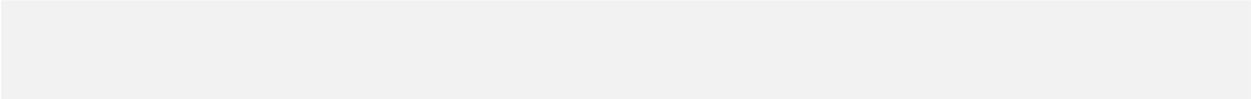


**PMS: Portfolio Management Service**

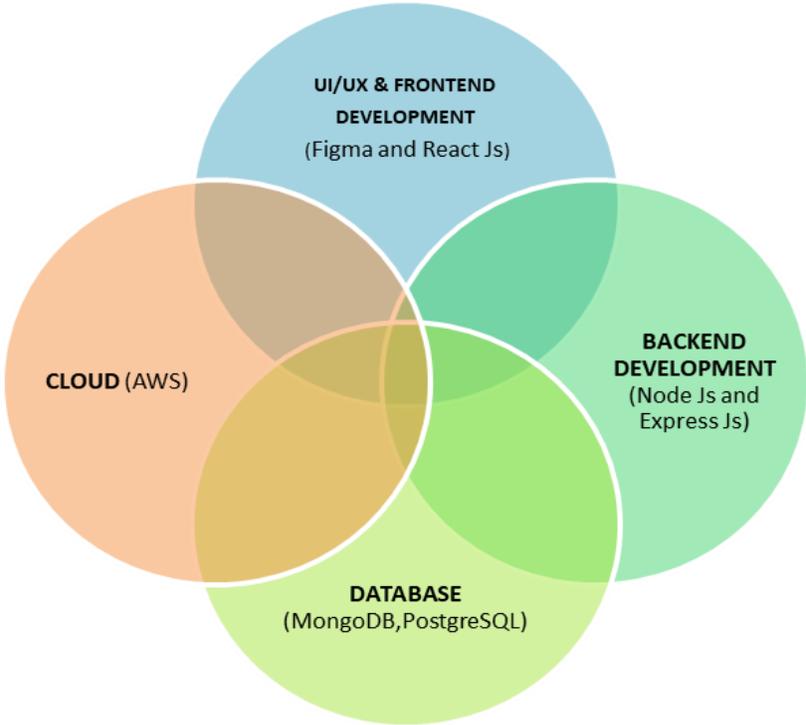
***USER MANUAL***



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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.

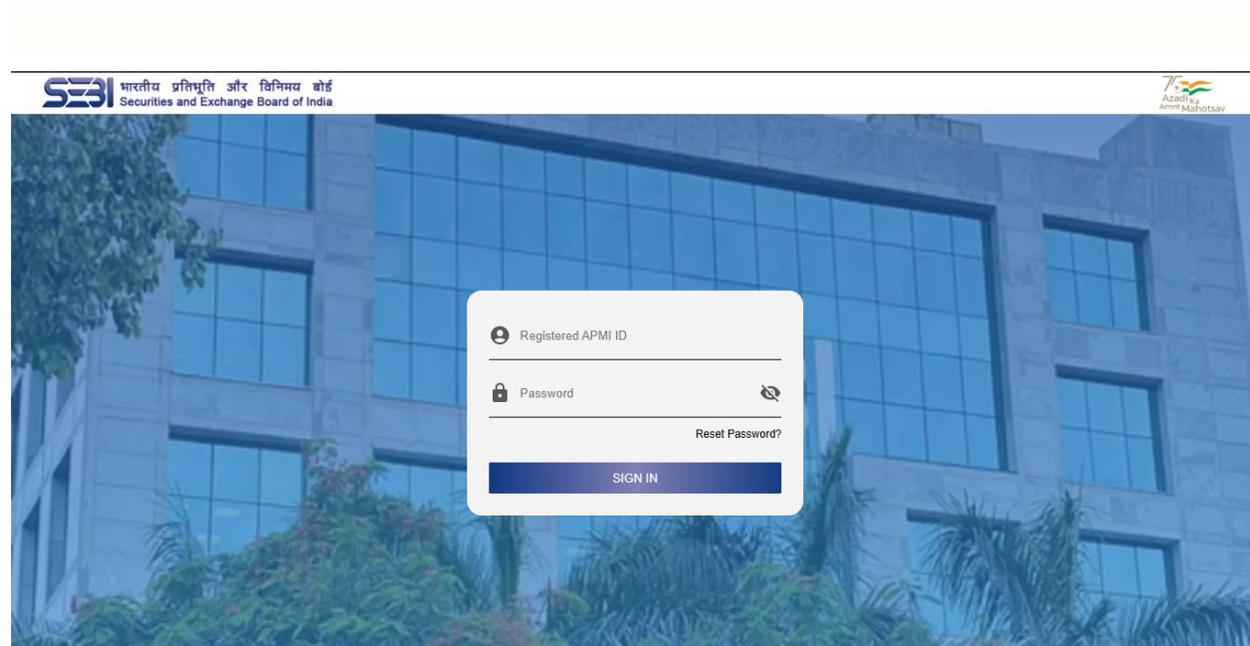
Additionally, PMS is equipped with desired capabilities, providing customizable features and functionalities to adapt to evolving regulatory landscapes and business requirements.

