etc. Pace Financial Investment Adviser Private Limited has received approval for rendering portfolio management services vide registration number INPO00006998.

#### (ii) Promoters of the Portfolio Managers, Directors and their background

#### a. Promoters

1. Amit Goel (Din-00

4.4

(Din-00055421)

2. Shweta Goel

d (Din-01079095)

#### b. Particulars of Directors

I. Name of Director

Amit Goel (Din-00055421)

Address
Qualification:

S-33, Panchsheel Park, New Delhi-110017

Master of Business Administration

from Faculty of Management Studies (FMS), Delhi University

Experience

27 YEARS

Date of Admission

April 1, 2019

II. Name of Director

Shweta Goel (Din-01079095)

Address : Qualification :

S-33, Panchsheel Park, New Delhi-110017

1. Post Graduate Diploma in Travel and Tourism

Marketing from Kuoni Academy

2. Master of Business Administration from Institute of

Marketing and Management, Delhi

Experience : 18 YEARS

Date of Admission :

April 1, 2019



#### (iii) THE REGULATED GROUP ENTITIES ARE AS UNDER:

- 1 PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED
- 2 PACE COMMODITY BROKERS PRIVATE LIMITED
- 3 PACE STOCK BROKING SERVICES PRIVATE LIMITED
- 4 PACE FINANCIAL (IFSC) PRIVATE LIMITED
- 5 PACE 360 INVESTMENT TRUST
- 6 PACE PORTFOLIO MANAGERS LLP
- 7 PACE FINANCIAL INVESTMENT SERVICES LLP
- 8 SHINE STAR BUILD-CAP PRIVATE LIMITED

#### (iv) Details of services being offered:

Pace Financial Investment Adviser Private Limited will provide Discretionary and Non-Discretionary Portfolio Management and Advisory services. Kindly refer to Point 5 for more details.

#### 4) Penalties, pending litigation or proceedings, findings of inspection or investigations for which action may have been taken or initiated by any regulatory authority.

(i)	All cases of penalties imposed by the Board or the directions issued by the Board under the Act or Rules or Regulations made thereunder	Nil
(ii)	The nature of the penalty / direction	Not Applicable
(111)	Penalties imposed for any economic offence and / or for violation of any securities laws	Nil
(iv)	Any pending material litigation / legal proceedings against the Portfolio Manager / key personnel with separate disclosure regarding pending criminal cases, if any	Nil
(v)	Any deficiency in the systems and operations of the Portfolio Manager observed by the Board or any regulatory agency	Nil
(vi)	Any enquiry / adjudication proceedings initiated by the Board against the Portfolio Manager or its directors, principal officer or employee or any person directly or indirectly connected with the Portfolio Manager or its directors, principal officer or employee, under the Act or Rules or Regulations made thereunder.	Nil

#### 5. SERVICES OFFERED

#### DISCRETIONARY PORTFOLIO MANAGEMENT SERVICES

Under the Discretionary portfolio management services, the Portfolio Manager will have the sole and absolute discretion to deploy assets brought in by a client in any type of security as per the Agreement. This may include the responsibility of managing and reshuffling the portfolio, buying and selling securities, keeping safe custody of the securities and monitoring book closures, dividend, bonus, rights etc. so that all benefits accrue to the Client's Portfolio, for an agreed fee structure and for a definite period as described, entirely at the Client's risk.

The Portfolio Manager shall have full and absolute discretion to make investment decisions on the client's behalf in any type of security as per the executed agreement. The Portfolio Manager's decision in deployment of the Clients account is absolute and final and can never be called in question or be open to review at any time during the currency of the agreement or any time thereafter except in the ground of



conflict of interest, fraud, malafide intent or gross negligence by the Portfolio Manager. This right of the Portfolio Manager shall be exercised strictly in accordance with the relevant Act, rules and regulations, guidelines and notifications in force from time to time.

The portfolio of a client may differ from that of another client as per the discretion of the Portfolio Manager. The investment objective is to generate capital appreciation predominantly through investments in equities with a medium to long-term perspective.

The Portfolio Manager will have a market capitalization and benchmark agnostic strategy with a flexibility to invest across the market capitalization spectrum (i.e. large, mid and small cap companies) and across industries / sectors. The Portfolio Manager will seek to generate superior risk adjusted returns by superior stock selection based on fundamental research of companies, their businesses, and the valuations at which they are quoting.

#### NON-DISCRETIONARY SERVICES

The Portfolio Manager will provide Non-discretionary Portfolio Management Services as per express prior Instructions issued by the Client from time to time, in the nature of investment consultancy/management, and may include the responsibility of managing, renewing and reshuffling the portfolio, buying and selling the securities, keeping safe custody of the securities and monitoring book closures, dividend, bonus, rights, etc. so as to ensure that all benefits accrue to the Client's Portfolio, for an agreed fee structure and for a definite described period, entirely at the Client's risk.

#### **ADVISORY SERVICES**

The Portfolio Manager will provide Advisory Portfolio Management Services, in terms of the SEBI (Portfolio Manager) Regulations, 2020. The Portfolio Manager's responsibility shall include advising on the portfolio strategy, sectoral allocation and investment and divestment of individual securities on the client portfolio, for an agreed fee structure, entirely at the Client's risk

The Portfolio Manager shall be solely acting as an advisor to the portfolio of the client and shall not be responsible for the investment / divestment of securities and / or administrative activities on the client's portfolio.

Currently the Portfolio Manager is offering various investment approaches under Pace 360 Multi Asset PMS Scheme. Pace 360 Multi Asset PMS is the debut scheme of Portfolio Manager with various investment approaches will focus on investing in multi assets which are listed at least on one of the recognized stock exchanges in India. Various asset classes that the PMS will take exposure into:

- Domestic and Global equity & equity related instruments
- Debt & fixed income instruments such as bonds, preference capital, commercial paper, corporate bonds, tax-free bonds and pass-through certificates across maturities
- Commodities like Metals, Energy, Agro-commodities and other commodities and related instruments
- Real Estates related investment instruments like REIT and InvIT

The portfolio may also invest in listed mutual fund schemes and ETFs of the above assets individually or in combination.

For providing a safe avenue to the portfolio during bearish conditions, the portfolio may invest in money market fund schemes.



The investment approach would strive to generate total returns through regular rebalancing within the asset classes in its portfolio.

The portfolio would have the optimal diversification across asset classes and sub-asset classes, with the opportunistic overweight/underweight vis-à-vis its blended benchmark. It would endeavor to grab certain high conviction picks, to potentially generate higher alpha.

The portfolio may aim to use derivatives up to an extent, as an additional tool to complement the portfolio return in the special situation. All such positions would be within the relevant regulations.

#### Investment Objective

- The portfolio manager will work towards achieving the following objectives for any investments Consistent return with low volatility
- 2. Generate alpha against the benchmark index
- 3. Sustainably beat inflation to generate high quality real return

The above-mentioned objectives serve for a generic portfolio management however, the final Investment objective will depend on the client and his/her profile. A client may only want to focus on capital protection which will limit our choice of securities. Similarly, if a client wants aggressive capital appreciation, we have to ease our volatility measures.

#### **Investment Approaches**

Portfolio Manager will focus on investing in multi assets which are listed at least on one of the recognized stock exchanges in India. Various asset classes that the PMS will take exposure into:

- · Domestic and Global equity & equity related instruments
- Debt & fixed income instruments such as bonds, preference capital, commercial paper, corporate bonds, tax-free bonds and pass-through certificates across maturities
- Commodities like Metals, Energy, Agro-commodities and other commodities and related instruments
- · Real Estates related investment instruments like REIT and InvIT

The portfolio may also invest in listed mutual fund schemes and ETFs of the above assets individually or in combination.

For providing a safe avenue to the portfolio during bearish conditions, the portfolio may invest in money market fund schemes.

The investment approach would strive to generate total returns through regular rebalancing within the asset classes in its portfolio.

The portfolio would have the optimal diversification across asset classes and sub-asset classes, with the opportunistic overweight/underweight vis-à-vis its blended benchmark. It would endeavor to grab certain high conviction picks, to potentially generate higher alpha.

The portfolio may aim to use derivatives up to an extent, as an additional tool to complement the portfolio return in the special situation. All such positions would be within the relevant regulations.

#### Investment Horizon and Risk-Return Profile:

Portfolio is recommended for investors seeking to hold a Multi Asset portfolio with risk appetite as per the investment approach opted and expecting the returns over a long-term horizon. Portfolio investment may be recommended for more than 3 years.

#### Benchmark:

Based on the latest SEBI circular and the benchmark options suggested by APMI, following benchmark is used to analyze the performance of the Portfolio w.e.f.01\*\* April,2023. The composition of these blended benchmarks has also been defined by the respective benchmark agency. The benchmark selection will depend on the investment approach opted by the investor.



