

Marathon Trends Advisory Private Limited Investment Advisor Charter

BASL Membership ID: BASL2035

SEBI Registration No.: INA000018319

A. Vision and Mission Statements for Investors

Vision: Our vision as an Investment Advisor is to provide informed and secure investment advice. We aim for investors to "Invest with knowledge & safety".

Mission: We are committed to empowering every investor by guiding them toward the right investment products tailored to their needs. Our mission includes helping clients manage and monitor their investments effectively, access relevant reports, and achieve financial wellness. Our goal is that "Every investor should be able to invest in right investment products based on their needs, manage and monitor them to meet their goals, access reports and enjoy financial wellness".

B. Details of Business Transacted by the Investment Adviser with Respect to the Investors

1. Client Agreements and Transparency:

- When engaging with clients, we enter into comprehensive agreements that cover fee details, conflict of interest disclosures, and the confidentiality of information.
- Transparency is our priority, ensuring that clients fully understand the terms and conditions of our services.

2. Risk Profiling and Suitability Assessment:

- We conduct unbiased risk profiling for each client, ensuring that investment recommendations align with their risk tolerance and financial goals.
- Suitability assessments help us tailor advice to individual circumstances. We are committed to doing a proper and unbiased risk-profiling and suitability assessment of the client.

3. Compliance with KYC Norms:

- To adhere to Know Your Customer (KYC) norms, we maintain registration with both the Know Your Client Registration Agency (KRA) and the Central Know Your Customer Registry (CKYC).
- This ensures due diligence and compliance with regulatory requirements.

4. Annual Audit and Accountability:

- As per SEBI (Investment Advisor) Regulations, we conduct an annual audit to review our practices and ensure compliance.
- Accountability and transparency are integral to our operations.

5. Complaint Redressal:

- We take complaints seriously and promptly address them.
- The status of complaints is accessible on our website.
- Clients can seek resolution through SEBI's Complaints Redress System (SCORES) if dissatisfied with our response.
- We strive to redress grievances immediately, but not later than 21 days of receipt.

6. Contact Information:

- Our website provides details such as the advisor's name, proprietor, registration type, registration number, validity of the SEBI registration certificate, complete address, and associated SEBI regional/local office information.

7. Registered Investment Adviser:

- We operate as a Registered Investment Advisor under SEBI (Investment Advisor) Regulations.
- Our commitment to regulatory compliance ensures trust and reliability for our clients.
- We adhere to prescribed guidelines and ensure we employ qualified and certified professionals, as mandated by Regulation 7 of SEBI (Investment Advisor) Regulation, 2013.

C. Key Aspects of Our Services:

1. Communication Channels:

- We interact with clients exclusively through our official phone numbers: 8169871990.
- All client communications occur via registered email IDs. We deal with clients only from official numbers.

2. Record Keeping:

- We maintain comprehensive records of interactions with clients, including prospective clients.

- These records cover all conversations related to investment advice, even before formal onboarding.

3. Client Onboarding:

- Our onboarding process includes sharing application forms and Investment Advisory services agreements with clients.
- We complete the Know Your Customer (KYC) process.
- We conduct risk profiling and assess each client's unique needs.

4. Full Disclosure:

- Our client agreements provide complete details about our business, affiliations, and compensation structure.
- We emphasize transparency, ensuring that clients understand our services and limitations.
- We will disclose any conflict of interest of the investment advisory activities with any other activities of the investment adviser.
- We will also disclose the extent of use of Artificial Intelligence tools in providing investment advisory services.
- We make adequate disclosure to the investor of all material facts such as risks, obligations, costs, etc., relating to the products or securities advised.
- We provide clear guidance and adequate caution notice to clients when providing investment advice for dealing in complex and high-risk financial products/services.

5. Limited Access to Accounts:

- We offer advisory services only; we do not have access to clients' accounts or holdings.
- Our focus is on providing informed advice based on risk profiles and individual preferences.

6. Risk Profiling and Confirmation:

- Investment advice is tailored to each client's risk profile.
- Clients receive their risk assessment via email, along with the advisory agreement.
- Our recommendations are periodically reviewed based on client preferences and evolving needs.

7. Service Parameters and Timelines:

- We will disclose the timelines for the various services provided by the investment adviser to clients and ensure adherence to the said timelines.

8. Fair and Equitable Treatment:

- We treat all advisory clients with honesty and integrity.
- We will not discriminate in terms of services provided, among clients opting for same/similar products/services offered by the investment adviser.

9. Confidentiality:

- We ensure confidentiality of information shared by clients unless such information is required to be provided in furtherance of discharging legal obligations or a client has provided specific consent to share such information.

D. Details of Grievance Redressal Mechanism and How to Access It

Investors are advised that in case of any grievance/complaint, an investor may approach Marathon Trends Advisory Private Limited via our email id: grievances@marathontrends.com. We shall ensure that the grievance is resolved within 30 days of receipt of the same.

If the investor is not satisfactorily redressed by our response, one may lodge a complaint with SEBI on SEBI's 'SCORES' portal, which is a centralized web-based complaints redressal system. SEBI takes up the complaints registered via SCORES with the concerned intermediary for timely redressal. SCORES facilitates tracking the status of the complaint.