## Login Page:

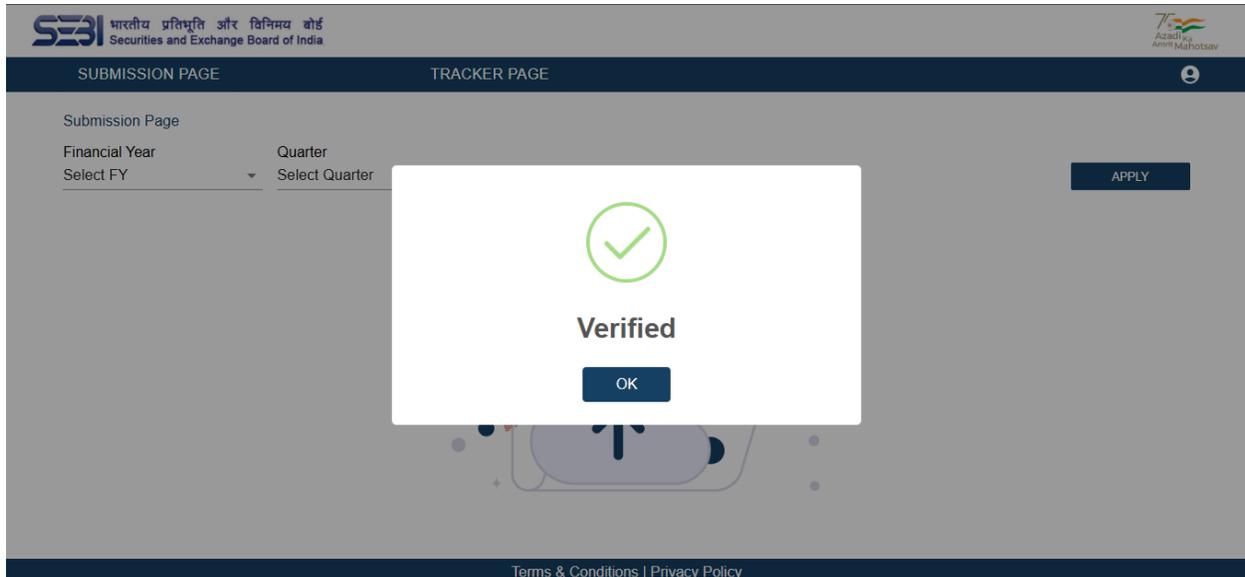
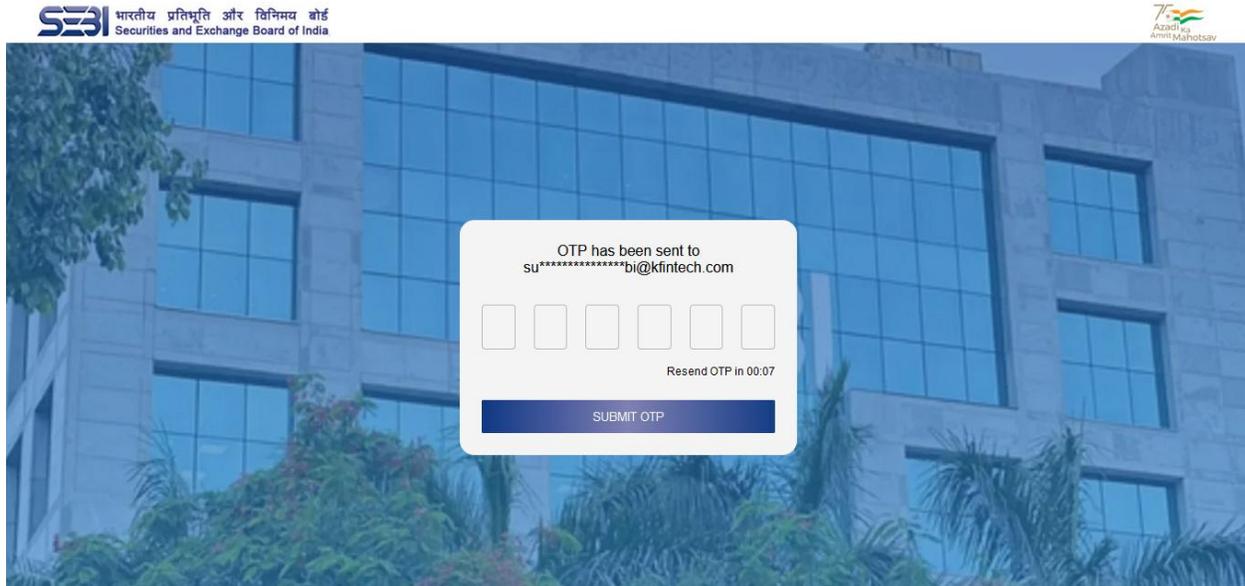
The login page serves as a secure access point for users, including SEBI and PMs to log in to their accounts on the website.

