

INVESTOR CHARTER

PART A: Investor Charter for Eternity Capital Fund

A. Vision and Mission Statement:

Vision

To develop the Fund industry on professional and ethical lines and maintain high standards of governance and transparency.

Mission

- Maintain high professional and ethical standards within the AIF industry.
- Comply with all applicable regulations and co-operate with the regulators in all aspects of the AIF activity.
- Act in a fiduciary capacity towards the Contributors.

B. Details of business transacted by the organization with respect to the investors:

- To enter into an agreement with the client providing all details including fee details, aspect of Conflict of interest disclosure and maintaining confidentiality of information.
- To do a proper and unbiased risk – profiling and suitability assessment of the client.
- To obtain registration with Know Your Client Registration Agency (KRA) and Central Know Your Customer Registry (CKYC).
- To conduct audit annually.
- To disclose the status of complaints in its website.
- To disclose the name, proprietor name, type of registration, registration number, validity, complete address with telephone numbers and associated SEBI regional/local Office details in its website.
- To employ only qualified and certified employees.
- To deal with clients only from official number.
- To maintain records of interactions, with all clients including prospective clients (prior to onboarding), where any conversation related to advice has taken place.

C. Details of services provided to investors:

1. On-boarding of investors.

- 1.1 Sharing this Memorandum.
- 1.2 Account opening with the Fund:

- Completing KYC of Contributors and registration of KYC with KRAs.
- Sharing of copies of Fund Documents with Contributors.
- Entering into Contribution Agreements with Contributors.

2. Obtaining investor consent for material changes to fund structure.

- 2.1 Change in the Sponsor or the Investment Manager of the Fund.
- 2.2 Change in control of the Sponsor or the Investment Manager of the Fund.
- 2.3 Material changes to terms of the Memorandum
 - Term of Fund.
 - Investment objective and strategy.
 - Increase in fees and charges.
- 2.4 Winding up of Fund prior to expiry of tenure set out in the Fund Documents.

3. Dissemination of financial information of Fund.

- 3.1 Net asset value of Fund.
- 3.2 Financial information of Portfolio Companies.
- 3.3 Information on performance of Fund.

4. Disclosures with respect to material risks associated with the Fund and its Portfolio Investments.

- 4.1 Any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction.
- 4.2 Any material liability arising during the tenure of the Fund.
- 4.3 Any breach of a provision of the Memorandum or any other agreement made with the Contributors or any other Fund Documents.
- 4.4 Intimation regarding any conflict of interest.
- 4.5 Risks associated with the portfolio, such as concentration risk, foreign exchange risk, leverage risk, realization risk, strategy risk, reputation risk, extra-financial risks such as social and corporate governance risks etc. at the Fund and Portfolio Company level.

5. Intimation of any non-material changes in the operations of the Fund.

- 5.1 Non-material changes such as
 - Bank account details
 - Address of Fund or its Investment Manager or Sponsor

- Contact details such as email-ID, contact number, etc. of the Fund or its Investment Manager or Sponsor

6. Grievance redressal

- 6.1 Redressal of Contributor complaints received directly from investors and/ or from SEBI / SCORES.

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

Sr. No.	Description of activity/services provided by Fund to its Contributors	Timeline for completion of activity
1.	Valuation related disclosures:	
a.	Disclosure of NAV of scheme(s) of the Category III Alternative Investment Fund	Monthly basis
2.	Transparency related disclosures:	
a.	Disclosure of financial information of Portfolio Companies	Within 60 days from the end of the quarter end or earlier as per the fund documents.
b.	Disclosure of material risks: concentration risk, foreign exchange risk at Fund level and leverage risk, realization risk, strategy risk, reputation risk at investee company level, extra-financial risks such as social and corporate governance risks etc. at Fund and Portfolio Company level	
c.	Financial, risk management, operational, portfolio, and transactional information regarding Portfolio Investments	To be disclosed periodically to the Contributors
d.	Any fees ascribed to the Investment Manager or Sponsor; and any fees charged to the Fund or any Portfolio Company	
e.	Any inquiries/ legal actions by legal or regulatory bodies in any jurisdiction	
f.	Any material liability arising during the Fund's tenure	As and when occurred
g.	Any breach of a provision of the Memorandum or agreement made with the Contributors or any other Fund Documents	
h.	Intimation regarding conflict of interest in any transaction	
i.	Any change in terms of Memorandum /Fund Documents	On consolidated basis within one month of end of each financial year
3.	Complaint handling related services:	

Sr. No.	Description of activity/services provided by Fund to its Contributors	Timeline for completion of activity
a.	Response to complaint received from investors	Within 21 days from the date of receipt of complaint
b.	Redressal of Contributor complaint received from SEBI/ SCORES	Within 21 days from the date of receipt of complaint

E. Details of grievance redressal mechanism and how to access it.

1. AIFs are required to redress all Contributor complaints in timely manner.
2. An AIF, by itself or through its manager or sponsor, are required to lay down procedure for resolution of disputes between the investors and AIF or manager or sponsor through arbitration or any such mechanism as mutually decided between the investors and the AIF.
3. Investors can also approach SEBI for redressal of their complaints through SEBI SCORES platform. On receipt of complaints, SEBI takes up the matter with the concerned AIF.
4. Investors may send their complaints to: Office of Investor Assistance and Education, Securities and Exchange Board of India, SEBI Bhavan. Plot No. C4-A, 'G' Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.

F. Responsibilities of Contributors

1. **Responsibility to inform and educate yourself**
 - 1.1 Read thoroughly all Fund Documents including this Memorandum, Contribution Agreement, sales literature, newsletters and understand the product.
 - 1.2 Carefully consider all investment risks, fees, and/or other factors detailed in these aforementioned documents.
 - 1.3 Ensure and make certain that the proposed investment in the Fund meets your investment objective and is in alignment with your risk appetite.
 - 1.4 Review your portfolio holdings, account statements and transaction confirmation on regular basis to ensure that you aware of all transactions and securities where you are invested.
2. **Responsibility to timely update your KYC and information with the Intermediary**
 - 2.1 Provide complete and accurate information in your KYC documents, including financial/ income status.
 - 2.2 Timely updation of KYC information.
3. **Responsibility to abide by the contribution agreement.**

- 3.1 The Contributor needs to read carefully and understand the agreement that he/she is entering into with the Fund and abide by the terms thereof.
- 3.2 The Contributor should be aware that investment terms are not guarantee of future performance or returns of the Fund.
4. **Responsibility to use right financial intermediaries, consultants and advisors.**
 - 4.1 Carefully consider validity and reliability of investment information obtained from all sources, especially unsolicited information obtained over the internet.
5. **Responsibility to maintain confidentiality of information.**
 - 5.1 Contributors shall not disclose any material non-public information that is received by virtue of being Contributors of the Fund, except as may be guided by the terms of the Fund Documents.

Eternity Capital