

# DISHA DUGAR JHUNJHUNWALA

Practicing Company Secretary

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## COMPLIANCE AUDIT REPORT

**FOR THE FINANCIAL YEAR ENDED 31<sup>st</sup> MARCH 2023**

[Pursuant to Regulation 19(3) of the SEBI (Investment Advisers) Regulations, 2013]

To,  
**Ms. Rima Rajiv Vasa**  
**SEBI Registered Investment Advisor**  
**Regn No. INA300004267**  
5A, Park Side Road,  
"Apna Mit", 5<sup>th</sup> Floor,  
Kolkata- 700 026

I have examined:

- (a) all the documents and records made available to us and explanation provided by Ms. Rima Rajiv Vasa ("the Investment Advisor"),
- (b) the filings/ submissions made by her to Government Departments and SEBI,
- (c) website of the investment advisor,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

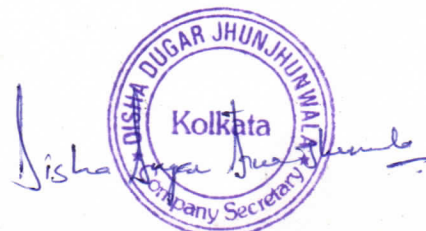
for the year ended [31<sup>st</sup> March 2023] ("Review Period") in respect of compliance with the provisions of :

- (a) the **SEBI (Investment Advisers) Regulations, 2013** ("SEBI Regulation") and the amendments, circulars, guidelines issued thereunder
- (b) the **Securities Contract (Regulations) Act, 1956**
- (c) the **Securities Exchange Board of India Act, 1992**;
- (d) the **SEBI {KYC (Know Your Client) Registration Agency (KRA)}, Regulations, 2011** and

The specific Regulations of the SEBI Regulation, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- a) Application for grant of certificate (Reg.3)
- b) Consideration of application and eligibility criteria (Reg.6)
- c) Qualification and certification requirements (Reg. 7)

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- d) Net worth (Reg. 8)
- e) Condition of Certificate (Reg.13)
- f) General Responsibilities (Reg.15)
- g) Fees (Reg.15A)
- h) Risk Profiling (Reg.16)
- i) Suitability (Reg.17)
- j) Disclosure to client (Reg.18)
- k) Maintenances of record (Reg.19)
- l) Redressal of client grievance (Reg.21)
- m) Client level segregation of advisory and distribution activities.(Reg.22)
- n) Implementation of advice or execution (Reg.22A)

and based on the above examination, I/We hereby report that, during the Review Period:

(a) The Investment Advisor has complied with the provisions of the above Regulations and circulars/ guidelines issued there under and has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records except the following:

- a. Maintenance of website as per Circular SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ix)

**Place: Kolkata**  
**Date: 25.09.2023**

  
  
**Disha Dugar Jhunjunwala**  
**Practicing Company Secretary**  
**FCS No.:8128**  
**C P No.: 10895**  
**UDIN: F008128E001078296**