

Part 2A of Form ADV: *Firm Brochure*

Item 1 – Cover Page

Avendus Wealth Management Private Limited

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Date of Brochure: **October 16, 2019**

This brochure provides information about the qualifications and business practices of Avendus Wealth Management Private Limited. If you have any questions about the contents of this brochure, please contact us at 91-22-6648-1437 or priya.sonavane@avendus.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Avendus Wealth Management Private Limited also is available on the SEC's website at **www.adviserinfo.sec.gov**. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 156771.

Item 2 Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Avendus.

Avendus believes that communication and transparency are the foundation of its relationship and continually strive to provide our Clients with complete and accurate information at all times. Avendus encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Since our last disclosure document, following are the material changes:

- 1) Avendus Wealth Management Private Limited has appointed HDFC Bank Limited as an additional Custodian for management and administration for Portfolio Management Services.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Avendus.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at 91-22-6648-1437 or by email at priya.sonavane@avendus.com.

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Item 4 Advisory Business

Avendus Wealth Management Private Limited (also referred to as the firm, we, us and Avendus Wealth Management throughout this disclosure brochure) is an investment adviser registered with the United States Securities and Exchange Commission (“SEC”) and headquartered in Mumbai, India. The firm caters to Investment Advisory and Portfolio Management needs of Family office and Ultra High Net Worth Individuals / families, spanning all asset classes.

- Avendus Wealth Management is a subsidiary of Avendus Capital Private Limited. Although there are several individuals with direct ownership in Avendus Capital Private Limited, Redpoint Investments Pte Ltd holds around 65.33% in the total paid up share capital of the Avendus Capital Private Limited. Funding to Redpoint has been provided by funds managed by Kohlberg Kravis Roberts & Co LP (KKR) and/or its affiliates.
- Listed below are the three individuals with ownership in Avendus Capital Private Limited. The following individuals’ ownership collectively around 17.14% and they are ultimately responsible for the day-to-day operations of Avendus Capital Private Limited and its subsidiaries.
 - Ranu Vohra – Managing Director and CEO
 - Gaurav Deepak – Jt. Managing Director
 - Kaushal Aggarwal – Jt. Managing Director
- Avendus Wealth Management filed its initial application to register as an investment adviser in December 2012. Avendus Wealth Management acquired the investment adviser registration of its parent company, Avendus Capital Private Limited through a proper succession filing. Avendus Capital Private Limited deemed it appropriate to transfer its wealth management business into a separate subsidiary – Avendus Wealth Management effective December 1, 2012.

DESCRIPTION OF ADVISORY SERVICES

The following are descriptions of the primary advisory services of Avendus Wealth Management. Please understand that a written agreement, which details the exact terms of the service, must be signed by you and Avendus Wealth Management before we can provide you the services described below.

Individual Portfolio Management

Avendus Wealth Management offers portfolio management and investment advisory services, which involves Avendus Wealth Management providing you with regular and ongoing supervision over your specified accounts.

You may appoint our firm as your investment adviser of record on specified accounts (collectively, the “Account”) to execute trades in the Account. The Account consists only of separate account(s) held by qualified custodian(s) under your name. The qualified custodians maintain physical/demat custody of

all funds and securities of the Account, and you retain all rights of ownership (e.g., right to withdraw securities or cash, exercise or delegate proxy voting and receive transaction confirmations) of the Account. The following accounts are opened by you:

- Portfolio Management Account with Avendus Wealth Management Private Limited
- Bank Account with HDFC Bank Limited
- Custody Account with IL&FS Securities Services Limited (ISSL)/ Axis Bank Limited / HDFC Bank Limited
- Equity Broking Account with Emkay Global Financial Services Ltd.
- The client will give a limited Power of Attorney (POA) in favor of ISSL / Axis Bank Limited / HDFC Bank Limited to operate the Bank and Custody Account and to make investments on behalf of the client based on the instructions of Avendus Wealth Management. The POA could be revoked by the client at any time.

For pool trading you would open the Portfolio account with Avendus Wealth Management Private Limited and the Custody account with ISSL/Axis Bank Limited/ HDFC Bank Limited.

We monitor the Account and provide advice regarding buying, selling, reinvesting or holding securities, cash or other investments of the Account. Through personal discussions in which goals and objectives based on your particular circumstances are established, we develop, create and manage a portfolio. During our data-gathering process, we determine your individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background. We based on your financial situation, investment objectives and risk tolerance then manage the Account.

We will need to obtain certain information from you to determine your financial situation and investment objectives. You will be responsible for notifying us of any updates regarding your financial situation, risk tolerance or investment objective and whether you wish to impose or modify existing investment restrictions; however, we will contact you periodically to discuss any changes or updates regarding your financial situation, risk tolerance or investment objectives. We are always reasonably available to consult with you relative to the status of your Account. You have the ability to impose reasonable restrictions on the management of your accounts, including the ability to instruct us not to purchase certain securities, types of securities, or industry sectors.

It is important that you understand that we manage investments for other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you or actions taken for you. We are not obligated to buy, sell or recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

Conflicts may arise in the allocation of investment opportunities among accounts that we manage. We strive to allocate investment opportunities believed to be appropriate for your account(s) and other accounts advised by our firm among such accounts equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit, and in fact, are required to not disclose such non-public information due to insider trading regulations.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., Conservative, Moderate, Liquid, Ultra- Conservative , Balanced, Growth, and Aggressive).

Investment Advisory Services

We may provide financial and investment consultations on accounts not managed or maintained by us. Accounts are reviewed based upon your specific needs and desires for future financial goals and/or objectives. Avendus Wealth Management provides general or specific recommendations to the client. The service provides regular consultations provided on a quarterly or more frequent basis.

Through this service, we will not have any authority or responsibility to implement our recommendations. All final decisions to accept our advice and implement our advice are the responsibility of the client. If you have accounts reviewed by our firm and are unable to implement our investment recommendations, it is important to notify us so that we can properly adjust future recommendations.

Clients are always responsible for notifying Avendus Wealth Management of any changes to their financial situation or investment objectives. We will meet with the client as often as needed to determine the client's financial situation and investment objectives and to find out if the client would like to impose and/or modify any reasonable restrictions on their accounts.

It is important that you understand that Avendus Wealth Management provides investment advice to other clients and may give them advice or take actions for them or for our personal accounts that is different from the advice we provide to you. We are not obligated in any way to recommend to you any security or other investment that we may buy, sell or recommend for any other clients or for our own accounts.

There can be no assurance that a particular investment opportunity that comes to our attention will be allocated in any particular manner. If we obtain material, non-public information about a security or its issuer that we may not lawfully use or disclose, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit, and in fact, are required to not disclose such non-public information due to insider trading regulations.

Limitation on Advice for Certain Types of Investments

Our investment recommendations are not limited to any specific product or service offered by a broker-dealer and will generally include advice regarding the following Indian securities.

