Board of Directors **Dated:** 07th July 2020

SPA Capital Advisors Limited

PMS Corporate Governance Report for Quarter ended June 2020

In terms of SEBI **PMS Circular IMD/PMS/CIR/1/21727/03 dated November 18, 2003** circular, Board of Directors of Portfolio Managers is to review the position of compliances of SEBI (Portfolio Managers) Regulations 1993 and subsequent circulars, in their periodical meetings, in particulars in respect of the following matters:

✓ Review of position of compliances of SEBI Regulations and Guidelines on quarterly basis.

✓ Review of position of establishment of a system to ensure that due diligence has been exercised by all officials working in their operations under PMS.

✓ Review of a system to ensure that the Interest of the Investors is protected.

✓ Review of system of Redressal of investor grievances and complaint/s received, if any.

✓ Review of any deficiency letters or warning letters issued to the Portfolio Managers by SEBI during the intervening period, if any, and corrective action taken in the matter.

✓ Review of Comments/Observations made by Internal Auditor, if any, during intervening period, so as to judge the quality of internal procedures being followed by the portfolio manager.

Position of Compliance with respect to above matter for Quarter ended June 2020 is as under:-

S. No.	Description of Compliance	Position of Compliance
1.	Review of position of Compliances of SEBI Regulations and Guidelines on Quarterly Basis	During the quarter ended June, 2020, SEBI, the regulator of PMS has not introduced any new set of Compliances. Position of compliances as at end of Quarter ended June 2020 is as per **Annexure A.** During the period, Monthly Reporting of PMS for period ended April 2020, May 2020 and June 2020 were timely done to SEBI. Copies of the Reports as submitted are Attached as **Annexure B** for perusal.
2.	Review of position of establishment of a system to ensure that due diligence has	During the quarter, SPA Code of Conduct for carrying on Portfolio Management services was

	been exercised by all officials working in their operations under PMS.	again circulated to all concerned officials associated with PMS to ensure Compliance. Copy of the same is placed as as **Annexure C**.
3.	Review of a system to ensure that the Interest of the investors is protected	To create investors awareness and protect their interest SPA is carrying out regular Market Research to understand dynamics of play of various market factors and keeping the investor abreast of the same by sending all clients various reports on the basis of Macro Development. Further, it is our Company's policy to render high standard of services to the Clients, exercise due diligence and ensure proper care and exercise independent professional judgment while sending advisory to all clients, keeping in view their risk profile and existing portfolio of investments and its investment objectives. It is our Company's endeavour to avoid any conflict of interest in the Investment or disinvestment decision of the clients. Where any conflict arises, it is company's endeavour to ensure fair treatment to all clients. SPA updated PMS Disclosure documents are being shared with all clients on time to time basis in terms of SEBI guidelines, giving disclosure of all possible sources of conflict of duties and interest, while providing unbiased services.
4.	Review of system of Redressal of investor grievances and complaints received, if any	During the quarter ended June 2020, no complaint was received from any Client in SEBI complaint portal SCORES or a dedicated email grievances.pms@spacapital.com. Compliance officer is visiting the portal and accessing the email on periodical basis to ascertain the investor grievances, if any, and to take timely corrective action for their redressal. Copy of information available on SEBI Score portal as on date reflecting NIL complaints during last quarter, is attached as **Annexure D** for kind perusal.
5.	Review of any deficiency letters or warning letters issued to the Portfolio Managers by	During the review period, no deficiency or warning letter received from the SEBI, the

	SEBI during the intervening period, if any, and corrective action taken in the matter.	Regulator.
6.	Review of Comments/Observations made by Internal Auditor, if any during intervening period, so as to judge the quality of internal procedures being followed by the Portfolio Manger	M/s Khandelia & Sharma, a firm of Chartered Accountants were appointed as Internal Auditors for Financial Year 2019-2020.

Submitted for information please to comply with SEBI directives on PMS Corporate Governance.

