Mrigaashree Capital Private Limited

ARN-77393 (Varun Agarwal - AMFI Registered Mutual Fund & SIF Distributor
& APMI Registered PMS Distributor)

Process & Internal Control Framework

We operate primarily as a Mutual Fund Distributor focused on transaction facilitation and client servicing. We provide product-related information and incidental guidance in the course of distribution, while the final investment decision remains solely with the investor

1. Client Onboarding & KYC

- We obtain and verify mandatory KYC and client information.
- We ensure PAN, KYC status, bank details, FATCA/CRS and other applicable declarations are properly captured.
- We obtain nomination/opt-out instructions as applicable.

2. Investor Profile & Risk Assessment

We check the following: -

- Investment horizon
- Risk profile/risk appetite
- Existing investments, where relevant
- Liquidity requirements

3. Scheme Selection / Product Evaluation

Before facilitating a transaction, we review the relevant scheme information available in the Fund Factsheet and other official scheme-related documents. The following parameters are considered, as applicable: -

- Scheme category
- Investment objective
- Benchmark
- Riskometer
- Asset allocation
- Investment strategy
- Fund manager
- Expense ratio
- Portfolio characteristics
- Performance history
- Relevant scheme documents
- Suitability for identified investor category

4. Transaction Process - Before execution we:

I. Discuss the relevant scheme/product with the client.
II. Provide the applicable scheme-related documents/information.
III. Explain material risks and costs.
IV. Obtain the client's decision/instruction.
V. Execute the transaction through the approved platform – i.e. **NSE MF Invest Platform**.

5. Transaction Controls

We follow a **maker-checker/supervisory process** for monitoring and tracking client transactions. For this purpose, we maintain an **Excel-based Transaction Control Sheet**, which is used to record and monitor each transaction from initiation through completion.

The Control Sheet helps us maintain a proper audit trail and track the status of transactions, including:

- Purchase
- Redemption
- Switch
- SIP/STP/SWP
- Bank mandate changes
- Nomination
- Change of address/contact details
- Transmission
- Folio consolidation
- Change of distributor/ARN

6. Marketing

We **do not maintain or operate any social-media pages for promotional purposes**. While communicating with clients, we ensure that the communication is accurate, fair, balanced, and in accordance with applicable AMFI/SEBI guidelines.

We specifically ensure the following:

- No guaranteed/assured return
- No misleading performance claim
- No exaggerated statement
- Correct scheme/product information
- Appropriate risk disclosures
- No inappropriate comparison
- No misleading use of past performance
- Appropriate AMFI/SEBI-prescribed disclosures wherever applicable

7. Complaint & Grievance Management

We maintain a **Complaint Register**:

Also retain:

- Client complaint
- Acknowledgement
- Correspondence
- Resolution
- Closure confirmation

8. Training & Staff Awareness

We conduct **periodic training and awareness sessions for all relevant employees** to ensure that they understand their responsibilities

- AML/KYC
- Investor protection
- Cybersecurity
- Data confidentiality
- Periodic compliance updates

9. Record Retention

We have a **Document Retention Policy**:

- KYC documents
- Client forms
- Transaction instructions
- Risk/profile records
- Scheme evaluation
- Communication
- Complaints
- Commission records
- Compliance reviews
- AMC correspondence

10. Our Service & Compliance Approach: -

Distribution → Product information → Investor education → Transaction facilitation → Servicing → Execution of client instructions → Documentation → Compliance.

Disclaimer: -

We act as a **Mutual Fund Distributor (MFD)** and facilitate the execution and servicing of mutual fund transactions. We are **not a SEBI-registered Investment Adviser or Portfolio Manager**, and we do not provide investment advisory or portfolio management services in such capacity.

The investment decision is solely that of the investor. Investors should independently evaluate the suitability of any mutual fund scheme based on their financial objectives, risk appetite, investment horizon, and other relevant circumstances.

We may receive **commission/trail commission, as applicable, from Asset Management Companies (AMCs) for the distribution of mutual fund schemes**. The commission received may vary across schemes and AMCs. AMC-wise detailed commission disclosure is available on our website under the **"Disclosure"** section. Investors may refer to this section for details of the commissions received from respective Asset Management Companies (AMCs)

Past performance is not indicative of future returns. **Mutual Fund investments are subject to market risks.** There is no assurance or guarantee of achieving any particular return. Investors are advised to carefully read the **Scheme Information Document (SID), Statement of Additional Information (SAI), Key Information Memorandum (KIM)** and other scheme-related documents before investing.

All transactions are undertaken only upon the investor's instruction/consent and in accordance with applicable regulatory requirements.