- Equities (listed and unlisted)
- Mutual Funds.
- Futures and Options
- Bonds
- Structured Notes/ Products
- Securities as defined under Securities Contract (Regulation) Act, 1956.

Note – we do not generally provide advice on U.S. registered securities and investments. Therefore, we recommend you consult with other financial professionals for advice on U.S. investments.

Tailor Advisory Services to Individual Needs of Clients

Avendus Wealth Management's advisory services are always provided based on your individual needs. This means, for example, that when we provide portfolio management services, you are given the ability to impose restrictions on the accounts we manage for you, including specific investment selections and sectors primarily under the non-discretionary services. We work with you on a one-on-one basis through interviews and questionnaires to determine your investment objectives and suitability information.

We will not enter into an investment adviser relationship with a prospective client whose investment objectives may be considered incompatible with our investment philosophy or strategies or where the prospective client seeks to impose unduly restrictive investment guidelines.

Clients Assets Managed by Avendus Wealth Management

As of 9/30/2019 we were actively managing total client assets of \$ 1,40,40,49,229. At that time, \$ 7,00,50,614 were managed on a discretionary basis and \$ 1,33,39,98,615 were managed on a non-discretionary basis.

Item 5 Fees and Compensation

In addition to the information provided in *Item 4 – Advisory Business*, this section provides additional details regarding our firm's services along with descriptions of each service's fees and compensation arrangements. It should be noted that lower fees for comparable service may be available from other sources. The exact fees and other terms will be outlined in the agreement between you and Avendus Wealth Management.

Fees for Individual Portfolio Management and for Investment Advisory Services

Our annual fees for Portfolio Management and Investment Advisory Services are based upon a percentage of assets under management and generally range from 0.5 p.a. % to 1.5% p.a. Our fees are divided and billed, quarterly in arrears, at the end of each quarter based upon the average value (market value or fair market value in the absence of market value), of the client's account. Fees will be debited from the account in accordance with the client authorization in the Portfolio Management Agreement.

A minimum of \$1,000,000 of assets under management is required to work with our firm. This account size may be negotiable under certain circumstances. Avendus Wealth Management Private Limited may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee, subject to applicable laws.

Compensation in Addition to Management/Advisory Fee. In addition to or in lieu of (for Advisory consulting services) our standard annual fee, we may also receive commissions on the execution of securities held in Portfolio Management accounts and Advisory accounts, subject to relevant regulations. Such commissions may be paid directly by the product sponsor or Mutual Fund Company to Avendus Wealth Management, subject to relevant regulations.

You are never obligated to work with our firm and are never obligated to purchase investment products through our investment advisor representatives. You have the option to purchase investment products through other brokers or agents that are not affiliated with Avendus Wealth Management.

Performance Based Fees. In select situations, we may assess a performance-based fee arrangement in addition to the annual portfolio management fee. Note, we do not assess performance-based fees to all

clients. Our performance-based fee schedule is based on a percentage of assets under management plus a percentage of the difference between a client's account and that of an appropriate pre-defined return. Avendus Wealth Management Private Limited will choose the pre-defined return based on the nature of the investment strategy to be used.

The fees charged for this service will be determined by the client's individual circumstances and will never exceed 25% of the account's performance above an appropriate index/pre-defined return. The actual fees are disclosed to the client before entering into this type of arrangement and are detailed in the client's Portfolio Management Agreement and Investment Advisory Agreement. Performance Based Fees are billed on an Annual basis.

The client must understand the proposed method of compensation and its risks prior to entering into the contract. Accordingly, clients paying performance-based fees are directed to the "Performance-Based Fees" section (Item 6) below for more comprehensive disclosures, including potential conflicts of interest resulting from this type of compensation.

To qualify for this type of fee schedule, a client must either demonstrate a net worth of at least \$2,100,000 or must have at least \$1,000,000 under management with Avendus Wealth Management.

Clients who elect to terminate their contracts will be charged a performance-based fee based on the performance of the account for the measuring period going back from the termination date and pro-rated from the date on which the performance-based fee was previously assessed by our firm or the first transaction date, whichever is later.

The performance-based fee may create an incentive for Avendus Wealth Management Private Limited to recommend investments, which may be riskier or more speculative than those, which would be recommended under a different fee arrangement.

General Information

Limited Negotiability of Fees: Although Avendus Wealth Management Private Limited has established the aforementioned fee schedule(s) we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client.

We may group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annualized fee.

Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

Termination of the Advisory Relationship: Either party, for any reason, may cancel a client agreement at any time. Upon termination of any account, any prepaid, unearned fees will be promptly refunded and outstanding fees or charges will be recovered from the client. However, it is not the policy of our firm to normally accept any prepaid fees.

Mutual Fund Fees: All fees paid to Avendus Wealth Management Private Limited for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services

provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. As stated above, we will receive a portion of the loads and/or fees charged by mutual funds in the form of commissions.

Wrap Fee Programs and Separately Managed Account Fees: Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the advisers, which may be charged as part of a wrap fee arrangement.

Additional Fees, Expenses and Taxes: In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians, bankers, fund accountants and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transaction for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information. Advisory fees charged by our firm are subject to local and national taxes assessed in India. Taxes are calculated and listed on our billing invoice which is provided to you at the time fees are deducted from your account.

Grandfathering of Minimum Account Requirements: Pre-existing advisory clients are subject to Avendus Wealth Management Private Limited's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

Advisory Fees in General: Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees: Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

Item 6 Performance-Based Fees and Side-By-Side Management

As we disclosed in Item 5 of this Brochure, our firm charges a performance-based fee from the client.

We endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser; accordingly, we take the following steps to address these conflicts:

1. We disclose to clients the existence of all material conflicts of interest. We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
2. We conduct regular reviews of each client account to verify that all recommendations made to a client are suitable to that client's needs and circumstances;
3. We have implemented policies and procedures for fair and consistent allocation of investment opportunities among all client accounts;
4. We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients and equitable treatment of all clients, regardless of the fee arrangement.

The client must understand the performance-based fee method of compensation and its risks prior to entering into a management contract with us.

PERFORMANCE-BASED FEES WILL ONLY BE CHARGED IN ACCORDANCE WITH THE PROVISIONS OF RULE 205-3 OF THE INVESTMENT ADVISERS ACT OF 1940 AND/OR APPLICABLE STATE REGULATIONS. THE FEES WILL NOT BE OFFERED TO ANY CLIENT RESIDING IN A STATE IN WHICH SUCH FEES ARE PROHIBITED.

Item 7 Types of Clients

Avendus Wealth Management Private Limited provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals
- Companies
- Charitable organizations/Family Trust
- Hindu Undivided Family
- Partnership/Limited Liability Partnership Firms

As previously disclosed in Item 5, our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

We may use one or more of the following methods of analysis in formulating our investment advice and/or managing client assets:

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Quantitative Analysis: We use mathematical models in an attempt to obtain more accurate measurements of a company's quantifiable data, such as the value of share price or earnings per share, and predict changes to that data.

