

# PRAKASH BHAVSAR & ASSOCIATES

**Chartered Accountants** 

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To, Cusp Money Advisors Private Limited 402, Gala Hub Anx, Bopal, Ahmedabad - 380058

Sub: Submission of Annual Audit Report of Investment Adviser activity

Dear Sir,

We have conducted the annual audit of Cusp Money Advisors Private Limited (herein referred as RIA), SEBI Registration no- INA000020004, for Investor Adviser business as required by SEBI Regulations.

We are enclosing herewith copy of the audit report for the period April, 2024 to March, 2025.

Kindly acknowledge the receipt of the same

For Prakash Bhavsar & Associates

CA. Prakash B. Bhavsar

Proprietor

FRN: 108072W

Membership No. 044048

DATE: 25/09/2025

UDIN: 25044048BMHKKH4490



## Background:

Cusp Money Advisors Private Limited is a SEBI registered Investment Advisor.

As part of the ongoing compliance requirements of Securities Exchange Board of India (Investment Advisers) Regulations, 2013, investment advisers shall conduct yearly audit in respect of compliance with these regulations from a member of the Institute of Chartered Accountants of India or Institute of Company Secretaries of India.

CA. <u>Prakash B. Bhavsar</u> has been assigned the external audit of of Cusp Money Advisors Private Limited for ensuring secure and continuous business operations and identifying possible lapses / inadequacies / deficiencies, if any, based on compliance requirements / guidance / circular issued by SEBIi.

Audit period: The audit period for the current annual audit is April 2024 to March 2025.

**Scope**: The scope of the audit is as per the Securities Exchange Board of India (Investment Advisers) Regulations, 2013. The detailed scope, compliance details and audit observations, if any, have been provided in the Annexure enclosed herewith.



#### ANNEXURE

### NOTE:

- Annual Audit Compliance Report (ACR) An investment adviser shall conduct yearly audit in respect of compliance with these regulations from a member of Institute
  of Chartered Accountants of India or Institute of Company Secretaries of India 71[or Institute of Cost Accountants of India] 72[and submit a report of the same as may
  be specified by the Board].
- 2. <u>Client Level Segregation</u> As per Clause 2(xiii)(c)(iii) of SEBI Circular No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 dated lanuary 08, 2025, an investment adviser shall maintain on record an annual certificate from a member of ICAI/ ICSI/ ICMAI or from an auditor confirming compliance with client level segregation requirements. Such annual certificate shall be obtained within six months of the end of the financial year.
- 3. Action Taken Report (ATR) As per Clause 2(xiii)(c)(ii) of SEBI Circular No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 dated January 08, 2025, submit adverse findings of audit, if any, along with action taken thereof duly approved by the individual IA or management of non-individual IA to IAASB/SEBI within a period of one month from the date of the audit report but not later than October 31st of each year for the previous financial year.

## Annual Compliance Audit Report for F. Y 2024-2025

| Name of Investment Adviser                     | Cusp Money Advisors Private Limited                                      |       |
|--|--|-------|
| SEBI Registration No.                          | INA000020004   |       |
| BSE Enlistment No.                             | 2246   |       |
| Entity type                                    | Private Limited  |       |
| Financial Year                                 | 2024-2025  |       |
| Name and Contact Details of Principal Officer  | Hardik Sureshbhai Thakkar<br>+91 9724325983<br>hardik.thakkar@cusp.money |       |
| Name and Contact Details of Compliance Officer | Hardik Sureshbhai Thakkar<br>+91 9724325983<br>hardik.thakkar@cusp.money |       |
|  | Nif  |       |
| Total No. of Clients as on 31-03-2025          |  | ADVIC |

| Regulation Particulars |  | Compliance  |  | Managemen  | t Comments   |  |
|------------------------|--|---|--|--|--|--|
|                        | Particulars  | Status (anyone<br>status as<br>applicable to<br>respective point<br>to be retained) | Reason for<br>non-<br>compliance/<br>non-<br>applicability | Auditor<br>comments<br>accepted in<br>case of non-<br>compliance | Action taken on<br>adverse findings<br>(duly approved by<br>the individual<br>IA/management<br>of the non-<br>individual IA) |  |
| Regulation 2 (s)       | Is "principal officer" in case of non-individual investment adviser engaged:  (i) solely in providing investment advisory services, shall mean the managing director or designated director or managing partner or executive chairman of the board or equivalent management body who is responsible for the overall function of the business and operations of non-individual investment adviser;  (ii) in the activities other than investment advisory services, through separate departments/divisions, may be the person at the management level who is a business head or unit head, responsible for the overall function of the business and operations related to investment advisory services:  Provided that in case of non-individual investment adviser being a partnership firm, one of the partners shall be designated as its principal officer. | Complied<br>Not Complied<br>Not Applicable  |  |  | ADVISO   |  |