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.

Welcome Back!



Alert Module



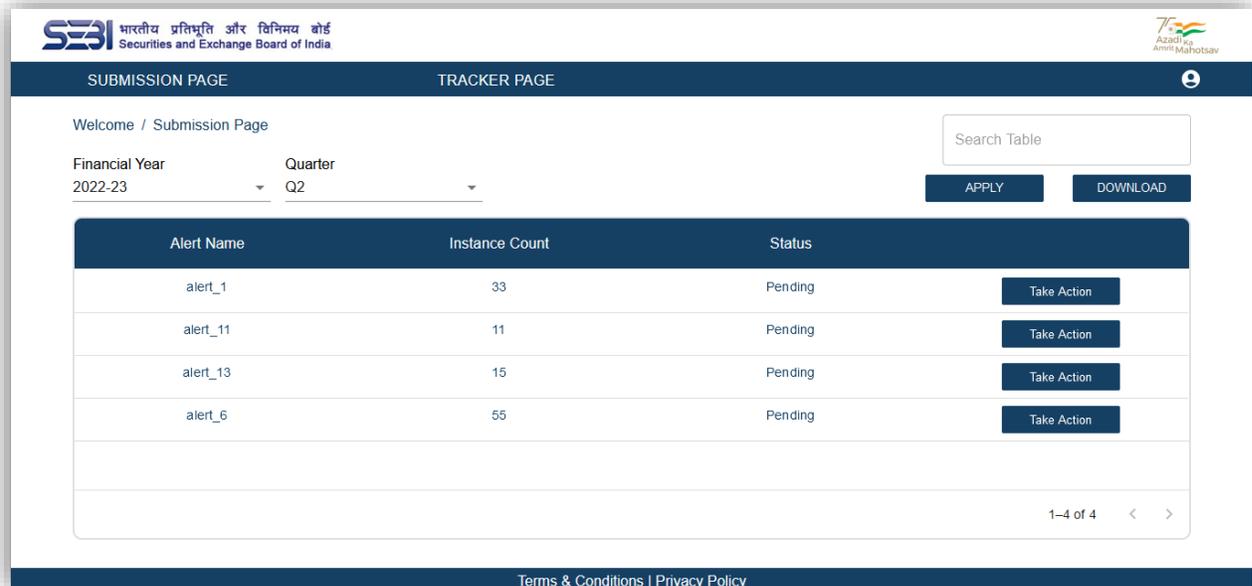
CMM Module

# 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 screenshot displays the SEBI Submission Page interface. At the top, the SEBI logo and name are visible, along with the text 'भारतीय प्रतिष्ठुति और विनिमय बोर्ड' and 'Securities and Exchange Board of India'. The page is titled 'SUBMISSION PAGE' and 'TRACKER PAGE'. Below the header, there is a search bar labeled 'Search Table' and two buttons: 'APPLY' and 'DOWNLOAD'. The main content area features a table with the following data:

Alert Name	Instance Count	Status	
alert_1	33	Pending	<a href="#">Take Action</a>
alert_11	11	Pending	<a href="#">Take Action</a>
alert_13	15	Pending	<a href="#">Take Action</a>
alert_6	55	Pending	<a href="#">Take Action</a>

At the bottom right of the table, there is a pagination indicator '1-4 of 4' with navigation arrows. The footer contains the text 'Terms & Conditions | Privacy Policy'.