A risk in using quantitative analysis is that the models used may be based on assumptions that prove to be incorrect.

Qualitative Analysis: We subjectively evaluate non-quantifiable factors such as quality of management, labor relations, and strength of research and development factors not readily subject to measurement, and predict changes to share price based on that data.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

Industry Analysis: We study the state of the industries and look for good companies in that domain.

Risks for all forms of analysis: Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and

other publicly available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Investment Strategies

Depending on the client's profile, we use one of the following investment strategies when managing client assets and/or providing investment advice:

Only Liquid:

Investment strategy that emphasizes on capital preservation and extremely low volatility in the portfolio. Investments should be highly liquid and redeemable with no or low cost. Adjusted for inflation, investment returns may be very low or, in some years, negative, in exchange for high liquidity and reduced risk of potential loss.

Ultra Conservative:

Investment strategy is to preserve capital with a very small portfolio allocation in marginally higher maturity to benefit from higher yield. Adjusted for inflation, investment returns may be very low or, in some years, negative, in exchange for high liquidity and reduced risk of potential loss. Portfolio may have marginally higher volatility than "Only Liquid" strategy

Conservative:

To maintain capital. Adjusted for inflation, Investment returns may be very low or, in some years, negative, in exchange for high liquidity and reduced risk of potential loss.

Moderate:

Investment strategy is to have capital appreciation and continued income stream from largely debt and some equity exposure. Investor is tolerant to price volatility linked to equity markets and is willing to have lesser exposure to cash and fixed deposit as compared to debt and equity. There can be minor exposure to Alternates with longer investment horizon and higher volatility. There is risk of partial loss in principal in certain market conditions.

Balanced:

Investment strategy is designed to have a balance between debt for income and stocks for growth. Investor is tolerant to debt and equity linked volatility in order to generate higher returns. There can be some exposure to Alternate as well. There is risk of principal loss in adverse movement in equity & debt markets.

Growth:

Investment strategy is to focus on wealth accumulation over time through price appreciation, rather than income. Investor is willing to have price volatility risk associated with higher equity exposure in order to achieve higher growth. Exposure to Alternate can be marginally higher than that in "Balanced" strategy.

Aggressive:

Investment strategy is to achieve above average growth over time with little focus on income. Investor is willing to take higher risk in order to achieve above-average returns in the overall portfolio. There can be wide variance in results from one year to the other in pursuit of longer-term goals. There is substantial risk of principal loss in the portfolio and individual transactions as well.

Risk of Loss

Past performance is not indicative of future results. Therefore, you should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities (including stocks, mutual funds, and bonds, etc.) involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. You should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. There are certain additional risks associated with investing in securities through our investment management program, as described below:

- Equity (stock) market risk – Common stocks are susceptible to general stock market fluctuations and to volatile increases and decreases in value as market confidence in and perceptions of their issuers change. If you held common stock, or common stock equivalents, of any given issuer, you would generally be exposed to greater risk than if you held preferred stocks and debt obligations of the issuer.
- Company Risk. When investing in stock positions, there is always a certain level of company or industry specific risk that is inherent in each investment. This is also referred to as unsystematic risk and can be reduced through appropriate diversification. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry. For example, if a company's employees go on strike or the company receives unfavorable media attention for its actions, the value of the company may be reduced.
- Fixed Income Risk. When investing in bonds, there is the risk that the issuer will default on the bond and be unable to make payments. Further, individuals who depend on set amounts of periodically paid income face the risk that inflation will erode their spending power. Fixed-income investors receive set, regular payments that face the same inflation risk.
- ETF and Mutual Fund Risk – When investing in an ETF or mutual fund, you will bear additional expenses based on your pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities the ETF or mutual fund holds. You will also incur brokerage costs when purchasing ETFs.
- Management Risk – Your investment with our firm varies with the success and failure of our investment strategies, research, analysis and determination of portfolio securities. If our investment strategies do not produce the expected returns, the value of the investment will decrease.

Item 9 Disciplinary Information

Item 9 is not applicable to this Disclosure Brochure because there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our business or integrity.

Item 10 Other Financial Industry Activities and Affiliations

Other Financial Industry Activities

In addition to the Individual Portfolio Management and Investment Advisory Services detailed in Items 4 and 5 of this brochure, we also offer Real Estate Advisory Services to our clients. Through this service, we assist you in identifying physical real estate properties to purchase, monitor them for you and help you exit. Such services are considered non-investment advisory because we provide advice on physical real estate properties. We are compensated for this service by commissions and fees received when clients purchase/sell properties. Compensation earned from our Real Estate Advisory Services are separate from the fees and compensation we earn for our Individual Portfolio Management and Investment Advisory Services.

You are never obligated or required to utilize our Real Estate Advisory Services. Likewise, Real Estate Advisory clients are not obligated or required to sign up for Individual Portfolio Management and Investment Advisory Services offered by Avendus Wealth Management.

Affiliated Companies

Avendus Wealth Management conducts activities and/or has material arrangements with some affiliates who are “related persons” as defined on the U.S. Securities and Exchange Commission’s Form ADV instructions. These activities may be material to our investment advisory business or our advisory clients. These affiliates include companies under common control of Avendus Capital Private Limited by virtue of their status as subsidiaries of Avendus Capital Private Limited. Avendus PE Investment Advisors Private Limited, Avendus Capital (UK) Private Limited, Avendus Capital, Inc., Avendus Finance Private Limited, Avendus Capital Alternate Strategies Private Limited, Avendus Capital Public Markets Alternate Strategies LLP, Avendus Capital Asset Management (UK) Limited, Ocean Dial Asset Management Limited, Ocean Dial Asset Management India Private Limited and Avendus Capital Pte Ltd. are subsidiaries of Avendus Capital Private Limited. Avezo Advisors Private Limited is an associate of the company and acts as an investment manager to funds and provides portfolio management services.

Avendus Capital Private Limited

Our parent company is an investment banking firm providing services in the areas of Mergers & Acquisitions and Private Equity syndication. Our services are considered separate and independent from the investment banking services offered by our parent company. We have established procedures designed to insulate our investment management and investment recommendation services from the services of Avendus Capital Private Limited in an effort to reduce conflicts of interest that may arise between our separate lines of business.

Avendus PE Investment Advisors Private Limited

Avendus PE Investment Advisors Private Limited is an India based entity which has contributed as sponsor to the funds managed by Group Company.

Avendus Capital Inc.

Avendus Capital Inc. is a United States based broker/dealer registered with FINRA and an investment adviser with state securities Boards of New York, New Jersey, California and Texas. Avendus Capital Inc. was initially established to provide investment services in the US including Mergers & Acquisitions services and Private Equity Syndication. We have entered into an affiliated solicitor arrangement with Avendus Capital Inc. so that they may refer potential investment advisory clients living in the US to our firm. Avendus Wealth Management will reimburse all costs with a suitable markup incurred by Avendus Capital Inc. for referring clients to Avendus Wealth Management.