- CRISIL-Aggresive Credit Debt Term Index (For Tresor Secure and Tresor Shield)
- NSE Multi Asset Index 1(For Tresor Flexi, Tresor Smart Beta, Tresor Prive, Tresor Smart Aplha and SKG India Value)

#### Size of the Portfolio:

The Client shall deposit with the Portfolio Manager, an Initial Corpus consisting of funds of an amount prescribed by the Portfolio Manager for a specific portfolio in the "Strategy Term Document", subject to minimum amount as specified under SEBI Regulations, as amended from time to time. The client may on one or more occasion or on a continual basis, make further placement of funds under the service.

#### Securities in the Portfolio:

- Investments can be made in all types of equity & equity related securities listed at any of the recognized stock exchange including but not limited to all the equity indices, shares, units of equity mutual funds, Exchange Traded Funds based on Foreign Indices and overseas market, units of SEBI registered & listed Alternative Investment Funds, Hedge & arbitrage funds, equity derivatives (Futures & Options) and the like as may be permitted by the Act, Rules and/or Regulations, guidelines and notifications in force from time to time. These securities may be acquired through primary market issuances such as a subscription to Initial public offers, Follow on Public offers, Rights issues and private placements of securities, secondary market purchases, and the like.
- Investments can be made in all types of debt securities including but not limited to debentures of any maturity (fixed, floating, Variable Coupon, and equity index / stocks / stocks basket linked, real estate backed) which are listed and may or may not be convertible, non-convertible, secured, unsecured, rated, Securitized Debt, instruments with debt like features (e.g. Compulsorily redeemable preference shares), Pass Through Certificates, Bonds, Government securities issued or guaranteed by Central or State Government, corporate debt of both public and private sector undertakings, securities issued by banks (both public and private sector) and development financial institutions, fixed deposits, commercial papers, certificate of deposit, treasury bills and other money market instruments, units of Debt mutual funds, Exchange Traded Funds, units of SEBI registered & listed Alternative Investment Funds, floating rate debt securities and fixed income derivatives like interest rate swaps, forward rate agreements and the like as may be permitted by the Act, Rules and/or Regulations, guidelines and notifications in force from time to time. It also includes Real Estates related instruments like REIT, InvIT, Real Estate Mutual Funds, and the like These securities may be acquired through primary market issuances such as a subscription to Initial public offers, Follow on Public offers, Rights issues and private placements of securities, secondary market purchases, auctions held by the Reserve Bank of India, open market sales of securities conducted by Reserve Bank of India and the like.

The Portfolio manager may buy securities which have equity like nomenclature while the features in terms of returns and convertibility will be like debt. These instruments would include but not be limited to securities like non-convertible compulsorily redeemable preference shares, optionally convertible preference shares and some Optionally convertible debentures. Investment in listed/publicly traded securities will be valued on the day end's NAV/closing price. Investment in other debt instruments will be valued as per valuation provided by the valuation agency/ies.



#### Source of income in the Portfolio

It is envisaged that the investor, including FPIs, could earn the following streams of income from investments made in the portfolio investments:

- Dividend income;
- Interest income;
- Short term/Long Term Gains on sale of securities and mutual funds; and
- · Other income from investment in Derivatives

#### Additionally,

a) The debentures which the Portfolio Manager may invest in for the client may or may not have some form of collateral backing them. Such collateral may include one or more amongst the following – real estate assets, shares of the issuing company, shares of other companies related to the issuing company, other listed or unlisted shares, escrow of cashflows, brand, patents, fixed assets of the company etc. However, depending on the specific collateral used and as per the interpretation of the Companies Act, 2013 the debentures may be deemed to be secured or unsecured in nature.

- b) Investment in Instruments that are listed may not be backed by any collateral.
- c) Investments in preference capital issues may not be backed by any collateral and would be subject to the Company Law regulations or any other statutes that may govern their issuance from time to time.
- d) Investing in any tranche of a Pass-through certificate may not be backed by any collateral.
- e) Owing to the credit risk of debt that the investment approach is investing into, the preservation of capital is not guaranteed. In case of a default by issuer in any of the underlying securities, the trustees would endeavour to recover the principal and the interest for the investors but there is a risk of erosion of the principal invested in the investment approach by the investor. Additionally, the recovery process in case of a default may take time to be implemented. Hence, at the level of each individual instrument, there exists a risk of partial or complete capital erosion in case of a default by the issuer.
- f) The securities invested into by the investment approach will have credit quality of a wide range and hence a varying amount of credit risk. Investment will be made only in rating A & above securities. The issuing company's latest available credit rating will be considered. The rating of the securities or the issuing company will be A and above.
- g) The Portfolio Manager will endeavour to follow stringent due diligence process while selecting the securities.
- Investments can be made in Gold, Silver, other metal commodities, Crude & Energy, Agro & Non-Agro based commodities, and Related Instruments listed at any of the recognized commodity exchange (Multi Commodity Exchange) including but not limited to all the units of commodity-linked mutual funds, Exchange Traded Funds, Sovereign Gold Bonds, units of SEBI registered & listed Alternative Investment Funds, commodity derivatives and the like as may be permitted by the Act, Rules and/or Regulations, guidelines and notifications in force from time to time. These securities may be acquired through primary market issuances such as a subscription to Initial public offers, secondary market purchases, and the like.



The following are the Investment approaches available in Pace 360 Multi Asset PMS. An investor can choose any one of the investment approaches according to his Investment Objective, Time Horizon, Risk Tolerance, and personal preference. The Clients Portfolio is customized taking into account the clients preferences and objectives with reference to risk and reward as indicated in the clients application form.

1)

Name of Investment Approach:	TRESOR SMART ALPHA:
	This is a multi-asset investment approach that
	adopts an aggressive investment methodology
	Instead of investing directly in individual
	securities, it utilizes ETFs to gain exposure to
	various asset classes. This strategy helps to
	diversify the portfolio and mitigate overall
	investment risk.
Strategy	Multi Asset
Benchmark	NSE Multi Asset Index 1
Name of Fund Manager	Mr.Amit Goel
Asset Allocation :	
	• Fixed Income (NCD/CP/CD/MFs/ETFs etc.) &
	Cash Equivalents : up to 100%
	Precious Metals : Gold & Silver (ETFs/ SGBs):
	Upto 10%
	• Equity & Equity equivalents (Direct
	Stocks/MFs/ETFs): up to 100%
Risks associated with the Investmen	nt Risk associated with equity & Precious
approach	Metals investment
	Concentration Risk: This symbolizes
	the probability of loss arising from
	heavy exposure to a particular group
	of sectors or securities.
	Market Risk: The portfolio is always
	subject to market volatility, which
	could have an impact on the pricing
	and performance of the portfolio
	Liquidity risk: The liquidity of the
	Portfolio's investments may
	intrinsically be limited by trading
	volumes in the securities in which it
	invests.
	Risk associated with debt and money
	market investment
	<ul> <li>Market Risk/ Interest Rate Risk:</li> </ul>
	Changes in market interest rates may
	affect the Portfolio Value as the prices



	of securities generally inversely proportional to interest rate movement. Prices of longer duration securities generally fluctuate more with interest rate movement than shorter-duration securities. So, the possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in the value of the Portfolio.  • Credit Risk: Credit risk or default risk is an inherent risk if the issuer of fixed income security may default on its obligation and will be unable to make timely principal and/or interest payments on the security.
Indicative Tenure or investment horizon	Investor is expected to invest for a tenor of 3-5 years in this investment approach

2)

Name of Investment Approach	SKG INDIA VALUE:  This is a multi-asset investment approach primarily focused on equity and equity-related instruments, following a highly aggressive investment methodology. The strategy emphasizes allocation to large-cap, mid-cap and small-cap equity securities, with the flexibility to invest in other asset classes based on the portfolio manager's market outlook.
Strategy	Multi Asset
Benchmark	NSE Multi Asset Index 1
Name of Fund Manager	Mr. Amit Goel
Asset Allocation :	<ul> <li>Equity Derivatives: up to 100%</li> <li>Fixed Income &amp; Cash Equivalents: up to 100%</li> <li>Direct Equity, Equity Arbitrage and Equity equivalents (MFs/ETFs): up to 100%</li> <li>REITs/InVITs: Up to 10%</li> </ul>
Risks associated with the Investment approach	Risk associated with equity & Precious  Metals investment  Concentration Risk: This symbolizes the probability of loss arising from heavy exposure to a particular group of sectors or securities.  Market Risk: The portfolio is always subject to market volatility, which



	could have an impact on the pricing and performance of the portfolio  • Liquidity risk: The liquidity of the Portfolio's investments may intrinsically be limited by trading volumes in the securities in which it
	invests.
	Risk associated with debt and money market investment
	<ul> <li>Market Risk/ Interest Rate Risk:         Changes in market interest rates may affect the Portfolio Value as the prices of securities generally inversely proportional to interest rate     </li> </ul>
	movement. Prices of longer duration securities generally fluctuate more with interest rate movement than shorter-duration securities. So, the
	possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in
	the value of the Portfolio.  • Credit Risk: Credit risk or default
	risk is an inherent risk if the issuer of fixed income security may default on
	its obligation and will be unable to make timely principal and/or interest payments on the security.
Indicative Tenure or investment horizon	Investor is expected to invest for a tenor of 3-5