Priyam Gupta

Compliance officer

Principal Officer

SPA Capital Advisors Limited New Delhi

Annexure A

Position of PMS Compliances –Quarter ended June, 2020

Nature of PMS Services Rendered during quarter	PMS Advisory Services Only Advisory Services (Funds of clients remained with client only and final decision to invest/disinvest a security is with client after considering advisory provided by us)
Number of total clients to whom PMS services rendered as on end of previous quarter ended March 20 and value of Corpus as at the end of that quarter	2 Clients –Value of Corpus 2761.540 Crore as on March 31, 2020.
Number of total clients to whom PMS services rendered as on end of this quarter ended June 20 and value of Corpus as at the end of this quarter	1 Client – Value of Corpus 137.310 crore as on June 30, 2020.
PMS Client added during quarter June 2020	**Nil**
Name of Client for which mandate expired during quarter (April 2020 - June 2020)	**Nil**
PMS clients for which mandate is expiring in next quarter (July 2020- September 2020)	**Nil**
Clients from whom receipt of fee is pending	**Nil**
Position of compliant, if any, received during a quarter (April 2020 to June2020)	**Nil,** No complaint received from any of PMS Clients during the quarter ended June 2020 and till date.
Any other new initiative added	**Nil**
Any other developments /issue during the quarter ended June, 2020.	Shri Mukesh Kumar Mantri is a qualified Chartered Accountant and Company Secretary having Experience of almost 28 years. Mr. Mukesh Kumar Mantri has been appointment as Principal officer of Portfolio Management Services. The Change in Compliance officer was duly informed to SEBI as well as all PMS Clients.

Date: 07th July 2020

Priyam Gupta

Compliance officer

Udaya Capital Advisors Limited New Delhi

Principal Officer

भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India

Annexure B.

Welcome SPA CAPITAL ADVISORS LIMITED | Logout

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Tuesday Sep 22 2020 | 12:23:55

Reports | Monthly Compliance Report

Monthly Compliance Report

Name of Applicant: SPA CAPITAL ADVISORS LIMITED

Role: Portfolio Managers

Report Id.: 2530152

Registration No.: INP000004664

Registration Start Date: 10/02/2015

Registration End Date:

Monthly Report Duration
अर्धवार्षिक रिपोर्ट अवधि

2020 | April | Go

Details of Compliance Officer / अनुपालन अधिकारी के विवरण

First Name *
प्रथम नाम

Mr. | PRIYAM

Middle Name
मध्य नाम

Last Name *
अंतिम नाम

GUPTA

Direct Line No. *
दूरभाष (सीधा)

91 | 011 | 45675500

Mobile *
मोबाइल नं.

91 | 9831563633

Email Id *
ई-मेल

priyam.gupta@spagroupindia.com

Discretionary Services / वैवेकिक (डिस्क्रेश्नरी) सेवाएँ

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार	No. of Investors as on (month end)* /	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)					
			Equity / इक्विटी	Debt / ऋण (डेट)	Equity Derviatives* /	Mututal Fund* /	Others* / अन्य	Total / कुल

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		No. of Investors as on (month end)* / महीने के अंत तक निवेशकों की सं.	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)							
				Equity / इक्विटी		Debt / ऋण (डेट)		Equity Derviatives* / इक्विटी व्युत्पन्नी (डेरिवेटिव्ज़)	Mututal Fund* / पारस्परिक निधि (म्यूचुअल फंड)	Others* / अन्य	Total / कुल
				Listed* / सूचीबद्ध (लिस्टिड)	Unlisted* / असूचीगत (अनलिस्टिड)	Plain Debt* / सादा ऋण (प्लेन डेट)	Structured Debt* / संरचित ऋण (स्ट्रक्चर्ड डेट)				
1	Individual / व्यक्ति	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
4		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5		FII / एफआईआई	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Grand Total / कुल योग			0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
1	Gross Sales in the month (Amount in Rs.Crores)* / महीने में कुल बिक्री	0.000
2	Gross Purchase in the month (Amount in Rs.Crores)* / महीने में कुल खरीद	0.000
3	Portfolio Turnover Ratio (Cumulative Purchases/ Funds under portfolio)* / पोर्टफोलियो व्यापारावर्त (टर्नओवर) अनुपात [संचयी खरीद / निधियाँ (फंड्स) - पोर्टफोलियो के तहत]	0.000
4	Performance of Protfolio Manager as on in month and in % (on weighted average basis for all clients)* / पोर्टफोलियो प्रबंधक का प्रदर्शन - महीने में और % में [सभी ग्राहकों हेतु भारित (वेटिड) औसत आधार पर]	0
5	Value of Assests Manager under PF/ EPFO* / पीएफ / ईपीएफओ के तहत प्रबंधित आस्तियों का मूल्य।	0.000