Avendus Capital (UK) Private Limited

Avendus Capital (UK) Private Limited is an investment banking firm established to carry out activities in the United Kingdom and registered with the Financial Conduct Authority. Similar to Avendus Capital Private Limited, the UK Company provides services in the areas of Mergers & Acquisitions and Private Equity Syndication. Our services are considered separate and independent from the investment banking services offered by Avendus Capital (UK) Private Limited.

Avendus Finance Private Limited

Avendus Capital Private Limited acquired 100% ownership of Avendus Finance Private Limited (AFPL) (formerly known as Pacific Hire Purchase Limited (PHPL)) on January 17, 2013. AFPL is registered as a Non-Banking Financial Company (“Non-Deposit Taking Company”) with the Reserve Bank of India. AFPL provide loans, advances, buying and selling of fixed income securities. AFPL is also registered as a Depository Participant. The services of AFPL and our services are considered separate and independent from the services of AFPL.

Avendus Capital Pte. Ltd.

Avendus Capital Private Limited has established Avendus Capital Pte. Ltd as wholly owned subsidiary in Singapore. Avendus Capital Pte Ltd. carries out Fund management activities and it is registered with MAS as VCFM (Venture Capital Fund Manager). Avendus Capital Pte Ltd has obtained the license to provide fund management services to the Master Fund and various other funds (including feeder funds/intermediate vehicles).

Avezo Advisors Private Limited

Avezo Advisors Private Limited is a private limited company registered under Indian Companies Act, 2013, which manages funds regulated under the Securities and Exchange Board of India and provides portfolio management services to clients.

Due to our affiliation with Avezo Advisors Private Limited we have a material financial interest when recommending strategies offered through their firm. This is because Avezo Advisors Private Limited is compensated for managing and operating its investment management strategies.

We address for this conflict by comparing strategies offered by Avezo Advisors Private Limited against other similar investment options and strategies available and we will recommend other investment options when more appropriate for the client. However, the following conflict of interest disclosures are provided specific to Avezo Advisors Private Limited.

Because of our affiliation with Avezo Advisors Private Limited, we may be more reluctant or slower to move your money out of their strategies than we will be for your investments in other securities not managed by our affiliate even to the extent the strategies have poor performance.

Avezo Advisors Private Limited receive up to annual fee-based assets under management and up to performance fee as per agreed amounts. Further, we receive a referral fee for recommending our clients investment in the strategies offered through Avezo Advisors Private Limited.

Unlike our Portfolio Management Services, their strategies are not managed based on your individual needs and unique investment circumstances. Instead, we will recommend the strategies if they would be suitable based on your investment circumstances.

Avendus Capital Public Markets Alternate Strategies LLP

Avendus Capital Public Markets Alternate Strategies LLP is a limited liability partnership registered under Limited Liability Partnership Act, 2008, which manages funds regulated under the Securities and Exchange Board of India.

Due to our affiliation with Avendus Capital Public Markets Alternate Strategies LLP, we have a material financial interest when recommending strategies offered through their firm. This is because Avendus Capital Public Markets Alternate Strategies LLP is compensated for managing and operating its investment management strategies.

We address for this conflict by comparing strategies offered by Avendus Capital Public Markets Alternate Strategies LLP against other similar investment options and strategies available and we will recommend other investment options when more appropriate for the client. However, the following conflict of interest disclosures are provided specific to Avendus Capital Public Markets Alternate Strategies LLP.

Because of our affiliation with Avendus Capital Public Markets Alternate Strategies LLP, we may be more reluctant or slower to move your money out of their strategies than we will be for your investments in other securities not managed by our affiliate even to the extent the strategies have poor performance.

Avendus Capital Public Markets Alternate Strategies LLP receives annual fee based on assets under management and performance fee, as per agreed amount. Further, we receive a referral fee for recommending our clients investment in the strategies offered through Avendus Capital Public Markets Alternate Strategies LLP.

Unlike our Portfolio Management Services, their strategies are not managed based on your individual needs and unique investment circumstances. Instead, we will recommend the strategies if they would be suitable based on your investment circumstances.

Avendus Capital Alternate Strategies Private Limited

Avendus Capital Alternate Strategies Private Limited is a Company registered under Companies Act, 2013. The main object of the Company is to act as manager, consultants, advisors, portfolio manager, administrators, attorneys, agents, or representative of domestic and offshore venture capital funds, private equity funds, offshore funds, provident funds, insurance funds or any other funds formed or established in India or elsewhere by the Company. The Company is yet to start its operations.

Ocean Dial Asset Management Limited

Ocean Dial Asset Management Limited based at London is the adviser to currently India centric long only equity funds in the UK.

Avendus Capital Asset Management (UK) Limited

Avendus Capital Asset Management (UK) Limited is an entity registered at the UK and is a Special Purpose Vehicle of Avendus Capital Private Limited to hold stakes in Ocean Dial Asset Management Limited.

Ocean Dial Asset Management India Private Limited

Ocean Dial Asset Management India Private Limited is an entity incorporated in India and primarily acts as an Investment Manager to an Alternative Investment Fund registered with Securities and Exchange Board of India.

Other Financial Industry Affiliates

As explained in Item 4 of this brochure, Redpoint Investments Pte Ltd holds 65.33% in the total paid up share capital of the parent company i.e. Avendus Capital Private Limited. Funding to Redpoint has been provided by funds managed by Kohlberg Kravis Roberts & Co LP (KKR) and/or its affiliates. We may distribute funds managed by KKR entities and receive commissions for the same from KKR entities, subject to applicable regulations.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics and Personal Securities Transactions

Our firm has adopted policies and procedures, which set forth high ethical standards of business, conduct that we require of our employees, including compliance with applicable federal securities laws.

Avendus Wealth Management Private Limited and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the policies and procedures but to the general principles that guide the Policies.

Our policies and procedures include collection of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our policies also require the prior approval for dealing in listed securities. Our code also provides for oversight, enforcement and recordkeeping provisions.

Avendus Wealth Management Private Limited's policies and procedures further include the firm's policy prohibiting the misuse of material non-public information. Avendus Wealth Management Private Limited may, at times, effect an agency cross transaction for an advisory client, provided that the

transaction is consistent with our firm's fiduciary duty to the client and that all requirements outlined in Sec. 206(3)-2 of the Investment Advisers Act of 1940 are met.

This section is intended to provide a summary description of the Code of Ethics of Avendus Wealth Management. If you wish to review the Code of Ethics in its entirety, you should send us a written request and upon receipt of your request, we will promptly provide a copy of the Code of Ethics to you.