3)

Name of Investment Approach	TRESOR SMART BETA:  This is a multi-asset investment approach focusing on concentrated portfolio. It employs a 'bottom-up' methodology for security selection across all asset classes, prioritizing individual security analysis over a macro, top-down approach.
Strategy	Multi Asset
Benchmark	NSE Multi Asset Index 1
Name of Fund Manager	Mr. Amit Goel
Asset Allocation:	<ul> <li>Fixed Income (NCDs/MFs/ETFs/Bonds): up to 100%</li> <li>Sovereign Gold Bonds/ ETFs/ Precious Metals Derivatives: up to 30%</li> </ul>



years in this investment approach

	<ul> <li>Equity and Equity equivalents (MFs/ETFs): up to 100%</li> <li>Global Equity ETFs: up to 30%</li> </ul>
Risks associated with the Investment approach	Risk associated with equity & Precious Metals investment
	Concentration Risk: This symbolizes the probability of loss arising from heavy exposure to a particular group of sectors or
	securities.     Market Risk: The portfolio is always     which to market valetility which
	subject to market volatility, which could have an impact on the pricing and performance of the portfolio
	<ul> <li>Liquidity risk: The liquidity of the Portfolio's investments may intrinsically be limited by trading</li> </ul>
	volumes in the securities in which it invests.
	Risk associated with debt and money market investment
	<ul> <li>Market Risk/ Interest Rate Risk:         Changes in market interest rates may affect the Portfolio Value as the prices of securities generally inversely proportional to interest rate     </li> </ul>
	proportional to interest rate movement. Prices of longer duration securities generally fluctuate more with interest rate movement than shorter-duration securities. So, the
	possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in the value of the Portfolio.
	<ul> <li>Credit Risk: Credit risk or default risk is an inherent risk if the issuer of fixed income security may default on its obligation and will be unable to make timely principal and/or interest</li> </ul>
	payments on the security.
Indicative Tenure or investment horizon	Investor is expected to invest for a tenor of 3-5

TRESOR SMART BETA: The former name of scheme was Tresor Sustainer. There are changes in asset allocation. At the time of above changes there were no investor invested in the scheme. The changes shall be applicable w.e.f. 10.12.2024.



years in this investment approach

Name of Investment Approach	TRESOR SECURE:  This is primarily a fixed-income investmen approach designed to follow a conservative risk strategy. It may also allocate to precious metals
Strategy	based on the portfolio manager's market outlook.  Deht
Benchmark	
Name of Fund Manager	CRISIL-Aggresive Credit Debt Term Index Mr. Amit Goel
Asset Allocation :	Fixed Income (NCDs/MFs/ETFs/Bonds): up to 100%     Sovereign Gold Bonds/ ETFs/ Precious Metals Derivatives: up to 50%
Risks associated with the Investment approach	Risk associated with debt and money market investment  • Market Risk/ Interest Rate Risk: Changes in market interest rates may affect the Portfolio Value as the prices of securities generally inversely proportional to interest rate movement. Prices of longer duration securities generally fluctuate more with interest rate movement than shorter-duration securities. So, the possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in the value of the Portfolio.  • Credit Risk: Credit risk or default risk is an inherent risk if the issuer of fixed income security may default on its obligation and will be unable to make timely principal and/or interest payments on the security.
Indicative Tenure or investment horizon	Investor is expected to invest for a tenor of 2-3 years in this investment approach

5)

Name of Investment Approach	TRESOR FLEXI:		
	This is primarily a multi-asset investment		
	approach that allows the portfolio manager to		
	adjust asset allocation dynamically based on their		
	market outlook. The manager has full flexibility to		



	allocate investments across one or multiple asset		
	classes as deemed appropriate.		
Strategy	Multi Asset		
Benchmark	NSE Multi Asset Index 1		
Name of Fund Manager	Mr. Amit Goel		
Asset Allocation :	<ul> <li>Fixed Income (NCDs/MFs/ETFs/Bonds):         up to 100%</li> <li>Sovereign Gold Bonds/ ETFs/ Precious         Metals Derivatives; up to 100%</li> <li>Equity and Equity equivalents</li> </ul>		
	(MFs/ETFs)/ Equity Derivatives: up to 100%  Global Equity ETFs: up to 100%		
Risks associated with the Investment	Risk associated with equity & Precious		
approach	Concentration Risk: This symbolizes the probability of loss arising from heavy exposure to a particular group of sectors or securities.      Market Risk: The portfolio is always subject to market volatility, which could have an impact on the pricing and performance of the portfolio     Liquidity risk: The liquidity of the Portfolio's investments may intrinsically be limited by trading volumes in the securities in which it invests.		
	Risk associated with debt and money market investment		
	<ul> <li>Market Risk/ Interest Rate Risk:         Changes in market interest rates may affect the Portfolio Value as the prices of securities generally inversely proportional to interest rate movement. Prices of longer duration securities generally fluctuate more with interest rate movement than shorter-duration securities. So, the possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in the value of the Portfolio.</li> <li>Credit Risk: Credit risk or default risk is an inherent risk if the issuer of fixed income security may default on</li> </ul>		



	make timely principal and/or interest payments on the security.
Indicative Tenure or investment horizon	Investor is expected to invest for a tenor of
	3-5 years in this investment approach

<sup>\*</sup> The distribution within the portfolio will depend on the market dynamics and the portfolio manager's market outlook. The portfolio manager has the discretion to decide the final asset composition and security selection within the asset class. The portfolio can hold into Cash & Cash Eq. for short term.

6)

Name of Investment Approach	TRESOR PRIVE:
	Tresor Prive embodies a true multi-asset
	investment approach, with the flexibility to invest
	in any security listed on at least one recognized
	stock exchange in India. This includes a diverse
	range of asset classes such as equities, fixed
	income, precious metals, REITs, InvITs, and
	commodities.
Strategy	Multi Asset
Benchmark	NSE Multi Asset Index 1
Name of Fund Manager	Mr. Amit Goel
Asset Allocation :	Domestic and Global equity & equity
	related instruments
	Debt & fixed income instruments such
	as bonds, preference capital,commercial
	paper, corporate bonds, tax-free
	bonds, and pass-through certificates
	across maturities.
	<ul> <li>Commodities like Metals, Energy, Agro-</li> </ul>
	commodities and other commodities and
	related instruments
	Real Estates related investment
	instruments like REIT and InvIT.
	The asset allocation in the portfolio may include
	one or more of the following asset classes in
	various compositions.*
	• Fixed Income
	(NCDs/MFs/ETFs/Bonds): up to 100%
	<ul> <li>Sovereign Gold Bonds/ ETFs/ Precious</li> </ul>
	Metals Derivatives: up to 100%
	<ul> <li>Equity and Equity</li> </ul>
	equivalents(MFs/ETFs)/ Equity
	Derivatives: up to100%
	Real Estate Funds, REIT, InvIT: Up to
	100%



- Commodity Derivatives (Energy/ Metals/ Agro& Non-Agro Commodities):
   Up to 100%
- Global Equity ETFs: up to 100%

## Risks associated with the Investment approach

## Risk associated with equity & Precious Metals investment

- Concentration Risk: This symbolizes the probability of loss arising from heavy exposure to a particular group of sectors or securities.
- Market Risk: The portfolio is always subject to market volatility, which could have an impact on the pricing and performance of the portfolio
- Liquidity risk: The liquidity of the Portfolio's investments may intrinsically be limited by trading volumes in the securities in which it invests.

## Risk associated with debt and money market investment

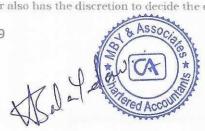
• Market Risk/ Interest Rate Risk: Changes in market interest rates may affect the Portfolio Value as the prices of securities generally inversely proportional to interest rate movement. Prices of longer duration securities generally fluctuate more with interest rate movement than shorter-duration securities. So, the possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in the value of the Portfolio.

> Credit Risk: Credit risk or default risk is an inherent risk if the issuer of fixed income security may default on its obligation and will be unable to make timely principal and/or interest payments on the security.

#### Indicative Tenure or investment horizon

Investor is expected to invest for a tenor of 3-5 years in this investment approach

\* The distribution within the portfolio will depend on the market dynamics and the portfolio manager's market outlook. The portfolio manager has the discretion to decide the final asset composition and security selection within the asset class. The portfolio manager also has the discretion to decide the composition of



the benchmark using the relevant indices which will be confirmed to respective investor on the investor's registered mail id and investor has to provide the acknowledgement of acceptance. The portfolio can hold into Cash & Cash Equivalent for short term.

\$ The Portfolio Manager has the discretion and may create different composition of securities under the existing "Tresor Prive" investment approach denominated by the unique sequence. Post above, this approach may invest in the same asset classes in the same or different combination. The respective benchmark for this approach may have the different composition of indices which will be decided by the Portfolio Manager with Investor's consent. Further as an additional measure the portfolio manager shall also have in additional authority wherein portfolio manager may have different investment approaches aligned with different client's kyc and other requirements as per appointed custodian to comply with the desired regulations. This is to clarify that all such changes in investment approaches shall be intimated to the client and under the intimation acknowledgement of client.