Non Discretionary Services / गैर-वैवेकिक (नॉन-डिस्क्रेश्नरी) सेवाएँ

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		No. of Investors as on month end)* / महीने के अंत तक निवेशकों की सं.	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)							
				Equity / इक्विटी		Debt / ऋण (डेट)		Equity Derviatives* / इक्विटी व्युत्पन्नी (डेरिवेटिव्ज़)	Mututal Fund* / पारस्परिक निधि (म्यूचुअल फंड)	Others* / अन्य	Total / कुल
				Listed* / सूचीबद्ध (लिस्टिड)	Unlisted* / असूचीगत (अनलिस्टिड)	Plain Debt* / सादा ऋण (प्लेन डेट)	Structured Debt* / संरचित ऋण (स्ट्रक्चर्ड डेट)				
1	Individual / व्यक्ति	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
4		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5		FII / एफआईआई	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Grand Total / कुल योग			0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
1	Gross Sales in the month (Amount in Rs.Crores)* / महीने में कुल बिक्री	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
2	Gross Purchase in the month (Amount in Rs.Crores)* / महीने में कुल ख़रीद	0.000
3	Portfolio Turnover Ratio (Cumulative Purchases/ Funds under portfolio)* / पोर्टफोलियो व्यापारावर्त (टर्नओवर) अनुपात [संचयी खरीद / निधियाँ (फंड्स) - पोर्टफोलियो के तहत]	0.000
4	Performance of Protfolio Manager as on in month and in % (on weighted average basis for all clients)* / पोर्टफोलियो प्रबंधक का प्रदर्शन - महीने में और % में [सभी ग्राहकों हेतु भारित (वेटिड) औसत आधार पर]	0
5	Value of Assests Manager under PF/ EPFO* / पीएफ / ईपीएफओ के तहत प्रबंधित आस्तियों का मूल्य	0.000

Advisory Services / सलाहकार संबंधी सेवाएँ

Sr.No / क्र. सं.	Advisory Business / सलाहकार संबंधी कारबार	Details / कुल
1	Total number of individual clients* / ग्राहकों (जो व्यक्ति / व्यष्टि हों) की कुल संख्या	0
2	Total number of corporates* / कारपोरेट की कुल संख्या	1
3	Value of assets for which Advisory Services are being given (Amount in crores)* / उन आस्तियों (असेट्स) का मूल्य, जिनके संबंध में सलाहकार संबंधी सेवाएँ दी जा रही हों (रकम - करोड़ में)	138.130

Complaints / शिकायतें

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		Total numnber of complaints pending at the begining of the month* / महीने के आरंभ में लंबित शिकायतों की कुल संख्या	No. of complaints recieved during the month* / महीने के दौरान प्राप्त शिकायतों की सं.	No. of complaints resolved during the month* / महीने के दौरान निपटाई गई शिकायतों की सं.	Total number of complaints pending at the end of the month / महीने के अंत तक लंबित शिकायतों की कुल संख्या
1	Individual / व्यक्ति	Resident / निवासी	0	0	0	0
2		Non Resident / अनिवासी	0	0	0	0
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0	0	0
4		Non Resident / अनिवासी	0	0	0	0
5		FII / एफआईआई	0	0	0	0
Total / कुल			0	0	0	0

भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India

Welcome SPA CAPITAL ADVISORS LIMITED	Logout

Last Login Details:
Monday Oct 05 2020 | 04:25:08

Reports | Monthly Compliance Report

Monthly Compliance Report

Name of Applicant: SPA CAPITAL ADVISORS LIMITED

Role: Portfolio Managers

Report Id.: 2546962

Registration No.: INP000004664

Registration Start Date: 10/02/2015

Registration End Date:

Monthly Report Duration
अर्धवार्षिक रिपोर्ट अवधि

2020 | May | Go

Details of Compliance Officer / अनुपालन अधिकारी के विवरण

First Name *
प्रथम नाम

Mr. | PRIYAM

Middle Name
मध्य नाम

Last Name *
अंतिम नाम

GUPTA

Direct Line No. *
दूरभाष (सीधा)

91	011	45675500

Mobile *
मोबाइल नं.