Agency Cross Transactions

An agency cross transaction is defined as a transaction where a person acts as an investment adviser in relation to a transaction in which the investment advisor, or any person controlled by or under common control with the investment advisor, acts as broker for both the advisory clients and for another person on the other side of the transaction. Agency cross transactions typically may arise where an adviser is dually registered as a broker-dealer or has an affiliated broker-dealer. Agency cross transactions are permitted for advisers only if certain conditions are met under Section 206(3) of the Investment Advisers Act of 1940 or SEC Rule 206(3)-2.

As a fiduciary, the interests of our clients must always be placed first. The trading policies and procedures of Avendus Wealth Management prohibit unfair trading practices and seek to avoid conflicts of interests, where possible, or to disclose conflicts when they arise. We will attempt to resolve conflicts in the client's favor when reasonably possible.

We may engage in an agency cross transaction only when it is deemed to be in the best interests of both clients and neither client is disfavored. Such cross transactions will only be used when it can be determined that doing so would achieve "best execution" and benefit the clients involved by saving commissions, market impact costs, and other transaction charges. Agency cross transactions involving an advisory client will be transacted without any compensation, unless specifically approved by our Chief Compliance Officer in compliance with the above criteria and in accordance with either Section 206(3) of the Investment Advisers Act of 1940 or SEC Rule 206(3)-2.

Where compensation is approved for an agency cross transaction involving advisory clients, we will provide a written disclosure to the customers that we will act as broker for, receive compensation from, and have a potential conflicting division of loyalties regarding both parties to the transaction. We will also receive written, executed consent from the client prospectively authorizing us to effect agency cross transaction in client's accounts.

Where compensation is charged, we will send to each client at or before completion of the transaction, information, which includes the date of the transaction, a statement of the nature of the transaction, an offer to furnish the time the transaction took place, and the total of all compensation received. We will provide each client, who was a party to an agency cross transaction for compensation, an annual written disclosure statement identifying the total number of agency cross transactions since the last statement, and the total compensation received.

Item 12 Brokerage Practices

When purchasing equity securities on your behalf, going forward you will need to open a broking account with Emkay Global Financial Services Ltd. (referred to as "Emkay"), an introducing broker/dealer, and then settled through IL&FS Securities Services Ltd. (referred to as "ISSL") an India registered custodian that services as qualified custodian of all securities. Axis Bank Limited is also an additional Custodian for Portfolio Management Services (referred to as "Axis"). HDFC Bank Limited is also an additional Custodian for Portfolio Management Services (referred to as "HDFC")

ISSL/ Emkay/Axis/HDFC is not affiliated with Avendus Wealth Management. In addition to serving as the clearing broker/dealer, ISSL/Axis/ HDFC serves as the qualified custodian for portfolio management accounts. HDFC Bank serves as the qualified custodian to hold client funds and cash balances.

The decision to require the use of Emkay is based on Avendus Wealth Management's decision that Avendus Wealth Management can provide efficient and cost-effective services through Emkay.

The requirement to use ISSL / Axis/ HDFC (which is not affiliated with Avendus Wealth Management) is based on the fact that a settlement arrangement with ISSL / Axis/ HDFC which is a qualified custodian for equity securities has been established. There are some investment advisors that permit the use of multiple broker/dealers and permit clients to select the broker/dealer. Avendus Wealth Management has considered the positive factors to this approach which include the ability to better negotiate brokerage costs such as transaction fees, the ability to better analyze speed of execution, and the ability to compare and negotiate services. Considering all factors in relation to Avendus Wealth Management's structure and capacities, Avendus Wealth Management has concluded that one brokerage arrangement suggested by Avendus Wealth Management (i.e. Emkay/ISSL) is a better policy than utilizing multiple brokerage platforms. However, the clients are free to choose their broker. However, the current policy may change in the future and if Avendus Wealth Management decides to change brokerage arrangements all clients will be made aware of the change in policy.

Avendus Wealth Management periodically reviews commission and fee structures of various broker/dealers, along with services, research and tools in order to evaluate the overall execution services provided by Emkay and ISSL/ Axis/ HDFC against the other broker/dealers. Accordingly, while Avendus Wealth Management will consider competitive rates, it may not necessarily obtain the lowest possible commission and brokerage rates for client account transactions. Therefore, the overall services provided by Emkay and ISSL/Axis/ HDFC are evaluated to determine the level of best execution provided to clients. However, considering Avendus Wealth Management requires its clients to use the brokerage services of Emkay and ISSL/Axis/ HDFC, Avendus Wealth Management may not be able to achieve the *most* favorable execution of client transactions and therefore Avendus Wealth Management's practice of requiring the use of Emkay and ISSL/Axis/ HDFC may cost clients more money compared to advisory programs offered by other investment advisors.

While clients may be able to attain brokerage services with lower costs and expenses, clients should be aware of some of the qualitative factors Avendus Wealth Management considers for selecting Emkay/ ISSL/Axis/ HDFC. These factors include, but are not necessarily limited to, being able to rely on the internal staff of Emkay to provide operations, trading, and other services. Avendus Wealth Management receives commission from Emkay for the trades executed on behalf of client through Emkay. Further, associates and other departments of the Avendus Wealth Management may receive fees from the third parties in connection with investment of fund of clients in the products of third parties

Item 13 Review of Accounts

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are monitored, these accounts are reviewed periodically. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by Avendus Wealth Management Private Limited team.

REPORTS: In addition to the statements and confirmations of transactions that clients receive from their broker-dealer as agreed, we provide quarterly reports summarizing account performance, balances and holdings. Further, login access also has been given to clients.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our *Firm Brochure*) and a separate disclosure statement that includes the following information according to the Cash Solicitation Rule of the Advisers Act of 1940:

- the Solicitor's name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- Whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral.

Item 15 Custody

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment adviser has the ability to access or control client funds or securities, the investment adviser is deemed to have custody and must ensure proper procedures are implemented.

Avendus Wealth Management is deemed to have custody of client funds and securities whenever Avendus Wealth Management is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Avendus Wealth Management will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Avendus Wealth Management is deemed to have custody, we have established procedures to ensure:

- (1) All client funds and securities are held at a qualified custodian in a separate account for each client under that client's name.
- (2) Clients open the accounts directly with the custodian and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained.
- (3) Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports and statements received from Avendus Wealth Management. When clients have questions about

their account statements, they should contact Avendus Wealth Management or the qualified custodian preparing the statement.

Item 16 Investment Discretion

When providing portfolio management services, Avendus Wealth Management maintains trading authorization over your Account and can provide management services on a **discretionary** basis. When discretionary authority is granted, we will have the authority to determine the type of securities and the amount of securities that can be bought or sold for your portfolio without obtaining your consent for each transaction. If you decide to grant trading authorization on a **non-discretionary** basis, we will be required to contact you prior to implementing changes in your account. Therefore, you will be contacted and required to accept or reject our investment recommendations including:

- The security being recommended
- The number of shares or units
- Whether to buy or sell
- The price of the security

Once the above factors are agreed upon, we will be responsible for making decisions regarding the timing of buying or selling an investment. If your accounts are managed on a non-discretionary basis, you need to know that if we are not able to reach you or you are slow to respond to our request, it can have an adverse impact on the timing of trade implementations, and we may not achieve the optimal trading price.