| Regulation 3   | Application for grant of certificate  (1) No person shall act as an investment adviser or hold itself out as an investment adviser unless he has obtained a certificate of registration from the Board under these regulations.  | Complied<br>Not Complied<br>Not Applicable                       |  |  |
|--|--|--|--|--|
| Regulation 6   | Consideration of application and eligibility criteria Regulation 6 states all matters, which are relevant for the purpose of grant of certificate of registration.   | Complied<br>Not Complied<br>Not Applicable                       |  |  |
| Regulation 7   | Qualification and certification requirement. 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<br>Not Complied<br>Not Applicable                       |  |  |
| EBI Circular Ref. No.<br>EBI/HO/IMD/DF1/CIR/P/2020/182<br>Dated September 23, 2020)<br>lause 2(iv) | I wege and notice in the second notice in the secon | <del>Complied</del><br><del>Not Complied</del><br>Not Applicable |  |  |

| Regulation 8   | Net worth Investment advisers shall maintain "Deposit" with IAASB as per the rules.  | Complied<br>Not Complied<br>Not Applicable |  |  |
|--|--|--|--|--|
| Regulation 8  And SEBI circular Ref no. SEBI/HO/MIRSD/MIRSD-PoD1/P/CIR/2025/003 dated January 08, 2024 point 2(ii) | Deposit requirement post 15th December 2024 Compliance to deposit requirement post 15th December 2024 as below basis the no, of clients:  No. of clients Up to 150 clients 1 Lakh 151 to 300 clients 2 lakhs 301 to 1000 clients 5 lakhs 1001 and above clients 10 Lakhs   | Complied<br>Not Complied<br>Not Applicable |  |  |
| Regulation 13(b)   | Conditions of certificate: The investment adviser shall inform the Board in writing, if any information or particulars previously submitted to the Board are found to be false or misleading in any material particular or if there is any material change in the information already submitted.   | Complied<br>Not Complied<br>Not Applicable | No material change in particulars                        |  |
| Regulation 13(c)   | Conditions of certificate: The investment adviser, not being an individual, shall include the words 'investment adviser' in its name: Provided that if the investment advisory service is being provided by a separately identifiable department or division or a subsidiary, then such separately identifiable department or division or subsidiary shall include the words 'investment adviser' in its name; | Complied<br>Not Complied<br>Not Applicable |  |  |
| legulation 13(d)   |  | Complied<br>Not Complied<br>Not Applicable | Cusp Money Advisors Private Limited is a non- individual |  |

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|                   | investment adviser registered under these regulations shall use the term 'part-time investment adviser' in all their correspondences with their clients.]   |  | investment<br>advisor   |        |
|-------------------|---|--|---|--------|
| Regulation 13(e)  | Registration as Non-Individual Investment Advisor Individuals registered as investment advisers whose number of clients exceed three hundred at any point of time or the fee collected during the financial year exceeds three crore rupees, whichever is earlier shall  a. Apply for grant of in-principle registration as non-individual investment adviser; b. The in-principle registration shall be valid for a period of three months to assist in the transition from registration as individual investment adviser to non-individual investment adviser; c. On completion of the transition period or upon grant of certificate of registration as non-individual investment adviser, whichever is earlier, investment adviser shall surrender his registration as individual investment adviser. | Complied<br>Not Complied<br>Not Applicable                       | Cusp Money<br>Advisors<br>Private Limited<br>is a non-<br>individual<br>investment<br>advisor |        |
| Regulation 13(f)  | The number of clients of a part-time investment adviser shall not exceed seventy-five in total at any point of time.  | <del>Complied</del><br><del>Not Complied</del><br>Not Applicable | Cusp Money<br>Advisors<br>Private Limited<br>is not a<br>parttime IA                          |        |
| Regulation 15 (7) | Has an investment advisor entered into transactions on its own account which is contrary to its advice given to clients for a   | Complied<br>Not Complied<br>Not Applicable                       | No such<br>transactions.  | ADVISO |

