PMS: Portfolio Management Service

USER MANUAL

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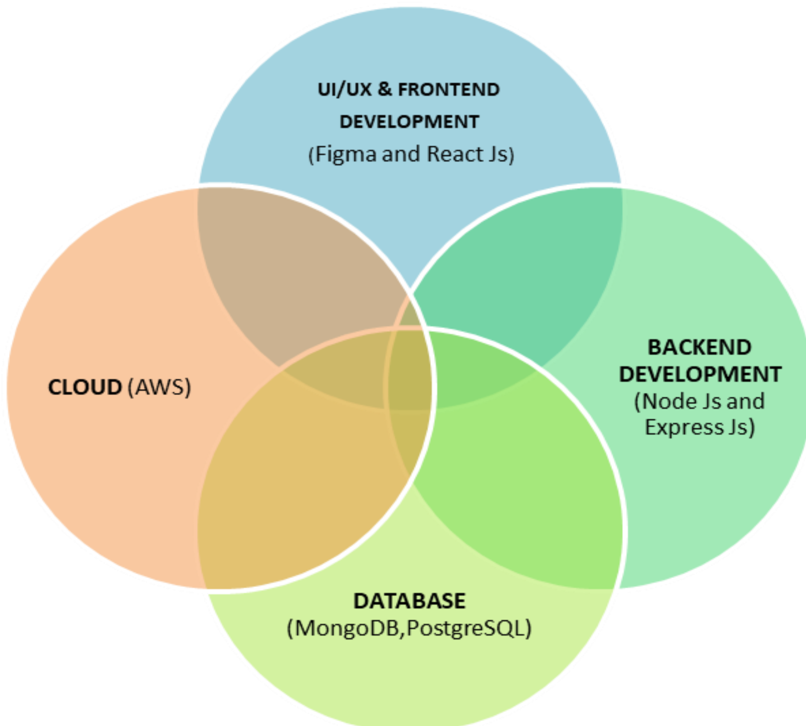
Tech Stack Used:



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. CMM 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 **CMM** (Compliance Monitoring Module) module facilitates efficient tracking and reporting of compliance activities quarterly, promoting transparency and accountability.

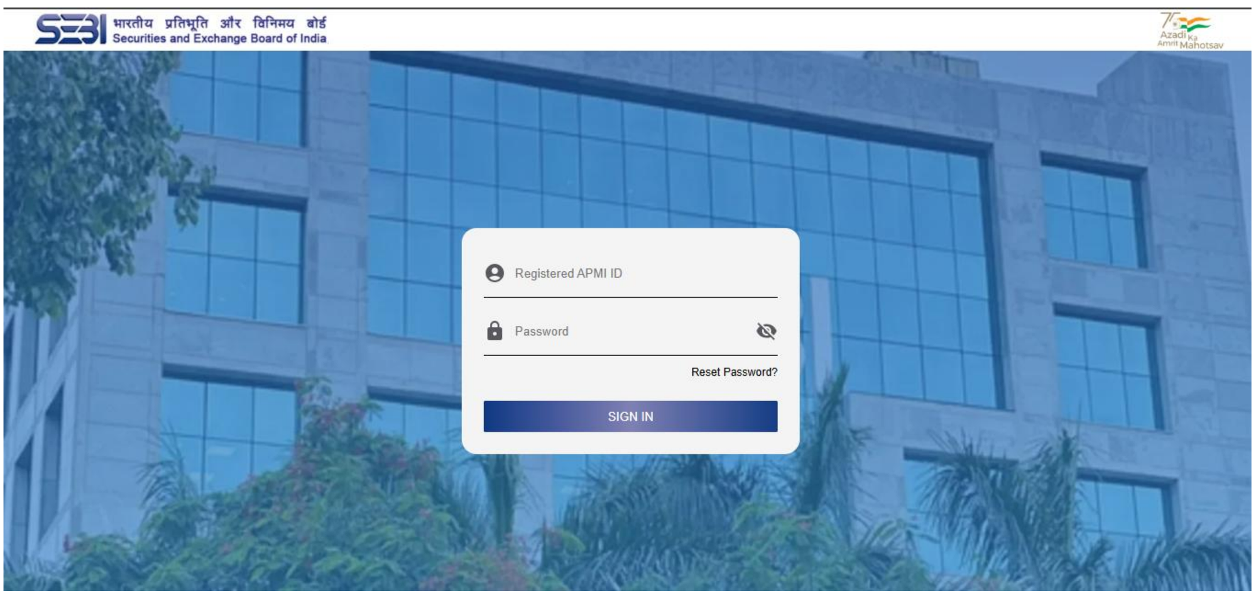
Additionally, PMS is equipped with desired capabilities, providing customizable features and functionalities to adapt to evolving regulatory landscapes and business requirements.

Login Page:

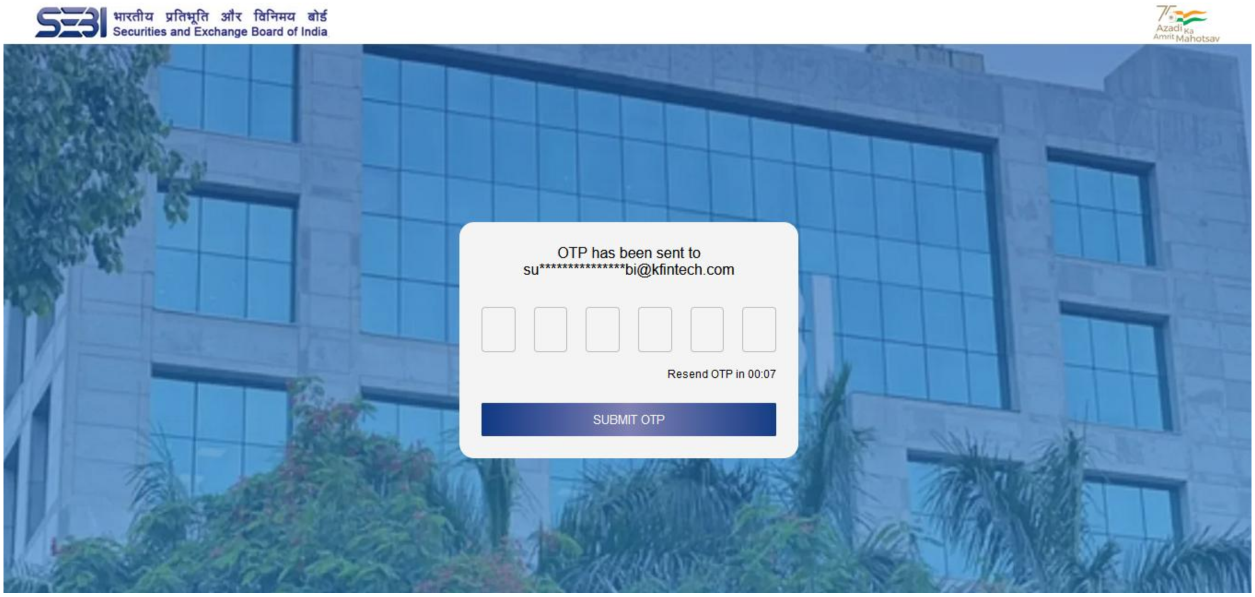
The login page serves as a secure access point for users, including SEBI and PMs to log in to their accounts on the website.