You will have the ability to place reasonable restrictions on the types of investments that may be purchased in your Account. You may also place reasonable limitations on the discretionary power granted to Avendus Wealth Management so long as the limitations are specifically set forth or included as an attachment to the client agreement.

Item 17 Voting Client Securities

Avendus Wealth Management does not vote proxies on behalf of Clients. Therefore, it is your responsibility to vote all proxies for securities held in your accounts.

Item 18 Financial Information

Under no circumstances do we require or solicit payment of fees in excess of \$1,200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonable likely to impair our ability to meet our contractual obligations. Avendus Wealth Management Private Limited has not been the subject of a bankruptcy petition at any time since inception.

Customer Privacy Policy Notice

Our Commitment to You

AvendusWealth Managment ("Avendus") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Avendus (also referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection

with the management or servicing of our relationship with you. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

Avendus does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and proper business purposes in connection with the servicing and management of our relationship with you as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Privacy Policy.

Why you need to know?	
Registered Investment Advisors (“RIAs”) share some of your personal information. Federal and State laws give you the right to limit some of this sharing. Federal and State laws require RIAs to disclose how we collect, share, and protect your personal information.	

What information do we collect from you?	
Social security or taxpayer identification number	Assets and liabilities / Net-worth
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	KYC Documents as mandated by regulations and Investment experience and goals

What sources do we collect information from in addition to you?	
Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How we share your information?
RIAs do need to share personal information regarding its clients to effectively implement the RIA’s services. In the section below, we list some reasons we may share your personal information.

Basis for sharing	Sharing	Limitations
Servicing our Clients We may share non-public personal information with our affiliates and group companies and non-affiliated third parties (such as brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed services to you consistent with applicable law, including but not limited to: <ul style="list-style-type: none"> Processing transactions; 	Avendus may share this information.	Clients cannot limit the Advisors ability to share.

<ul style="list-style-type: none"> • General account maintenance; • Responding to regulators or legal investigations; and • Credit reporting, etc. 		
Administrators We may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your personal information to the performance of the specific service we have requested.	Aventus may share this information.	Clients cannot limit the Advisors ability to share.
Marketing Purposes Aventus does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Aventus or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	Aventus does not share personal information.	Clients cannot limit the Advisors ability to share.
Authorized Users In addition, your non-public personal information may also be disclosed to you and persons we believe to be your authorized agent or representative.	Aventus does share personal information.	Clients can limit the Advisors ability to share.
Information About Former Clients Aventus does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.	Aventus does not share personal information regarding former clients	Clients can limit the Advisors ability to share.

How do we protect your information?
To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic safeguards. These include computer safeguards such as passwords, secured files and buildings.
Our employees are advised about Aventus's need to respect the confidentiality of each client's non-public personal information. We train our employees on their responsibilities.
We require third parties that assist in providing our services to you to protect the personal information they receive. This includes contractual language in our third-party agreements.

Changes to our Privacy Policy.

We will send you notice of our Privacy Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise our Privacy Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Questions/ Grievances/Complaints:

- You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (91-22) 6648-1437 or via email at priya.sonavane@avendus.com.
- For any complaints/grievances you can write to us on awmplig@avendus.com.
- For other operational queries you can write to us on AWMcare@avendus.com.

Form ADV Part 2B – Brochure Supplement

For

**George Mitra
Chief Executive Officer & Managing Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications George Mitra (CRD# **5897485**) in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Mitra is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

George Mitra, Chief Executive Officer & Managing Director

Year of Birth: 1969

Education:

Mr. Mitra Graduated in April 1993 from Jadavpur University with a Bachelor of Engineering in Electronics.

Received an MBA in April 1997 from the Faculty of Management Studies (FMS) Delhi University.

Business Background:

Chief Executive Officer & Managing Director, Avendus Wealth Management Private Limited, Aug 2016 till date

Chief Executive Officer, Avendus Wealth Management Private Limited, May 2014 till Aug 2016

Executive Director, Avendus Wealth Management Private Limited, December 2012 to April 2014

Executive Director, Avendus Capital Private Limited, Wealth Management July 2010 to November 2012.

Director and Location Head, Deutsche Bank, Private Wealth Management from May 1997 to June 2010.

Item 3: Disciplinary Information

Mr. Mitra does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Mitra does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Mitra does not receive any other additional compensation.

Item 6: Supervision

George is Chief Executive Officer & Managing Director- Avendus Wealth Management Private Limited. George has played a pivotal role in growing Avendus' Wealth management franchise and strengthening the NRI business.

Avendus Wealth Management Private Limited also employs Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Mitra's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Zarksis Gotla
Executive Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Zarksis Gotla (CRD# **5897491**) in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Gotla is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Zarksis Gotla, Executive Director

Year of Birth: 1969

Education:

Mr. Gotla graduated from Mumbai University in June 1990 with a Bachelor of Commerce Degree.

Mr. Gotla is also a Qualified Chartered Accountant in India which he earned in 1994.

Business Background:

Executive Director, Avendus Wealth Management Private Limited, December 2012 till date

Executive Director, Avendus Capital Private Limited, September 2010 to November 2012

Director, Deutsche Bank Private Wealth Management, January 2005 to August 2010.

Associate Vice President, BNP Paribas Wealth Management, August 1997 to December 2004.

Item 3: Disciplinary Information

Mr. Gotla does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Gotla does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Gotla does not receive any other additional compensation.

Item 6: Supervision

Zarksis is Executive Director, part of the senior management team. He works closely with the CEO & MD, Mr. George Mitra, in growing the Wealth Management franchise at Avendus Wealth Management. Zarksis reports to George.

Avendus Wealth Management Private Limited also employs Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Gotla's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Priya Sonavane
Chief Compliance Officer**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Priya Sonavane (CRD# **6825055**) in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Ms. Sonavane is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Priya Sonavane, Chief Compliance Officer

Year of Birth: 1982

Education:

Ms. Sonavane is a Bachelor of Commerce Degree holder, a Qualified Company Secretary (Year 2008) and a Law Degree Holder (Year 2013).

Business Background:

Vice President- Compliance & Company Secretary, Avendus Wealth Management Private Limited- May, 2019 till date

Associate Vice President – Compliance & Company Secretary, Avendus Wealth Management Private Limited- March 2017 till date

Associate Vice President – Compliance, Legal & Company Secretary, Union KBC Asset Management Company Private Limited, September 2011 till March 2017

Senior Manager- Compliance & Secretarial, ING Investment Management (India) Private Limited, Feb 2009 till August 2011

Executive - Legal, Secretarial, & Compliance, Fortis Investment Management (India) Private Limited, Oct 2007 to Jan 2009

Executive- Secretarial, M/s Makarand M. Joshi & Co, July 2005 to Sept 2007

Item 3: Disciplinary Information

Ms. Sonavane does not have any history of disciplinary events.

