

December 13, 2021

Rising Omega Advisors Pvt Ltd

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December 13, 2021

This brochure provides information about the qualifications and business practices of Rising Omega Advisors Pvt Ltd. If you have any questions about the contents of our brochure, please contact us at +91 (079) 4800-1313. 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 ROA also is available on the United States Securities and Exchange Commission's website at www.adviserinfo.sec.gov. Registration with the United States Securities and Exchange Commission does not imply a certain level of skill or training.

Item 2: Material Changes

This section of the Rising Omega Advisors Private Limited (“RISING”, “ROA”, or “we”) Firm Brochure outlines the material changes since RISING’s last update of the Brochure.

The Brochure requirements include providing a Summary of Material Changes (the “Summary”) reflecting any material changes to our policies, practices, or conflicts of interest made since our last required “annual update” filing. In the event of any material changes, such Summary is provided to all clients within 120 days of our fiscal year-end. Of course the complete Brochure is available to clients at any time upon request.

Item 3: Table of Contents

Item 2: Material Changes.....	2
Item 4: ROAL's Advisory Business.....	4
Item 5: Fees and Compensation.....	4
Item 6: Performance-Based Fees and Side-by-Side Management.....	05
Item 7: Our Clients	06
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss	06
Item 9: Disciplinary Information	10
Item 10: Other Financial Industry Activities and Affiliations	11
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12: Brokerage Practices	12
Item 13: Review of Accounts.....	13
Item 14: Client Referrals and Other Compensation	13
Item 15: Custody.....	14
Item 16: Investment Discretion.....	14
Item 17: Voting of Securities	14
Item 18: Financial Information.....	14

Item 4: ROA's Advisory Business

Rising Omega Advisors Pvt Ltd ("ROA") is an investment advisory firm specializing in alternative investments. ROA provides discretionary investment management and advisory services, together with investment management products, to financial advisors, institutions and individual investors.

ROA is registered with the Securities and Exchange Commission (SEC) as an investment adviser. Registration with the SEC or other regulators does not imply a certain level of skill or training.

ROA is organized as an Indian Private Limited Company and its principal place of business is located at Signature Tower, Ste. 620, GIFT IFSC, Gandhinagar 382355 India. As of December 1, 2021, ROA's assets under management were approximately \$150 thousand.

It is owned as follows:

Bhavik Joshi – 33.33% Direct Owner
Vishal Sabhar – 33.33% Indirect Owner
Ankur Patel – 33.33% Indirect Owner

ROA currently manages a hedge fund (Rising Fintech LLP). However, the information presented in this brochure relates only to the investment advisory services involving securities.

Currently, we provide investment advisory services to Rising Fintech LLP, an affiliated private fund.

Rising Fintech LLP

We serve as the Investment Manager and as the Designated Partner of the Rising Fintech LLP ("RFTL"). RFTL is a hedge fund, meaning it invests and trade in all sorts of financial instruments, long and/or short, to generate growth of capital.

Our advisory services to the RFTL consist of managing, either directly or through the efforts of other registered investment advisory firms, the excess margin and other cash assets of the fund, by investing these assets in high quality, fixed income securities. The cash management function is generally performed for in a similar manner, using policy statements and investment guidelines that are consistent across the firm.

Other Services

We provide investment advice to clients through consultations on a periodic basis. We also may offer advice to qualified, existing and prospective, clients regarding investing in RFTL fund.

Item 5: Fees and Compensation

The following section describes how ROA is compensated for the services we provide to our clients.

We receive an annual management fee of 2.00%, calculated and payable monthly, for providing investment advisory services to RFTL.

We and certain of our principals and employees are limited partners in RFTL.

Additional information about the fees and expenses paid by the RFTL is contained in the offering and organizational documents for the fund.

For all other accounts, ROA charges an annual advisory fee, billed quarterly, as a percentage of assets under management based on a fee schedule similar to the one listed below. (Please note the fee schedule below is a general fee schedule provided for illustrative purposes and advisory fee may be negotiated.)

Assets Managed	Annual Fee (%)
First \$ 500,000	2.00%
Next \$ 1,000,000	1.50%
Next \$ 3,500,000	1.25%
Over \$ 5,000,000	0.75%

ROA may also receive a performance fee from RFTL – please see Item 6 - Performance- Based Fees and Side-by-Side Management for more information.