91	9831563633

Email Id *
ई-मेल

priyam.gupta@spagroupindia.com

Discretionary Services / वैवेकिक (डिस्क्रेश्नरी) सेवाएँ

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार	No. of Investors as on (month end)* /	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)					
			Equity / इक्विटी	Debt / ऋण (डेट)	Equity Derviatives* /	Mututal Fund* /	Others* / अन्य	Total / कुल

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		No. of Investors as on (month end)* / महीने के अंत तक निवेशकों की सं.	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)							
				Equity / इक्विटी		Debt / ऋण (डेट)		Equity Derviatives* / इक्विटी व्युत्पन्नी (डेरिवेटिव्ज़)	Mututal Fund* / पारस्परिक निधि (म्यूचुअल फंड)	Others* / अन्य	Total / कुल
				Listed* / सूचीबद्ध (लिस्टिड)	Unlisted* / असूचीगत (अनलिस्टिड)	Plain Debt* / सादा ऋण (प्लेन डेट)	Structured Debt* / संरचित ऋण (स्ट्रक्चर्ड डेट)				
1	Individual / व्यक्ति	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
4		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5		FII / एफआईआई	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Grand Total / कुल योग			0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
1	Gross Sales in the month (Amount in Rs.Crores)* / महीने में कुल बिक्री	0.000
2	Gross Purchase in the month (Amount in Rs.Crores)* / महीने में कुल खरीद	0.000
3	Portfolio Turnover Ratio (Cumulative Purchases/ Funds under portfolio)* / पोर्टफोलियो व्यापारावर्त (टर्नओवर) अनुपात [संचयी खरीद / निधियाँ (फंड्स) - पोर्टफोलियो के तहत]	0.000
4	Performance of Protfolio Manager as on in month and in % (on weighted average basis for all clients)* / पोर्टफोलियो प्रबंधक का प्रदर्शन - महीने में और % में [सभी ग्राहकों हेतु भारित (वेटिड) औसत आधार पर]	0
5	Value of Assests Manager under PF/ EPFO* / पीएफ / ईपीएफओ के तहत प्रबंधित आस्तियों का मूल्य	0.000

Non Discretionary Services / गैर-वैवेकिक (नॉन-डिस्क्रेश्नरी) सेवाएँ

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		No. of Investors as on month end)* / महीने के अंत तक निवेशकों की सं.	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)							
				Equity / इक्विटी		Debt / ऋण (डेट)		Equity Derviatives* / इक्विटी व्युत्पन्नी (डेरिवेटिव्ज़)	Mututal Fund* / पारस्परिक निधि (म्यूचुअल फंड)	Others* / अन्य	Total / कुल
				Listed* / सूचीबद्ध (लिस्टिड)	Unlisted* / असूचीगत (अनलिस्टिड)	Plain Debt* / सादा ऋण (प्लेन डेट)	Structured Debt* / संरचित ऋण (स्ट्रक्चर्ड डेट)				
1	Individual / व्यक्ति	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
4		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5		FII / एफआईआई	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Grand Total / कुल योग			0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
1	Gross Sales in the month (Amount in Rs.Crores)* / महीने में कुल बिक्री	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
2	Gross Purchase in the month (Amount in Rs.Crores)* / महीने में कुल ख़रीद	0.000
3	Portfolio Turnover Ratio (Cumulative Purchases/ Funds under portfolio)* / पोर्टफोलियो व्यापारावर्त (टर्नओवर) अनुपात [संचयी खरीद / निधियाँ (फंड्स) - पोर्टफोलियो के तहत]	0.000
4	Performance of Protfolio Manager as on in month and in % (on weighted average basis for all clients)* / पोर्टफोलियो प्रबंधक का प्रदर्शन - महीने में और % में [सभी ग्राहकों हेतु भारित (वेटिड) औसत आधार पर]	0
5	Value of Assests Manager under PF/ EPFO* / पीएफ / ईपीएफओ के तहत प्रबंधित आस्तियों का मूल्य	0.000