7)

Name of Investment Approach	TRESOR SHIELD:		
	Tresor Shield is a fixed income investment approach and aims to prioritize income over capital appreciation by investing in instrument that distribute interest and preference dividend income would also be generated through buying and selling of fixed income securities over the short term to medium term by taking advantage of avenues in both the primary and the secondary markets.  Debt  CRISIL-Aggresive Credit Debt Term Index  Mr. Amit Goel		
Strategy			
Benchmark			
Name of Fund Manager			
Asset Allocation :	Portfolio investment approach is to invest only in rated & listed fixed income securities such as Non-convertible Debentures, preference capital, commercial paper, corporate bonds, tax free bonds and pass-through certificates across maturities.  The portfolio may also invest in listed Debt mutual fund schemes and ETFs individually or in combination.		
Risks associated with the Investment approach	Risk associated with debt and money market investment  Market Risk/ Interest Rate Risk: Changes in market interest rates may affect the Portfolio Value as the prices of securities generally inversely proportional to interest rate movement. Prices of longer duration securities generally fluctuate more		



	shorter-duration securities. So, the possible reaction of Fixed Income securities in the Indian Debt Market may lead to possible movements in the value of the Portfolio.  • Credit Risk: Credit risk or default risk is an inherent risk if the issuer of fixed income security may default on its obligation and will be unable to make timely principal and/or interest
Indicative Tenure or investment horizon	payments on the security.  Investor is expected to invest for a tenor of 1-3 years in this investment approach

Note: The Portfolio Manager may, at its discretion if it deems fit, hold any Portfolio Investment beyond indicative tenure.

#### Investment Philosophy:

The investment approach of Tresor Shield is to buy and hold the low to moderate yield debt instruments keeping the flexibility to respond to the changing market conditions and interest rate environment. However, sale at a premium before maturity will also be explored subject to opportunities. Opportunistically, the portfolio will also target extracting returns for market making for low to moderate yield debt instruments – buying and selling over a short duration. The strategy will undertake to an extent as deemed fit by the Portfolio Manager, opportunistic buying and selling of debt securities or any other instrument in the portfolio to improve the returns earned by investors. However, in this endeavour, the portfolio manager may on some occasions not receive suitable exit for the securities thus bought in the portfolio. In such cases, the portfolio manager may either decide to hold such security to maturity or to exit it at a loss when compared with the purchase price. For investors entering the investment approach partially or wholly through their current holdings of debt instruments, the portfolio manager will seek to diversify these holdings to reduce concentration of credit risk. As a possible implication, the yield in Internal Rate of Return [IIR] terms and income paid out through regular coupons of the portfolio thus achieved may be different (and lower) from that of their current holdings.

#### 6. Policy for investment in Associate / Group companies and for conflicts

The Portfolio Manager will not invest in its subsidiary or associate companies. All transactions of purchase and sale of securities by portfolio manager and its employees who are directly involved in investment operations shall be disclosed if found having conflict of interest with the transactions in any of the client's portfolio. If the portfolio manager has group companies, a disclosure of conflict of interest related to services offered by group companies of the portfolio manager if any shall be made.

#### 7. Direct Onboarding Facility

The Portfolio Manager provides direct onboarding facility to Clients. Clients can directly invest with Portfolio Manager without any intermediary or distribution agent. To know more please refer to our website www.pace360.in



#### 8. Risk Factors

#### 8.1 Risks associated with Equity & Precious Metals and other Commodity investments:

It is to declare that the stocks or companies may or may not declare a dividend in the future even if they have declared a dividend in the past or they may declare the lesser dividend in the subsequent period. The portfolio manager does not give any assurance for the same.

The performance of the portfolio could be impacted by the changing domestic and global economic conditions. The performance may also be subsequently impacted by various unexpected activities including terrorism or acts of war.

Operational risk can arise out of systemic issues within an organization, Operational risk is intrinsic to any business due to which it becomes difficult to operate in the market.

It is to declare that the portfolio manager may invest in the Equity/ Precious Metals/Commodity derivatives segment which is also allowed up to the extent of portfolio value. It is to complement the portfolio returns and to hedge in the short term. This investment is limited to the investment approach selected by the investor.

The Client may withdraw whole or part of the portfolio by giving advance notice and the Portfolio Manager will endeavor to liquidate the securities held in the investment approach and return the funds or securities of the investment approach as per the terms of portfolio agreement, as the case may be, to the client within a reasonable time. In case the Portfolio Manager is for any reason unable to sell the securities, the Client shall be obliged to accept the securities in the portfolio.

#### 8.2 Risks associated with debt and money market mutual fund schemes:

The investment in debt and money market schemes exposes the portfolio to Market Risk, Liquidity Risk, Credit Risk, and Interest Rate Risk which are inherent in investments in debt and money market securities. The following are the risk and mitigants for investment in debt and money market securities which would be impacting the value of the portfolio.

#### 8.3 General Risk Factor

- All Investments under the portfolio are subject to market and other related risks. Portfolio Manager
  gives no assurance or guarantees that the value of or return on investments will always be
  accumulative, it could depreciate to an unpredictable extent.
- Securities investments are subject to market risks and there is no assurance or guarantee that
  the objectives of investments will be achieved.
- Past performance of the Portfolio Manager is not indicative of its future performance.
- Investors are not being offered any guaranteed or assured return/s i.e. either of Principal or appreciation on the portfolio.
- Investors may note that Portfolio Manager's investment decisions may not be always profitable, as
  actual market movements may be at variance with anticipated trends.
- The liquidity of the Portfolio's investments is inherently restricted by trading volumes in the securities in which it invests.
- The valuation of the Portfolio's investments, may be affected generally by factors affecting securities markets, such as price and volume volatility in the capital markets, interest rates, currency exchange rates, changes in policies of the Government, taxation laws or any other appropriate authority policies and other political and economic developments which may have an adverse bearing on individual securities, a specific sector or all sectors including equity and debt



- markets. There will be no prior intimation or prior indication given to the Clients when the composition / asset allocation pattern changes.
- Risk Arising from Investment Objective, investment approach and Asset Allocation Trading volumes, settlement periods and transfer procedures may restrict the liquidity of the investments made by the Portfolio. Different segments of the financial markets have different settlement periods and such periods may be extended significantly by unforeseen circumstances. The inability of the Portfolio to make intended securities purchases due to settlement problems could cause the Portfolio to miss certain investment opportunities. By the same rationale, the inability to sell securities held in the portfolio due to the absence of a well-developed and liquid secondary market for debt securities would result, at time, in potential losses to the Portfolio, in case of a subsequent decline in the value of securities held in the Portfolio.
- The Portfolio Manager may, considering the overall level of risk of the portfolio, invest in lower rated/unrated securities offering higher yields and/or higher capital appreciation potential. This may increase the risk of the portfolio. Such investments shall be subject to the scope of investments as laid down in the Agreement.
- Securities, which are not quoted on the stock exchanges, are inherently illiquid in nature and carry a larger amount of liquidity risk, in comparison to securities that are listed on the exchanges or offer other exit options to the investor, including a put option. The Portfolio Manager may choose to invest in unlisted securities that offer attractive yields and/or higher capital appreciation potential. This may however increase the risk of the portfolio. Such investments shall be subject to the scope of investments as laid down in the Agreement.
- While securities that are listed on the stock exchange carry lower liquidity risk, the ability to sell these investments is limited by the overall trading volume on the stock exchanges. Money market securities, while fairly liquid, lack a well-developed secondary market, which may restrict the selling ability of the Portfolio(s) and may lead to the investments incurring losses till the security is finally sold.
- The Portfolio Manager may, subject to authorization by the Client in writing, participate in securities lending. The Portfolio Manager may not be able to sell / lend out securities, which can lead to temporary illiquidity. There are risks inherent in securities lending, including the risk of failure of the other party, in this case the approved intermediary to comply with the terms of the agreement. Such failure can result in a possible loss of rights to the collateral, the inability of the Approved Intermediary to return the securities deposited by the lender and the possible loss of corporate benefits accruing thereon.
- To the extent that the portfolio will be invested in securities denominated in foreign currencies, the India Rupee equivalent of the net assets, distributions and income may be adversely affected by fluctuations in foreign exchange rates caused by changes in regulations concerning exchange controls, political circumstances or other restrictions on investment.
- Interest Rate Risk: changes in interest rates may affect valuation of the Portfolio. Debt markets
  can be volatile leading to the possibility of price movements up or down in fixed income securities
  and thereby of possible movements in the valuations of Portfolios.
- Liquidity or Marketability Risk: Certain securities may become impossible to sell or not
  marketable due to the absence of any potential buyers. In such situations, the investment in the
  securities may be lost or its realization may be inordinately delayed.