Item 6: Performance-Based Fees and Side-by-Side Management

Currently, all ROA Funds and Managed Accounts are charged by ROA a combination of asset-based and/or performance fees. ROA may, in the future, charge other types of fees and use different fee structures.

In the case of RFTL only, ROA is entitled to receive a quarterly performance fee if the Fund reaches a net new profit. A performance fee may create a conflict of interest in that the investment personnel at ROA may have an incentive to allocate the investment opportunities to the RFTL Fund. A performance fee also creates potential conflicts of interest because ROA has an incentive to solicit prospective limited partners in, and devote more resources to RFTL. ROA also may have an incentive to favor the Fund for which performance fees are charged over other client portfolios for which performance fees are not charged, such as by allocating more profitable investments or opportunities to, or by devoting more resources to, this fund.

Potential conflicts of interest may arise from ROA's management of the RFTL Fund and other accounts. For example, conflicts of interest may arise with the allocation of limited investment opportunities. Allocations of investment opportunities generally could raise a potential conflict of interest to the extent that ROA may have an incentive to allocate investments that are expected to increase in value to preferred accounts.

ROA seeks to allocate investment opportunities to its clients, and otherwise to treat all of its clients, in a manner that is fair and equitable to all clients. ROA has adopted policies and procedures that address parameters to be considered in allocating investment opportunities and ROA's time.

We make investment decisions for our clients based on their respective investment objectives, guidelines, restrictions, risk profiles, tax status and other relevant considerations. Consequently, we may purchase or sell securities at the same or different times for some clients but not other clients, or we may make investment decisions for some clients that are contrary to investment decisions for other clients. In addition, we could favor some clients over other clients in the order in which trades are placed, in that portfolios for which trades are placed first could receive a more or less favorable execution price than portfolios for which trades are placed in subsequent transactions. We could also favor some clients over other clients when allocating investment opportunities of a limited nature, such as initial public offerings and private placements. We and/or our principals, employees or affiliates have a proprietary interest in certain portfolios, and we therefore may have an incentive to favor such portfolios over other portfolios or devote more resources to such portfolios as compared to other portfolios.

These practices may be considered potential conflicts of interest because they may benefit some clients over other clients depending on market conditions and other factors. We believe we have implemented policies and procedures that are reasonably designed to mitigate potential conflicts of interest raised by side-by-side management of various portfolios. Some of these policies and procedures are described in Item 12 – Brokerage Practices of this brochure. You may contact us at +91 7569585161 to discuss the policies and procedures we have implemented in an effort to mitigate potential conflicts of interest raised by side-by-side management of various portfolios.

Item 7: Our Clients

We provide investment advisory services to private investment funds, individuals, trusts, estates, charitable organizations, corporations and other business entities and foundations.

For our Managed Accounts we generally require a minimum account size of \$50,000 for opening and maintaining a non-institutional Managed Account with us.

For institutional accounts, we generally require a minimum account size of \$250,000 for opening and maintaining an institutional Managed Account with us.

We may waive this account minimum for any client in our discretion. We may also consolidate separately managed accounts of related parties to determine whether or not our account minimums are satisfied for a particular client.

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

We provide investment management services for equity strategies to institutional and non-institutional clients through separately Managed Accounts. The following section includes a summary of the investment objectives, principal investment strategies, and material risks associated with the equity strategies ROA offers to clients through Managed Accounts.

ROA's primary method of analysis or strategy for equity managed accounts is diversification through strategic asset allocation. Our investment process is grounded in the following core beliefs:

- Access to research and a disciplined process are essential for long-term success.

- Global diversification expands our field of opportunities.
- A long term approach allows us to take advantage of undervalued investments.
- Using mutual funds and hedge funds allows us to access some of the world's best investment minds.

Some of the risks involved with using this method include risk of market correction or bear market which would negatively impact the equity portion of the portfolio; risk that the long term return will fall below the return needed by the client.

ROA primarily utilizes mutual funds and hedge funds when managing client accounts. Some of the risks involved with only recommending mutual funds include the risk that the fund will significantly underperform its benchmark, as most mutual funds do underperform their benchmarks. When ROA invests in a mutual fund, clients will bear additional expenses based on their pro rata share of the mutual fund's operating and management fee expenses. The risk of owning a mutual fund generally reflects the risks of owning the underlying securities the mutual fund holds.