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... <a href="#">Read more</a>	
<b>PMS Comments</b>	<b>Proposed Plan of Action</b>	
<input type="text"/>	<input type="text"/>	
<input type="button" value="UPLOAD"/>		<input type="button" value="SUBMIT"/>

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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.

Welcome / Submission Page

Financial Year  
2022-23

Quarter  
Q2

Search Table

Alert Name	
alert_11	<input type="button" value="Take Action"/>
alert_13	<input type="button" value="Take Action"/>
alert_6	<input type="button" value="Take Action"/>
alert_1	<input type="button" value="Take Action"/>

**Submitted Successfully**

1-4 of 4

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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.

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
alert_1	33	<a href="#">View</a>
alert_11	11	<a href="#">View</a>
alert_13	15	<a href="#">View</a>
alert_6	55	<a href="#">View</a>

Search Table

Guidance Type

Status

APPLY FILTER CLEAR

[Submit](#)

1-4 of 4 < >

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.

The screenshot displays the SEBI submission tracker interface. At the top, the SEBI logo and name are visible on the left, and the 75th Anniversary logo is on the right. The page is titled 'SUBMISSION PAGE' and 'TRACKER PAGE'. Below the header, there is a navigation bar with 'Welcome / Tracker'. The main content area shows a table with columns for 'Guidance Type' and 'Status'. The 'Guidance Type' column lists 'alert\_1', 'alert\_11', 'alert\_13', and 'alert\_6'. The 'Status' column lists 'pending' for all entries. A modal dialog box is centered on the screen, asking 'Are you sure about your submission?' and providing a warning: 'Responses once recorded, shall not be reverted later.' The dialog box has three buttons: 'UPLOAD', 'Submit', and 'Cancel'. The background interface includes a search bar, 'APPLY' and 'FILTER' buttons, and a 'Submit' button at the bottom. The footer contains 'Terms & Conditions | Privacy Policy'.

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		
1 <sup>st</sup> Email	At time of Upload	Upload Intimation	Include Principal Officer email id(s)
2 <sup>nd</sup> mail	14 <sup>th</sup> Day since upload	Deadline Approaching email	Include Principal Officer email id(s)
3 <sup>rd</sup> Email	21 <sup>st</sup> Day since upload at 00:00 hrs	Deadline Reminder	Include Principal Officer email id(s)
Fourth e-mail/Repeat Email	22 <sup>st</sup> Day since upload at 00:00 hrs	Non Submission Email	Include Principal Officer email id(s)
Thereafter	Every 7 <sup>th</sup> Day thereafter	Non Submission Email	Include Principal Officer email id(s)

Welcome / Tracker

Search Table

Financial Year  
2023-24

Quarter  
Q1

APPLY

FILTER

Guidance Type	Instance Count	Details	Status
annexure13	33	<a href="#">View</a>	pending
annexure13	11	<a href="#">View</a>	pending
annexure13	15	<a href="#">View</a>	pending
annexure13	55	<a href="#">View</a>	pending

Submit

1-4 of 4 < >

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.

Welcome / Tracker

Financial Year  
2022-23

Quarter  
Q2

Search Table

APPLY

FILTER

Guidance Type	Instance Count	Details	Status
! alert_1	33	<a href="#">View</a>	open

Submit

1-1 of 1 < >

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".

Tracker / View

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

ADD COMMENT

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Welcome / Tracker / View

Ticket ID m67lco4b	Guidance Type annexure4	Total Instance Count 10	
22/01/2025 Case ID Count: 10			
PMS Comments		Proposed Plan of Action testing	DOWNLOAD

EDIT COMMENT

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## 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.