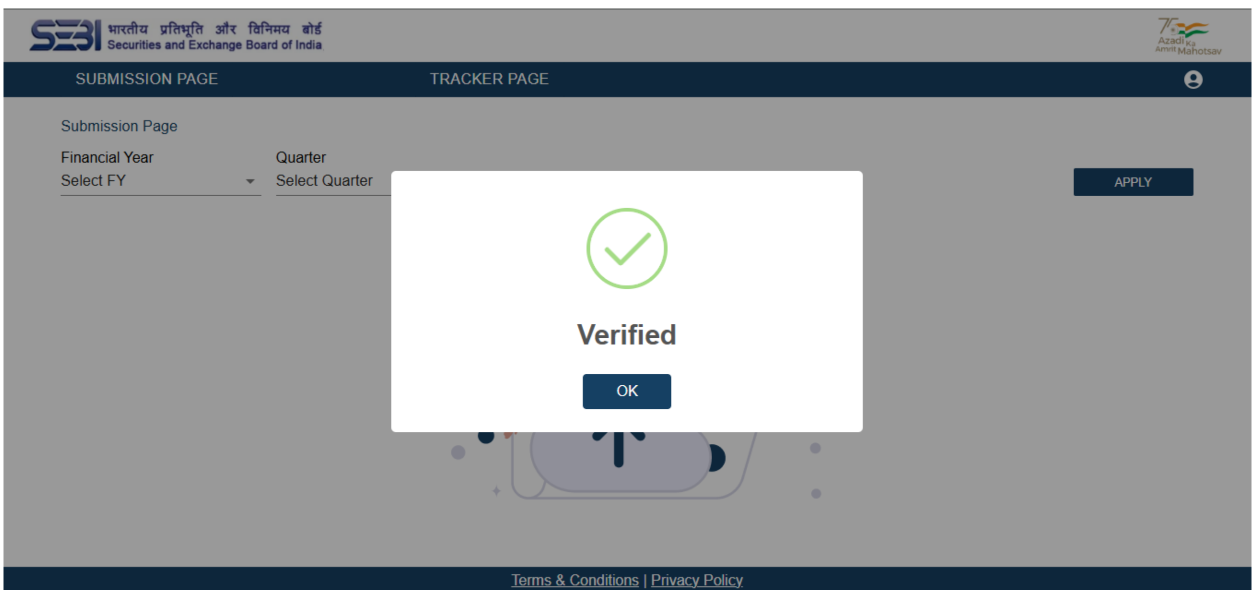
Steps to follow:

- 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 60 seconds, 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.

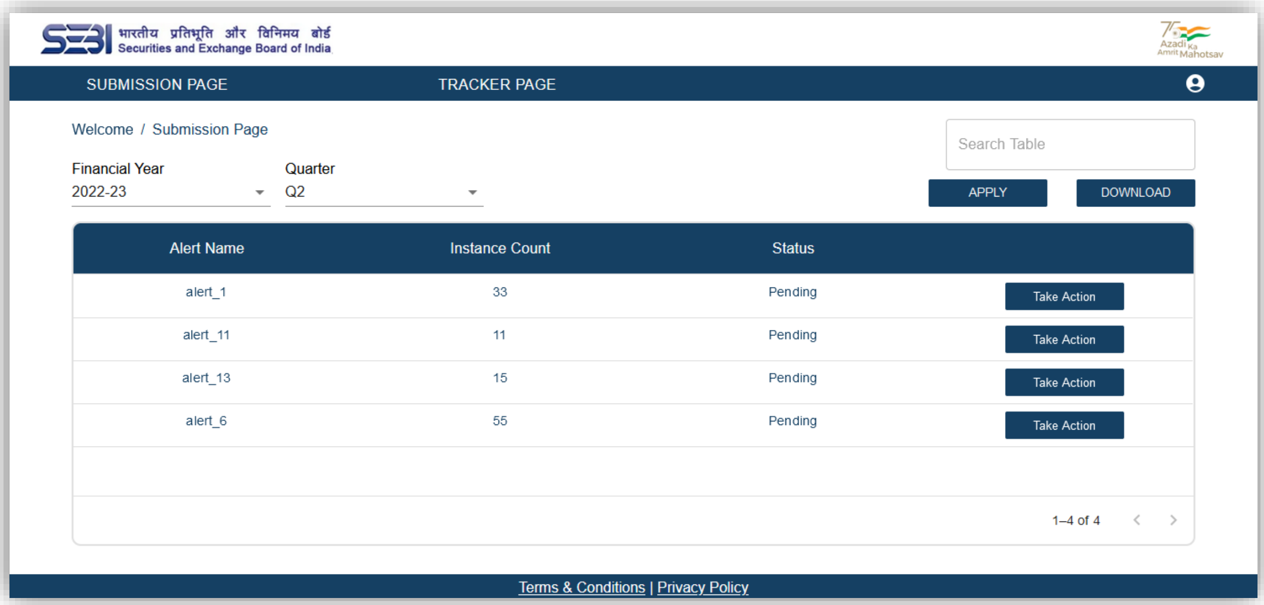
2. **CMM Module:**
   a. Allows users to upload CMM files, and track progress with SEBI.
   b. Enables users to add comments, evidence, and reports related to compliance activities.

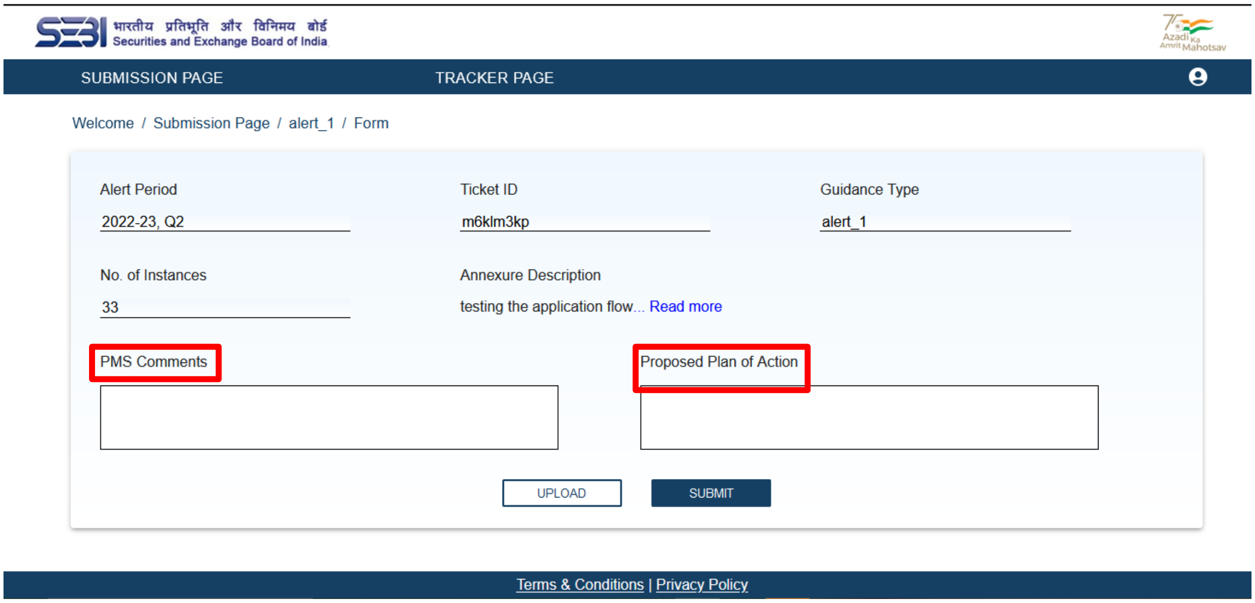
1. ALERT MODULE:

At the outset, the SEBI officer uploads a ZIP file comprising separate Excel sheets, each corresponding to a specific Portfolio Management Service (PMS). Upon successful submission, an automated email notification is promptly sent to the respective principal officer of each PMS, informing them of the upload

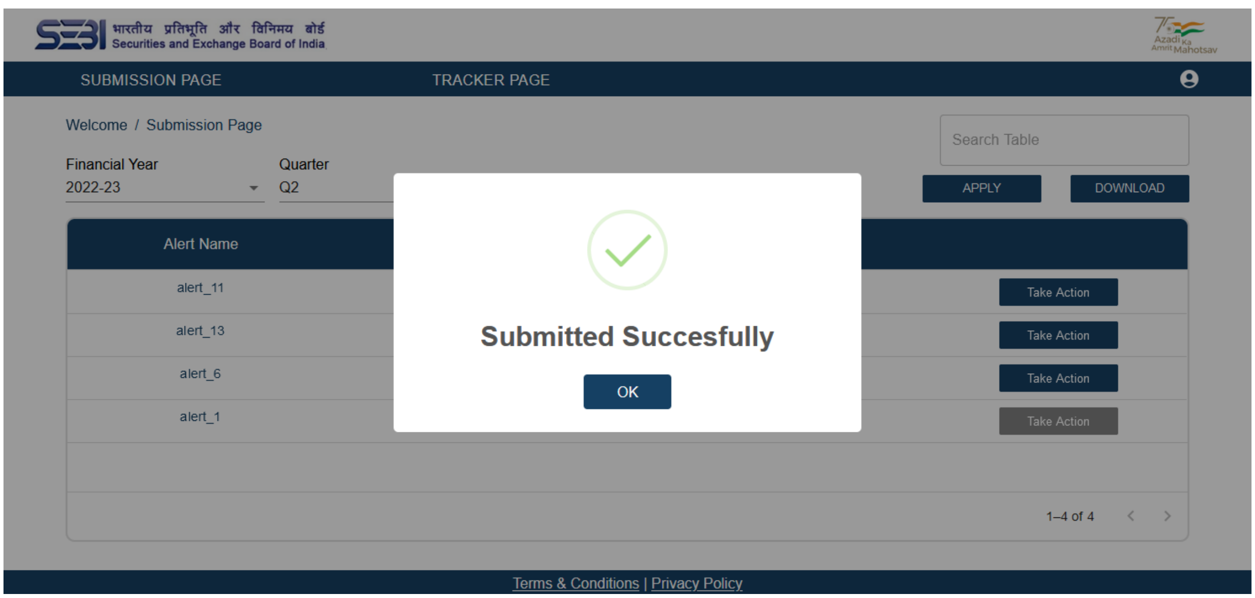
The principal officer of the PMS can subsequently navigate to the Submission Page to review the alerts issued by SEBI. For each alert, they have the option to provide detailed comments and appropriate responses. After addressing all the raised alerts, the principal officer proceeds to the Tracker Page to conduct a final review and ensure all actions have been duly completed.

