

IIFL Capital Inc. – Customer Relationship Summary

September 23, 2023

Introduction

IIFL Capital Inc. (IIFLC) is registered with Financial Industry Regulatory Authority (FINRA) and the Securities and Exchange Commission (SEC) as a broker-dealer. Brokerage and investment advisory services and fees differ, so it is important for a retail investor to understand the differences.

Free and simple tools are available to research firms and financial professionals at: www.Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

Relationships and Services

What investment services and advice can you provide me?

IIFLC acts as a placement agent for affiliated and unaffiliated funds that may include hedge fund or private fund placements. IIFLC may make recommendations to its client's ("retail investors") to purchase these funds, however, the ultimate decision whether to purchase these products are made by the retail investors. As a potential client (retail investor), you will be informed of the dealer arrangements IIFLC has with the issuer and shall be provided the private placement memoranda. The settlement of the transaction will be handled directly between investors and the issuers. It is important to understand that IIFLC does not monitor your investment(s) or account after a recommendation is made and/or the transaction is entered. It is important to note that IIFLC only offers its retail investors a limited menu of products, namely private placements of securities by Indian issuers. IIFLC does not mandate a minimum investment requirement, however, fund managers typically require a minimum investment of \$125,000 (USD).

Questions to consider:

- *Given my financial situation, should I choose a brokerage service? Why or why not?*
- *How will you choose investments to recommend to me?*
- *What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

It is important for you, the retail investor, to understand the fees and costs you will incur for our brokerage services, including how frequently they are assessed and the conflict of interest they may create.

- As a client you do not compensate IIFLC directly.
- Private Placement Services: IIFLC is compensated by the Funds either as a percentage of capital raised or a fixed fee determined on a case by case basis. These fees may create a conflict of interest for the Firm because any marketing of an investment for which the Firm receives a fee creates an incentive for the Firm to encourage you to make an investment. All such fees, incentives and conflicts are or will be disclosed in any offering or subscription documents.

Additional Information:

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. If you require more detailed information regarding fees please refer to the subscription documents and private placement memorandum.

Questions to consider:

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

IIFL Capital Inc. – Customer Relationship Summary

September 23, 2023

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the recommendations we provide you. Here are some examples to help you understand what this means.

- IIFLC receives placement fees from the sponsors / managers of the investments IIFLC recommends, which are generally based upon the amount of investor subscriptions. These fees create a conflict of interest because the Firm receives a fee which creates an incentive for the Firm to encourage you to make an investment.
- IIFLC offers investments in a limited number of funds. There may be other fund investments that we do not offer that better suit your needs such as equities, debt or annuities, etc.
- IIFLC also recommends funds managed by its affiliated investment manager.

Questions to consider:

- *How might your conflicts of interest affect me, and how will you address them?*

Additional information:

How does your financial professional make money?

Our RRs receive a fixed salary along with a discretionary, performance-based year-end bonus. The size of their bonuses will typically depend on the overall profitability of the Firm. As such, our RRs have an incentive to encourage you to invest through IIFLC.

Disciplinary History

Do you or your financial professionals have a legal or disciplinary history?

Yes. The Firm does have a disciplinary history. Visit www.investor.gov/CRS for a free and simple search tool to research us and our financial professionals. There is no individual RR at the Firm that maintains a disciplinary history.

Questions to consider:

- *As a financial professional, do you have any disciplinary history?*
- *If so, for what type of conduct?*

Additional Information

If you would like additional, up-to-date information about our firm or to request a copy of the relationship summary, please contact our Chief Compliance Officer, John Cullinane at 212-221-6800 or jcullinane@us.iiflcap.com

Questions to consider:

- Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me and my investments?