- Past performance is not indicative of future results.
- Investing in securities (including stocks, mutual funds, bonds, and hedge funds) involves risk of loss.
- Depending on the different types of investments there may be varying degrees of risk.
- Clients and prospective clients should be prepared to bear investment loss including loss of original principal.
- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- 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.
- Interest Rate Risk – When interest rates rise, the value of fixed income investments held by the Fund may decline. When interest rates decrease, income from the Fund's fixed income investments may decline. This effect is typically more pronounced for intermediate and long-term fixed income securities.
- Credit Risk – Fixed income securities of an issuer will likely decline in value or the issuer may fail to make timely payments of interest or principal on the securities. Political, economic and other factors also may adversely affect the value of fixed income securities.
- 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.

- 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.
- Options Risk – Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.

Private Funds

We provide investment management services and serve as the general partner to the RFTL Fund. The following section includes a summary of the investment objectives, principal investment strategies, and material risks associated the Hedge Fund.

The summaries of the investment objectives, principal investment strategies, and material risks provided below are necessarily limited and are presented for general informational purposes in accordance with regulatory requirements.

Investment Objective: The Fund's investment objective is to seek capital appreciation with low long-term correlation to traditional public equity and fixed income markets. There can be no assurance that the Fund will achieve its investment objective.

Principal Investment Strategies: The Fund seeks to achieve its investment objective, principally by allocating its assets to ROA's proprietary strategies which includes Equity Long/Short, Short term and Systematic Trend following.

Ongoing Monitoring: ROA monitors and manages the Master Fund's portfolio on an ongoing basis. This monitoring includes the ongoing reassessment of Portfolio Fund Strategies and a Portfolio Fund Manager's ongoing competence with those Portfolio Fund Strategies, including with respect to factors that may impact performance. No risk-management process is fail-safe, and no assurance can be given that ROA's risk management process will achieve its objective.

ROA believes there are a number of potential reasons for reducing capital allocated to a Portfolio Fund. Some of these reasons may include: deficiencies in the investment strategy or internal controls of a Portfolio Fund Manager, identification of a better alternative, style drift, change in key personnel, change in investment strategy, significant change in the amount of assets under management, or a decline in performance.

ROA anticipates that the number and identity of Portfolio Funds and other investments will vary over time, at ROA's discretion, as a result of allocations and reallocations among new and existing Portfolio Funds and the performance of each Portfolio Fund as compared to the performance of other Fund assets.

Material Risks: Investing in securities and other instruments involves a risk of loss that advisory clients should be prepared to bear, and clients may lose all of their invested capital. These risks vary dependent on the strategy and investment objective of the Funds and investors should carefully read the offering material and consult their own advisers with respect to such investment.

An investment in the Fund should be considered a speculative investment that entails substantial risks, including but not limited to:

- Investment in Fund is speculative and there is no guarantee that the Fund will achieve its investment objective.
- The Fund's shares will not be listed on any securities exchange and it is not anticipated that a secondary market for Fund shares will develop.
- The Fund's shares are subject to substantial restrictions on transferability and resale and may not be transferred or resold except as permitted under the Declaration of Trust of the Fund and applicable law.
- Although the Fund may offer to repurchase shares (or a portion thereof) on a quarterly basis or from time to time, no assurance can be given that repurchases will occur or that any shares properly tendered will be repurchased by the Fund.
- Fund shares will not be redeemable at a shareholder's option. As a result, a shareholder may not be able to sell or otherwise liquidate his or her shares.
- Fund shares are appropriate only for shareholders who can tolerate a high degree of risk and do not require a liquid investment.
- The Portfolio Funds in which the Fund invests may pursue various investment strategies and are subject to special risks.
- Funds' investment activities involve the use of strategies and investment techniques with significant risk characteristics, including risks arising from volatility in the global equity, fixed-income, currency, commodities and real estate markets, the risks of short sales, the risks of leverage, the potential illiquidity of securities and derivative instruments, the risk of loss from counterparty defaults and the risk of borrowing to meet withdrawal requests.
- Market Risk – Either the stock market as a whole, or the value of an individual company, goes down resulting in a decrease in the value of client investments. This is also referred to as systemic risk.
- 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.
- Interest Rate Risk – When interest rates rise, the value of fixed income investments held by the Fund may decline. When interest rates decrease, income from the Fund's fixed income investments may decline. This effect is typically more pronounced for intermediate and long-term fixed income securities.
- Credit Risk – Fixed income securities of an issuer will likely decline in value or the issuer may fail to make timely payments of interest or principal on the securities. Political, economic and other factors also may adversely affect the value of fixed income securities.