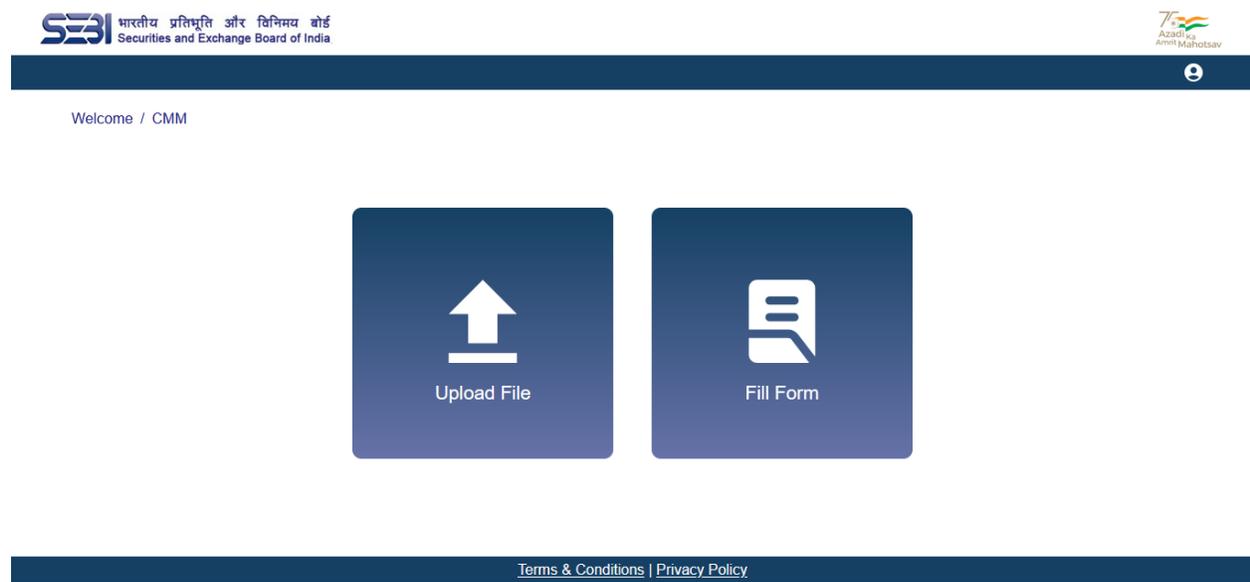
## 2. CMM MODULE:

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.

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CMM UPLOAD CMM TRACKER

Welcome / CMM / Upload File

Financial Year 2025-26 Quarter Q1

APPLY PREVIEW

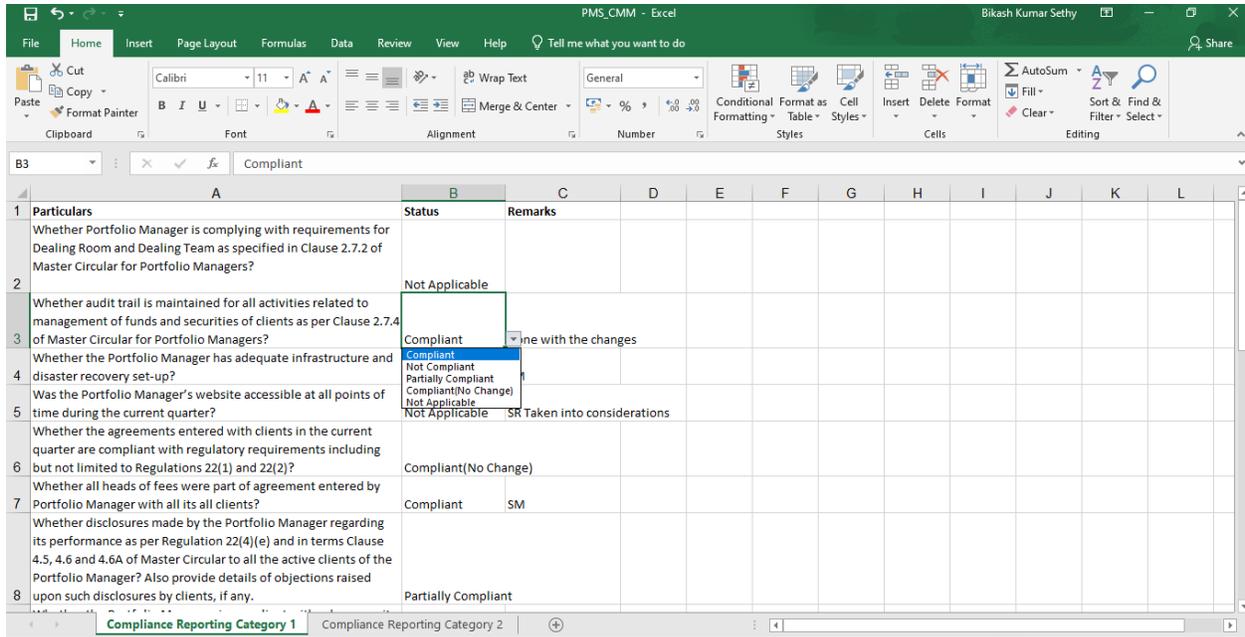
Choose the required file to upload

Download Template Submit

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**NOTE:** The file which will be uploaded must be in **.xlsx** format. The format of 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*

