

Indicative list of Infrastructure Adequacy of a Portfolio Manager/Applicant

- 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.
- 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.
- 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.
- d) Designated staff of PMS should have independent space to function.
- 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.
- f) Only authorized personnel should have access to the dealing room. Entry and exit to dealing room should be monitored to prevent unauthorized access.
- g) 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 should be preserved for a period not less than 3 financial years.

Applicability of this provision for Portfolio Managers is as per the table below:

AUM of Portfolio Managers (Rs. in Crore)	Applicability from
≤ 1000	01.10.2025
> 1000	01.04.2025

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.

- h) Access to IT or administration personnel entering the dealing room during trading hours should always be in company of one authorized personnel.
- i) No one should be allowed to carry any communication device inside the dealing room 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.