The link for the SCORES 2.0 Portal is: <https://scores.sebi.gov.in>.

Investors also have the option of sending complaints physically to SEBI at the following address:

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.

After exhausting these options for resolution of the grievance, if the investor is not satisfied with the outcome, they can initiate dispute resolution through the ODR Portal at <https://smartodr.in/login>. They can directly initiate dispute resolution through the ODR Portal if the grievance lodged with the Investment Adviser is not satisfactorily resolved at any stage of the subsequent escalations mentioned above. Our website has a link to access the SEBI Master Circular and the ODR Portal.

E. Rights of Investors

Investors have the following rights:

- Right to Privacy and Confidentiality
- Right to Transparent Practices
- Right to Fair and Equitable Treatment
- Right to Adequate Information
- Right to Initial and Continuing Disclosure
- Right to receive information about all the statutory and regulatory disclosures.
- Right to Fair & True Advertisement
- Right to Awareness about Service Parameters and Turnaround Times
- Right to be informed of the timelines for each service
- Right to be Heard and Satisfactory Grievance Redressal
- Right to have timely redressal
- Right to Suitability of the Financial Products
- Right to Exit from Financial product or service in accordance with the terms of agreement with the investment adviser
- Right to receive clear guidance and caution notice when dealing in Complex and High-Risk Financial Products and Services
- **Additional Rights for Vulnerable Consumers:**
 - Right to get access to services in a suitable manner even if differently abled
 - Right to provide feedback on the financial products and services used
 - Right against coercive, unfair, and one-sided clauses in financial agreements

F. Investor Responsibilities: Do's and Don'ts

Investors are encouraged to familiarize themselves with the following guidelines:

Do's:

1. **Choose Registered Investment Advisers:**
 - Always engage with SEBI-registered Investment Advisers. Their SEBI registration number serves as evidence of their legitimacy.
 - Verify that the Investment Adviser holds a valid Registration Certificate.
 - Check for the SEBI registration number. You can find a list of all SEBI-registered Investment Advisers on the SEBI website here:

<https://www.sebi.gov.in/sebiweb/other/OtherAction.do?doRecognisedFpi=yess&intmld=13>).

2. Transparent Fee Payments:

- Pay only advisory fees to your Investment Adviser.
- Use banking channels for payments and retain duly signed receipts with payment details. You may also make payment of advisory fees through the Centralised Fee Collection Mechanism (CeFCOM) of IAASB if the investment adviser has opted for the mechanism.

3. Prioritize Risk Profiling:

- Always request your risk profiling assessment before accepting investment advice.
- Ensure that the Investment Adviser tailors recommendations based on your risk profile and considers available investment options.

4. Seek Clarifications:

- Ask relevant questions and clarify doubts with your Investment Adviser before acting on their advice.

5. Evaluate Risk and Liquidity:

- Assess the risk-return profile, liquidity, and safety aspects of investments before making decisions.

6. Written Agreements:

- Insist on written terms and conditions, duly signed and stamped.
- Carefully review details such as advisory fees, plans, and recommendation categories before engaging with any Investment Adviser.

7. Stay Vigilant:

- Be attentive during your transactions and stay informed.

8. Seek Redressal:

- Approach the appropriate authorities to address doubts or grievances.

9. Report Assured or Guaranteed Returns:

- Inform SEBI about Investment Advisers offering assured or guaranteed returns.

10. Right to Exit and Seek Clarifications:

- Always be aware that you have the right to exit the service of an Investment Adviser.
- Always be aware that you have the right to seek clarifications and clear guidance on advice.

11. Provide Feedback:

- Always be aware that you have the right to provide feedback to the Investment Adviser in respect of services received.

12. Beware of Contravening Clauses:

- Always be aware that you will not be bound by any clause, prescribed by the investment adviser, which is contravening any regulatory provisions.

Don'ts:

1. Avoid Stock Tips:

- Don't fall for stock tips disguised as investment advice.
- Rely on informed analysis rather than speculative tips.

2. Funds and Investment Advisers:

- Do not provide funds directly to the Investment Adviser.
- Maintain a clear separation between your funds and the adviser's operations.

3. Beware of Assured Returns:

- Don't be swayed by promises of exorbitant or guaranteed returns.
- Rational decision-making should prevail over greed.

4. Stay Clear of Luring Advertisements:

- Avoid being influenced by flashy advertisements or market rumors.
- Base your decisions on sound research and analysis.

5. Be Cautious with Phone Calls and Messages:

- Avoid executing transactions solely based on phone calls or messages from advisers or their representatives.
- Verify information independently before acting.

6. Decisions Based on Repeated Messages:

- Don't make decisions solely due to repeated messages or calls by Investment Advisers. Take your time and consider all relevant factors.

7. Discounts and Incentives:

- Do not fall for limited-period discounts or other incentives, gifts, etc. offered by Investment Advisers. Evaluate investment opportunities objectively.

8. Investment Alignment with Goals:

- Avoid rushing into investments that do not align with your risk appetite and financial goals. Consider long-term implications before committing.

9. Protect Your Credentials:

- Do not share login credentials or passwords for your trading, demat, or bank accounts with the Investment Adviser. Maintain the security of your financial accounts.