Particulars	Status	Remarks
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.	Yes	Done with the changes
Whether the Portfolio Manager, its principal officer, its director, promoter, partners and key management persons by whatever name called are fit and proper persons based on the criteria specified in Schedule II of the SEBI (Intermediaries) Regulations, 2008.	No	
Whether any disciplinary action was taken against the entities as mentioned in Regulation 7(2)(f) in the current quarter. If yes, provide details.	No	
Whether consent was obtained from all clients onboarded in this quarter by the Portfolio Manager for investment in associates/related entities? If not, reasons thereof and number of such clients.	Yes	Progress, done 50 % check
Whether there is any deviation in disclosure documents shared with client from the provisions made in Regulation 22(4) read with Schedule V and Regulation 22(12)? If yes, provide details.	No	
Whether the portfolio manager keeps the funds of all clients in a separate account maintained in a Scheduled Commercial Bank?	No	
Whether the portfolio manager transacts in securities within the limitation		

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.

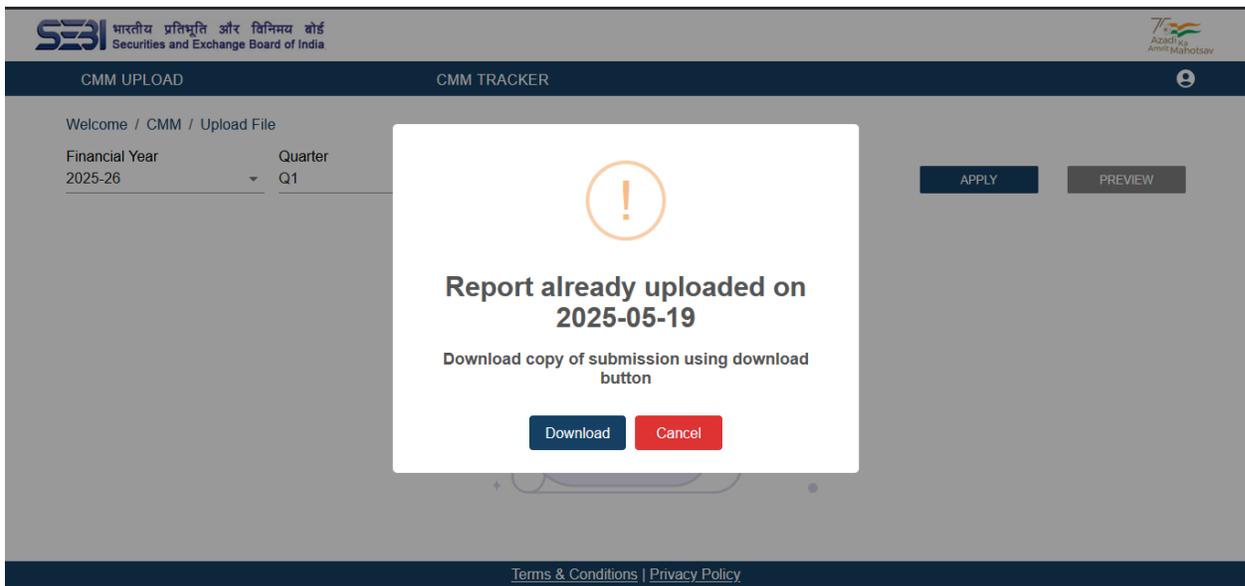
Note : Remarks are compulsory for partially compliant cases.

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

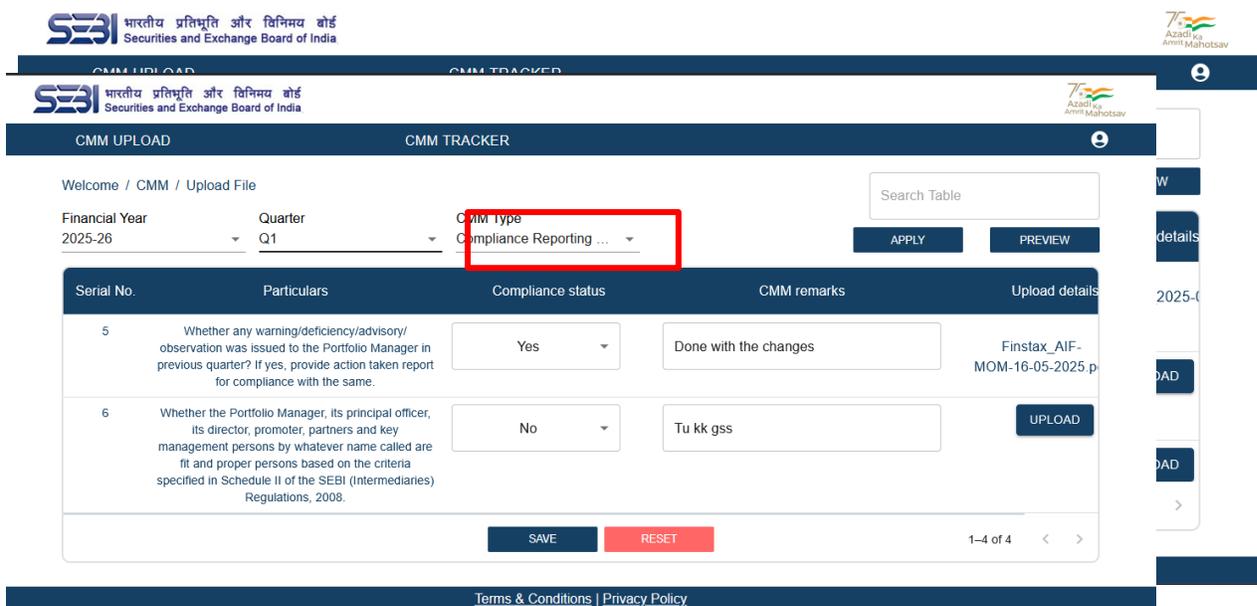
The screenshot displays the 'CMM TRACKER' interface. At the top left is the SEBI logo and text: 'भारतीय प्रतिभूति और विनियम बोर्ड Securities and Exchange Board of India'. At the top right is the '75 Azadi Ka Amrit Mahotsav' logo. Below the header, there are two tabs: 'CMM UPLOAD' and 'CMM TRACKER'. The main content area shows a breadcrumb 'Welcome / CMM / Upload File'. Below this are two dropdown menus: 'Financial Year' set to '2025-26' and 'Quarter' set to 'Q1'. To the right of these are 'APPLY' and 'PREVIEW' buttons. A large light blue box contains the text 'PMS\_CMM.xlsx' with a red 'x' icon to its right. Below this box are 'Download Template' and 'Submit' buttons. At the bottom of the page, there is a dark blue footer 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, 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.

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Securities and Exchange Board of India

PMS Code: INP000001234

PMS Name: TEST

Compliance Reporting Category 1

Serial No.	Particulars	Compliance status	CMM remarks	Uploaded details
1	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?	Not Compliant	ttk	PIVOT_TABLE_2025-05-15T12_31_33.pdf
2	Whether audit trail is maintained for all activities	Compliant	Done with the changes	-

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

BACK UPLOAD SUBMIT

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Securities and Exchange Board of India

PMS Code: INP000001234

PMS Name: TEST

Compliance Reporting Category 1

Compliance Reporting Category 2

Serial No.	Particulars	Compliance status	CMM remarks	Uploaded details
5	Whether any warning/ deficiency/advisory/ observation was issued to the Portfolio Manager in previous quarter? If yes, provide action taken report for compliance	Yes	Done with the changes	Finstax_AIF-MOM-16-05-2025.pdf

**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 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.

The screenshot displays the CMM Tracker interface. At the top, there are navigation tabs for 'CMM UPLOAD' and 'CMM TRACKER'. Below the tabs, the breadcrumb path is 'Welcome / CMM / Tracker'. On the right, there is a 'Search Table' input field. Below the search field, there are two dropdown menus: 'Financial Year' set to '2025-26' and 'Quarter' set to 'Q1'. To the right of these dropdowns are two buttons: 'APPLY' (highlighted with a red box) and 'FILTER'. Below the filters is a table with the following columns: 'S.NO', 'Particulars', 'Details', and 'Status'. The table contains three rows of data, each with a status of 'open'. At the bottom right of the table, there is a pagination indicator '1-3 of 3' with navigation arrows. At the very bottom of the page, there is a footer with links for 'Terms & Conditions' and 'Privacy Policy'.

S.NO	Particulars	Details	Status
2	! 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?	<a href="#">View</a>	open
3	! Whether the Portfolio Manager has adequate infrastructure and disaster recovery set-up?	<a href="#">View</a>	open
4	! Was the Portfolio Manager's website accessible at all points of time during the current quarter?	<a href="#">View</a>	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.

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

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

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CMM UPLOAD CMM TRACKER 

Welcome / CMM / Fill Form

Financial Year: 2025-26 Quarter: Q4 CMM Type: Compliance Reporting ... APPLY PREVIEW

Serial No.	Particulars	Compliance status	CMM remarks	Upload details
1	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	<span>UPLOAD</span>
2	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	<span>UPLOAD</span>
3	Whether the Portfolio Manager has adequate infrastructure and disaster recovery set-up?	Select Status	Enter Comment	<span>UPLOAD</span>

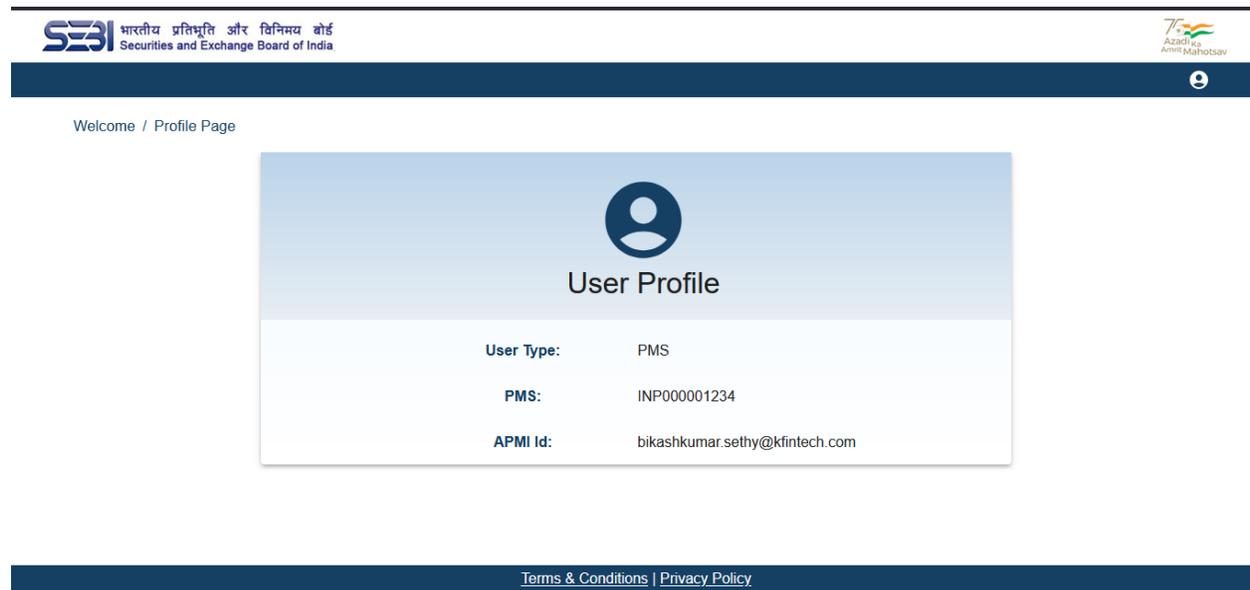
SAVE RESET 1-4 of 23 < >

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## 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.



The screenshot shows the top navigation bar of the SBI website. On the left, the SBI logo is followed by 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". Below the navigation bar, a dark blue header contains a user profile icon. Below this, the text "Welcome / Profile Page" is visible. The main content area features a "User Profile" card with a light blue header containing a user icon and the title "User Profile". The card's body contains the following information:

<b>User Type:</b>	PMS
<b>PMS:</b>	INP000001234
<b>APMI Id:</b>	bikashkumar.sethy@kfintech.com

At the bottom of the page, a dark blue footer contains the text "Terms & Conditions | Privacy Policy".

## 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.