



PMS: Portfolio Management Service

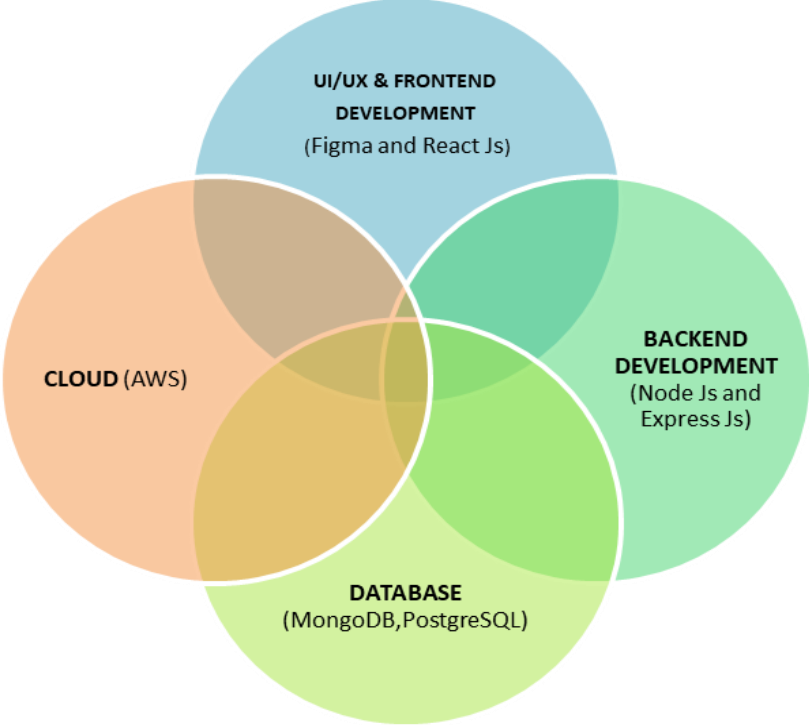
USER MANUAL



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Tech Stack Used:



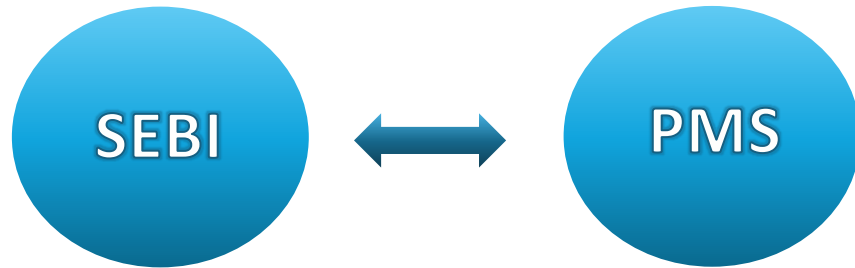
Introduction:

- **PMS** is an interactive platform bridging the gap between SEBI and Portfolio Managers (PMs). PMS (Portfolio Management Service) is designed to streamline communication and enhance collaboration between regulatory authorities and financial institutions. An interface with the following modules:
 1. Alert Module
 2. CTR Module
- The **Alert Processing** module ensures timely notification and response to regulatory alerts raised by SEBI, empowering both parties to stay ahead of compliance requirements.
- The **CTR** (Compliance Test Report) Module facilitates efficient tracking and reporting of compliance activities quarterly, promoting transparency and accountability.

Additionally, PMS is equipped with desired Capabilities, providing customizable features and functionalities to adapt to evolving regulatory landscapes and business requirements.

Users:

1. PMS User (Alert and CTR Module)
2. SEBI User (Alert and CTR Module)

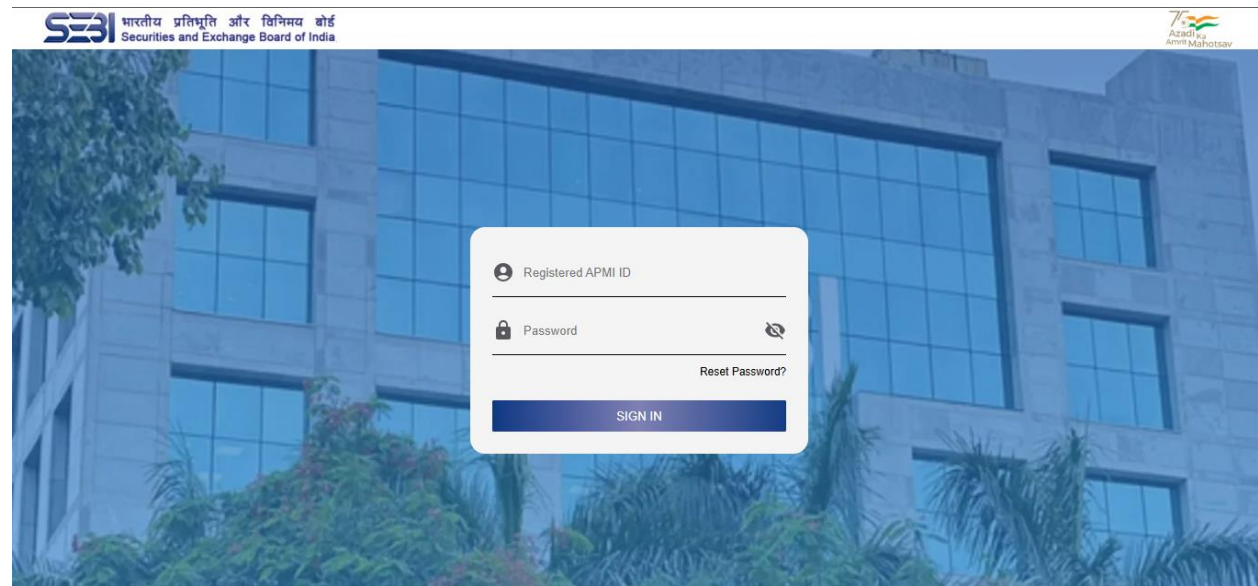


Login Page:

