

FirstCoreAdvisers LLP

Compliance Policy Document

SEBI Registered Investment Adviser (Non-Individual)
SEBI Registration No.: INA000022288
Version 1.0 | Effective Date: 20th Apr, 2026
Prepared by: Vijay Ramani S

This document contains three mandatory policies as required under the SEBI (Investment Advisers) Regulations, 2013 and subsequent amendments:

1. Data Security & Privacy Policy
2. Grievance Redressal Policy
3. Conflict of Interest Policy



Policy 1: Data Security & Privacy

Effective under Regulation 15(14) of the SEBI (Investment Advisers) Regulations, 2013.

1.1 Purpose

This policy sets out how “FirstCoreAdvisers LLP” (“the Firm”) collects, processes, stores, and protects client data in the course of providing SEBI-registered investment advisory services. The Firm is committed to maintaining the highest standard of data confidentiality, integrity, and security.

1.2 Data We Collect

- Identity & KYC data: Name, PAN, Aadhaar (verification only), address, date of birth
- Financial data: Portfolio details, investment objectives, risk profile, income details
- Contact data: Email address, mobile number
- Transaction data: Advisory engagement records, fee receipts, communication logs

1.3 How We Collect & Verify Data

KYC Verification

- The Firm uses Digio's API-based platform for client KYC verification and Aadhaar-based eSign for advisory agreements.
- Central KYC (CKYC) is completed through CAMSKRA, using Digio's API for verification and record submission.
- Aadhaar numbers are used solely for identity verification through the regulated API. The Firm does not store Aadhaar numbers on its local systems.

PAN

- PAN is used for client identification and KYC compliance. It is submitted to CAMSKRA/KRA through regulated channels and is not stored locally.

1.4 Data Storage & Access

Data Type	Storage & Access
KYC / PAN / Aadhaar	Processed via Digio & CAMSKRA APIs only. Not stored locally.
Client portfolio & financial data	Stored in a dedicated, access-controlled OneDrive folder or processed and tracked via third-party portfolio consolidation software (e.g.: MProfit) and underlying data backed up to a dedicated, access-controlled OneDrive folder.
Advisory agreements & records	Stored in OneDrive; signed copies via Digio eSign platform.
Communication logs	Email/platform records maintained for minimum 5 years per SEBI mandate.

OneDrive folder/Third party portfolio consolidation software access is restricted to the Principal Officer and Compliance Officer only. Access rights will be reviewed whenever there is a change in LLP structure.

1.5 Data Retention

- All client records and advisory documentation are retained for a minimum of 5 years from the date of the last transaction or engagement, as mandated by SEBI.
- Upon client offboarding, data is archived and access is restricted. Physical copies, if any, are securely disposed of.

1.6 Use of Technology & AI Tools

- If any AI-based tools or analytics platforms are used to assist in portfolio analysis or advice generation, clients will be informed of the same at the time of onboarding and in their advisory agreement.
- The Firm takes sole responsibility for the accuracy, security, and compliance of any advice generated with or without AI assistance, in line with Regulation 15(14).

1.7 Third-Party Data Processors

- Digio (KYC verification, eSign): Data processed under Digio's regulatory framework as a licensed technology service provider.
- CAMSKRA (CKYC registry): Data shared as mandated by SEBI/RBI for central KYC purposes.
- Microsoft OneDrive (portfolio data storage): Subject to Microsoft's enterprise data protection and privacy standards.
- Third party portfolio consolidation software (e.g.: Mprofit): Client portfolio data is entered and maintained within such software solely for the purpose of providing investment advisory services. Data is not used for any other purpose

The Firm does not sell, rent, or share client data with any third party for commercial purposes.

1.8 Security Measures

- All platforms used to access client data are password protected.
- Access credentials are not shared between team members.
- Periodic review of access logs to detect unauthorised access.
- Immediate revocation of access rights upon any change in team composition.

1.9 Data Breach Protocol

- In the event of a data breach or suspected unauthorised access, the Compliance Officer will initiate an internal review within 24 hours.
- Affected clients will be notified promptly with details of the breach and remedial measures taken.
- The Firm will report the breach to IAASB/SEBI as required under applicable regulations.

1.10 Client Rights

- Clients may request access to their personal data held by the Firm at any time.
 - Clients may request correction of inaccurate data by writing to the Compliance Officer.
 - Requests will be addressed within 10 working days.
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Policy 2: Grievance Redressal Policy

Effective under Regulation 21 of the SEBI (Investment Advisers) Regulations, 2013 and guidance in SEBI Master Circular for Investment Advisers.

2.1 Purpose

The Firm is committed to addressing client grievances promptly, fairly, and transparently. This policy establishes a structured mechanism for clients to raise concerns and seek resolution in connection with the investment advisory services provided by the Firm.

2.2 Grievance Officer

Designated Grievance Officer (Compliance Officer)

Name: Vijay Ramani S

Role: Compliance Officer, FirstCoreAdvisers LLP

Email: compliance@firstcore.one

Phone: +91-9840403288

Address: 7/4, Krishnamachari Avenue, Adyar, Chennai - 600020

2.3 How to Lodge a Grievance

- Email: Send a written complaint to the Grievance Officer's email address above.
- Written letter: Address to the Compliance Officer at the Firm's registered office.
- In person: By prior appointment during business hours.

Please include your full name, client ID, a description of the grievance, and any supporting documents when submitting a complaint.