- 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.
- 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.
- Options Risk – Options on securities may be subject to greater fluctuations in value than an investment in the underlying securities. Purchasing and writing put and call options are highly specialized activities and entail greater than ordinary investment risks.

Cybersecurity

The computer systems, networks and devices used by us and service providers to us and a client to carry out routine business operations employ a variety of protections designed to prevent damage or interruption from computer viruses, network failures, computer and telecommunication failures, infiltration by unauthorized persons and security breaches. Despite the various protections utilized, systems, networks, or devices potentially can be breached. A client and its investors could be negatively impacted as a result of a cybersecurity breach.

Cybersecurity breaches can include unauthorized access to systems, networks, or devices; infection from computer viruses or other malicious software code; and attacks that shut down, disable, slow, or otherwise disrupt operations, business processes, or website access or functionality. Cybersecurity breaches may cause disruptions and impact business operations, potentially resulting in financial losses to a client; interference with our ability to calculate the value of an investment in a client; impediments to trading; the inability us and other service providers to transact business; violations of applicable privacy and other laws; regulatory fines, penalties, reputational damage, reimbursement or other compensation costs, or additional compliance costs; as well as the inadvertent release of confidential information.

Similar adverse consequences could result from cybersecurity breaches affecting issuers of securities in which a client invests; counterparties with which a client engages in transactions; governmental and other regulatory authorities; exchange and other financial market operators, banks, brokers, dealers, insurance companies, and other financial institutions; and other parties. In addition, substantial costs may be incurred by these entities in order to prevent any cybersecurity breaches in the future.

Item 9: Disciplinary Information

Neither ROA nor any of its management persons have been involved in any legal or disciplinary events, material or otherwise.

Item 10: Other Financial Industry Activities and Affiliations

As discussed under Advisory Business, ROA sponsors pooled investment partnerships and other entities which it serves as the general partner. Investments in RFTL Fund sponsored by ROA are conducted on a private placement basis and prospective investors are solicited by means of the confidential private placement memorandum of RFTL, among other practices.

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

Code of Ethics

ROA has adopted a code of ethics pursuant to the requirements of the Investment Advisers Act of 1940 and Rule 17j-1 of the Investment Company Act. Our code of ethics reflects the principle that our employees owe a fiduciary duty of care, loyalty and good faith to our clients. Our code also provides that our employees must comply with applicable federal securities laws and may not engage in any act, practice or course of conduct that operates as a fraud or deceit upon our clients.

In general, our code of ethics contains policies and procedures that require our employees to:

- identify their brokerage or securities accounts to us;
- report their securities transactions and holdings to us on a periodic basis;
- certify their compliance with our code of ethics on a periodic basis;
- provide us with their trade confirmations and account statements; and
- report any actual or suspected violations of the code of ethics to us.

ROA will provide a copy of the Code to any client or prospective client upon request.

Investing in the Same Securities or at the Same Time

We receive management fees from the Private Funds. We and/or our principals, employees and affiliates are shareholders of the RFTL Fund. We may offer advice to qualified, existing and prospective, clients regarding investing in the RFTL Fund. These relationships create potential conflicts of interest because we may have a financial incentive to favor the RFTL Fund over other client portfolios. For example, if both the RFTL Fund and a client are in need of an additional subadviser for a particular strategy, and the subadviser selected by ROA has a limited capacity for managing assets, ROA might have an incentive to allocate more of the subadviser's capacity to RFTL Fund where ROA has an investment versus to the client. However, it is ROA's policy to allocate investment opportunities fairly among all accounts.

Personal Trading

We and our principals or employees may purchase or sell for our own portfolios the same securities that we purchase or sell for client portfolios. We also may recommend that our clients purchase or sell the same securities that we and/or our principals or employees may purchase or sell for our own portfolios. We and/or our principals or employees may purchase or sell securities for our own portfolios at the same or different times as client portfolios. We and/or our principals or employees may also purchase or sell securities for our own portfolios while selling

or purchasing the same securities for client portfolios. These practices create potential conflicts of interest because we and/or our principals and employees may have an incentive to favor our own portfolios over client portfolios. We believe that we have implemented policies and procedures that are reasonably designed to mitigate these potential conflicts of interest.

Item 12: Brokerage Practices

As an investment advisory firm, ROA has a fiduciary and fundamental duty to seek best execution for client transactions. Best execution is not defined simply as attaining the lowest price, but as the best overall qualitative execution in the particular circumstances. ROA, as a matter of policy and practice, seeks to obtain best execution for client transactions.