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|   | period of fifteen days from the day of such advice  | ****                                       |  |   |       |
|---|---|--|--|---|-------|
| Regulation 15 other than sub point 7  | General Responsibility Whether IA has followed all the responsibilities as mentioned regulation 15?   | Complied Not Complied Not Applicable       |  |   |       |
| Regulation 15A read with SEBI Circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025) Clause 2(viii) | Fees Investment Adviser shall be entitled to charge fees for providing investment advice from a client in the manner as specified by the Board namely - Assets under Advice (AUA) mode or Fixed fee mode. | Complied                                   | No clients as on<br>31st March<br>2025             |   |       |
| SEBI Circular Ref. No. SEBI/HO/MIRSD/MIRSD-<br>PoD-1/P/CIR/2024/50 Clause 2(2.1)  | Restriction on free trial  IAs shall not provide free trial for any products/services to prospective clients.   | Complied<br>Not Complied<br>Not Applicable |  |   |       |
| SEBI Circular Ref. No. SEBI/HO/MIRSD/MIRSD-<br>PoD-1/P/CIR/2024/50 Clause 2(2.1)  | Non acceptance of part payments  IAs shall not accept part payments (where some part of the fee is paid in advance) for any product/service.  | Complied<br>Not Complied<br>Not Applicable | No clients as on 31st March 2025                   |   |       |
| Regulation 16   | Risk profiling This involves profiling, assessing the risk appetite of each client individually, and communication of such profile to the respective client.  | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31st March<br>2025             |   |       |
| SEBI Master Circular Ref. No.<br>EBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>Clause 2(2.2)  |   | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31st March<br>2025             | V |       |
| regulation 17   | Suitability Investment adviser shall ensure suitability of  | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31 <sup>st</sup> March<br>2025 |   | ADVIS |

| SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(viii)  And SEBI Circular Ref No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025) Clause 1.2(viii)(b) – (c) | Risk profiling and suitability for non-individual clients.  (a) In case of non-individual clients, IA shall use the investment policy as approved by board/management team of such non-individual clients for risk profiling and suitability analysis.  (b) The discretion to share the investment policy/relevant excerpts of the policy shall lie with the non-individual client. However, IA shall have discretion not to onboard non-individual clients if they are unable to do risk profiling of the non-individual client in the absence of investment policy. | Complied Not Complied Not Applicable       | No clients as on 31 <sup>st</sup> March 2025       |       |
|---|---|--|--|-------|
| Regulation 18   | Disclosure to clients This involves disclosure of all prescribed information by the investment adviser to its clients.  | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31st March<br>2025             |       |
| Regulation 19   | Maintenance of records This regulation requires maintenance of prescribed records, preservation of the same and audit of such records by the prescribed professional.   | Complied<br>Not Complied<br>Not Applicable |  |       |
| EBI Master circular Ref. No.<br>EBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>lause 1.2(vi)   |   | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31 <sup>st</sup> March<br>2025 | ADV/C |

| SEBI Circular Ref. No.<br>SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003<br>(Dated January 08, 2025) Clause 2 (xii) | Maintenance of record Regulation 22A of the IA Regulations provides that IAs may provide implementation services to the advisory clients in securities market. In this regard, IAs providing implementation/execution services shall maintain call recording of every consent for implementation/execution obtained from the client if advice/execution is given through telephone call. All such communications shall have time stamped to maintain clear audit trail. | Complied<br>Not Complied<br>Not Applicable | No clients as cn<br>31 <sup>st</sup> March<br>2025 |                    |
|--|---|--|--|--------------------|
| SEBI Circular Ref. No.<br>SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated<br>September 23, 2020) Clause 2(ii)            | Agreement between IA and the client.  IA shall enter into an investment advisory agreement with its clients as prescribed and shall ensure that neither any investment advice is rendered, nor any fee is charged until the client has signed the aforesaid agreement and a copy of the signed agreement is provided to the client.   | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31 <sup>st</sup> March<br>2025 |                    |
| SEBI Circular Ref. No.<br>SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003<br>Dated January 08, 2025) Clause 2 (xi)   | Agreement between IA and the client. The agreement shall also include the Most Important Terms and Conditions (MITC) to be disclosed by IAs. Consent of client to agreement between IA and client may be signed by the client in person or through any other legally acceptable mode including DigiLocker enabled Aadhaar based esignature facility.  | Complied<br>Not Complied<br>Not Applicable | No clients as on<br>31 <sup>st</sup> March<br>2025 |                    |
| And<br>EBI Circular Ref. No.   | such details as may be specified by the   | Complied<br>Not Complied<br>Not Applicable |  | ADVISORS OF STREET |

