

RIA Disclosure Document

Key Information and Disclosure Document for Investment Advisory Services

Undertaken by **Marathon Trends Advisory Private Limited**) (through its investment advisory division known as **Marathon Trends Advisory Private Limited**)

The purpose of this key information and disclosure document is to provide essential information about the investment advisory services. It aims to assist and enable investors in making informed decisions when engaging an investment advisor.

Essential Information

- **Investment Advisor:** The Investment Advisor is disclosed as **Marathon Trends Advisory Private Limited**, operating through its division, **Marathon Trends Advisory Private Limited**.
- **Investor Advisory Services:** This document outlines the investment advisory services provided by the Investment Advisor.
- **Investor Responsibility:** Investors are advised to carefully read this entire document and retain it for future reference.

Disclaimer

- **Market Risks:** Investment in securities markets is subject to market risks. Investors should read all related documents carefully before investing.
- **No Guarantees:** Registration granted by SEBI, membership of BASL, and certification from NISM do not guarantee the performance of the intermediary or provide any assurance of returns to investors.
- **Illustrative Purposes:** The securities quoted in this document are for illustration purposes only and are not recommendatory.
- **Past Performance:** Any performance depictions are for illustration purposes, and past performance may or may not sustain in the future.

Regulatory Compliance

This key information and disclosure document has been prepared in accordance with regulations 15 and 18 of the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013, as amended from time to time. It also adheres to the circulars, guidelines, and instructions issued by SEBI under these regulations.

Regulatory Compliance

This Key Information Document adheres to the Securities and Exchange Board of India (SEBI) (Investment Advisers) Regulations, 2013, as amended (the "Regulations") and any associated guidelines or instructions issued by SEBI.

Confidentiality

This Key Information Document is intended solely for the recipient and should not be reproduced or distributed further without prior written consent from Marathon Trends Advisory Private Limited (the "Investment Advisor").

Limitations

This document provides a general overview of the Investment Advisor's services and is not exhaustive. It is recommended that potential clients conduct their own due diligence and seek professional advice before engaging Marathon's services.

About Marathon Trends Advisory Private Limited

Marathon is a SEBI-registered Investment Advisor (Registration No.: INA000018319) and a member of BASL (Membership ID: BASL2035). Established by Mr. Atul Suri, Marathon Trends Advisory Private Limited specializes in managing discretionary investment portfolios for high-net-worth individuals (HNIs) and ultra-high-net-worth individuals (UHNIs) in India. Marathon is also a registered Portfolio Manager with SEBI (INP000005722).

Contact Information

Marathon Trends Advisory Private Limited CIN:

U74140MH2006PTC160618

Office Address: 701A, Ramee Emeralds, Linking Road, Street 29, Santacruz (W), Mumbai – 400054

Email: ria@marathontrends.com Website: www.marathontrendsria.com

Directors

(i) Mr. Atul Suri (CEO): Extensive experience in portfolio management and investment analysis.

- Extensive experience in portfolio management and investment analysis.
- Holds a Masters in Banking and Finance, specializing in quantitative and technical analysis.
- Previously held leadership positions at Birla Sun Life Securities and RARE Enterprises.
- Founded Marathon Capital, focusing on derivatives trading and market analysis.
- Leverages his combined expertise in fundamental and technical analysis to guide Marathon's Trend Following PMS strategy.

Mr. Vineet Singh (Principal Officer & Co-promoter)

- Deep understanding of various financial disciplines including investment evaluation, risk management, and long-term stock investing.
- Proven track record in research, portfolio management, and trade execution.

- Extensive experience across equity and commodity markets.
- Leads Marathon's research team, ensuring data-driven investment decisions.
- Previously held positions at Marathon Capital and RARE Enterprises, honing skills in high-value investment and derivatives trading.

Affiliation with Other Intermediaries

Marathon Trends Advisory Private Limited has no affiliations with other intermediaries. However, the company has partnered with various financial intermediaries, financial institutions, and individuals to promote and distribute its financial product offerings. These partnerships include availing their advisory, distribution, or onboarding platforms.

Disciplinary History / Complaint Status

1. **Penalties and Directions:** No penalties or directions have been issued by SEBI under the SEBI Act or Regulations against Marathon Trends Advisory Private Limited, its directors, or employees related to investment advisory services.
2. **Litigations and Investigations:** There are no pending material litigations or legal proceedings, findings of inspections, or investigations for which action has been taken or initiated by any regulatory authority against Marathon Trends Advisory Private Limited, its directors, or employees.
3. **Complaints Update:** For the latest updates on complaints, kindly visit our website: Marathon Trends Advisory Complaints > Disclaimer > IA > IA Historical complaints for the period end.

Services Offered and Terms of Offerings

The Investment Adviser provides investment advice to clients related to investing, purchasing, selling, or dealing in securities, including shares, debentures, bonds, derivatives, securitized instruments, structured products, mutual funds, and money market instruments.

