

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)
Regulation 8	<u>Net worth</u> (1) Investment advisers who are non-individuals shall have a net worth of not less than fifty lakh rupees. (2) Investment advisers who are individuals shall have net tangible assets of value not less than five lakh rupees.	<input type="checkbox"/> Complied <input checked="" type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable	It is observed that net-worth of RIA is less than requisite amount during the audit period.	Observation is noted and capital would be raised to induct in RIA and have requisite level of net-worth.
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.	<input type="checkbox"/> Complied <input checked="" type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable	It is observed that KYC documents of the clients are collected. However, RIA is not registered with KRA and CKYC.	Observation is noted and registration with KRA and CKYC would be taken on priority.
SEBI/HO/IMD/DF1/ CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ix)	<u>Display of details on website and in other communication channels.</u> IAs shall prominently display the information as specified under this clause, on its website, mobile app, printed or electronic materials, know your client forms, client agreements and other correspondences with the clients	<input type="checkbox"/> Complied <input checked="" type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable	It is observed that requisite details are not displayed on website and in other communication channels of RIA	Observation is noted and changes would be made to display requisite details on website and in other communication channels

Thanks and Regards,

FOR M/S GROWTHLIFT INVESTMENT ADVISORIES PRIVATE LIMITED


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