- Derivative Risk: Derivatives are specialized instruments that require an understanding not only of the underlying interest but of derivatives itself. Portfolios using derivatives / futures and Options products are affected by risks different from those associated with stock and bonds. Such products are highly leveraged instruments and their use requires a high degree of skill, diligence and expertise. Small price movements in the underlying security may have a large impact on the value of the derivatives and Futures and Options. Some of the risks relate to mispricing or the improper valuation of derivatives and the inability to correlate the positions with underlying assets, rates and indices, counter party risk. Also, the market for derivatives markets nascent in India.
- Credit Risk: Credit Risk or default risk refers to the risk that an issuer of a fixed income security may default (i.e., will be unable to make timely principal and interest payments on the security). Because of this risk corporate debentures are sold at a higher yield above those offered on Government Securities which are sovereign obligations and carry lower credit risk. Normally, the value of a fixed income security will fluctuate depending upon the changes in the perceived level of credit risk as well as any actual event of default. The greater the credit risk, the greater the yield required for someone to be compensated for the increased risk.

#### Risks arising out of Non Diversification

Diversification of portfolio across asset classes, investment themes, sectors and securities is normally construed to be less risky for investors. It is to be noted that the portfolio is likely to be more focused on a single asset class, i.e. equities which inherently can be volatile. Further the portfolio could be subject to more risk on account of its concentration of investments into a few sectors or a limited number of securities. In addition to limited/inadequate diversification across asset classes, themes and sectors, the portfolio could be prone to higher risk on account of non-diversification across capitalizations, particularly if the portfolio has a bias towards mid-cap and small-cap companies.

#### Specific Risk factors pertaining to Unlisted Securities

In case of a Company's IPO, the investment maybe subject to regulatory lock in, if any, as prescribed by SEBI from time to time. Many of such investments made by the Portfolio Manager may be illiquid, and there can be no assurance that the Portfolio Manager will be able to realize value from such investments in a timely manner. Since such investment may involve a high degree of risk, poor performance by such investments could lead to adverse effects on investor portfolios.

#### 9. FINANCIAL PERFORMANCE BASED ON THE AUDITED FINANCIAL STATEMENTS

The Portfolio Manager is established and registered on 1<sup>st</sup> April, 2019. The Audited Summarized financial Statements for the immediately preceding three years is as under:

Particulars	Amount in INR (based on previous three audited financials)				
Farticulars	2023-24	2022-23	2021-22		
Total Income	5,98,61,708	2,71,84,639	1,25,84,374		
Profit/Loss After Tax	3,69,50,530	1,29,37,888	22,06,042		
Paid up Capital	6,00,00,000	6,00,00,000	6,00,00,000		
Reserve & Surplus	5,46,45,200	1,76,94,671	47,56,782		

Extract of pages of audited financial statements Balance sheet, P&L and Cash Flow-Ann-1.



The Net worth of M/s Pace Financial Investment Adviser Private Limited as on 31st March,2024 was Rs.10,96,45,200/- (Rupees Ten Crore Ninety-Six Lakh Forty Five Thousand and Two Hundred Only)

#### 10. PORTFOLIO MANAGEMENT PERFORMANCE

Portfolio Management performance of the portfolio manager for the last year in case of discretionary Portfolio - disclosure of performance indicators calculated using 'Time Weighted Rate of Return' method in terms of Regulation 22 (4) (e) of SEBI (Portfolio Managers) Regulations, 2020.

#### 1. TRESOR FLEXI

Particulars	Current Year (April 01,2024 - November 30,2024	Annualized Return as on 31.03.2024	Return as on	Annualized Return as on 31.03.2022
Portfolio Performance (%) Net of all fees and charges levied	6.76%	23.46%	11.74%	12.67%
TRESOR FLEXI Benchmark: NSE Multi Asset Index)	9.49%	23.73%	9.87%	11.45%

#### 2. TRESOR SECURE

Particulars	Current Year (April 01,2024 -November 30,2024	Annualized Return as on 31.03.2024	Return as on	Annualized Return as on 31.03.2022
Portfolio Performance (%) Net of all fees and charges levied	11.80%	11.57%	7.16%	6.18%
TRESOR SECURE (CRISIL-Aggresive Credit Debt Term Index	6.72%	11.10%	3.37%	2.71%

#### 3.TRESOR SMART BETA (previously known as TRESOR SUSTAINER)

Particulars	Current Year (April 01,2024 -November 30,2024	Annualized Return as on 31.03.2024	Return as on	Annualized Return as on 31.03.2022
Portfolio Performance (%) Net of all fees and charges levied	7.16%	19.58%	11.92%	13.23%
TRESOR SMART BETA (Benchmark: NSE Multi Asset Index)	9.49%	23.73%	6.91%	10.31%

Scheme name of Tresor Sustainer has been changed to "Tresor Smart Beta" w.e.f 10.12.2.024



#### 4. TRESOR PRIVE

Particulars	Current Year (April 01,2024 -November 30,2024	Annualized Return as on 31.03.2024	Annualized Return as on 31.03.2023	Annualized Return as on 31.03.2022
Portfolio Performance (%) Net of all fees and charges levied	4,21%	18.65%	13.38%	NA
TRESOR PRIVE (Benchmark: NSE Multi Asset Index)	9.49%	23.73%	6.78%	NA

#### 5. SKG INDIA VALUE

Particulars	Current Year(April 01,2024 -November 30,2024	Annualized Return as on 31.03.2024	Annualized Return as on 31.03.2023 (w.e.f July,2023)
Portfolio Performance (%) Net of all fees and charges levied	9.03%	35.53%	NA
SKG INDIA VALUE (Benchmark: NSE Multi Asset Index)	9.49%	13.31%	NA

#### 6. TRESOR SMART ALPHA

Particulars	Current Year (April 01,2024 -November 30,2024	Annualized Return as on 31.03.2024	Annualized Return as on 31.03.2023
Portfolio Performance (%) Net of all fees and charges levied	4.65%	15.70%	11.74%
TRESOR SMART ALPHA Benchmark: NSE Multi Asset Index)	-0.39%	20.52%	9.87%

Imp Note: Scheme name of Senya Maximizer has been changed to "Tresor Smart Alpha"

There are no investors in Tresor Shield. Tresor Prive and Tresor Prive1 have come into effect in the month of May,2022. **Tresor Prive1 has been merged into Tresor Prive category w.e.f 01st August,2023.** Name of Senya Maximizer has been renamed as "**Tresor Smart Alpha**" and there was no client in Tresor Smart Alpha on 20th July,2024. SKI India Value have come into effect in the month of July,2023. Performance numbers of previous financial year for these portfolios are available for disclosure. Returns for above investments approaches have been calculated from first investment date till 30th November,2024 in respective investment approach. The Name of Tresor Sustainer has been renamed as "Tresor Smart Beta" and there was no client in this scheme as on 10th December,2024.

The background and experience of the Directors is provided in Point 3 above.



<sup>\*</sup> Benchmark considered as applicable as of March 31, 2024

#### 11. NATURE OF EXPENSES

The following are indicative types of costs and expenses for clients availing the Portfolio Management services. The exact basis of charge relating to each of the following services shall be annexed to the Portfolio Management Agreement or the agreements foreach of the services availed by the client at the time of execution of such agreements.

#### (a) Management Fees

Management Fees relate to the Portfolio Management Services offered to clients. The fee may be a fixed charge or a percentage of funds or linked to portfolio returns achieved or a combination of any of these, as mutually agreed with the Client in the PMS Agreement.

Subject to regulatory limits, the management fee relates to the portfolio management services offered to the Clients. The fee may be a fixed charge or up to 3% plus applicable taxes per annum of the quantum of the funds being managed as agreed in the Agreement.

#### (a.1) Performance Fee

Subject to regulatory limits, the portfolio manager may charge performance fees (means the performance-linked fee payable to the Portfolio Manager above the Hurdle Rate in accordance with the terms of the Agreement and this Document) up to 50% plus applicable taxes on the share of profits generated for portfolio management, subject to hurdle rate (means the rate of return or benchmark return above which the performance fee will be charged as per the terms of the Agreement) between 0 to 25% per annum or linked to benchmark subject to high-water mark (means value of the highest Closing NAV achieved by the Portfolio in any year during the subsistence of this Agreement (adjusted for any additional funds/withdrawals by the Client in that year) and net of Portfolio Management Fees, for that year) principle as per the details provided in the Agreement.

Management Fee carries goods and service tax at the applicable rate as per the Finance Act 2017 as amended from time to time.

The actual Management fee applicable to an investor will be as per agreed "Strategy Term Document".

Other charges include the following expenses, shall be charged at actual.

#### (b) Custodian/Depository Fees

The charges relating to opening and operation of dematerialized accounts, custody and transfer charges for shares, bonds and units, dematerialization, and other charges in connection with the operation and management of the depository accounts.

#### (c) Registrar and transfer agent fee

Charges payable to registrars and transfer agents in connection with effecting transfer of securities and bonds including stamp charges, cost of affidavits, notary charges, postage stamp and courier charges.

#### (d) Brokerage and transaction costs

The brokerage charges and other transaction related charges like service charge, stamp duty, transaction costs, turnover tax, exit and entry loads on the purchase and sale of shares, stocks, bonds, debt, deposits, units and other financial instruments.

