

**ACTION TAKEN REPORT  
TO WHOMSOEVER IT MAY CONCERN**

Regulation	Particulars	Compliance Status	Reason for non-compliance/ non-applicability	Action taken on adverse findings (duly approved by the individual IA / management of the non-individual IA)
<b>Regulation 7</b>	<u>Qualification and certification requirement.</u> An individual investment adviser or a principal officer of a non-individual investment adviser registered as an investment adviser under these regulations and persons associated with investment advice shall have minimum qualification and certification requirements as mentioned in Regulation 7(1) and 7(2)	Complied <b>Not- Complied</b> Not Applicable	It is observed that NISM certification of Principal officer was not valid below period – 1. NISM XA- From 09 April, 2022 to 20 November, 2022 2. NISM XB- From 8 September 2022, to 7 February, 2023	Observation is noted and it is to state that the lapse in the NISM certificate was inadvertent. However, since it was essential to address the issue promptly, we took corrective actions to ensure ongoing compliance with regulatory requirements. The principal officer appeared and secured the certification as soon we identified the lapse.
Regulation 15	<u>General Responsibility</u> The regulation 15 imposes certain responsibilities on the Investment Adviser for the transactions it undertakes on behalf of its clients.	Complied <b>Not- Complied</b> Not Applicable	RIA is collecting KYC documents from its clients. It is observed that RIA is not registered with CKYC and KRA.	We have noted the comments and the same shall be completed on priority.
Cyber Security Awareness	Whether any planned Cyber Security Awareness carried out among employees, stakeholders and clients, If Yes, details of Cyber Security Awareness programme conducted in the Audit FY	Complied <b>Not- Complied</b> Not Applicable	Cyber Security awareness was not conducted by the RIA	We have noted the comments, we will conduct Cyber Security Awareness among employees, stakeholders and clients

Thanks and Regards,

  
Sandeep Udyavar Rai  
Director  
(Compliance Office)

  
Pedda Venkatappa Gari Balaji  
Director  
(Principle Officer)

Date:30.10.2023

Place:Bangalore

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