Advisory Services / सलाहकार संबंधी सेवाएँ

Sr.No / क्र. सं.	Advisory Business / सलाहकार संबंधी कारबार	Details / कुल
1	Total number of individual clients* / ग्राहकों (जो व्यक्ति / व्यष्टि हों) की कुल संख्या	0
2	Total number of corporates* / कारपोरेट की कुल संख्या	1
3	Value of assets for which Advisory Services are being given (Amount in crores)* / उन आस्तियों (असेट्स) का मूल्य, जिनके संबंध में सलाहकार संबंधी सेवाएँ दी जा रही हों (रकम - करोड़ में)	131.190

Complaints / शिकायतें

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		Total numnber of complaints pending at the begining of the month* / महीने के आरंभ में लंबित शिकायतों की कुल संख्या	No. of complaints recieved during the month* / महीने के दौरान प्राप्त शिकायतों की सं.	No. of complaints resolved during the month* / महीने के दौरान निपटाई गई शिकायतों की सं.	Total number of complaints pending at the end of the month / महीने के अंत तक लंबित शिकायतों की कुल संख्या
1	Individual / व्यक्ति	Resident / निवासी	0	0	0	0
2		Non Resident / अनिवासी	0	0	0	0
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0	0	0
4		Non Resident / अनिवासी	0	0	0	0
5		FII / एफआईआई	0	0	0	0
Total / कुल			0	0	0	0

भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India

Welcome SPA CAPITAL ADVISORS LIMITED	Logout

Last Login Details:
Monday Oct 05 2020 | 04:25:08

Reports | Monthly Compliance Report

Monthly Compliance Report

Name of Applicant: SPA CAPITAL ADVISORS LIMITED

Role: Portfolio Managers

Report Id.: 2551604

Registration No.: INP000004664

Registration Start Date: 10/02/2015

Registration End Date:

Monthly Report Duration
अर्धवार्षिक रिपोर्ट अवधि

2020 | June | Go

Details of Compliance Officer / अनुपालन अधिकारी के विवरण

First Name *
प्रथम नाम

Mr. | PRIYAM

Middle Name
मध्य नाम

Last Name *
अंतिम नाम

GUPTA

Direct Line No. *
दूरभाष (सीधा)

91	011	45675500

Mobile *
मोबाइल नं.

91	9831563633

Email Id *
ई-मेल

priyam.gupta@spagroupindia.com

Discretionary Services / वैवेकिक (डिस्क्रेशनरी) सेवाएँ

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार	No. of Investors as on (month end)* /	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)					
			Equity / इक्विटी	Debt / ऋण (डेट)	Equity Derviatives* /	Mututal Fund* /	Others* / अन्य	Total / कुल

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		No. of Investors as on (month end)* / महीने के अंत तक निवेशकों की सं.	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)							
				Equity / इक्विटी		Debt / ऋण (डैट)		Equity Derviatives* / इक्विटी व्युत्पन्नी (डेरिवेटिव्ज़)	Mututal Fund* / पारस्परिक निधि (म्यूचुअल फंड)	Others* / अन्य	Total / कुल
				Listed* / सूचीबद्ध (लिस्टिड)	Unlisted* / असूचीगत (अनलिस्टिड)	Plain Debt* / सादा ऋण (प्लेन डैट)	Structured Debt* / संरचित ऋण (स्ट्रक्चर्ड डैट)				
1	Individual / व्यक्ति	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
4		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5		FII / एफआईआई	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Grand Total / कुल योग			0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
1	Gross Sales in the month (Amount in Rs.Crores)* / महीने में कुल बिक्री	0.000
2	Gross Purchase in the month (Amount in Rs.Crores)* / महीने में कुल खरीद	0.000
3	Portfolio Turnover Ratio (Cumulative Purchases/ Funds under portfolio)* / पोर्टफोलियो व्यापारावर्त (टर्नओवर) अनुपात [संचयी खरीद / निधियाँ (फंड्स) - पोर्टफोलियो के तहत]	0.000
4	Performance of Protfolio Manager as on in month and in % (on weighted average basis for all clients)* / पोर्टफोलियो प्रबंधक का प्रदर्शन - महीने में और % में [सभी ग्राहकों हेतु भारित (वेटिड) औसत आधार पर]	0
5	Value of Assests Manager under PF/ EPFO* / पीएफ / ईपीएफओ के तहत प्रबंधित आस्तियों का मूल्य	0.000