#### (e) Securities Lending and Borrowing charges

The charges pertaining to the lending of securities, costs of borrowing including interest, and costs associated with transfers of securities connected with the lending and borrowing transfer operations.

#### (f) Certification and professional charges

Charges payable for out sourced professional services like accounting, taxation and legal services, notarizations etc. for certifications, attestations required by bankers or regulatory authorities.

#### (g) Incidental Expenses



Charges in connection with the courier expenses, postal, telegraphic, opening and operation of bank accounts etc.

#### (h) Exit Charges

Exit charges are applicable if the investor wants to withdraw from the portfolio. The Exit charges will be as per agreed "Strategy Term Document" signed by the investor.

Subject to regulatory limits, the Portfolio Manager may charge the following early withdrawal fee as a percentage of the value of the Portfolio /withdrawn Portfolio as per the terms and conditions of a particular Product as agreed in the Agreement.

For exit within Year 1 from the date of each investment allocation- up to 2% plus applicable taxes.

#### 12. TAX PROVISIONS

Clients will be responsible and liable for all taxes under the provisions of the Income Tax Act, 1961 for any income generated out of the investment made in the portfolio management including advance tax obligations. In view of the individual nature of tax consequences on any income, capital gains or otherwise, each Client is advised to consult / his / her / its tax advisor with respect to the specific tax consequences to him/ her / it with respect to participation in the portfolio management services.

The Portfolio Manager will provide adequate statements to the client for accounting and tax purposes. The Portfolio Manager shall not be responsible for assisting in or completing the fulfillment of the client's tax obligations.

#### Non-resident investors (including FPI):

A non-resident investor would be subject to taxation in India only if;

- · it is regarded a tax resident of India; or
- being a non-resident in India, it derives (a) Indian-sourced income; or (b) if any income is
  received/deemed to be received in India; or (c) if any income has accrued / deemed to have accrued
  in India in terms of the provisions of the ITA.

As per Section 6 of the ITA, a foreign company will be treated as a tax resident in India if its place of effective management (POEM) is in India in that year. POEM has been defined to mean a place where key management and commercial decisions that are necessary for the conduct of the business of an entity are, in substance made. In case, the foreign company has a POEM in India, it would qualify as resident of India for tax purposes and consequently, its worldwide income would be taxable in India.

#### 12.1 Tax deduction at source

As per the provisions of the ITA, in case of taxability of non-resident who is a tax resident of a country with which India has a tax treaty for granting relief of tax, the provisions of the ITA shall apply to the extent they are more beneficial.

Tax is required to be deducted at source for non-residents by the authorized dealer under section 195 of the Income Tax Act, 1961 ('the Act'). If any tax is required to be withheld on account of any future legislation, the Portfolio Manager shall be obliged to act in accordance with the regulatory requirements in this regard.

Any person entitled to receive any sum or income or amount, on which tax is deductible under Chapter XVIIB, shall furnish his Permanent Account Number to the person responsible for deducting such tax, failing which tax shall be deducted at the higher of the following rates, namely:

- (i) at the rate specified in the relevant provision of this Income Tax Act; or
- (ii) at the rate or rates in force; or
- (iii) at the rate of twenty per cent.



Health and Education cess @ 4% is applicable.as of now and other surcharges may vary with income levels.

#### 12.2 Advance tax installment obligations

It shall be the Client's responsibility to meet the obligation on account of advance tax installments payable on the due dates under the Act.

#### 13. ACCOUNTING POLICIES

- Pace Financial Investment Adviser Private Limited shall maintain a separate Portfolio record in the name of the client to account for the assets of the client and any receipts, income and expenses in connection therewith as provided under SEBI Regulations (Portfolio Managers Regulations 2020).
- 2. For every Client Portfolio, Pace Financial Investment Adviser Private Limited shall keep and maintain proper books of accounts, records and documents, for the Client, on mercantile system of accounting, so as to explain its transactions and to disclose at any point of time the financial position of the Client Portfolio and Financial Statements and in particular give a true and fair view of the state of affairs.
- The following Accounting Policies are proposed to be followed for the purpose of maintaining books
  of accounts, records for the client.
- For the purposes of the financial statements, Pace Financial Investment Adviser Private Limited shall carry all investments in the balance sheet at cost.
- Investments introduced by the client in his portfolio will be booked at the market value as of the date of introduction to the portfolio.
- Dividend income earned by a Client shall be recognized, not on the date the dividend is declared, but on the date the shares are quoted on an ex-dividend basis. For investments which are not quoted on a stock exchange, dividend income shall be recognized on the date of actual receipt.
- In respect of all interest-bearing investments, income shall be accrued on a day-to-day basis as it is earned. Therefore, when such investments are purchased, interest paid for the period from the last interest due date up to the date of purchase shall not be treated as a cost of purchase but shall be debited to Interest Recoverable Account. Similarly, interest received at the time of sale for the period from the last interest due date up to the date of sale shall not be treated as an addition to sale value but shall be credited to Interest Recoverable Account.
- 8. In determining the holding cost of investments and the gains or loss on sale of investments, the First-in-First-out (FIFO) method shall be followed.
- 9. Transactions for purchase or sale of investments shall be recognized as of the trade date and not as of the settlement date, so that the effect of all investments traded during a financial year is recorded and reflected in the financial statements for that same year.
- 10. Bonus shares to which the Client becomes entitled shall be recognized only after the ex-date of the bonus issuance of the original shares.
- Rights entitlement shall be recognized after the allotment of the new shares as per the rights entitlement.
- 12. The cost of investments acquired or purchased shall include brokerage, service tax, securities transaction tax, stamp duty and any other charges customarily included in the broker's contract note.
- 13. In respect of privately placed debt instruments any front-end discount offered shall be reduced from the cost of the investment.



- 14. All other income & expenses shall be accounted on accrual basis.
- 15. Investments in equities and exchange traded funds will be valued at the closing market prices at the stock exchange (Bombay Stock Exchange (BSE) or National Stock Exchange (NSE) as the case may be). In case any securities are not traded on the valuation date, the last available traded price shall be used for the valuation of those securities. Debt instruments will be valued at the clean price.
- 16. Investments in units of Mutual Funds shall be valued at the repurchase price or the NAV published by the Mutual Fund Houses on the date of the report. Where no NAV is published for a particular day, the last working day's published NAV will be taken for valuation purpose.
- 17. Open positions in derivative transactions, will be marked to market on the valuation date.
- 18. Pending listing on BSE/NSE, securities relating from a demerger are valued at their apportioned costs as per the ratios / values in terms of the scheme.
- 19. Private equity / Pre IPO placements will be valued at cost or at an available last deal price at which the company has placed similar securities to other inventors.
- Unrealized gain / losses are the difference, between the current market value / Net Asset Value and the historical cost of the securities.
- 21. The Portfolio Manager and the client can adopt any specific norms or methodology for valuation of investments or accounting, if the same is mutually agreed between them.

#### 14. INVESTOR SERVICES

 Name, Address and Telephone Number of the Investor Relation Officer, who shall attend to the investor queries and complaints.

Name

: Namita Singh/ Kanika Miglani

Address

: A-1/291, Safdarjung Enclave, New Delhi 110029

Telephone

:+91 11 40587001

Email

: clientservice@pace360.in

Additionally, the communication may also be addressed to:

Name

: Shah Nawaz (Compliance Officer)

Address

: A-1/291, Safdarjung Enclave, New Delhi 110029

Telephone

:+91 11 40587001

Email

: Shahnawaza pace360.in

#### ii. Grievance redressal and dispute settlement mechanism

#### Investor Grievance Redressal Mechanism

Handling of all investor grievances is a centralized function. The Escalation Matrix for handling/resolving any Investor Grievance is as under:

#### **Escalation Matrix**

#### Level - 1

The investor can write at the mail id "clientservice@pace360.in" and mention his/her grievance on the mail.

#### Level - 2

If the complaint is not resolved within seven days of filing of grievance or the resolution offered to the client is not acceptable to the investor, then the investor can write an email CEO Desk at the mail id-ceodesk@pace360.in. The complaint shall be resolved within 21 days.



#### Level - 3

If the complaint is not resolved within 21 days, the customer shall complaint to the Portfolio Manager of PACE 360 at his following email id: portfoliomanager@pace360.in

- All Investor Grievances (hard copy or soft copy) that are received should be incorporated in the Register of Grievance and action to be initiated immediately.
- All the Investor Grievances recorded should be addressed within 21 working days from the date of receipt of grievance/ complaints as the case may be.
- If there is no response from Client Service Team within 21 working days of the complaint, the same would need to be escalated to CEO Desk or any other designated official as nominated by management for immediate action.
- The Compliance officer should verify all the resolved grievance and complaints, recorded in the Register of Grievance and Complaints.
- The Register of complaint and Grievance should be made available to the Internal/External Auditors during the time of Audit and to the Regulatory Authorities. Same would be maintained by Client Service Team.

In addition to the above, the clients can also Login to the SEBI SCORES website www.scores.gov.into register their grievances/complaints.