2.4 Resolution Timeline

Stage	Timeline
Acknowledgement of complaint	Within 2 working days of receipt
Internal review & resolution	Within 21 calendar days of receipt
Communication of resolution	Written response to client
Escalation (if unresolved)	Client may escalate to IAASB / SEBI SCORES

2.5 Escalation Mechanism

Level 1 — Internal Resolution

All grievances are first addressed internally by the Grievance Officer. If the client is unsatisfied with the resolution or if the Firm fails to respond within 21 days:

Level 2 — IAASB (BSE Limited)

- Clients may escalate to BSE Limited in its capacity as the Investment Adviser Administration and Supervisory Body (IAASB).
- Website: www.bseindia.com | Email: iara.compliance@bseindia.com

Level 3 — SEBI SCORES

- Clients may lodge a complaint on the SEBI Centralised Online Dispute Resolution (SCORES) portal: <https://scores.sebi.gov.in>
- SCORES enables online tracking of complaints and their resolution status.

| *Clients are encouraged to first attempt internal resolution before escalating to IAASB or SEBI SCORES.*

2.6 Grievance Register

- The Firm maintains a Grievance Register recording: date of receipt, client name, nature of complaint, status, and date of resolution.
- The Grievance Register is available for inspection during SEBI/IAASB audits.
- A summary of grievances received and resolved is included in the Firm's Annual Compliance Audit report.

2.7 Non-Retaliation

Clients will not face any adverse treatment for raising a grievance in good faith. The Firm treats all complaints as an opportunity to improve service quality.

Policy 3: Conflict of Interest Policy

Effective under Regulation 17 and Third Schedule (Code of Conduct) of the SEBI (Investment Advisers) Regulations, 2013.

3.1 Purpose

The Firm's advisory relationships are built on objectivity, transparency, and the client's best interest. This policy identifies potential conflicts of interest, establishes controls to manage them, and ensures full disclosure to clients wherever conflicts cannot be avoided.

3.2 Identified Conflict Areas

A. Advisory vs. Distribution

- The Firm operates exclusively as a SEBI-registered Investment Adviser under the AUA-based fee model.
- The Firm does not engage in mutual fund distribution or earn trail commissions from any product manufacturer, AMC, or financial intermediary.
- Neither the LLP nor its Partners, in their capacity as advisers, receive any referral fees, embedded commissions, or indirect income linked to client investments.

B. Personal Trading by Partners

- Both Partners (Principal Officer and Compliance Officer) invest in securities markets in their personal capacity.
- Partners are prohibited from trading in any security in a direction contrary to the advice given to clients on the same security (e.g., selling a stock personally while advising clients to buy it).
- In case of extraordinary situation to liquidate (contra to advice), the partners are restricted to execute such trades 5 days prior from or 15 days post, the date of advice to client. They can liquidate by giving 24hrs notice to clients, if such situations may so arise.
- A Personal Trading Register is maintained by each Partner, recording all personal trades with date, security, quantity, and price.
- Prior to advising any client on a security, Partners confirm that no conflict exists with their current personal positions.
- Both partners hold material positions on the model portfolio\recommended stocks and will continue to add\reduce positions based on the change in views of model portfolio\recommended stocks.

C. Associates & Related Parties

- Certain immediate relatives of the Partners are engaged in independent securities market activities. These activities are conducted entirely separately from the Firm and its advisory operations.
- The Firm maintains a strict information barrier ensuring that no client data, advisory inputs, or research findings are shared with any related party engaged in securities market activities.
- Partners periodically review potential overlaps between related-party market activities and current client advisory positions to proactively identify and manage any conflicts.
- Where a potential conflict is identified between a related-party position and client advice, the conflict is either avoided or disclosed to the relevant client in writing prior to rendering advice.
- The Firm's advisory recommendations are based solely on client-specific risk profiles and investment objectives, and are not influenced by any related-party market activity.

The Firm is committed to managing related-party relationships with transparency. Any material conflict that cannot be avoided will be disclosed to the client before advice is provided. Point B – as per regulation 15(7), 15(10)



D. Client-Related Conflicts

- Where a client is personally known to either Partner (friend, family, business associate), this relationship is disclosed to the other Partner and documented.
- Advice to such clients follows the same objective process as for all other clients, based solely on their risk profile and investment objectives.

E. Outside Business Activities

- Any business activity undertaken by either Partner outside this LLP that could potentially conflict with client interests will be disclosed to the Compliance Officer and, where material, to clients.

3.3 Disclosure to Clients

- All material conflicts of interest are disclosed to clients at onboarding through the Advisory Agreement and MITC.
- Ongoing disclosures are made whenever a new conflict arises during the course of the advisory relationship.
- Clients have the right to terminate the advisory agreement if they are not comfortable with any disclosed conflict.

3.4 Managing Conflicts

Conflict Type	Control Measure
Personal trading vs. client advice	Personal Trading Register + pre-advice conflict check
Related-party market activity	Information barrier + periodic conflict review + client disclosure
Related-party clients	Documented disclosure + objective advice process
Commission income	None accepted — pure fee-only AUA model

3.5 Review & Monitoring

- This policy is reviewed annually or upon any material change in the Firm's structure, partner relationships, or business activities.
 - The Compliance Officer is responsible for monitoring adherence to this policy and escalating breaches to the Principal Officer.
 - Compliance with this policy is included in the scope of the Firm's Annual Compliance Audit.
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Approval & Adoption

Role	Details
Firm Name	FirstCoreAdvisers LLP
SEBI Registration	SEBI Registration No.: INA000022288
Principal Officer	Subbiah Somasundaram 20 th Apr, 2026
Compliance Officer	Vijay Ramani S 20 th Apr, 2026
Version	1.0
Next Review Due	20-OCT-2026

This document is published on the Firm's website as required under the SEBI (Investment Advisers) Regulations, 2013 and the SEBI Master Circular for Investment Advisers.