For non-institutional equity strategy Managed Accounts, ROA has custodial arrangements with Interactive Brokers LLC (“IBKR”). IBKR offers us services that include custody of securities, trade execution, clearance and settlement of transactions. Therefore, non-institutional clients must open or transfer their accounts to IBKR in order to participate in ROA’s managed account services.

We have selected IBKR as the custodian of choice based on:

- IBKR’s competitive transaction charges, trading platform, and on-line services for account administration and operational support.
- IBKR’s general reputation, trading capabilities, investment inventory, their financial strength, and our personal experience working with IBKR staff.

Please note that not all investment advisors require the use of a specific broker/dealer. Some investment advisors allow clients to select the broker/dealer. However, for compliance and operational efficiency purposes, we have decided to require all non-institutional clients open accounts through IBKR when participating in our Managed Account services. Since we do not recommend, suggest, or make available a selection of custodians other than IBKR, and we have not verified whether their transaction fees are competitive with another custodian, best execution may not always be achieved.

Our recommendation for you to custody your assets with IBKR has no direct correlation to the services we receive from IBKR and the investment advice we offer you, although we do receive economic benefits through our relationship with IBKR that are typically not available to IBKR retail clients. Any commissions, charges or transaction fees associated with such brokerage transactions are received entirely by IBKR. ROA does not have a soft dollar arrangement with IBKR.

We are not a subsidiary of, or an affiliated entity of IBKR. We have sole responsibility for investment advice rendered, and our advisory services are provided separately and independently from IBKR.

Aggregating Trade Orders

ROA usually implements trades on an independent or individual account-by-account basis. However, different clients may carry many of the same securities in their respective accounts, only in different quantities to account for differences in risk tolerances. Therefore, in some cases it is efficient for ROA to trade in many client accounts simultaneously. This process is referred to as aggregating orders, batch trading or block trading and is used when ROA

believes such action may prove advantageous to clients. When ROA aggregates client orders, the allocation of securities among client accounts will be done on a fair and equitable basis. Typically, the process of aggregating client orders is done in order to achieve better execution, or to allocate orders among clients on a more equitable basis in order to avoid differences in prices and transaction fees or other transaction costs that might be obtained when orders are placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among our clients in proportion to the purchase and sale orders placed for each client account on any given day.

When we determine to aggregate client orders for the purchase or sale of securities, including securities in which our employees and affiliated persons may personally invest, we will do so in accordance with the parameters set forth in the SEC No-Action Letter, SMC Capital, Inc. It should be noted, we never receive additional compensation or economic benefit as a result of aggregation.

Item 13: Review of Accounts

ROA's Investment Committee, Portfolio Managers or their designee review Client accounts on an ongoing basis

Our Investment Committee meets periodically to review our investment strategies, general economic and market conditions and developments, investment ideas, and security-specific issues. Our Portfolio Managers regularly review and monitor investment performance, securities holdings, sector weightings, asset allocations, and other portfolio characteristics for client portfolios. Client portfolios may be reviewed on a more frequent basis depending on a variety of factors, such as changes in market, political or economic conditions, contributions or withdrawals of cash from a portfolio, changes in the portfolio's investment objectives, guidelines or restrictions, or meetings with clients.

The frequency of client reports depends upon the nature of the account and each client's requirements. Some clients receive reports on a monthly basis, while others receive reports quarterly or on a less frequent basis. Client reports are in writing and generally provide account performance and information about ROA's investment strategy.

Item 14: Client Referrals and Other Compensation

ROA does not currently pay compensation to other firms or individuals for providing or otherwise referring clients to us.

ROA may pay compensation from our own resources to financial intermediaries in connection with the distribution and sale of shares of the RFTL Fund and as compensation for shareholder-related services, including administrative, recordkeeping and shareholder communications services. We may also pay compensation to financial intermediaries to make shares of RFTL Fund available to investors through fund platforms or similar programs or for services provided in connection with these platforms or similar programs. These payments generally benefit us by providing financial intermediaries with an incentive to recommend sales of shares of RFTL Funds over other potential investments.

Item 15: Custody

ROA does not maintain custody of any Hedge Funds or Managed Account. All Client assets are held in separate accounts in the Client's name by unaffiliated broker/dealers, futures commission merchants and/or banks.