Non Discretionary Services / गैर-वैवेकिक (नॉन-डिस्क्रेशरी) सेवाएँ

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		No. of Investors as on month end)* / महीने के अंत तक निवेशकों की सं.	Net Assests under Management as on (month end) in Rs. Crore / मार्च 2015 तक शुद्ध प्रबंधनाधीन आस्तियाँ (असेट्स अंडर मैनेजमेंट) (रु. करोड़ में)							
				Equity / इक्विटी		Debt / ऋण (डैट)		Equity Derviatives* / इक्विटी व्युत्पन्नी (डेरिवेटिव्ज़)	Mututal Fund* / पारस्परिक निधि (म्यूचुअल फंड)	Others* / अन्य	Total / कुल
				Listed* / सूचीबद्ध (लिस्टिड)	Unlisted* / असूचीगत (अनलिस्टिड)	Plain Debt* / सादा ऋण (प्लेन डैट)	Structured Debt* / संरचित ऋण (स्ट्रक्चर्ड डैट)				
1	Individual / व्यक्ति	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
2		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
4		Non Resident / अनिवासी	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5		FII / एफआईआई	0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Grand Total / कुल योग			0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
1	Gross Sales in the month (Amount in Rs.Crores)* / महीने में कुल बिक्री	0.000

Sr.No / क्र. सं.	Particulars / विवरण	Amount in Rs.Crores / रकम (करोड़ में)
2	Gross Purchase in the month (Amount in Rs.Crores)* / महीने में कुल खरीद	0.000
3	Portfolio Turnover Ratio (Cumulative Purchases/ Funds under portfolio)* / पोर्टफोलियो व्यापारावर्त (टर्नओवर) अनुपात [संचयी खरीद / निधियाँ (फंड्स) - पोर्टफोलियो के तहत]	0.000
4	Performance of Protfolio Manager as on in month and in % (on weighted average basis for all clients)* / पोर्टफोलियो प्रबंधक का प्रदर्शन - महीने में और % में [सभी ग्राहकों हेतु भारित (वेटिड) औसत आधार पर]	0
5	Value of Assests Manager under PF/ EPFO* / पीएफ / ईपीएफओ के तहत प्रबंधित आस्तियों का मूल्य	0.000

Advisory Services / सलाहकार संबंधी सेवाएँ

Sr.No / क्र. सं.	Advisory Business / सलाहकार संबंधी कारबार	Details / कुल
1	Total number of individual clients* / ग्राहकों (जो व्यक्ति / व्यष्टि हों) की कुल संख्या	0
2	Total number of corporates* / कारपोरेट की कुल संख्या	1
3	Value of assets for which Advisory Services are being given (Amount in crores)* / उन आस्तियों (असेट्स) का मूल्य, जिनके संबंध में सलाहकार संबंधी सेवाएँ दी जा रही हों (रकम - करोड़ में)	137.310

Complaints / शिकायतें

Sr.No / क्र. सं.	Types of Clients / ग्राहकों का प्रकार		Total numnber of complaints pending at the begining of the month* / महीने के आरंभ में लंबित शिकायतों की कुल संख्या	No. of complaints recieved during the month* / महीने के दौरान प्राप्त शिकायतों की सं.	No. of complaints resolved during the month* / महीने के दौरान निपटाई गई शिकायतों की सं.	Total number of complaints pending at the end of the month / महीने के अंत तक लंबित शिकायतों की कुल संख्या
1	Individual / व्यक्ति	Resident / निवासी	0	0	0	0
2		Non Resident / अनिवासी	0	0	0	0
3	Corporate / कारपोरेट (कंपनी)	Resident / निवासी	0	0	0	0
4		Non Resident / अनिवासी	0	0	0	0
5		FII / एफआईआई	0	0	0	0
Total / कुल			0	0	0	0