#### 15. Related Party Transaction

Following related party transactions during the year ended March 31,2024 and outstanding balance as at March 31,2024 as per audited financial statements.

Related Party Transactions

Year ended on 31.03.2024

Nil

Loans and Advance received

91,52,350.00

Loans and Advance repaid

66,26,365.10

Amit Goel(short term borrowings) Cr 25,65,016.60 Cr \*Cr-credit,Dr-debit

Balance outstanding at the end of the year:

We availed services of stock broker from "Pace Stock Broking Services Private Limited" in ordinary course of business. Charges for services paid to stock broking are at arm's length price.

16. Various Fees charged as per audited financial statements:

Name of the Party	Nature of Transaction	(2023-2024) (based on audited financial statements)	(2022-2023) (based on audited financial statements)	(2021-2022) (based on audited financial statements)
Pace Financial Investment Adviser Pvt Ltd- Portfolio Manager	Management Fees	100,08,269.18	55,17,319.00	37,11,372.00
Pace Financial Investment Adviser Pvt Ltd- Portfolio Manager	Performance Fees	193,85,987.64	48,69,994.00	Wil
Orbis Financial Corporation Limited	Custodian Fees	5,52,291.65	2,87,839.00	2,19,801.87



### Charges Paid to Pace Stock Broking Services Pvt Ltd to avail broking services in the F.Y-23-24

Name of the Party	Nature of Transaction	Amount paid	For the period
Pace Stock Broking	Demat charges	2,32,493.60	2023-2024
Services Pvt Ltd			

Note: There is no broking charges paid to Pace Stock Broking Services Private Limited during the financial years except statutory charges as borne by it.

## 17. Disclosure of the details of Investment of clients' funds in the Securities of Associate/related Parties.

Sr.	Investment	Name of the	Investment amount	Value of investment	Percentage of
No.	Approach, if	associate/related	(cost of investment)	as on last day of the	total AUM as on
	any	party	as on last day of the previous calendar quarter (INR in crores)	previous calendar quarter (INR in crores)	last day of the previous calendar quarter
NIL	NIL	NIL	NIL	NIL	NIL

#### 18. Diversification policy for portfolio manager

The Portfolio Manager aims to provide optimal diversification based on the investment approach of the Investment approach, to minimize the concentration risk in the client portfolio. The Portfolio Manager shall endeavour to achieve diversification of the portfolio at the constituent level by allocating in large number of securities based on the stated investment approach. The Portfolio Manager will also strive to achieve diversification of constituents across various sectors based on assessment of macro-economic outlook and the investment approach.

Investment approaches investing in Mutual Funds and ETFs shall invest in fewer constituent mutual funds / ETFs as compared to other investment approaches. Strategies focused towards real estate investments or fixed income securities shall also have commensurate diversification across constituents based on their respective investment approaches.

19. There was no significant audit observations for the financial years 2021-2022 and 2022-2023 and 2023-2024 respectively. PMS registration issued by Sebi on  $03^{rd}$  July, 2020.

MBY & A880ciates FRN: 0022905N Chartered Accountants ASSOCIATION ASSOCI

Bala Yadav (Partner)

udin: 24533776BKAHZK3867.

### Name and Signature of the Directors of the Portfolio Manager:

Sr. No.	Name of Directors	Signature
1.	Amit Goel	estmont Adirine
2.	Shweta Goel	June v Spirit Activity of Private Priv

Date: 10-12-2024 Place: Delhi

#### FORM C

SECURITIES AND EXCHANGE BOARD OF INDIA (PORTFOLIO MANAGERS) REGULATIONS, 2020 (Regulation 14)

Pace Financial Investment Adviser Private Limited A-1/291, Safdarjung Enclave, New Delhi-110029 Tel no. +9111 40587001

#### We confirm that:

- the Disclosure Document forwarded to the Board is in accordance with the SEBI (Portfolio Managers) Regulations, 2020 and the guidelines and directives issued by the Board from time to time;
- (ii) the disclosures made in the document are true, fair and adequate to enable the investors to make a well informed decision regarding entrusting the management of the portfolio to us / investment in the Portfolio Management;
- (iii) the Disclosure Document has been duly certified by an Independent Chartered Accountants, a copy of Chartered Accountant certificate is enclosed

Signature of the Principal Officer

Date: 10-12-2024

Place: Delhi

Name:

Designation:

Amit Goel
Principal Officer

Address: A-1/291, Safdar Jung Enclave, New Delhi-110029

# PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED CIN: U65999DL2019PTC348078

## STANDALONE BALANCE SHEET AS AT MARCH 31, 2024

PARTICULARS	NOTEN		(₹ in hundred
	NOTE No.	AS AT	AS AT
I. EQUITY AND LIABILITIES		31-Mar-24	31-Mar-23
(1) Shareholders' Funds			
a) Share Capital			
b) Reserve & Surplus	3	600,000.00	600,000.00
b) Reserve a Surplus	4	546,452.00	176,943.70
(2) Current Liabilities			
a) Short Term Borrowings	5	2 565 046 60	
b) Trade Payables		2,565,016.60	39,031.70
c) Other Current Liabilities	6 7	5,295.86	1,422.98
d) Short Term Provisions	8	112,557.10	68,468.06
C 32 (1000.0 ADMINO 2001)	0	118,879.63	42,149.56
TOTAL		3,948,201.20	928,015.99
II. ASSETS			3-3,010.00
(1) Non-Current Assets			
a) Property, Plant & Equipments		0.075.00	
b) Intangible Assets		3,975.26	(=)
c) Deferred Tax Assets		*	-
, , , , , , , , , , , , , , , , , , , ,	8	#i	-0
(2) Current Assets			
a) Current Investments	9	3,698,016.45	803,191.77
b) Trade Receivables	10	11.27	19,168.09
c) Cash and cash equivalents	11	95,137.89	51,467.64
d) Short Term Loans & Advances	12	34,825.28	120.00
e) Other Current assets	13	116,235.08	47,775.19
3) Preliminary / Preoperative Expenses		-	6,293,29
TOTAL		3,948,201.20	928,015.99

Corporate Information & Significant Accounting Policies

Accompanying Notes form an integral part of the Financial Statement

1-2

3-6

In terms of our report attached For GVAP & Associates Chartered Accountants

F. R. No. 009009C

(CA, VIKAS GUPTA)

Partner

M.No.078393

UDIN-24078393BKD05T6466

Place:- New Delhi Date-:01.09.2024 AMIT GOED

Director (DIN -00055421) ( Schart

SHWETA GOEL Director (DIN -01079095)

### PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED CIN: U65999DL2019PTC348078

## STANDALONE STATEMENT OF PROFIT AND LOSS FOR THE PERIOD 01.04.2023 TO 31.03.2024

1	PARTICULARS	NOTE		(₹ in hundred)
- ANA		1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1 (1	For The Period	For The Period
10000		No	Ending 31.03.2024	Ending 31.03.202
1)	Revenue From Operations			
	Other Income	14	230,973.96	171,893.84
		15	367,643.12	99,952.55
II)	Total Income (I+II)			
			598,617.08	271,846.39
11)	Expenses			
	Employees benefit expenses			
	Depreciation	16	73,570.74	76,646.09
	Other Expenses		680.16	*
	Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y	17	35,981.25	23,674.88
	Total expenses			
	7.4 / 3/0000040CT Dollar 1 - Method 1 (1990) (Method 100)		110,232.15	100,320.97
V)	Profit before exceptional and extraordinary items and tax (II-III)		Washing Street, Street	
()	Exceptional items		488,384.93	171,525.42
			9	
(1)	Profit before extraordinary items and tax (IV-V)		100.00	
II)	Extraordinary Items		488,384.93	171,525.42
				- 2n
(111)	Profit before tax (VI-VII)		400 004 00	
()	Tax expense:-		488,384.93	171,525.42
	- Current tax		(440,070,00)	
	- Deferred tax		(118,879.63)	(42,146.54)
	- Previous year tax Adjustment			-
)	Profit/(Loss) for the period (VIII-IX)		200 505 00	(8.10)
	**************************************		369,505.30	129,378.78
1)	Earnings per equity share:			
	- Basic		0.40	0.00
	- Diluted		6.16	2.16
	Weighted average number of equity shares (face value of Rs 10)		6.16	2.16
			6,000,000.00	6,000,000.00

Corporate Information & Significant Accounting Policies

Accompanying Notes form an integral part of the Financial Statement

1-2

3-6

In terms of our report attached For GVAP-& Associates Chartered Accountants

F R No 0090090

(CA. VIKAS GUPTA)

Partner

M.No.078393

UDIN-2407-8393BKD0ST6466

Place.- New Delhi Date.- 01.09.2024

Pvt. 7

AMIT GOEL Director (DIN -00055421)

For and on behalf of Board of Directors

SHWETA GOEL Director (DIN -01079095)

### PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED CIN: U65999DL2019PTC348078

## STANDALONE CASH FLOW STATEMENT FOR THE YEAR ENDED 31.03.2024

	PARTICULARS	FIGURES AS AT 3	1.03.2024	FIGURES AS AT	(₹ in hundred
A	Cash Flow from Operating Activities:			AI	22.03.2023
	Net Profit Before Tax Adjustment for:	488,384.93		171,537.37	
	Depreciation Profit on sale of Investments Preliminary Expenses W/off	680.16 (310,524.98) 6,293.29		(81,797.58) 6,293.29	
	Operating Profit Before Changes in Working Capitals Adjustment for changes in Working Capitals:		184,833.40		96,033.08
	Short Term Loans & advances Trade Receivables Other Current assets Current Investments Short Term Borrowings Trade Payables Other Current Liabilities Preliminary / Preoperative Expenses Taxes Paid Net Cash Flow From Operating Activities  Cash Flow from Investing Activities: Purchase of Non Current Investments	(34,705.28) 19,156.82 (68,459.89) (2,584,299.70) 2,525,984.90 3,872.88 44,089.04 - (42,146.54)	(136,507.76) 48,325.64	7,012.00 571.53 52,919.82 (721,394.19) 14,681.70 1,357.95 37,588.61 - (7,422.23)	(614,684.82 (518,651.74)
	Net Cash Flow From Investing Activities		(4,655.42)		•
	Cash Flow from Financing Activities: Proceeds from Issue of Capital Proceeds/Repayment of Long Term Borrowings	<u>-</u>			
	Net Cash Flow From Financing Activities Total (A+B+C)		43,670.22		(518,651.74)
	(Net (Increase) / Decrease in the Cash & Cash Equivalents) Opening Balance of Cash & Cash Equivalents Closing Balance of Cash & Cash Equivalents		(43,670.22) 51,467.64 95,137.89		518,651.74 570,119.37 51,467.64

Corporate Information & Significant Accounting Policies
Accompanying Notes form an integral part of the Financial Statement

1-2 3-6

In terms of our report attached For GVAP & Associates Chartered Accountants F. R. No. 009009C

(CA. VIKAS GUPTA) Partner M.No.078393

UDIN-24078393BKD05T6466

Place:- New Delhi Date:- 01.09.2024 AMIT GOELS
(DIN -00055421)

any

Directer (DIN 01079095)

### PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED CIN: U65999DL2019PTC348078

## STANDALONE BALANCE SHEET AS AT MARCH 31, 2023

PARTICULARS	NOTE No.	AS AT	(₹ in hundred AS AT
		31-Mar-23	31-Mar-22
I. EQUITY AND LIABILITIES		01 Mai -23	31-War-22
(1) Shareholders' Funds			
a) Share Capital			
b) Reserve & Surplus	3 4	600,000.00	600,000.00
7	4	176,946.71	47,567.82
(2) Current Liabilities			
a) Short Term Borrowings	5	20.024.70	0/05000
b) Trade Payables		39,031.70	24,350.00
c) Other Current Liabilities	6 7	1,422.98	65.03
d) Short Term Provisions	8	68,468.06	30,879.45
	8	42,146.54	7,422.23
	TOTAL	928,015.98	710,284.53
II. ASSETS			710,204.00
(1) Non-Current Assets			
a) Property, Plant & Equipments		Maga:	
b) Intangible Assets			-
c) Deferred Tax Assets		a la	_ [
(2) Current Assets			
a) Current Investments	9	902 101 77	
b) Trade Receivables	10	803,191.77 19,168.09	- 40.740.00
c) Cash and cash equivalents	11	51,467.64	19,740.32
d) Short Term Loans & Advances	12	120.00	570,119.37
e) Other Current assets	13		7,132.00
7	13	47,775 19	100,706.27
3) Preliminary / Preoperative Expenses		6,293.29	12.586 57
	TOTAL	928,015.98	710,284.53

Corporate Information & Significant Accounting Policies

1-2

Accompanying Notes form an integral part of the Financial Statement

In terms of our report attached

For GVAP & Associates

Chartered Accountants

F. R. No 009009C

(CA. VIKAS GUPTA)

Partner

M.No 078393

UDIN:23078393BGWNAZ1149

Place: New Delhi Date - 05.09.2023 For and on behalf of Board of Directors

AMIT GOEL Director

(DIN -00055421)

SHWETA GOEL

Director

(DIN -01079095)

# PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED CIN: U65999DL2019PTC348078

## STANDALONE STATEMENT OF PROFIT AND LOSS FOR THE PERIOD 01.04.2022 TO 31.03.2023

	PARTICULARS	NOTE	T 200 220	(₹ in hundred)
		NOTE	For The Period	For The Period
		No	Ending 31.03.2023	Ending 31.03.2022
1)	Revenue From Operations			
	Other Income	14	171,893.84	84,512.62
		15	99,952.55	41,331.12
II)	Total Income (I+II)			
			271,846.39	125,843.74
111)	Expenses			
	Employees benefit expenses			
	Depreciation	16	76,646.09	74,978.00
	Other Expenses			100
	80000 Mary - 1880	17	23,674.88	21,374.99
	Total expenses			
	**************************************		100,320.97	. 96,352.99
V)	Profit before exceptional and extraordinary items and tax (II-III)		authavaes waarbeer . Me wa	
()	Exceptional items		171,525.42	29,490.75
				8
(1)	Profit before extraordinary items and tax (IV-V)		2022/02/2016/03 (0.00)	
(11)	Extraordinary Items		171,525.42	29,490.75
				2
(111)	Profit before tax (VI-VII)		171 505 10	
()	Tax expense:-		171,525.42	29,490 75
	- Current tax		140 440 50	
	- Deferred tax		(42,146.54)	(7,422.23)
	- Previous year tax Adjustment		7	4
)	Profit/(Loss) for the period (VIII-IX)		420 270 00	(8.10)
			129,378.88	22,060.42
	Earnings per equity share:			
	- Basic		2.16	0.07
	- Diluted		2.16	0.37
	Weighted average number of equity shares (face value of Rs 10)		6,000,000.00	0.37
	· · · · · · · · · · · · · · · · · · ·	and the second s	0,000,000.00	6,000,000.00

Corporate Information & Significant Accounting Policies

1-2

Accompanying Notes form an integral part of the Financial Statement

Accour

In terms of our report attached

For GVAP & Associates

Chartered Accountants

F. R. No. 009009C

(CA. VIKAS GUPTA)

Partner

M.No.078393

UDIN:23078393BCWNAZ1149

Place: - New Delhi Date - 05 09.2023 For and on behalf of Board of Directors

AMIT GOEL

Director

(DIN -00055421)

SHWETA GOEL

Director

(DIN -01079095)

## STANDALONE CASH FLOW STATEMENT FOR THE YEAR ENDED 31.03.2023

	PARTICIPAGE					
!	PARTICULARS	FIGURES AS AT 31.03.2023		FIGURES AS AT 31.03.2022		
Action	Cash Flow from Operating Activities					
	Net Profit Before Tax	171,525.42		29,490.75		
	Adjustment for:			29,430.73		
	Depreciation					
	Profit on sale of Investments	(81,797.58)		(66.09)		
	Preliminary Expenses W/off	6,293.29		6,293.29		
	Operating Profit Before Changes in Working Capitals		96,021.13			
	Adjustment for changes in Working Capitals:		50,021.13		35,717.95	
	Short Term Loans & advances	7,012.00		(6,089.36)		
	Trade Receivables	572.23		(18,752.44)		
	Other Current assets	52,931.08		(29,714.07)		
	Current Investments	(721,394.19)	1	6,566.09		
	Short Term Borrowings	14,681.70		14,350.00		
	Trade Payables	1,357.95		(1,229.89)		
	Other Current Liabilities	37,588.61		26,674.59		
	Preliminary / Preoperative Expenses			2.0,074.55		
	axos Paio	(7,422.23)	(614,672.86)	(8,112.34)	(16.307.42)	
	Net Cash Flow From Operating Activities		(518,651.73)	(0,712.04)	19,410.53	
	Cash How from Investing Activities:					
	Purchase of Non Current Investments					
	Net Cash Flow From Investing Activities		-			
8	Cash Flow from Financing Activities:					
	Proceeds from Issue of Capital					
	Proceeds/Repayment of Long Term Borrowings					
	Net Cash Flow From Financing Activities					
	Total (A+B+C)		(518,651.73)		19,410.53	
	(Net (Increase) / Decrease in the Cash & Cash Equivalents)		518,651.73		(19,410.53)	
	Opening Balance of Cash & Cash Equivalents		570,119.37		550,708.84	
	Closing Balance of Cash & Cash Equivalents		51,467.64		570,119.37	

Significant Accounting Policies & Corporate History

Accompanying Notes from an integral part of the Financial Statement

1-2

For and on behalf of Board of Directors

In terms of our report attached

For GVAP & Associates

Chartered Accountants
I R No 609009C

(CA. VIKAS GUPTA)
Partner

M No 078393

UDIN:23078393BGWNAZ1149

Place - New Delhi Date: 05 09 2023

AMIT GOEL

Director (DIN -00055421) SHWETA GOEL

Director

0.00

(0 00)

(DIN -01079095)