Managed Accounts are held at IBKR. ROA has the authority to choose the investments of the Managed Accounts, but does not have the ability to deduct advisory fees or withdraw or transfer securities from those accounts.

Although the securities and assets of the RFTL fund are held with a qualified custodian, we may be deemed to have custody over these securities and assets because ROA serves as the general partner of the RFTL. Investors in the RFTL will not receive statements from the custodians of the RFTL.

Item 16: Investment Discretion

ROA has discretionary authority to trade on behalf of the RFTL and Managed Accounts. Such authority is set forth in the advisory agreement between ROA and the Funds or Managed Accounts, as applicable. In all cases, ROA exercises its discretion in a manner consistent with the investment objectives as stated in the advisory agreement or as stated in a Fund's Offering Documents, as applicable.

Item 17: Voting of Securities

We do not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Item 18: Financial Information

ROA is not aware of any financial condition that is reasonably likely to impair its ability to meet its commitments to clients, and ROA has not been the subject of a bankruptcy proceeding.

Brochure Supplement: Form ADV Part 2B

December 13, 2021

Rising Omega Advisors Private Limited

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This Form ADV Part 2B Brochure Supplement and the content herein provide information about Bhavik Joshi, Vishal Sabhar and Ankur Patel that supplements our firm brochure. You should have received a copy of that brochure. Please contact us by telephone at +91 (079) 4800-1313 if you did not receive Rising Omega Advisors' ("Advisor") brochure or if you have any questions about the contents of this supplement. Additional information about Vishal Sabhar is available on the SEC's website at www.adviserinfo.sec.gov.

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.

Please note that the use of the term "registered investment adviser" and description of Rising Omega Advisors and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Item 2: Educational Background and Business Experience

Vishal Sabhar

Co-Chief Investment Officer

Year of Birth: 1983

Educational Background:

- Canterbury University; B.Sc. - Mathematics

Business Background:

- 04/2021 – Present; Rising Omega Advisors Pvt Ltd
- 09/2019 – Present; Rising Financials Pvt Ltd
- 01/2019 – Present; BitAlpha Global LLC
- 07/2018 – 09/2021; BitAlpha OU
- 07/2012 – 12-2018; First Allied Advisory Services Inc.
- 07/2010 – 12-2018; First Allied Securities Inc.
- 07/2010 – 01-2019; Genpact Limited

Exams, Licenses & Other Professional Designations:

- 01/2008; Series 7
- 03/2008; Series 63
- 05/2008; Series 24
- 08/2010; Series 4
- 08/2010; Series 66
- 02/2011; Series 51
- 02/2019; Series 3

Bhavik Joshi

Co-Chief Investment Officer

Year of Birth: 1978

Educational Background:

- Nirma University; B.E. – Instrumentation and Control Engineering

Business Background:

- 12/2020 – Present; Rising Omega Advisors Pvt Ltd
- 07/2001 – Present; Innovative Engineers
- 07/2007 – Present; Silcore Technologies
- 07/2009 – Present; Finvis Fiscals

Ankur T Patel
Chief Operating Officer

Year of Birth: 1984

Educational Background:

- Saurashtra University; B.Com. – Accounting
- IASE University; MBA - Finance

Business Background:

- 01/2021 – Present; Rising Omega Advisors Pvt Ltd
- 01/2018 – Present; BitAlpha Global LLC
- 07/2012 – Present; Rising Capital Zone Pvt Limited
- 08/2010 – 12-2012; SMC Global Securities Limited
- 05/2008 – 07-2010; Religare Securities Limited

Exams, Licenses & Other Professional Designations:

- NCFM Derivatives Module
- NCFM Forex Module

Item 3: Disciplinary Information

We have nothing to disclose in this regard.

Item 4: Other Business Activities

Ankur Patel is the COO of BitAlpha Global LLC. He devotes considerable amount of time managing his Investment Consulting business, Rising Financials Pvt. Ltd. Vishal Sabhar is the CEO of Rising Financials Pvt. Ltd which acts as Sponsor of the RFTL Fund.

Item 5: Additional Compensation

We have nothing to disclose in this regard.

Item 6: Supervision

Vishal Sabhar is the principal and Chief Compliance Officer. He is bound by our firm's Code of Ethics and supervises Mr. Joshi and Mr. Patel's activities to ensure compliance with our firm's Code of Ethics. Mr. Sabhar can be reached by telephone at +91 (079) 4800-1313.