Item 4: Other Business Activities

Ms. Sonavane does not have any other business activities to report.

Item 5: Additional Compensation

Ms. Sonavane does not receive any other additional compensation.

Item 6: Supervision

Ms. Sonavane is Chief Compliance Officer, part of the senior management team at Avendus Wealth Management. She reports to Group Head- Compliance and to the Board of Directors of Avendus Wealth Management Private Limited.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Arvind Bansal
Head of Products and Advisory**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Arvind Bansal (CRD# **6521620**) in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Bansal is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Arvind Bansal, Head of Products and Advisory

Year of Birth: 1976

Education: B Tech, Post Graduate Program (PGP) in Management

Mr. Bansal Graduated in 1997 from IIT Delhi as a Bachelor of Technology.

Received a PGP in 2003 from ISB, Hyderabad.

Business Background:

Executive Director, Avendus Wealth Management Private Limited, Jul 2014 to date

Director, Ocean Dial Advisory Private Limited, Apr 2013 to Jun 2014.

Visiting faculty, Narsee Monjee Institute of Management Studies, Jan 2013 to Mar 2013

Chief Investment Officer, Multi Manager, ING Investment Management Private Limited, Apr 2008 to Dec 2012

Head products and offshore sales, Multi Manager, ING Investment Management Private Limited, Jul 2005 to Mar 2008

Senior Manager, Prudential ICICI Asset Management Private Limited, Apr 2003 to Jun 2005

Co Founder, e2e Technologies Private Limited, Sep 2000 to Apr 2002

Consultant, KPMG India Private Limited, Jun 1997 to Aug 2000

Item 3: Disciplinary Information

Mr. Bansal does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Bansal does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Bansal does not receive any other additional compensation.

Item 6: Supervision

Arvind is a part of the senior management team at Avendus Wealth and is responsible for the firm's product capabilities in equity, fixed income and real estate asset classes. Avendus Wealth Management Private Limited also employs Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Bansal's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Rahul Sarin
Executive Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Rahul Sarin in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Sarin is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Rahul Sarin, Executive Director

Year of Birth: 1980

Education:

Mr. Sarin is an MBA from SP Jain Institute of Management & Research, Mumbai (2001-2003), BSc (Hons.) Chemistry from Stephen's college, Delhi (1998-2001).

Business Background:

Mr. Sarin has been with Avendus Wealth since Oct 2010 part of Relationship Management team. Prior to joining Avendus, he worked with Deutsche Bank, India from May 2008 to Oct 2010 as an Investment Advisor. Prior to Deutsche Bank, he worked with Merrill Lynch (2007-2008), UK and Citibank, UK (2004-2007) respectively in Relationship Management roles. He started his career with Citibank India in Operations from 2003-2004 after completing his MBA.

He has an overall work experience of more than 15 years.

Item 3: Disciplinary Information

Mr. Sarin does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Sarin does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Sarin does not receive any other additional compensation.

Item 6: Supervision

Mr. Sarin is an Executive Director, part of the senior management team. He works closely with the CEO & MD, Mr. George Mitra, in growing the Wealth Management franchise at Avendus Wealth Management. Mr. Sarin reports to Mr. Mitra.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Sarin's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Alok Agrawal
Executive Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Alok Agrawal in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Agrawal is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Alok Agrawal, Executive Director

Year of Birth: 1973

Education:

Mr. Agrawal is a B.E. Mechanical and has completed his Management in Business Administration.

Business Background:

Mr. Agrawal is associated with Avendus Wealth Management as a team lead in client relations since April 2011. He has also worked with Credit Suisse Securities India Pvt Ltd from June 2008 to March 2011 in Wealth Management business in Client relations role.

Earlier to this his experiences include: HSBC Asset Management in PMS (segregated accounts business) in Business Development; DSP Blackrock Asset Management in PMS (segregated accounts business) in Business Development; CRISIL-S&P in Financial Sector Ratings and Mutual Funds Rankings Business Development; VIP Industries (earlier Blowplast Ltd) in Sales.

He has an overall work experience of around 21 years.

Item 3: Disciplinary Information

Mr. Agrawal does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Agrawal does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Agrawal does not receive any other additional compensation.

Item 6: Supervision

Mr. Agrawal is an Executive Director, part of the senior management team. He works closely with the CEO & MD, Mr. George Mitra, in growing the Wealth Management franchise at Avendus Wealth Management. Mr. Agrawal reports to Mr. Mitra.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Agrawal's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Kshipra Dharmik
Associate Vice President**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Ms. Kshipra Dharmik in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Ms. Dharmik is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Kshipra Dharmik, Associate Vice President- Client Relations

Year of Birth: 1982

Education:

Ms. Dharmik is a B. Com, MBA (Finance), LLB.

Business Background:

Ms. Dharmik has an overall work experience of 12 years. She is currently associated with Avendus Wealth Management in the capacity of Associate Vice President Client relations. Earlier to that she was working with Price Waterhouse Coopers as an Analyst, Transfer Pricing. She was also an AVP, Special Projects, Kimaya Fashions Private Limited for Fund raising, growth strategies. Further, she was also a Director, Elephant Entertainment Private Limited in Budgeting & Finance, Brand Liaison and Client Relations (Corporate). She was also associated with Kredere Wealth Partner, Reliance Private Client-Client Relations.

Item 3: Disciplinary Information

Ms. Dharmik does not have any history of disciplinary events.

Item 4: Other Business Activities

Ms. Dharmik does not have any other business activities to report.

Item 5: Additional Compensation

Ms. Dharmik does not receive any other additional compensation.

Item 6: Supervision

Ms. Dharmik, Associate Vice President - Client Relations, is part of the Client Relations team. She works closely with Mr. Saurabh Pathak, Director, Client Relations in growing the Wealth Management franchise at Avendus Wealth Management. She reports to Mr. Pathak.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Ms. Dharmik's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Manoj Vaswani
Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Manoj Vaswani in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Vaswani is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Manoj Vaswani, Director

Year of Birth: 1982

Education:

MBA (PGDM) – IIM Calcutta (2004-2006)

Bachelor of Commerce – Loyola College, Chennai (1999-2002)

Business Background:

Mr. Vaswani is associated with Avendus Wealth Management in client relations since October 2014. Prior to joining Avendus, Mr. Vaswani has worked with Kotak Mahindra Bank – Wealth Management in client relations from June 2006 to October 2014. and with e-Serve International Ltd. From July 2002 – May 2004 (Personal Loan Processing).

Mr. Vaswani has an overall experience of 15 years.

Item 3: Disciplinary Information

Mr. Vaswani does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Vaswani does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Vaswani does not receive any other additional compensation.