- **Investment Portfolio Advice and Monitoring:**
 - The Investment Adviser provides advice on investment portfolios and other suitable investment products tailored to the client's needs. This includes ongoing monitoring, periodic reviews, asset allocation, and financial planning. The goal is to analyze the client's financial position, identify financial goals, and recommend strategies to achieve those goals.
- **Non-Binding Services:**
 - All Investment Advisory services are offered to clients with no binding obligations. Clients are free to implement or execute these services through any distributor, broker, or intermediary of their choice.
- **Performance Information Disclaimer:**
 - Performance-related information provided by the Investment Advisor is on a consolidated basis and has not been verified or approved by SEBI. Actual performance and returns across individual portfolios may

significantly vary from the data depicted by the Investment Advisor. Claims regarding such variations will not be entertained.

- Neither the Investment Adviser, its Directors, nor employees shall be liable for any discrepancies in individual portfolio returns. The overall performance of Marathon Trends Advisory Private Limited does not directly impact the expected performance of an individual client portfolio.
- MARATHON TRENDS ADVISORY PRIVATE LIMITED does not guarantee minimum or risk-free returns. Past performance should not be used as a sole basis for comparison with other investments.
- **Accredited Investors:**
 - Accredited investors can also avail the services offered by MARATHON TRENDS ADVISORY PRIVATE LIMITED. Eligibility criteria, accreditation status, and compliance with requirements set by the Accreditation Agency apply.

Risk Factors

The value of investments and expected returns can be influenced by various factors related to financial and securities markets. These factors include:

1. Portfolio Entities/Companies Risk:

- The performance of the model portfolio relies on the business performance and prospects of the portfolio entities and companies.
- The Investment Advisor conducts in-depth analysis of business sustainability, including studying balance sheets, to mitigate sector- specific or company-specific risks.

2. Valuation Risk:

- The Investment Advisor assesses portfolio entities based on various valuation parameters to determine the reasonableness of valuations during the creation of the model portfolio.
- Regular reassessment ensures alignment with changing market conditions.

3. Market Risk:

- Rather than attempting to time the markets, the Investment Advisor focuses on creating a portfolio using bottom-up fundamental research.
- To mitigate market risk, continuous monitoring and analysis of market and economic conditions are performed, which may impact the performance of the portfolio entities.

Please note that this document provides essential information, and investors should seek professional advice before making any investment decisions. The contact details remain the same:

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 - Office No.-701A Ramee Emeralds,
 - Linking Road, Street 29

- Santacruz (W), Mumbai – 400052
- **Email ID:** ria@marathontrends.com
- **Website:** www.marathontrendsria.com

1. Liquidity Risk:

- When investing in equities and portfolio entities, liquidity constraints pose a near-term risk during investment and disinvestment.
- To mitigate this risk, the Investment Advisor focuses on creating portfolios with a medium to long-term time horizon.

2. Service Provider Risk:

- The Investment Advisor relies on third-party service providers for various functions.
- Weak control over technology used by these service providers can jeopardize security and system integrity, impacting the operations of MARATHON TRENDS ADVISORY PRIVATE LIMITED.
- Mitigation efforts include partnering with regulated entities and incorporating indemnity clauses in agreements with service providers.

3. Other Risks:

- The advisory portfolio offered by the Investment Advisor suits clients with a high-risk profile.
- The Investment Advisory does not guarantee assured or guaranteed returns.
- Investors should carefully read the key information and disclosure document and other relevant materials before making investment decisions.
- MARATHON TRENDS ADVISORY PRIVATE LIMITED is not liable for any loss resulting from the operations of the model advisory portfolio.

Holdings and Disclosure of Interest

- MARATHON TRENDS ADVISORY PRIVATE LIMITED, its affiliates, employees, directors, or funds managed by MARATHON TRENDS ADVISORY PRIVATE LIMITED may hold same or contra positions in securities/stocks advised.
- Investors should exercise caution while executing advice based on their risk/return profile and suitability.

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1. Differing Advice for Other Clients:

- Subject to applicable laws, the Investment Advisor may provide advice or take actions for other clients or its own accounts that may differ from advice given to the client.
- The Investment Advisor is not obligated to recommend any security or investment that it may buy, sell, or recommend for other clients or its own accounts.

2. Other Financial Activities:

- The Investment Advisor, its directors, or affiliates may be involved in other financial or investment activities.
- These activities could occasionally create conflicts of interest with the investment advisory services provided to the client. For instance, they may serve as directors, officers, advisers, or agents of other companies.

3. Segregation for Proprietary Purposes:

- As an entity, the Investment Advisor may invest or divest in various securities or investments at its own discretion.
- This is undertaken by a separate and dedicated team to ensure avoidance of conflicts of interest related to investment advisory and the company's business.

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Conflict of Interest

1. Proprietary Investment Transactions:

- Proprietary investment transactions may occasionally differ from the investment advice or other related business actions.
- These differences can arise due to varying risk profiles, return expectations, investment objectives, or risk perceptions of the entities being advised.

2. Business Activities:

- In connection with advice on securities or investment products, the Investment Advisor may earn fees or remuneration in the form of advisory fees or other fees.
- The Investment Advisor, its directors, or employees may also be connected with fund houses, portfolio managers, mutual funds/asset management companies, alternative investment funds, broking companies, or other entities offering financial products (which may be part of investment advice) and may earn management fees.