Annexure C

SPA CODE OF CONDUCT- PORTFOLIO MANAGER

1. All officials associated with Portfolio Management Services shall, in the conduct of business, observe high standards of integrity and fairness in all their dealings with clients.
2. Portfolio Management Services be rendered to Client at all times with high standards of services, exercising due diligence, ensuring proper care and exercising independent professional judgment. Conflict of interest shall either be avoided in making investment or disinvestment decisions or where any conflict of interest arises, ensuring fair treatment to all clients. Clients be disclosed possible source of conflict of duties and interests, while providing unbiased services. Personal interest of the Company be not placed above those of clients.
3. Neither any statement be made in respect of other Portfolio Managers and nor any act be done to become privy to any act, practice or unfair completion, which is likely to be harmful to any interest of other Portfolio Managers or which may place such other Portfolio Managers in a disadvantageous position, while competing for or executing any assignment.
4. No exaggerated statement, whether oral or written, be made to the Clients either about the qualification or the capability to render certain services or achievements in regard to services rendered to other clients.
5. At the time of entering into a contract, Clients interest in various corporate bodies be obtained in writing and accordingly obtaining of unpublished price-sensitive information in respect of these body corporates be avoided.
6. No confidential information of a Client which come to knowledge while rendering services be shared with other clients. Likewise, confidential information about clients be not pressed for.
7. Professional services are rendered to the Clients with endeavour to :-
   - ✓ Ensure that the investors are provided with true and adequate information without making any misguiding or exaggerated claims and are made aware of attendant risks before any investment decision is taken by them;
   - ✓ Render the best possible advice to the client having regard to the client's needs and the environment, and his own professional skills;
   - ✓ Ensure that all professional dealings are effected in a prompt, efficient and cost effective manner.
8. Services are rendered without being a party to :-
   - ✓ creation of false market in securities;
   - ✓ price rigging or manipulation of securities;
   - ✓ passing of price sensitive information to brokers, members of the stock exchanges and any other intermediaries in the capital market or take any other action which is prejudicial to the interest of the investors.

Further, based on unpublished price sensitive information, if any, obtained during the course of any professional assignment, no transaction in securities be entered into either in personal accounts or through their associates or family members/relatives names.

9. No investment advice about any security in the publicly accessible media be made, whether real-time or non-real-time, without disclosing long or short position in the said Security by the Company. Further, while making such public comments, official making the investment advice

shall disclose the interest of his/her dependent family members and the Company including its long or short position in the said security.

10. While rendering Portfolio Management Services to Clients, investment decision of clients be not influenced by using own status as other registered intermediary.
11. All rules, regulations made under the Securities and Exchange Board of India Act 1992 be abided. Further, Model Code of Conduct specified in the SEBI (Prohibition of Insider Trading) Regulation 1992 be followed.