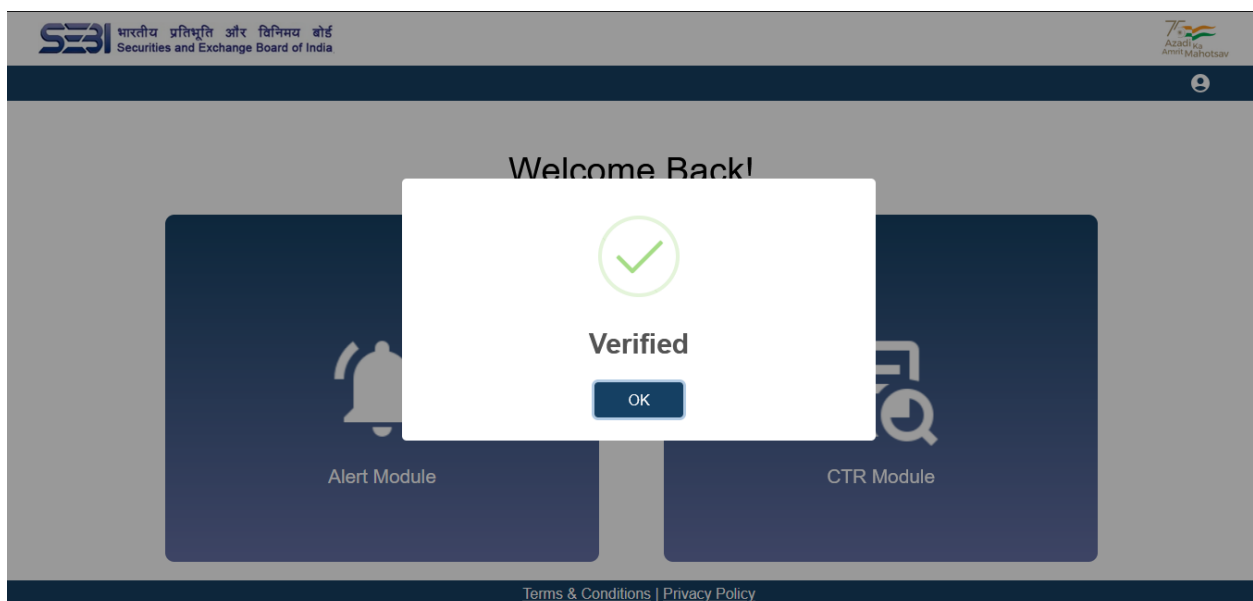
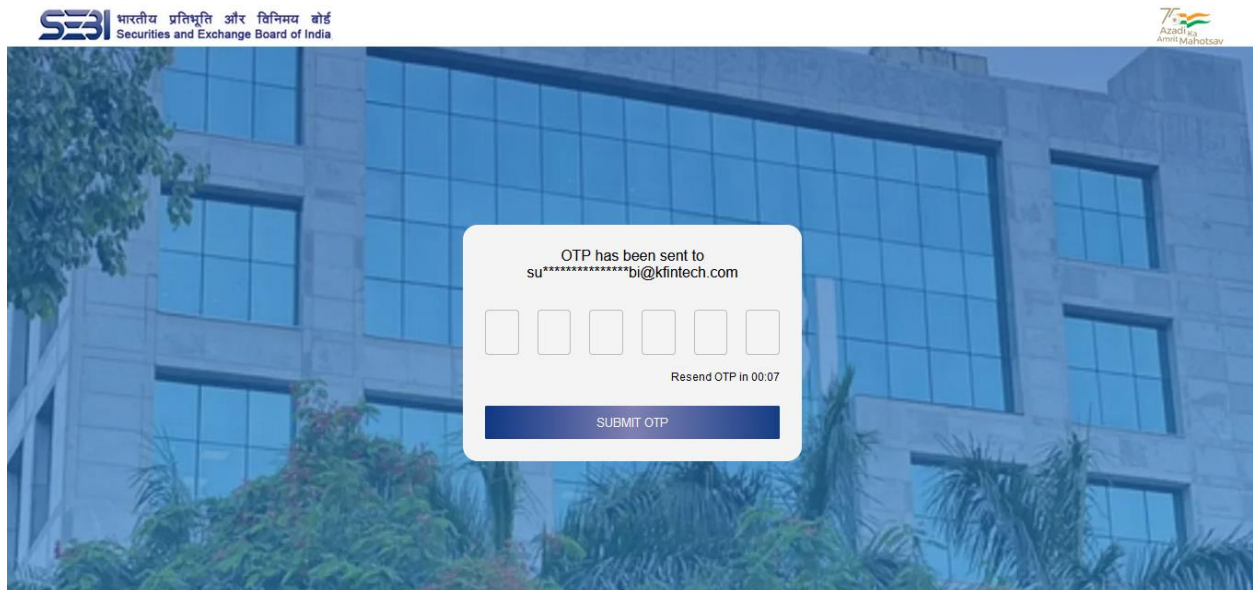
The login page serves as a secure access point for users, including SEBI and PMs to log in to their accounts on the website.

Steps to follow:

- Users can access the [Login Page](#).
- They can enter their Registered APMI ID and password.
- If they forget their password, they can click on the [Reset Password](#) to initiate the reset password process. Now users can enter their email address to receive instructions on how to set up a new password.



The login process includes OTP generation and verification. After entering credentials and clicking "Sign In," a 6-digit OTP is sent to the user's email. The user inputs this OTP for validation. If not received within 3 minutes, the OTP expires, requiring regeneration for authentication, enhancing login security.



PMS USER:

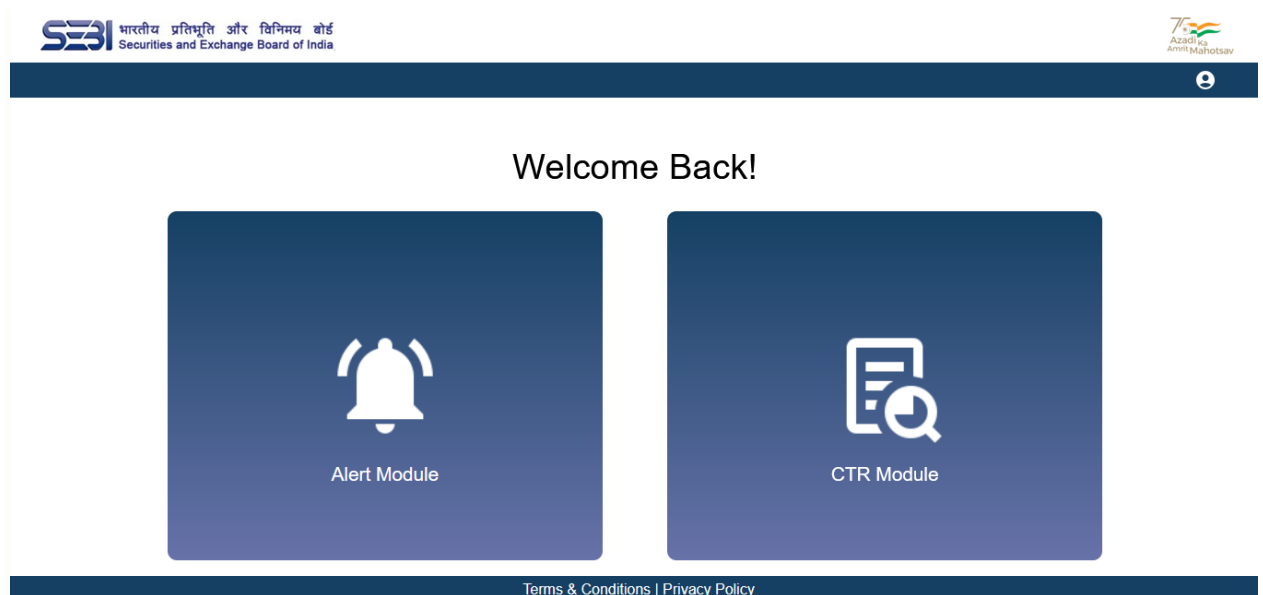
Upon successful login using PMS credentials, users from the PMS end are redirected to the landing page, where they are presented with two primary options:

1. Alert Module:

- a. Provides an interface to view alerts raised by SEBI.
- b. Subdivided into the Submission Page and Tracker Page for managing alerts effectively.

2. CTR Module:

- a. Allows users to upload CTR files, and track progress with SEBI.
- b. Enables users to add comments, evidence, and reports related to compliance activities.



1. ALERT MODULE:

On submission of Alerts by SEBI, the principal officer of the PMS will receive an email notification about the upload.

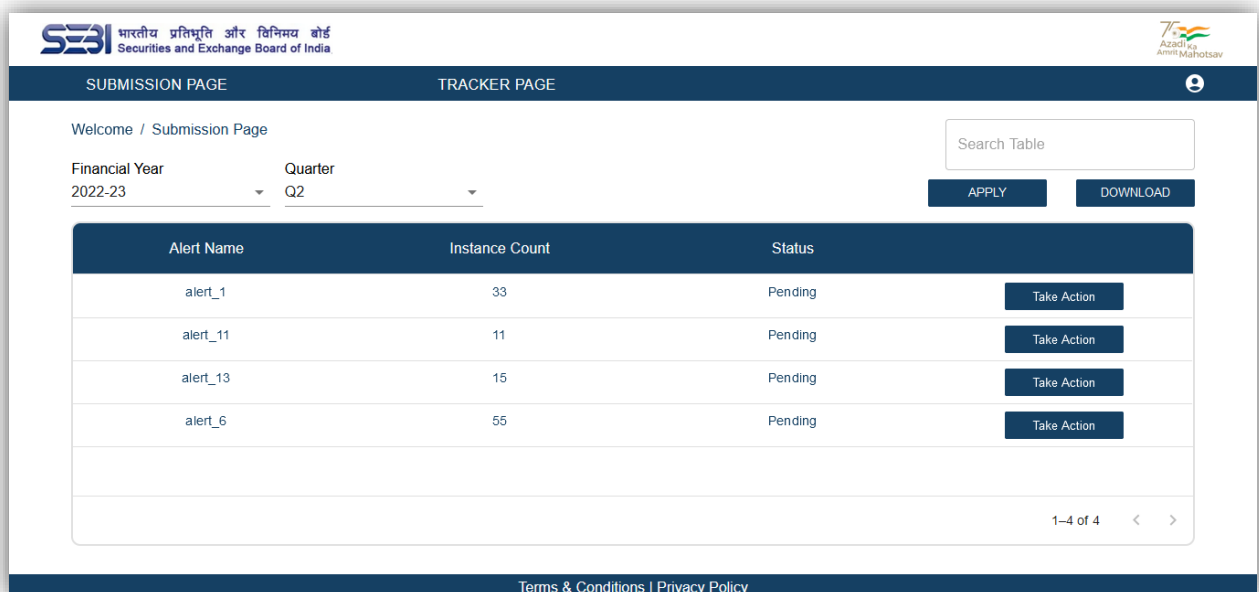
The principal officer of the PMS can then access the **Submission Page**, where they can view the alerts raised by SEBI. The principal officer can provide comments and responses to each of these alerts accordingly. Once the principal officer has taken the necessary actions to address all the alerts raised, they perform a final review on the Tracker Page.

After this final review, the principal officer submits the alerts to the respective SEBI officer for their review.

SUBMISSION PAGE

In the submission page select the financial year and quarter for which alerts have been uploaded. Click on Apply.

User can download all alerts using the “**DOWNLOAD**” button to view the alerts uploaded by SEBI.



The screenshot displays the SEBI Submission Page interface. At the top, there is a header with the SEBI logo and the text "भारतीय प्रतिभूति और विनियम बोर्ड Securities and Exchange Board of India" on the left, and "75 Azadi Ka Amrit Mahotsav" on the right. Below the header, there are two tabs: "SUBMISSION PAGE" (active) and "TRACKER PAGE". A user profile icon is visible in the top right corner. The main content area starts with a breadcrumb "Welcome / Submission Page" and a "Search Table" input field. Below this, there are two dropdown menus: "Financial Year" set to "2022-23" and "Quarter" set to "Q2". To the right of these dropdowns are two buttons: "APPLY" and "DOWNLOAD". The main part of the page is a table with the following data:

Alert Name	Instance Count	Status	
alert_1	33	Pending	Take Action
alert_11	11	Pending	Take Action
alert_13	15	Pending	Take Action
alert_6	55	Pending	Take Action

At the bottom right of the table, there is a pagination indicator "1-4 of 4" with left and right arrow symbols. At the very bottom of the page, there is a footer with the text "Terms & Conditions | Privacy Policy".

* Click on Take Action Button to proceed with submitting comments

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SUBMISSION PAGE TRACKER PAGE

Welcome / Submission Page / alert_1 / Form

Alert Period: 2022-23, Q2
Ticket ID: m6klm3kp
Guidance Type: alert_1

No. of Instances: 33
Annexure Description: testing the application flow [Read more](#)

PMS Comments
Proposed Plan of Action

UPLOAD SUBMIT

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PMS can add their comments , proposed plan of action and upload supporting documents and close their action on clicking SUBMIT button .

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SUBMISSION PAGE TRACKER PAGE

Welcome / Submission Page

Financial Year: 2022-23
Quarter: Q2

Search Table
APPLY DOWNLOAD

Alert Name	Take Action
alert_11	Take Action
alert_13	Take Action
alert_6	Take Action
alert_1	Take Action

Submitted Successfully
OK

1-4 of 4

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Once all the alerts has been taken action on , move on to Tracker page for further proceedings.

Welcome / Submission Page

Search Table

Financial Year
2022-23

Quarter
Q2

APPLY

DOWNLOAD

Alert Name	Instance Count	Status	
alert_1	33	Done	Take Action
alert_11	11	Done	Take Action
alert_13	15	Done	Take Action
alert_6	55	Done	Take Action
			1-4 of 4 < >

▫ **Alerts Section:**

- **Alert Name**: Displays the name or title of the alert.
- **Instance Count**: Displays the details instance count assigned by SEBI to be updated for the alerts.
- **Status**: Indicates the status of the alert, which can be either "Done" or "Pending"

▫ **Action Buttons:**

- **Take Action Button**: Allows users to act on the corresponding alert.
- **Download Button**: Allows users to download the alerts file uploaded by SEBI.

Welcome / Tracker

Financial Year
2022-23

Quarter
Q2

Search Table

APPLY

FILTER

Guidance Type	Instance Count	Details	Status
alert_1	33	View	pending
alert_11	11	View	pending
alert_13	15	View	pending
alert_6	55	View	pending

Guidance Type

Status

[APPLY FILTER](#) [CLEAR](#)

[Submit](#)

1-4 of 4 < >

PMS users can also use filters like “Guidance Type” and “Status”, to filter the alerts uploaded.

Welcome / Tracker

Financial Year
2022-23

Quarter
Q2

Search Table

APPLY

FILTER

Guidance Type	Instance Count	Details	Status
! alert_1	33	View	open

[Submit](#)

1-1 of 1 < >

In case SEBI need more details , The status will be open and PMS would receive the Alerts with the “!” exclamation mark in the “Tracker Page” to reupload / reupdate with their required details and documents as per the mentioned SEBI instructions in the comment for the no of instance counts required by the SEBI.

Tracker / View



Ticket ID m6klm3kp	Guidance Type alert_1	Total Instance Count 33	DOWNLOAD
SEBI Comments			DOWNLOAD
31/01/2025	Case ID Count: 23		
SEBI Comments	need more info...	DOWNLOAD	
31/01/2025	Case ID Count: 23		
PMS Comments	im providing support doc	Proposed Plan of Action	Nil DOWNLOAD


ADD COMMENT

PMS now can see SEBI comments for further required instructions and can add their comments and upload the details.

TRACKER PAGE

The monitoring of alerts issued by SEBI, necessitating action by the PMS, is facilitated through the Tracker page. The final submission cannot be done until and unless actions are taken against all the alerts. The alerts on which the necessary actions have been taken in the submission page become visible in the Tracker page.

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SUBMISSION PAGE TRACKER PAGE 

Welcome / Tracker

Financial Year: 2022-23 Quarter: Q1



Search Table


Guidance Type	Instance Count	Details	Status
alert_1	33	<input type="button" value="View"/>	pending
alert_11	11	<input type="button" value="View"/>	pending
alert_13	15	<input type="button" value="View"/>	pending
alert_6	55	<input type="button" value="View"/>	pending

1-4 of 4 

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Users can modify their comments before final submission in the Tracker page. For making changes, move on to view button click on Edit comment button to modify.

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SUBMISSION PAGE TRACKER PAGE 

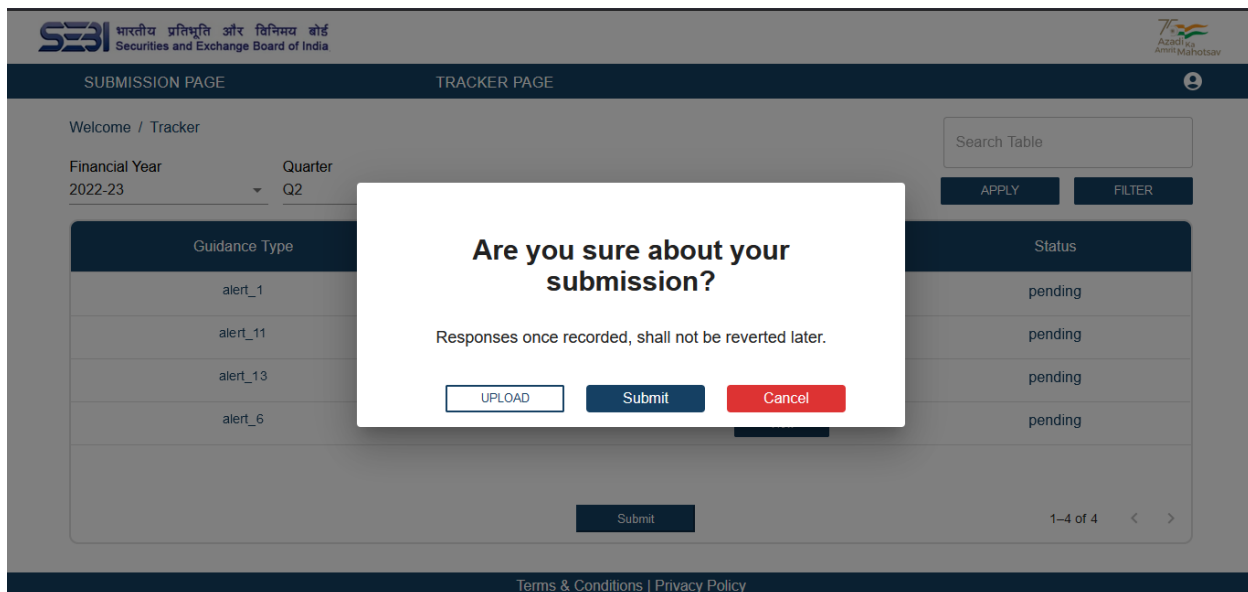
Tracker / View

Ticket ID: m6mkdnh Guidance Type: alert_1 Total Instance Count: 33

05/02/2025 Case ID Count: 33

PMS Comments: sa Proposed Plan of Action: dsaf

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To make the final submission click on 'SUBMIT' button in the Tracker page, The status section changes from 'pending' to 'open' once the submission is made.

After the status becomes 'open', the updated information is then visible in SEBI's bucket.


- **Action Buttons:**

- **View Button:** Upon clicking the "View" button, the system redirects the user to the "View Page", where they can access detailed information about a specific alert.
- **APPLY Button:** User can apply the requisites.
- **FILTER Button:** User can filter the guidance type and the status accordingly.
- **Submit Button:** It will be only enabled only when all the alerts are taken into "Actions".


SEBI-PMS Chat Section Features:

- **PMS Comments:** Displays comments from the Portfolio Management Service (PMS) regarding the specified alert instance.

- **Proposed Plan of Action:** Allows the PMS to outline its proposed plan of action for the specified alert instance.
- **Add Comment:** Allows users to add a new comment to the chat section for ongoing communication.
- **Edit Comment:** Allows users to edit the last comment
- **Download Button:** To download the support documents attached during comment addition.
- **SEBI Comments:** Displays comments from the Securities and Exchange Board of India (SEBI) regarding the specified alert instance.
 - **Download Documents:** Download document which was uploaded by SEBI for reference.



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SUBMISSION PAGE
TRACKER PAGE
🔍

Tracker / View

Ticket ID m6klm3kp	Guidance Type alert_1	Total Instance Count 33	DOWNLOAD
SEBI Comments			
31/01/2025	Case ID Count: 23		
SEBI Comments	need more info...	DOWNLOAD	
31/01/2025	Case ID Count: 23		
PMS Comments	im providing support doc	Proposed Plan of Action Nil	DOWNLOAD

[ADD COMMENT](#)

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Note: In case the PMS fails to respond to the alerts in the stipulated time, an auto-reminder e-mail shall be triggered to the Principal officer of the PMS including CEO. Additionally, an **email** will also be sent to the SEBI, informing them about PMS's failure to submit the report on time.

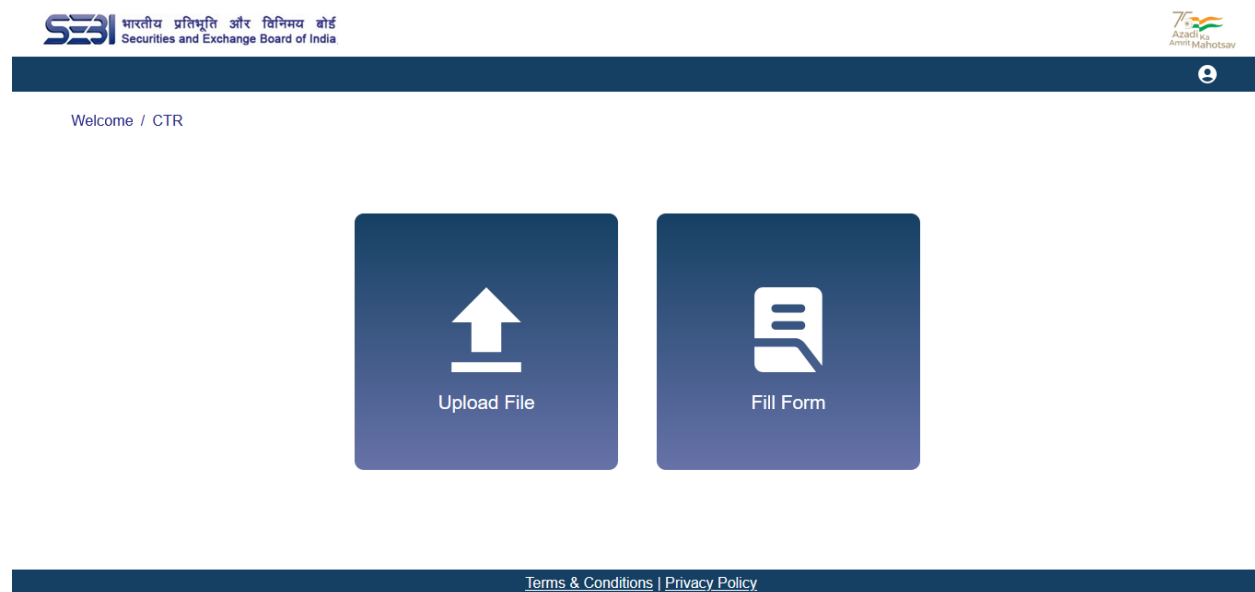
2. CTR MODULE:

This module involves the submission of reports by Portfolio Management Service (PMS) to the Securities and Exchange Board of India (SEBI) for compliance verification. These reports contain pre-defined particulars outlined by SEBI.

The process begins with the PMS providing the reports, which are then submitted to SEBI. SEBI reviews these reports to verify their compliance with the relevant regulations. The back-and-forth process between the PMS and SEBI continues until the reports are deemed compliant.

Regarding the uploading of the CTR file, there are two options available to the PMS.

The initial choice is to utilize the **“Upload File”** module for a direct file submission, offering a simple and direct method for uploading files. The alternative approach involves employing the UI/UX, specifically the **“Fill Form”** module, which entails completing a form to assist users in uploading files.



Users can opt for either of the two i.e. CTR Fill Form or CTR File Upload.


UPLOAD FILE:


CTR UPLOAD:

Portfolio Managers are responsible for submitting Compliance Test Reports (CTR) to SEBI quarterly to ensure adherence to regulatory requirements. These reports play a crucial role in verifying compliance with the specified guidelines. PMS can upload these reports directly by using the interface of CTR Upload, letting them select the financial year and quarter for submission. This streamlined process enables efficient monitoring and assessment of compliance.

To upload a CTR file, follow these steps:

1. **Choose the relevant financial year and quarter:** Select the desired financial year and quarter for which the CTR report to be uploaded.
2. **Enable the submit button:** After selecting the file, the submit button will become active.
3. **Click the submit button:** Once the submit button is enabled, click on 'SUBMIT' button to initiate the upload process.

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CTR UPLOAD CTR TRACKER

Welcome / CTR / Upload File

Financial Year: 2022-23 Quarter: Q2

APPLY PREVIEW



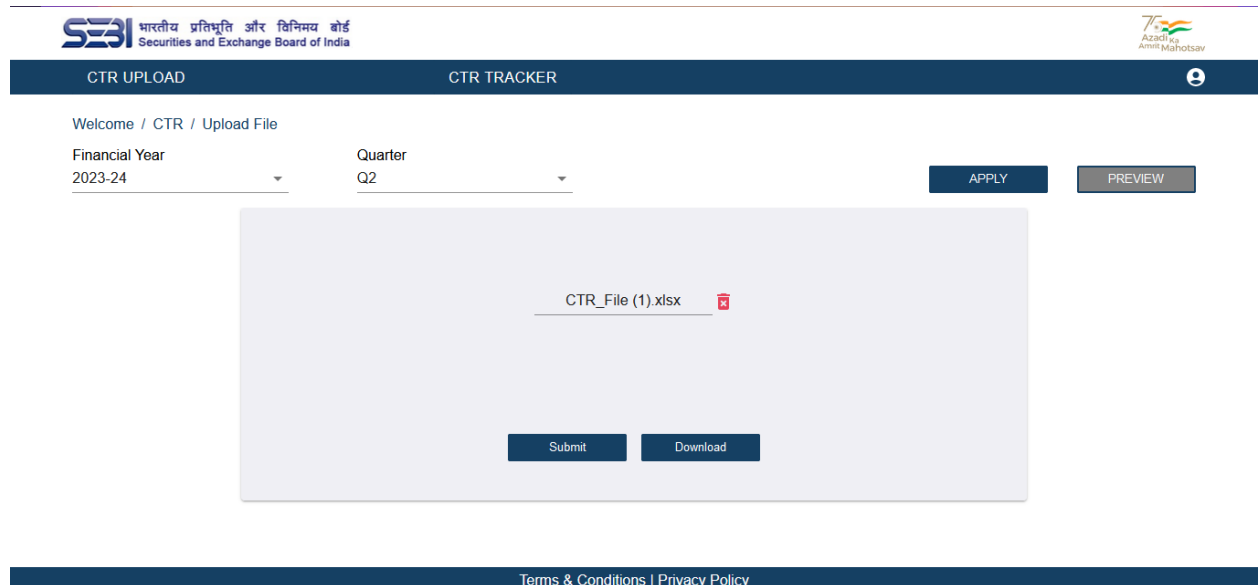
Choose the required file to upload

Download Template Submit

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NOTE: The file which will be uploaded must be in **.xlsx** format. The format of CTR File to be uploaded is provided in the **download** button.

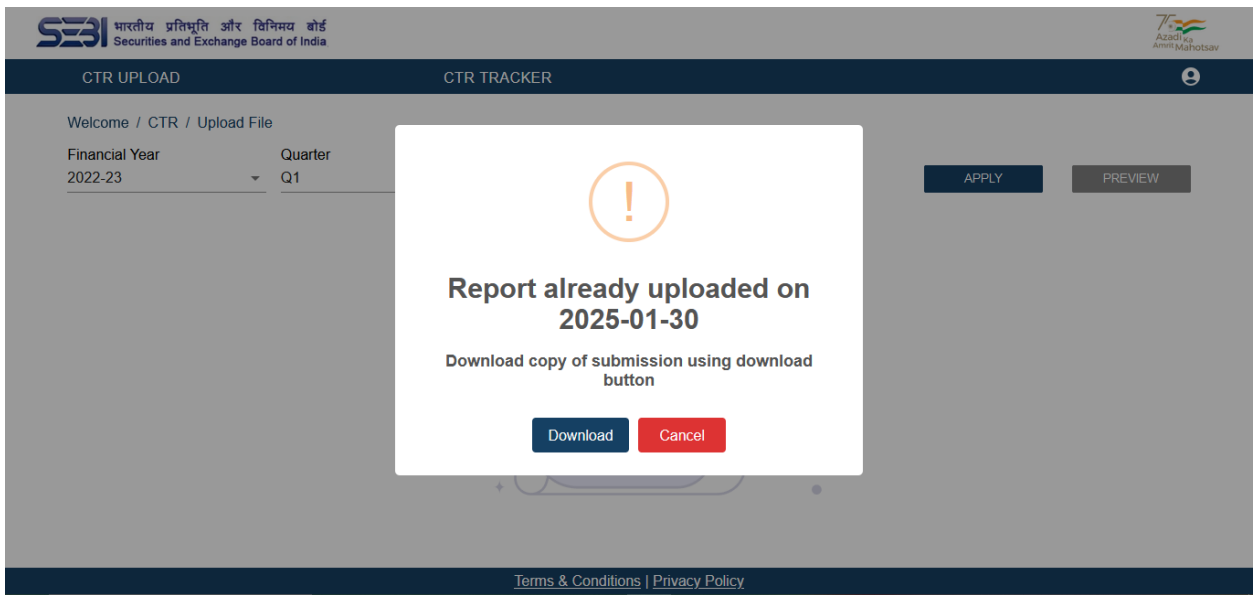
Upon selecting the desired file, the chosen file's name will be displayed.



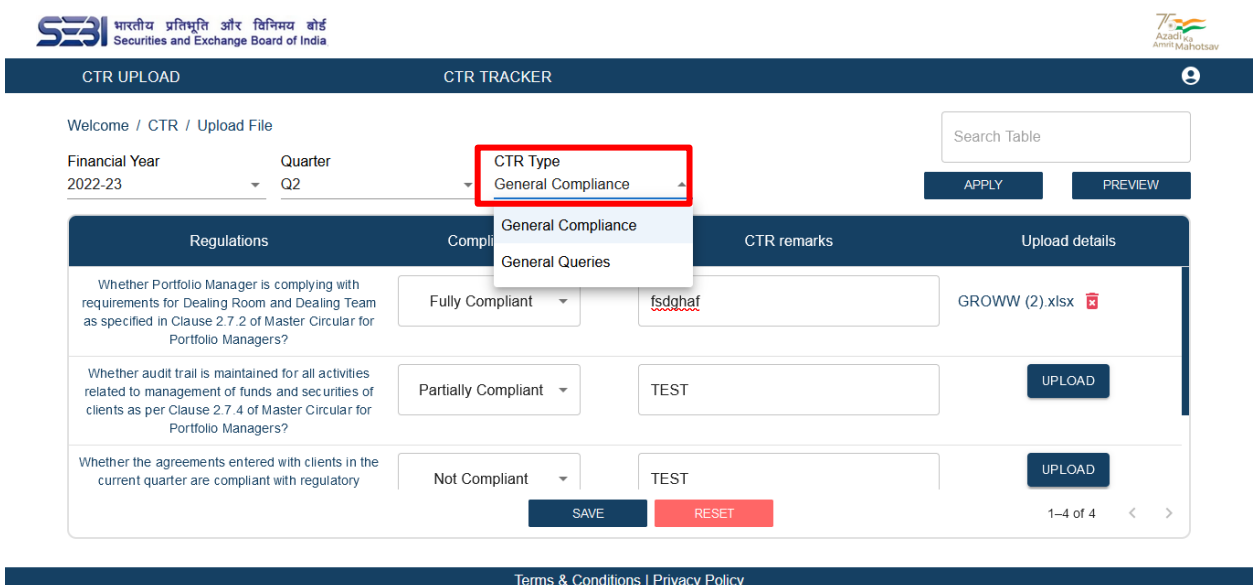
The screenshot shows the SEBI (Securities and Exchange Board of India) website interface for CTR Upload. The header includes the SEBI logo and the text "भारतीय प्रतिभूति और विनियम बोर्ड" and "Securities and Exchange Board of India". On the right, there is a logo for "75 AZADI KA AMrit Mahotsav". The main navigation bar has "CTR UPLOAD" and "CTR TRACKER" tabs. Below the navigation, the breadcrumb "Welcome / CTR / Upload File" is visible. The form contains two dropdown menus: "Financial Year" with "2023-24" selected and "Quarter" with "Q2" selected. To the right of these dropdowns are "APPLY" and "PREVIEW" buttons. A large light gray box in the center displays the filename "CTR_File (1).xlsx" with a red trash icon to its right. Below this box are "Submit" and "Download" buttons. At the bottom of the page, there is a dark blue footer bar with the text "Terms & Conditions | Privacy Policy".

Upon clicking the **“Submit”** button, it will be redirected to a page that displays the content of the previously uploaded file. This allows the user to review and potentially manipulate the input data as needed and upload any file if needed.

NOTE: *If a user attempts to upload a file for a financial year and quarter that has previously been submitted, the system will display a message informing the user that the **“Report already uploaded”** for that specific time period. This functionality is designed to prevent accidental or duplicate submission of reports, ensuring the integrity and consistency of the data maintained by the system. You can also download the submitted report using **“Download”** button.*



Upon entering the necessary input in the field, click the **“SAVE”** button to store the modifications, and a confirmation message will appear stating **“Data has been saved successfully”**. Click the **“RESET”** button to reset all the changes done previously. This will reset the previously saved modifications and cannot be reverted back.



Welcome / CTR / Upload File

Search Table

Financial Year
2022-23

Quarter
Q2

CTR Type
General Queries

APPLY

PREVIEW

Regulations	Compliance status	CTR remarks	Upload details
Was the Portfolio Manager's website not accessible for any period during the current quarter?	Yes	TEST	UPLOAD
Whether any warning/deficiency/advisory/observation was issued to the Portfolio Manager in previous quarter? If yes, provide action taken report for compliance with the same.	No	TEST	UPLOAD
Whether the Portfolio Manager, its principle officer, its director, promoter, partners and key management persons by whatever name called are	Yes	test	UPLOAD

SAVE RESET 1-3 of 3 < >

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Upon clicking the "PREVIEW" button, the entire preview will be displayed, user can proceed to click the "SUBMIT" button to submit the file. User can also click "UPLOAD" button to avail the option to upload any additional support document.

PMS Code:

INP000005190

PMS Name

1729 ADVISORS LLP

General Compliance

General Queries

Please find the upload option available to attach additional documents. Upload additional documents in zip format.

BACK

UPLOAD

SUBMIT

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PMS Code: INP000005190

PMS Name: 1729 ADVISORS LLP

General Compliance

Regulations	Compliance status	CTR remarks	Uploaded details
Whether Portfolio Manager is complying with requirements for Dealing Room and Dealing Team as specified in Clause 2.7.2 of Master Circular for Portfolio Managers?	Fully Compliant	fsdghaf	GROWW (2).xlsx
Whether audit trail is maintained for all activities related to management of funds and securities of clients as per Clause 2.7.4 of Master Circular for	Partially Compliant	TEST	-

i Please find the upload option available to attach additional documents. Upload additional documents in zip format.

BACK UPLOAD SUBMIT

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After the PMS submits the CTR file, the following occurs:

- The submitted CTR file details are reflected on the CTR Tracker page, providing a centralized view of the uploaded reports.
- Upon successful submission of the CTR file, an email notification is automatically sent to the PMS Principal officer and the respective SEBI officer. This email informs them about the completion of the CTR file upload process.

CTR TRACKER:

Once all the Compliance Test Report (CTR) reports are uploaded by the Portfolio Management Service (PMS) in the CTR Upload page, PMs can track the actions taken by SEBI in the CTR Tracker page. SEBI may request further clarification if needed, initiating a conversation until the report achieves compliance. The CTR Tracker page serves as a platform for monitoring the progress of the reports, any actions taken by SEBI, and any ongoing communication or clarification requests between SEBI and the PMS.

Select the desired **"Financial Year"** from the dropdown menu and then select the corresponding **"Quarter"**, click on the **"APPLY"** button to track the regulations and particulars for the chosen financial year and quarter.

The screenshot shows the SEBI CTR Tracker interface. At the top, there is a navigation bar with 'CTR UPLOAD' and 'CTR TRACKER' tabs. Below this, there is a search bar and a breadcrumb trail 'Welcome / CTR / Tracker'. The main area features two dropdown menus for 'Financial Year' (set to 2022-23) and 'Quarter' (set to Q1). To the right of these dropdowns are two buttons: 'APPLY' and 'FILTER', both highlighted with red boxes. Below the filters is a table with three columns: 'Particulars', 'Details', and 'Status'. The table contains three rows of data, each with a 'View' button in the 'Details' column. The first row is 'Certification programme for agents/distributors of mutual funds units and employees of mutual funds' with status 'open'. The second row is 'Registration of Intermediaries (Distributors)' with status 'closed'. The third row is 'Risk Management System in areas of operations like Fund Management, operations, customer service, market and distribution, disaster recovery and business contingency etc.' with status 'open'. At the bottom of the table, there is a pagination control showing 'Rows per page: 100' and '1-55 of 55'. The footer contains 'Terms & Conditions | Privacy Policy'.

Particulars	Details	Status
Certification programme for agents/distributors of mutual funds units and employees of mutual funds.	View	open
Registration of Intermediaries (Distributors).	View	closed
Risk Management System in areas of operations like Fund Management, operations, customer service, market and distribution, disaster recovery and business contingency etc.	View	open

- **Action Buttons:**

- **APPLY Button:** Apply the changes made
- **View Button:** Redirect you to the view page where it will display the particulars, Compliance status, and the back and forth conversation between the PMS and SEBI.

To add comments, select the "**Add Comment**" button, enter the comments, click on "**Upload**" button to attach any required files, and finalize by selecting the "**Send**" button.

- **Filter Button:** It will show the data by refining or narrowing down the existing data displayed on the page.

FILL FORM:

Within the Fill Form module, users can utilize the user-friendly interface (UI) and enhanced user experience (UX) to seamlessly upload files directly. This streamlined process ensures that all uploaded files and associated data are accurately reflected on the CTR Tracker page.

Steps to fill a form in Fill form Module:

1. Select desired Financial Year, Quarter.
2. Select CTR Type and then click on the 'APPLY' button.
3. Provide input for Compliance status, compliance percentage, and other required fields.
4. Click on the 'SAVE' button to save the entered information.
5. Click on the "RESET" button to reset all the changes and to start fresh.

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CTR UPLOAD CTR TRACKER

Welcome / CTR / Fill Form

Financial Year: 2022-23 Quarter: Q3 CTR Type: General Compliance

Search Table

APPLY PREVIEW

Regulations	Compliance status	CTR remarks	Upload details
Whether Portfolio Manager is complying with requirements for Dealing Room and Dealing Team as specified in Clause 2.7.2 of Master Circular for Portfolio Managers?	Select Status	Enter Comment	UPLOAD
Whether audit trail is maintained for all activities related to management of funds and securities of clients as per Clause 2.7.4 of Master Circular for Portfolio Managers?	Select Status	Enter Comment	UPLOAD
Whether the agreements entered with clients in the current quarter are compliant with regulatory	Select Status	Enter Comment	UPLOAD

SAVE RESET

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Note: In case the PMS fails to upload the CTR in the stipulated time, a reminder e-mail shall be triggered to the Principal officer of the respective PMS including CEO. Additionally, an email will also be sent to the SEBI, informing them about PMS's failure to submit the report on time.

This process ensures that there is proper tracking and accountability for the timely submission of compliance reports by the PMs. The automated email notifications help to promptly escalate any delays or non-compliance to the relevant parties, enabling SEBI to take appropriate action if required.

User Profile:

The profile section can be accessed by clicking on the icon on the top right corner of the top bar.

This page reveals necessary information on user's identity.

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SUBMISSION PAGE TRACKER PAGE

Profile Page

User Profile

User Type:	PMS
PMS:	INP000005190
APMI Id:	bikashkumar.sethy@kfintech.com

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FAQs:

Q. Want to go for “CTR File Upload”, but “CTR Fill form” option is visible, can I move to “CTR File Upload” again, and vice versa ?

Ans: Definetely, yes. Move to CTR file upload again. Click on Reset button. You will be able to visualize the file upload part once again and vice-versa.