3. Future Business Activity:

- As part of normal business activity, the Investment Advisor or its affiliates may undertake other business activities.
- These activities may be directly or indirectly connected with long-term business objectives, including corporate advisory, in line with the company's object clause.

However, clients are not obligated to avail execution or any other services offered by the Investment Advisor. All applicable fees and charges for such services should be paid directly to execution service providers and not through the Investment Advisor.

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Other Disclosures

- **Rights Retained:**
 - The Investment Advisor retains all rights related to the information contained in the document(s) shared from time to time.
- **Jurisdiction and Dispute Resolution:**
 - The Investment Advisor operates from within India and is subject to Indian laws.
 - Any dispute shall be resolved in the courts of Mumbai, Maharashtra.
- **Informational Purposes Only:**
 - Data and analysis provided by the Investment Advisor are for informational purposes only.
 - The information is sourced from various reliable sources, and reasonable care is taken to ensure accuracy.
 - The Investment Advisor is not responsible for errors or losses resulting from the information in this analysis.
- **Views and Opinions Disclaimer:**

- Neither the Investment Advisor nor its affiliates, directors, employees, agents, or representatives are liable for views or opinions expressed in this analysis.
 - No responsibility is taken for clerical, computational, systemic, or other errors in comparison analysis.
 - **Warranties and Completeness:**
 - The contents of this key information and disclosure document are true to the best of the Investment Advisor's knowledge and belief.
 - However, no liability is assumed for the relevance, accuracy, or completeness of the contents herein.
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The Investment Advisors (including its affiliates) and any of its directors, officers, employees, and other personnel will not accept any liability, loss, or damage of any nature, including but not limited to direct, indirect, punitive, special, exemplary, or consequential losses, as well as any loss of profit, arising from the use of this document in any manner whatsoever.

This document may include certain forward-looking statements that contain words or phrases such as “believe,” “expect,” “anticipate,” “estimate,” “intend,” “plan,” “objective,” “goal,” “project,” and similar expressions. Actual results may differ materially from those suggested by the forward-looking statements due to risks, uncertainties, or assumptions. The Investment Advisor takes no responsibility for updating any data or information.

This document cannot be copied, reproduced in whole or in part, or otherwise distributed without the prior written approval of the Investment Advisor.

Prospective clients are advised to review this document, the Advisory Agreement, presentations, and other related documents carefully and in their entirety.

Prospective clients should make an independent assessment and consult their own legal, business, and tax advisors concerning this document, the Advisory Agreement, and other related documents before expressing interest in the Advisory Portfolio.

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Disclaimers and Limitations of Liability

Important Information

The information contained in this document is for general guidance only and does not constitute professional advice. You should not take any action based on this information without first seeking professional advice specific to your circumstances.

No Liability

Neither Marathon Trends Advisory Private Limited (MARATHON TRENDS ADVISORY PRIVATE LIMITED) nor its affiliates or advisors assumes any responsibility for any reliance placed on the content of this document or for any decisions made based on it. By receiving this document, you agree to these terms.

Investment Risks

All investment portfolios are subject to various risks, including political, legal, social, economic, and market risks. You are solely responsible for any investment decisions you make based on this document.

MARATHON TRENDS ADVISORY PRIVATE LIMITED's Holdings

MARATHON TRENDS ADVISORY PRIVATE LIMITED, its directors, and employees may hold positions in the securities mentioned in this document. MARATHON TRENDS ADVISORY PRIVATE LIMITED may also sell securities that are part of its advisory portfolio.

Past Performance

Past performance is not necessarily indicative of future results. There is no guarantee that future results will be consistent with the information presented here.

Limited Distribution

The distribution of this information may be restricted in certain jurisdictions. You are responsible for informing yourself about and complying with any applicable restrictions.

Confidentiality

Unauthorized disclosure, use, dissemination, or copying of this information is strictly prohibited.

No Client Relationship

Receiving this document does not establish a client relationship between you and MARATHON TRENDS ADVISORY PRIVATE LIMITED.

Limitation of Liability

MARATHON TRENDS ADVISORY PRIVATE LIMITED and its affiliates, directors, employees, agents, or representatives shall not be liable for any damages arising from the use of this information, including errors or discrepancies.

Indemnification

By accessing this information, you agree to indemnify and hold harmless MARATHON TRENDS ADVISORY PRIVATE LIMITED and its affiliates from any and all liability arising from your misuse of this information.

Contact Information

For further information, please refer to the contact details provided below:

Marathon Trends Advisory Private Limited

CIN: U74140MH2006PTC160618

Office Address:

701A, Ramee Emeralds, Linking Road, Street 29, Santacruz West, Mumbai-400054

Email: ria@marathontrends.com

Website: www.marathontrendsria.com

Principal Officer: Mr. Vineet Singh (ria@marathontrends.com)

Compliance and Grievance Officer: Vidhi Gulabani (+91-8169871990; ria@marathontrends.com)

Corresponding SEBI Regional Office:

Securities and Exchange Board of India (SEBI) SEBI Bhavan Plot No. C4-A, G Block BKC-Bandra East, Mumbai- 400051.