Item 6: Supervision

Mr. Vaswani is a part of the Client Relations team at Avendus Wealth in Bangalore. He reports to Mr. Harmeet Sahney, Executive Director.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Vaswani's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Sudhir Karanth
Associate Vice President**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Sudhir Karanth in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Karanth is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Sudhir Karanth, Associate Vice President

Year of Birth: 1981

Education:

PGDBM from St Joseph's College of Business Administration.

Business Background:

Mr. Karanth has an overall experience of 13 Years in Financial services. Prior to joining Avendus Wealth Management, he has worked with ABN AMRO Bank for 2 years and 10 years at ICICI Prudential Mutual Fund.

Item 3: Disciplinary Information

Mr. Karanth does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Karanth does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Karanth does not receive any other additional compensation.

Item 6: Supervision

Mr. Karanth is an Associate Vice President, part of the client relations team at Avendus Wealth Management. He works closely with the Mr. Abhinav Kumar- Director, in growing the Wealth Management franchise at Avendus Wealth Management. He reports to Mr. Kumar.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Karanth's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Satish Narayan
Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Satish Narayan in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Sarin is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Satish Narayan, Director – Client Relations

Year of Birth: 1973

Education:

He holds a Masters in Finance (MFM) degree from Welingkar Institute of Management Development and Research, Mumbai University and is a Graduate in Economics from Mumbai University.

Business Background:

Mr. Narayan has an overall experience of more than 25 years in Banking and Capital Market across Consumer Banking, Corporate Banking, Non-Resident Business, International Business, Financial planning, Private Wealth Management for High Net worth Resident Indians, NRI's, and Family offices, Wills and Trust services and Estate Planning.

Prior to joining Avendus he worked with Reliance Wealth Management Ltd where he was a Market Director responsible for business development in India and Middle East.

He has also worked with organizations like TimesBank, Indusind Bank, ING Bank, Barclays Bank, ASK Wealth Advisors, Axis Bank and Reliance Wealth Management Ltd. Further, he has also been into Private Wealth Management for Ultra High Net worth clientele.

Item 3: Disciplinary Information

Mr. Narayan does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Narayan does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Narayan does not receive any other additional compensation.

Item 6: Supervision

Mr. Narayan is Director- Client Relations, part of the Client relations team at Avendus Wealth Management. He works closely with Ms. Amrita Farmahan, Senior Executive Director in growing the Wealth Management franchise at Avendus Wealth Management. He reports to Ms. Farmahan.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Narayan's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Akash Hariani
Executive Director**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Akash Hariani in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Hariani is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Akash Hariani, Executive Director – Multi Family Office

Year of Birth: 1975

Education:

Graduate from Mumbai University

Business Background:

Mr. Hariani has over 25 years of work experience. He has been working with Avendus Wealth for over two years heading the advisory and Multi family office services.

In the past, Mr. Hariani has worked with 20th Century Finance Corporation for five years in their Hire purchase division and was heading the Mumbai region. He has also worked with TCFC Securities for over two years heading the proprietary desk.

He has also worked with Kotak Mahindra Asset Management for four years heading the banking partnership platform. Earlier to that he worked with Kotak Mahindra Bank for over 12 years in their wealth management division managing some of the largest High net worth individuals in India.

Item 3: Disciplinary Information

Mr. Hariani does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Hariani does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Hariani does not receive any other additional compensation.

Item 6: Supervision

Mr. Hariani is an Executive Director- Multi Family Office, part of the Client relations team at Avendus Wealth Management. He works closely with MD & CEO, Mr. George Mitra in growing the Wealth Management franchise at Avendus Wealth Management. He reports to Mr. Mitra.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Hariani's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Form ADV Part 2B – Brochure Supplement

For

**Vedant Chandak
Vice President**

Effective October 16, 2019

This Brochure Supplement provides information about the background and qualifications Mr. Vedant Chandak in addition to the information contained in the Avendus Wealth Management Private Limited (“Avendus” or the “Advisor” - Disclosure Brochure). If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Avendus Disclosure Brochure or this Brochure Supplement, please contact us at +91-22-66481437 by email at priya.sonavane@avendus.com

Additional information about Mr. Chandak is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Vedant Chandak, Vice President - Client Relations

Year of Birth: 1986

Education:

B.A. (Hons) Economics from Delhi University, CFA – Cleared Level 3, FRM, Investment Management Program from IIM Ahmedabad.

Business Background:

Mr. Chandak has more than 12 years' experience across Bank of America, Standard Chartered, Kotak Mahindra Bank and Avendus.

Item 3: Disciplinary Information

Mr. Chandak does not have any history of disciplinary events.

Item 4: Other Business Activities

Mr. Chandak does not have any other business activities to report.

Item 5: Additional Compensation

Mr. Chandak does not receive any other additional compensation.

Item 6: Supervision

Mr. Chandak is Vice President- Client Relations, part of the Client relations team at Avendus Wealth Management. He works closely with Mr. Harmeet Sahney, Executive Director in growing the Wealth Management franchise at Avendus Wealth Management. He reports to Mr. Sahney.

Avendus Wealth Management Private Limited also employs Ms. Priya Sonavane as Chief Compliance Officer who, is responsible for maintaining a compliance program and compliance oversight for all employees. Ms. Sonavane also reviews Mr. Chandak's personal securities transactions for any irregularities.

These employees can be reached by calling 912266480050

Acknowledgement Letter for Disclosure Brochure, Privacy Notice & Agreement.

Date:

Dear

As registered investment adviser, SEC rules under the investment Advisers Act (or applicable state regulations) require that a written disclosure be delivered to each client and prospective client and that the firm maintain certain records as to the delivery of the Firm's ADV Part II or other disclosure brochure.

Our disclosure brochure describes our firm's advisory services, investment professionals, fees and conflicts, among other things. Also, and as a client, you have provided personal and financial information as a part of our professional relationship which is personal, non-public and private. Our firm has a formal Privacy Policy to respect and protect your privacy and to safeguard and restrict access to your personal information.

Federal and state regulations require our firm to initially deliver and annually send our Privacy Policy Notice to you, and a copy is enclosed.

This letter will document that you have received a copy of our firm's a) Privacy Notice, b) current Form ADV part II, or other disclosure brochure, at least 48 hours before or at the time of entering into an advisory agreement and c) investment advisory agreement.

If the disclosure brochure is delivered at the time of entering into an agreement, you have the right to terminate the agreement without penalty within five business days of entering into the agreement.

Kindly sign and date this acknowledgement letter below to indicate that you have received our firm's a) Privacy Policy, b) Form ADV Part II (or other disclosure brochure) and advisory agreement.

Thank you for your cooperation

Sincerely,

George Mitra

Managing Director & CEO of Avendus Wealth Management Private Limited.

T: +91 124 454 8003. F: +91 124 454 8020

CLIENT ACKNOWLEDGEMENT

Name:

Signature:

Date: