



**CLARIFICATION NOTE ON INDICATIVE LIST OF INFRASTRUCTURE ADEQUACY OF A
PORTFOLIO MANAGER/APPLICANT**

Sr. No.	Particulars	Clarification by APMI
a)	PMS Applicants should have independent infrastructure. If an entity has other SEBI/ other regulator registrations, it should be ensured that appropriate mechanism is in place, to avoid conflicts, if any arising out of such multiple registrations.	1. In furtherance to queries received from members and discussion with SEBI, please note there is no dealing room requirement stated by SEBI for AIF; 2. The said requirement of infrastructure is not applicable to Co-investment PMS.
b)	Registration Certificate of the PMS should be prominently displayed at an appropriate place preferably at visiting area, reception or sitting area in office premises, where it can be seen by visitors. New applicants should indicate the designated space to SEBI team on pre-registration visit. For registered PMS, the same shall be verified during any subsequent site visit.	No clarification required
c)	There should be a board approved policy in place for defining roles and responsibilities of employees engaged in Fund Management, Dealing, Compliance and Risk Management.	No clarification required
d)	Designated staff of PMS should have independent space to function.	Designated staff refers to the Principal Officer, Compliance Officer and an additional employee referred in point (e) of the PMS Regulation 2020.
e)	Dealing room should be set up by the PMS/ applicant for exclusive use for trading activities of PMS. Dealing room should have computer facilities and other devices to be used for activities related to trade execution only. No other software should be installed in such devices.	Dealing room referred here is at an entity level.
f)	Only authorized personnel should have access to the dealing room. Entry and exit to dealing	An "Authorized Personnel" includes a Dealer, the



	room should be monitored to prevent unauthorized access.	Principal Officer, the Fund Manager having equivalent qualifications to a Principal Officer. Entry to the dealing room is restricted to authorised personnel during trading hours only.						
g)	<p>Dealing room set up should be opaque and CC cameras should be installed enabling monitoring of activities in the dealing room including entry and exit to the dealing room. The CC camera may be recorded during trading hours only and the recordings <u>should be preserved for a period not less than 3 financial years.</u></p> <p>Applicability of this provision for Portfolio Managers is as per the table below:</p> <table border="1"> <thead> <tr> <th>AUM of Portfolio Managers (Rs. in Crore)</th> <th>Applicability from</th> </tr> </thead> <tbody> <tr> <td>≤ 1000</td> <td>01.10.2025</td> </tr> <tr> <td>>1000</td> <td>01.04.2025</td> </tr> </tbody> </table> <p>The records may be stored on a separate hard drive. The back up on hard drive may be taken on a weekly or monthly basis.</p>	AUM of Portfolio Managers (Rs. in Crore)	Applicability from	≤ 1000	01.10.2025	>1000	01.04.2025	<p>1. For the applicability of this provision, the AUM has to be considered as on 28th February'25 for current FY.</p> <p>2. Going forward, the AUM as on end of financial year i.e. as on 31st March would be considered.</p>
AUM of Portfolio Managers (Rs. in Crore)	Applicability from							
≤ 1000	01.10.2025							
>1000	01.04.2025							
h)	Access to IT or administration personnel entering the dealing room during trading hours should always be in company of one authorized personnel.	Pursuant to queries received from the members, please note a Dealer also being an Authorised Personnel, if he is present in the Dealing Room, no other Authorized Personnel is required to accompany the IT or administration personnel during trading hours.						
i)	No one should be allowed to carry any communication device inside the dealing room	No clarification						



	during trading hours. Designated e-mail should be the preferred mode of communication.	
j)	All the electronic logs such as emails and telephonic conversations recorded should be preserved for not less than a period of 8 years.	'All electronic logs' which have to be preserved for 8 years are referred to as emails and telephonic communication only which are taking place within the Dealing Room and not for the entire office.

IMPORTANT NOTE:

- The framework and the clarifications mentioned above do not override any regulations mentioned in the PMS Master Circular dated 07th June, 2024.

Warm Regards
Association of Portfolio Managers in India