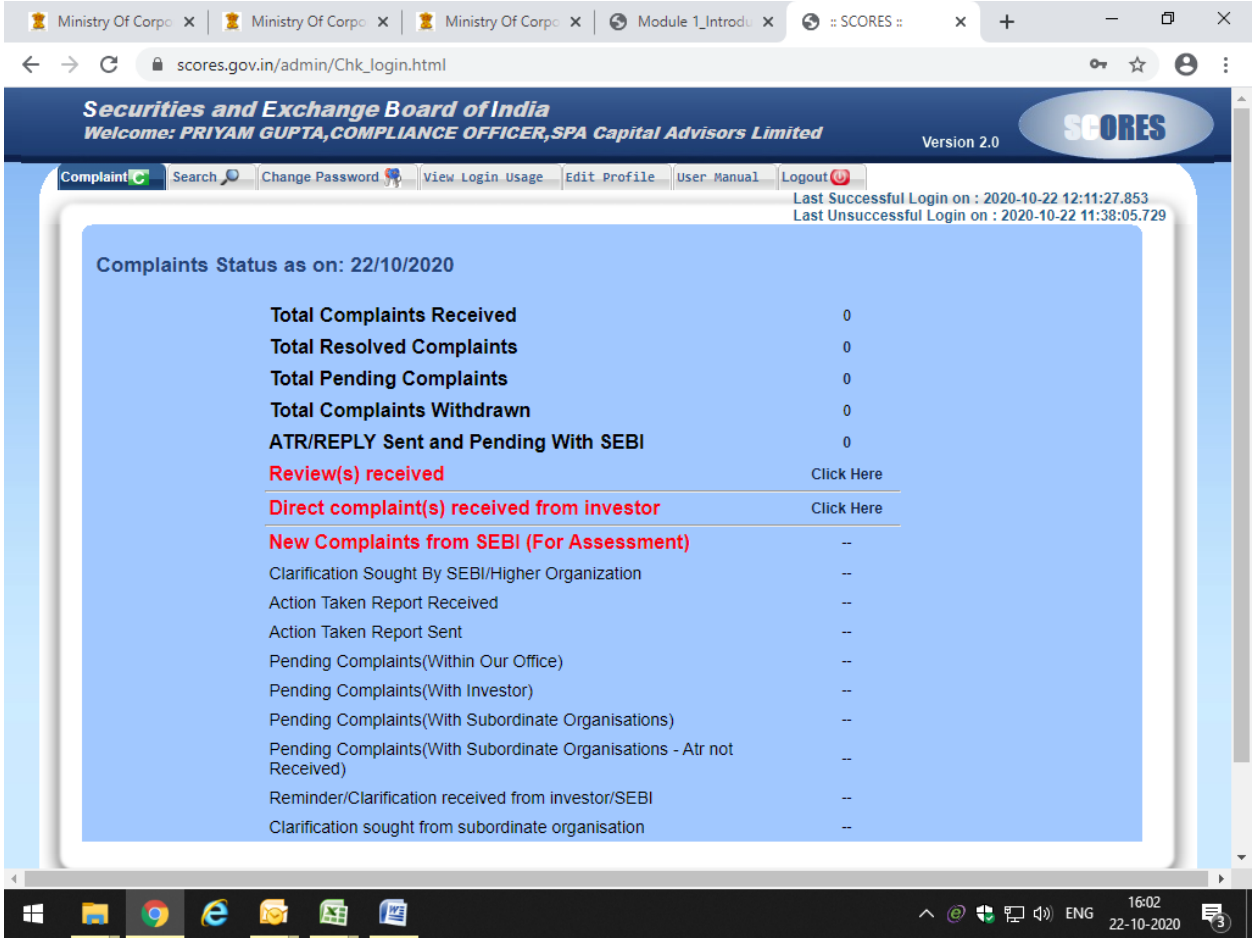
Priyam Gupta

Compliance Officer

Principal Officer

SPA Capital Advisors Limited New Delhi

Annexure D


Ministry Of Corpo
Ministry Of Corpo
Ministry Of Corpo
Module 1_Introdu
:: SCORES ::
scores.gov.in/admin/Chk_login.html
Securities and Exchange Board of India
Welcome: PRIYAM GUPTA,COMPLIANCE OFFICER,SPA Capital Advisors Limited
Version 2.0
SCORES
Complaint
Search
Change Password
View Login Usage
Edit Profile
User Manual
Logout
Last Successful Login on : 2020-10-22 12:11:27.853
Last Unsuccessful Login on : 2020-10-22 11:38:05.729
Complaints Status as on: 22/10/2020
Total Complaints Received 0
Total Resolved Complaints 0
Total Pending Complaints 0
Total Complaints Withdrawn 0
ATR/REPLY Sent and Pending With SEBI 0
Review(s) received Click Here
Direct complaint(s) received from investor Click Here
New Complaints from SEBI (For Assessment) --
Clarification Sought By SEBI/Higher Organization --
Action Taken Report Received --
Action Taken Report Sent --
Pending Complaints(Within Our Office) --
Pending Complaints(With Investor) --
Pending Complaints(With Subordinate Organisations) --
Pending Complaints(With Subordinate Organisations - Atr not Received) --
Reminder/Clarification received from investor/SEBI --
Clarification sought from subordinate organisation --
ENG
16:02
22-10-2020