Following the final review, the principal officer formally submits the addressed alerts to the designated SEBI officer for evaluation and further action.

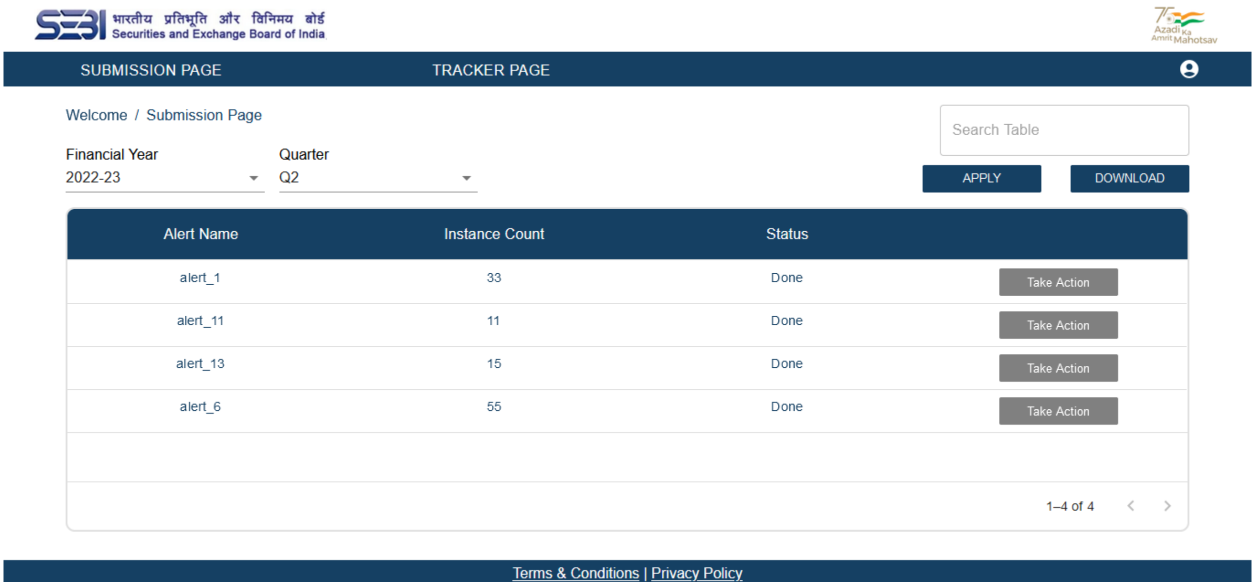




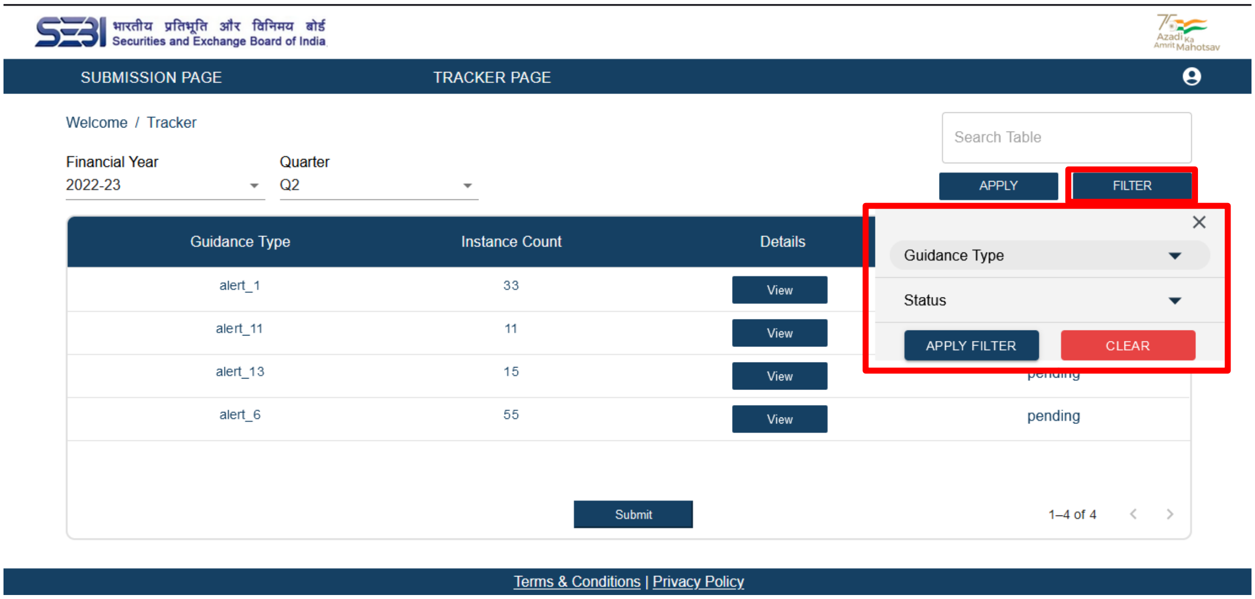
The PMS has the provision to enter their remarks under 'PMS Comments,' outline a detailed 'Proposed Plan of Action,' and upload any supporting documents. Once all inputs are provided, they can finalize the process by clicking the 'Submit' button.



After all required actions have been completed by clicking each of the 'Take Action' buttons, the 'Submit' button on the Tracker Page becomes activated, allowing the final submission to proceed.



- **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.

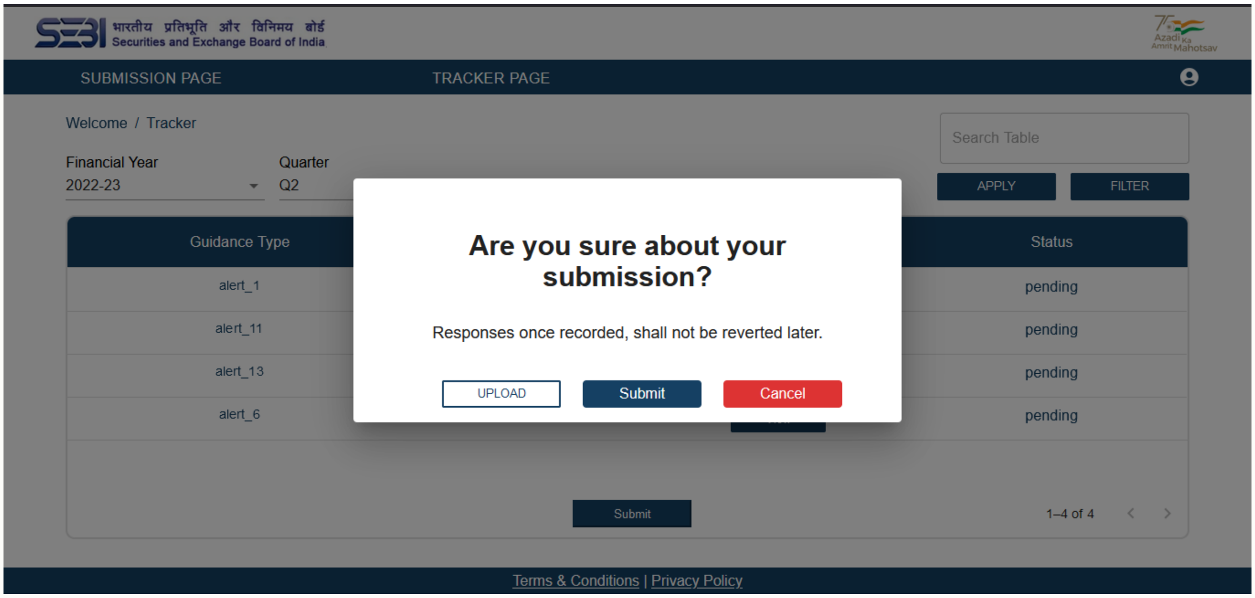


PMS can now proceed to tracker page for final submission.

TRACKER PAGE

The Tracker Page serves as a centralized dashboard for monitoring alerts issued by SEBI that require action from the PMS. Final submission is only permitted once appropriate actions have been taken for all listed alerts. Alerts that have been addressed on the Submission Page automatically appear in the Tracker Page for review.

Principal officers have the flexibility to modify or update their responses prior to final submission. By selecting each individual alert and using the "EDIT" button, they can revise comments or attached information as needed. Once all entries are verified and complete, they can proceed with the final submission by clicking the "SUBMIT" button on the Tracker Page.



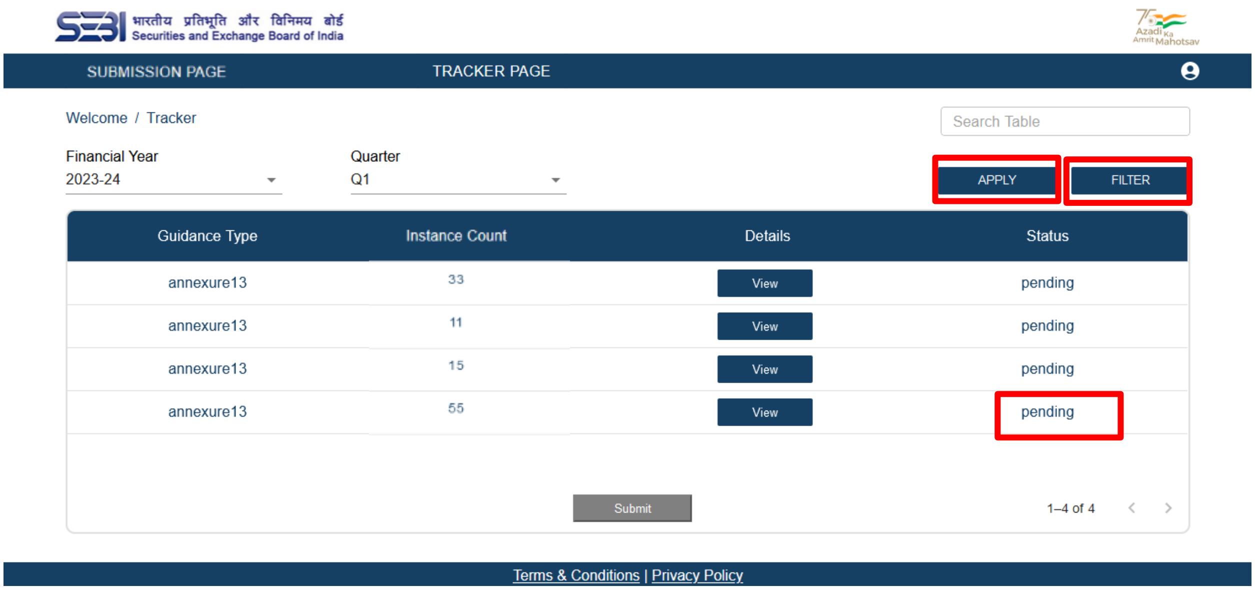
Upon final submission, the status of the submission transitions from 'Pending' to 'Open.' Once marked as 'Open,' the data becomes accessible to SEBI officers for further review and necessary action.

Note:

If the PMS fails to respond to the alerts within the prescribed timeframe, an automated reminder email will be dispatched to the principal officer as well as the CEO of the PMS. In parallel, a formal notification will be dispatched to SEBI, informing them of the PMS's non-compliance due to the delay in submitting the required responses and documentation within the designated deadline.

Escalation TAT for Alert module:

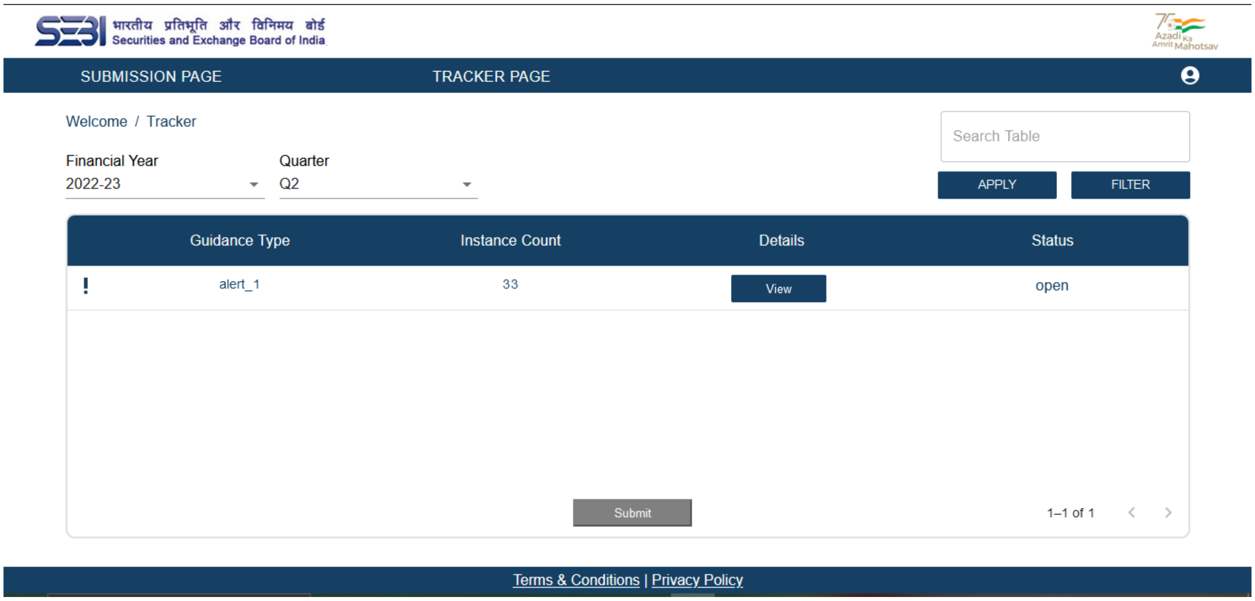
Reminder Number	Alerts – Trigger = Uploading of Alerts by Nodal SE		
1st Email	At time of Upload	Upload Intimation	Include Principal Officer email id(s)
2nd mail	14th Day since upload	Deadline Approaching email	Include Principal Officer email id(s)
3rd Email	21st Day since upload at 00:00 hrs	Deadline Reminder	Include Principal Officer email id(s)
Fourth e-mail/Repeat Email	22st Day since upload at 00:00 hrs	Non Submission Email	Include Principal Officer email id(s)
Thereafter	Every 7th Day thereafter	Non Submission Email	Include Principal Officer email id(s)



If SEBI requires additional information or clarification, the status will remain 'Open,' and the PMS will receive an email notification indicating the need for further action.

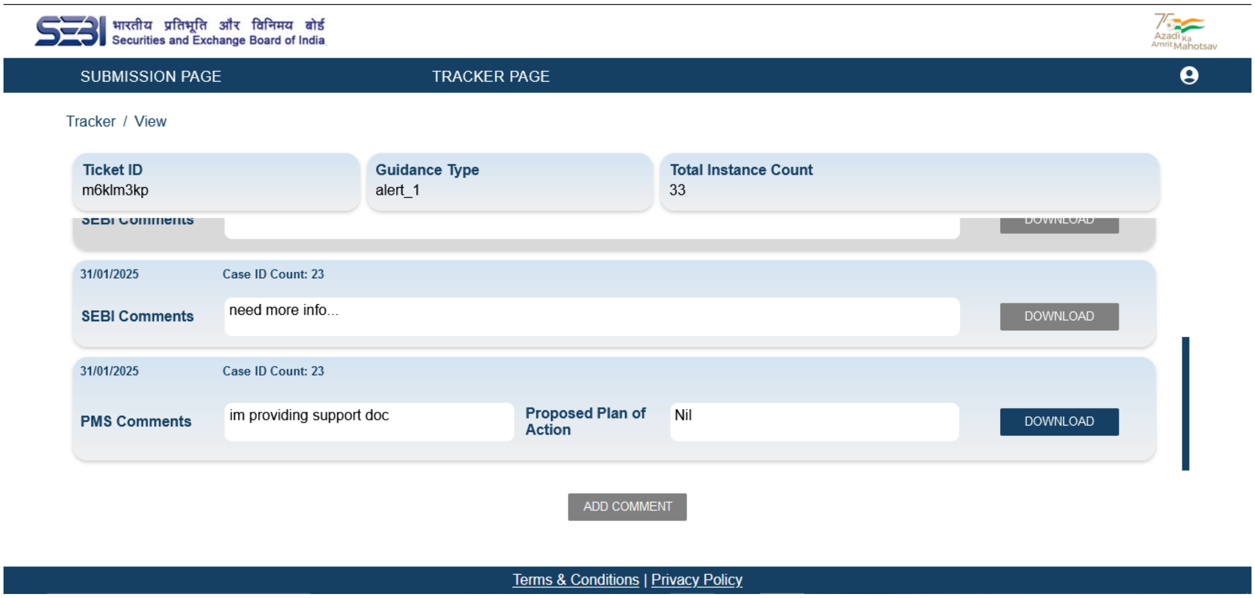
The PMS can monitor the overall progress of submissions by selecting the desired "**Financial Year**" and "**Quarter**", followed by clicking the "**APPLY**" button. Upon applying the filters, a comprehensive table displaying all relevant data and status updates will be generated for easy tracking and review.

Corresponding alerts will be marked with an exclamation mark ("!") on the Tracker Page, signaling that updates are necessary. The PMS must review SEBI's instructions provided in the comments section and respond by updating the relevant details and uploading any required documents accordingly.



This feature enables the PMS to effectively oversee the entire process, promptly detect any issues or discrepancies, and take proactive measures to guarantee timely resolution and adherence to compliance requirements.

- **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.

2. CMM 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 CMM file, there are two options available to the PMS.

The initial choice is to utilize the "**Upload File**" module for direct file submission, offering a simple and direct method for uploading template files. The alternative approach involves employing the application, 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. CMM Fill Form or CMM File Upload.

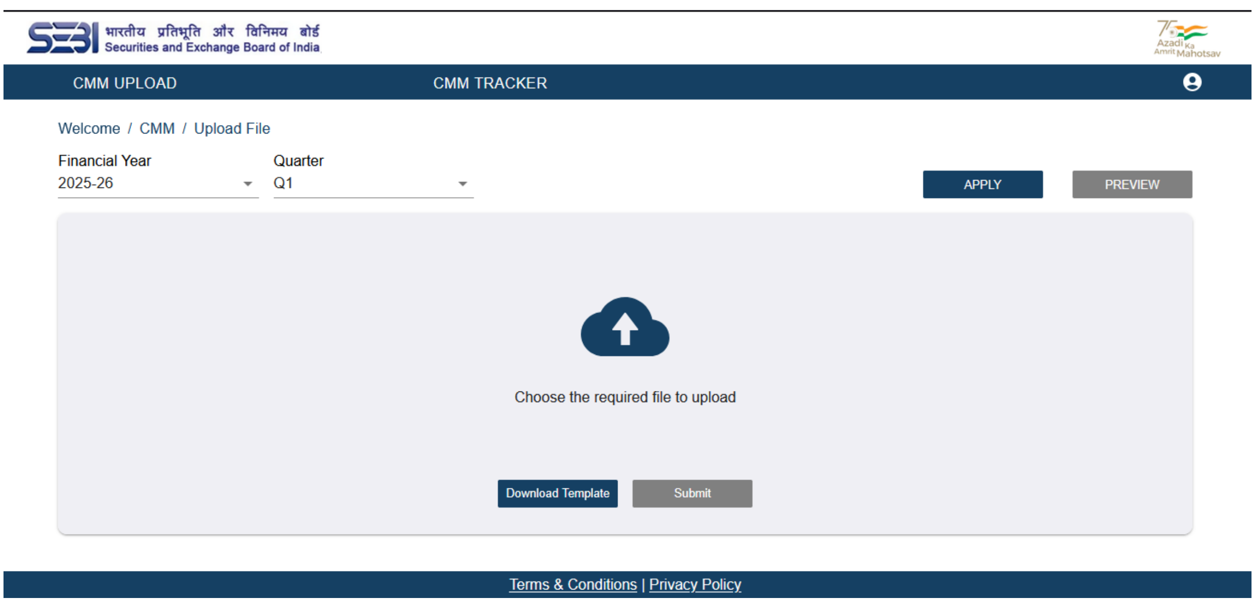
UPLOAD FILE:

CMM UPLOAD:

Portfolio Managers are responsible for submitting Compliance Monitoring Modules (CMM) 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 CMM Upload, letting them select the financial year and quarter for submission. This streamlined process enables efficient monitoring and assessment of compliance.

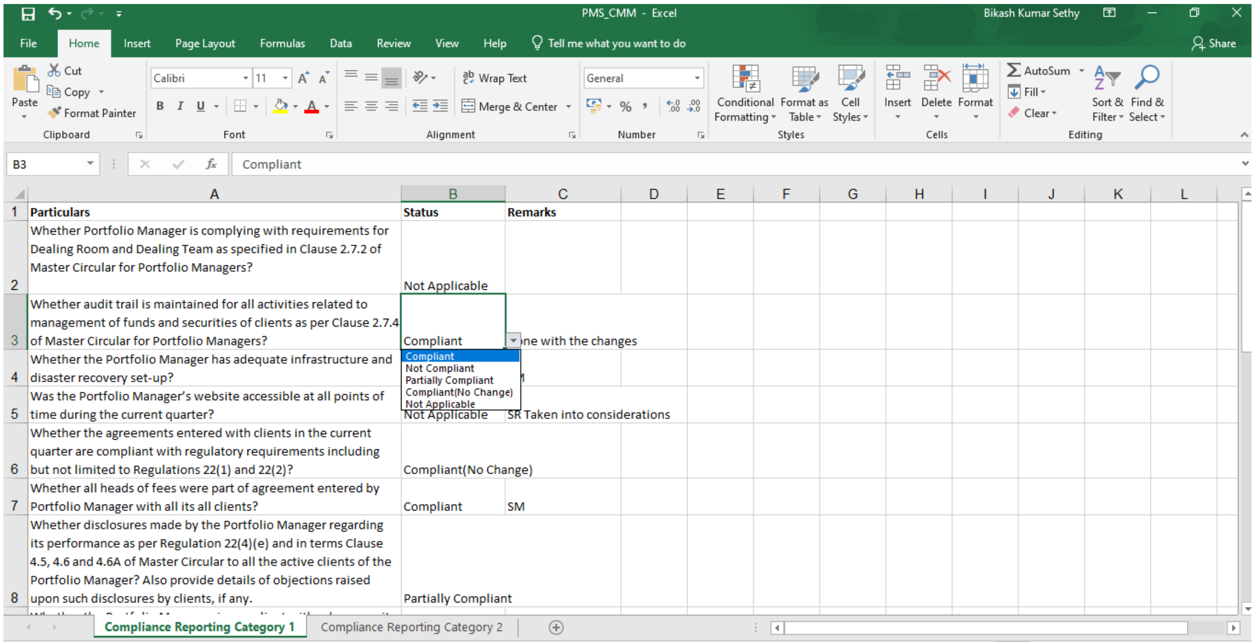
To upload a CMM file, follow these steps:

1. **Choosing the relevant financial year and quarter**: Select the desired financial year and quarter for which the CMM report to be uploaded.
2. Download the template file.



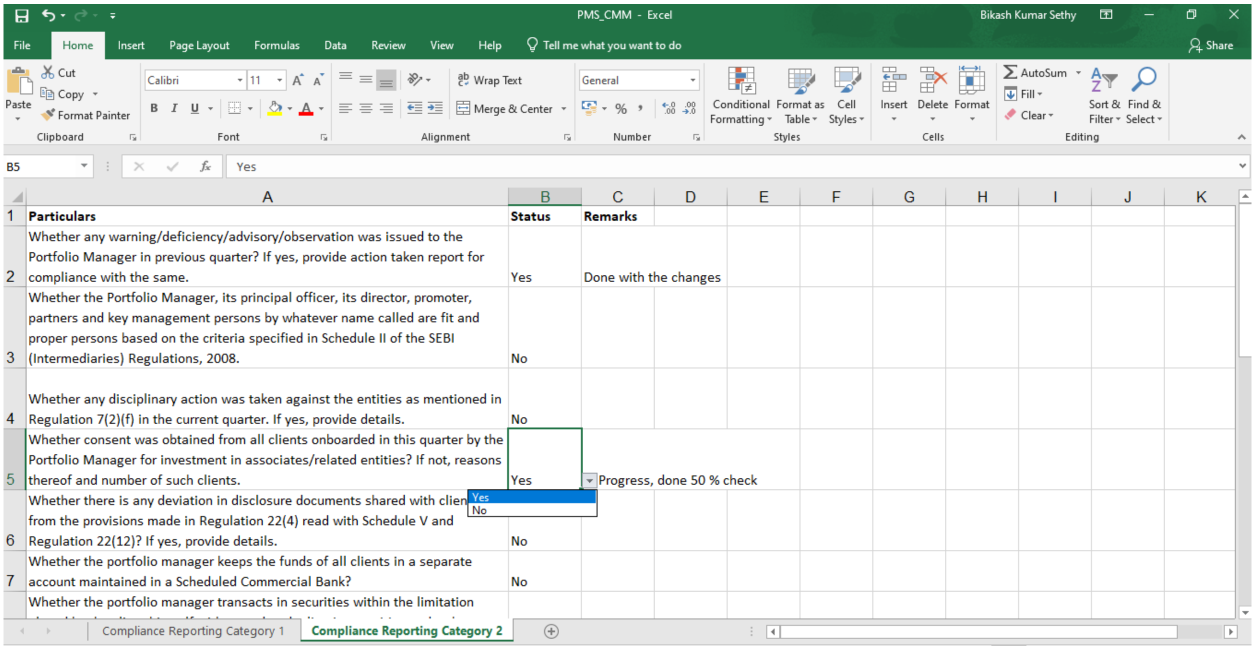
***NOTE**:* The file which will be uploaded must be in **.xlsx** format. The format of CMM File to be uploaded should be same as provided in the **download option**.

Upon opening the Excel file, the user will find two distinct worksheets: one labelled **"Compliance Reporting Category 1"** and the other **"Compliance Reporting Category 2."**



In the **Compliance Reporting Category 1** sheet, the columns are titled **Particular**, **Status**, and **Remarks**. For each particular listed, the user is required to choose an appropriate status from the following options:

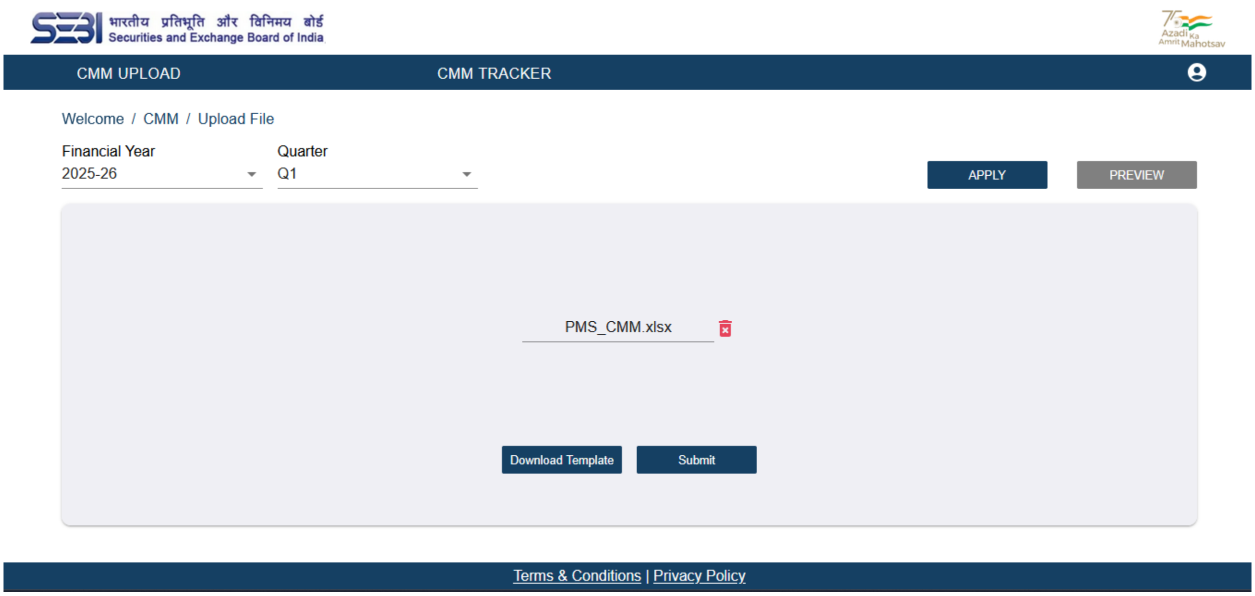
- *Compliant*
- *Not Compliant*
- *Partially Compliant*
- *Compliant (No Change)*
- *Not Applicable*



In the **Compliance Reporting Category 2** sheet, the layout is similar, with columns for **Particular**, **Status**, and **Remarks**. However, in this sheet, the user selects either *Yes* or *No* as the status for each respective item, based on the requirement.

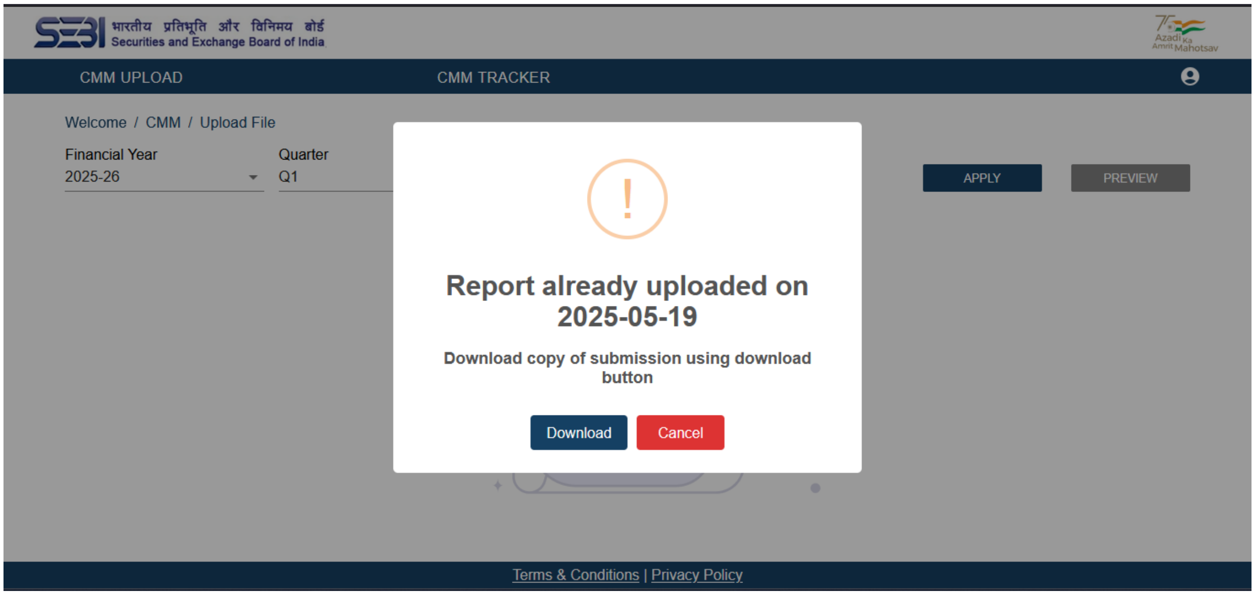
Note : Remarks are compulsory for partially compliant cases.

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

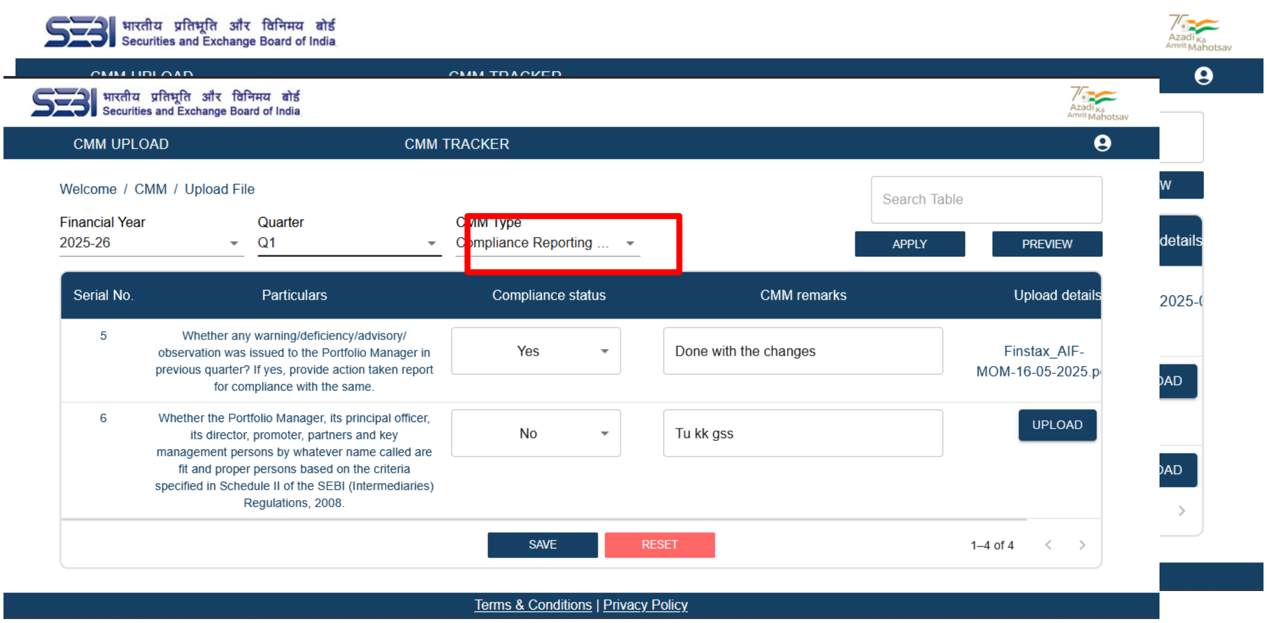


Upon clicking the “**Submit**” button, it will be redirected to a page that displays the content of the previously uploaded file. This allows the user to review and potentially manipulate the input data as needed and upload any file if needed.

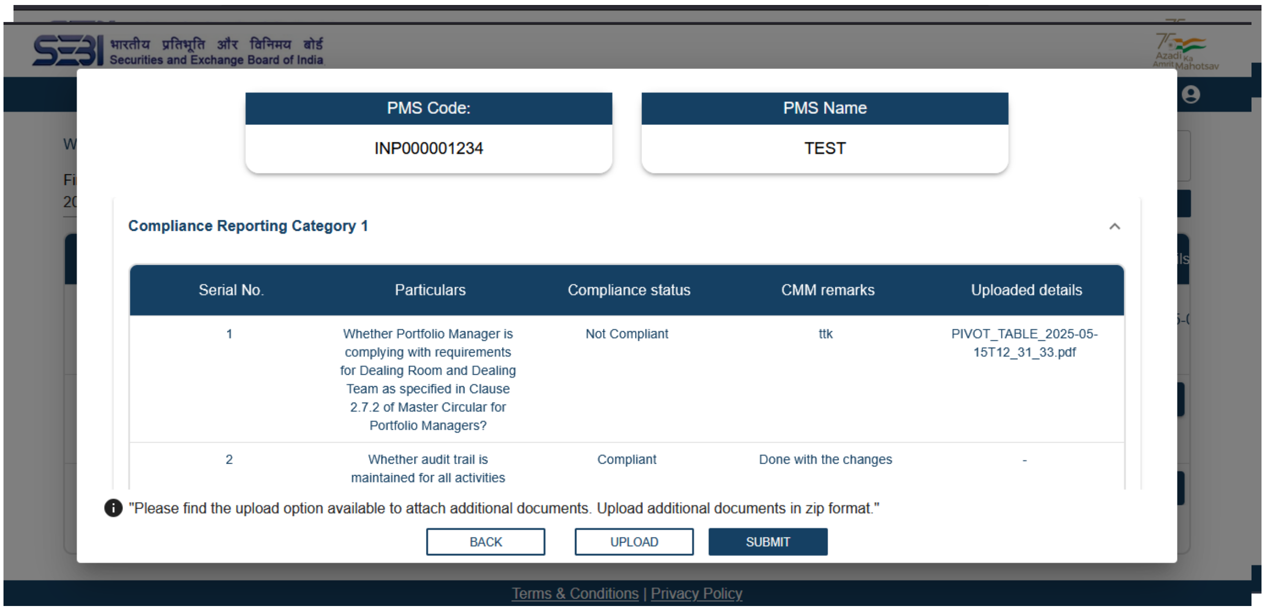
NOTE: *If a user attempts to upload a file for a financial year and quarter that has previously been submitted, the system will display a message informing the user that the "**Report already uploaded**" for that specific time period. This functionality is designed to prevent accidental or duplicate 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.*

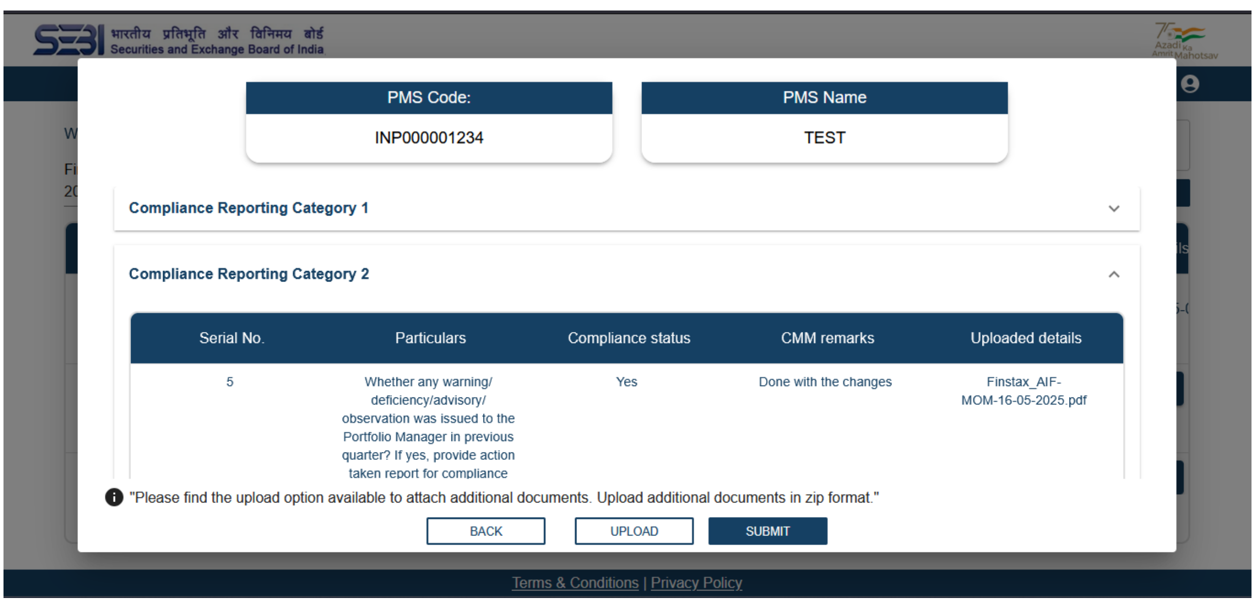


Upon entering the necessary input in the field, user needs to click the "**SAVE**" button to store the modifications, and a confirmation message will appear stating "**Data has been saved successfully**".



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 upload any additional support document.





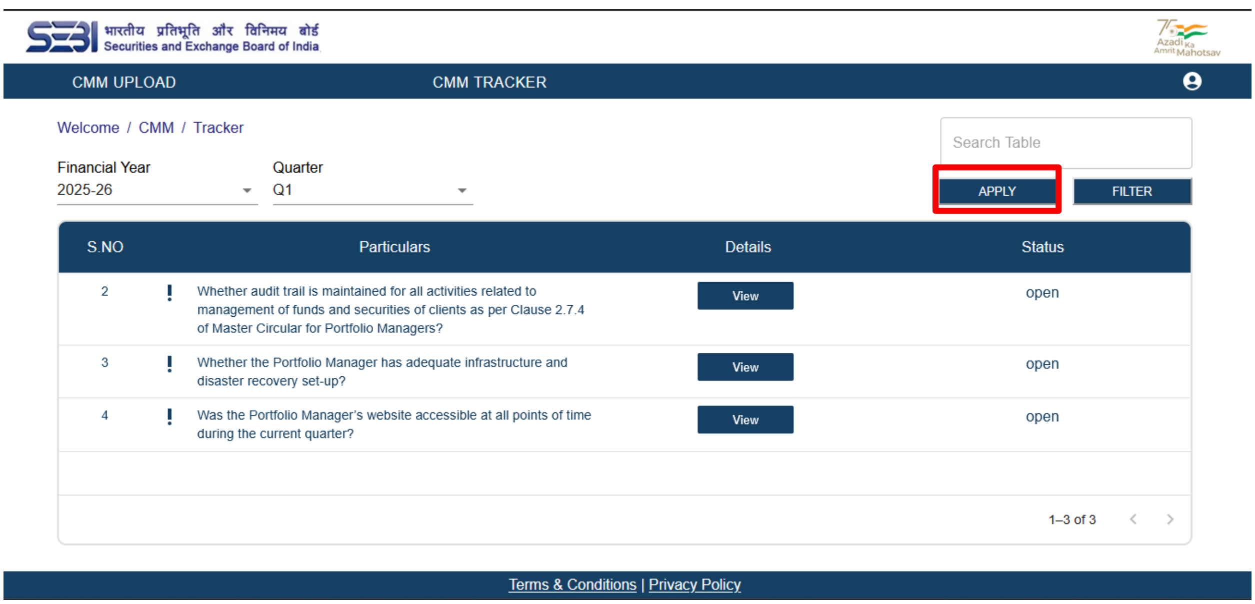
After the PMS submits the CMM file, the following occurs:

- Upon successful submission of the CMM 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 CMM file upload process.

CMM TRACKER:

Once all the Compliance Monitoring Module (CMM) reports are uploaded by the Portfolio Management Service (PMS) in the CMM Upload page, PMs can track the actions taken by SEBI in the CMM Tracker page. SEBI may request further clarification if needed, initiating a conversation until the report achieves compliance. The CMM 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 with status as "open" for the chosen financial year and quarter.



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.

Note:

- *If the PMS fails to upload the required documents within the prescribed timeframe, an automated reminder email will be dispatched to the principal officer as well as the CEO of the PMS. In parallel, a formal notification will be dispatched to SEBI, informing them of the PMS's non-compliance due to the delay in submitting the required responses and documentation within the designated deadline.*

Escalation TAT for CMM module:

Reminder Number	CMM – Deadline 21st Day after end of every Quarter		
1st Email	14th Day after end of every Quarter	Pre-Submission Reminder	Include Principal Officer email id(s)
2nd mail	21st Day at 00:00 Hrs	Deadline Reminder	Include Principal Officer email id(s)

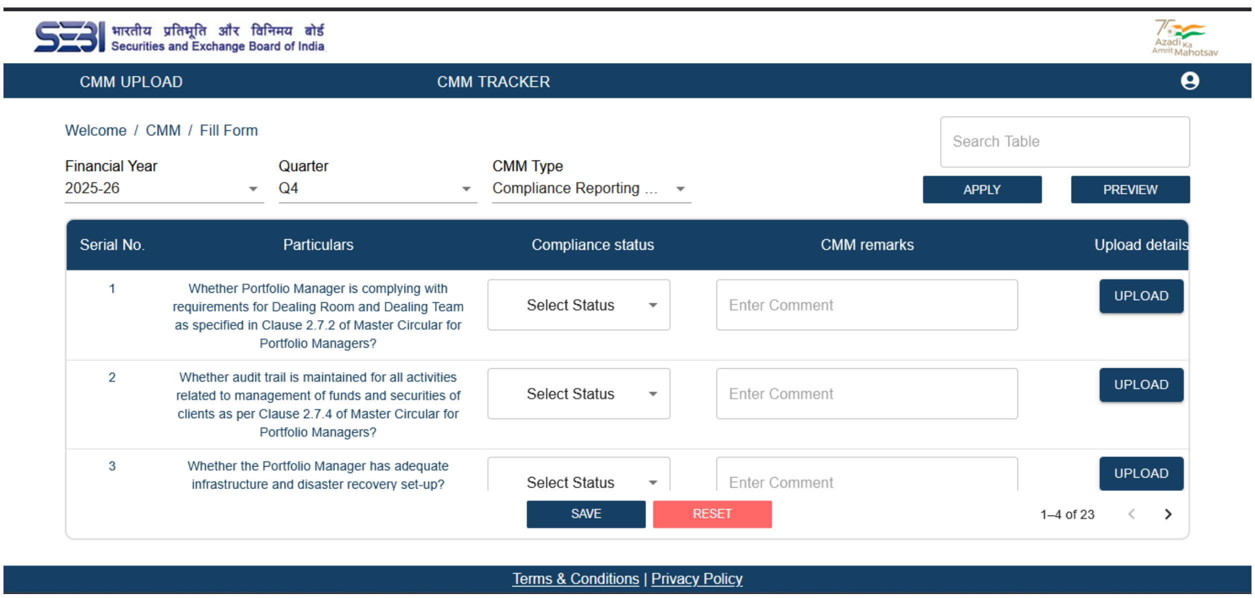
3rd Email	22nd Day at 00:00 Hrs	Non Submission Email	Include Principal Officer email id(s)
Fourth e-mail/Repeat Email	Every 7th Day thereafter	Non Submission Email	Include Principal Officer email id(s)

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 CMM Tracker page.

Steps to fill a form in Fill form Module:

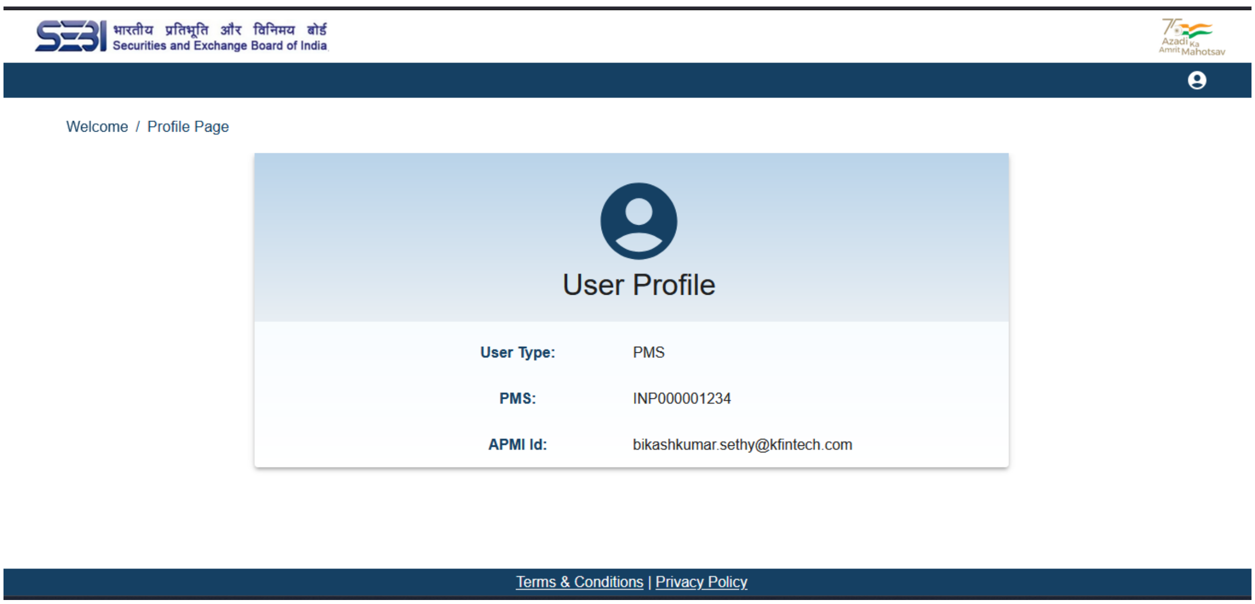
1. Select desired Financial Year, Quarter.
2. Select CMM Type and then click on the 'APPLY' button.
3. Provide input for Compliance status, compliance percentage, and other required fields.
4. User then clicks on the 'SAVE' button to save the entered information.
5. User can next click on the "RESET"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



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.



FAQs:

Q. Want to go for “CMM File upload”, but have went for option “CMM Fill Form”, can I do by “CMM File upload”, again ? Stuck ?

Ans: Yes, you can, In case user have done with CMM Fill Form, but wanted to go for CMM File upload option, follow the steps below to perform the same :

a) Move to file upload option
b) Select the required Fiscal Year and Quarter, click Apply.
c) A form page will appear, similar to the 'Fill Form' card. Use the 'Reset' button to clear the form. Upon resetting, you will be redirected to the Upload page.