| Regulation 20 (1) and SEBI Circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025) Clause 2 (v) (a) | Appointment of Compliance officer An investment adviser shall appoint a compliance officer who shall be responsible for monitoring the compliance by the investment adviser.  Whereas an independent professional appointed as compliance officer holds certifications from NISM by passing the following certification examinations- NISM-Series-X-A: Investment Adviser (Level 1) Certification Examination, NISM-Series-X-B: Investment Adviser (Level 2) Certification Examination, NISM-Series-X-C: Investment Adviser Certification (Renewal) Examination, and NISM-Series-III A: Securities Intermediaries Compliance (Non-Fund) Certification Examination | Complied<br>Not Complied<br>Not Applicable |         |
|--|---|--|---------|
| Regulation 21  And  SEBI Master circular Ref. No.  SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50  Clause - V(7)                        | Redressal of investor grievances through SEBI Complaints Redress system (SCORES) Platform:  7.2 - IAs shall prominently display in their offices the information about the grievance redressal mechanism available to investors.  7.3 - IAs shall also followed the Master Circular (SEBI/HO/OIAE/IGRD/P/CIR/2022) and Circular (SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023) Issued by SEBI on the redressal of investor grievances through the SEBI Complaints Redress System (SCORES) and complied with it.  | Complied<br>Not Complied<br>Not Applicable | J ADVIS |

| Implementation of advice or exe  (1) Investment adviser may pro- implementation services to advis provided no consideration shall the directly or indirectly either at groat family level.  (2) Investment adviser shall provimplementation services only the  | tion de y clients, obtained obtained Not Complied o level or Not Applicable 31st March 2025  |
|--|--|
| Client level segregation of ad distribution activities.  (1) Has the annual client lever requirement been certified by case of individual IA) and its s (in case of a non-individual IA auditor to be attached along variety (2) An individual investment not provide distribution service (3) The family of an individual adviser shall not provide distribution service (3) The family of an individual adviser shall not provide distribution service (3) The family of an individual adviser shall not provide distribution service.  SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(i)  September 23, 2020) Clause 2(i)  Client who is receiving distribution of investment adviser and no individual investment have client level segregation at for investment advisory and disservices.  (5) Non-individual investment maintain an arm's length relation between its activities as investment and distributor by providing advithrough a separately identifiable or division.  (6) Compliance and monitoring client segregation at group or fa shall be in accordance with the grescribed in the referred circular | segregation n auditor (in cutory auditor Certificate of h) viser shall nvestment tion services idual dual advice to a n services adviser shall roup level ibution  (viser shall ship nt adviser pry services lepartment  Decess for ily level delines as |

|  | schemes.  (3) Investment adviser or group or family of investment adviser shall not charge any implementation fees from the client.  (4) The client shall not be under any obligation to avail implementation services offered by the investment adviser.  |  |  |       |        |
|--|--|--|--|-------|--------|
| SEBI Circular Ref. No.<br>SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated<br>(Dated September 23, 2020) Clause 2(ix)   | Display of details on website and in other communication channels.  IAs shall prominently display the information as prescribed, on its website, mobile app, printed or electronic materials, know your client forms, client agreements and other correspondences with the clients.  | Complied<br>Not Complied<br>Not Applicable                       | No clients as on<br>31st March<br>2025 |       |        |
| SEBI/HO/IMD/IMD-II CIS/P/CIR/2021/0686 (Dated December 13, 2021)  and  SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 Clause - V (8) & SEBI/HO/IMD/IMD-II CIS/P/CIR/2021/0686 (Dated December 13, 2021) | Publishing Investor Charter and disclosure of Investor Complaints  (1) All registered investment advisers are required to publish investor charter on their websites and mobile applications. If registered investment adviser do not have websites/mobile applications, then as a one-time measure, investor charter to be sent to the investors on their registered e-mail address.  (2) All registered investment advisers are required to disclose the details of investor complaints by 7th of the succeeding month on a monthly basis on their websites and mobile applications. If investment adviser do not have websites/mobile applications, status of investor complaints to be sent to the investors on their registered email ids on a monthly basis. | Complied<br><del>Not Complied</del><br><del>Not Applicable</del> |  |       |        |
| RAI Guidelines - SEBI/HO/MIRSD/DoS-<br>P/P/OW/2023/0000011041/1 (Dated March 16,<br>023) and BASL Circular No. 20230329-1 dated<br>March 29, 2023  | Telecom Regulatory Authority of India (TRAI) - Guidelines to curb spam SMSes and misuse of Headers and Content Templates by unauthorised Telemarketers (UTMs)  | Complied<br>Not Complied<br>Not Applicable                       |  | N 101 | 1150AS |

| Usage of brand name/trade name -<br>SEBI/HO/MIRSD/ MIRSD-PoD-2/P/CIR/2023/52<br>(Dated April 06, 2023) and BASL Circular No.<br>20230411-1 dated April 11, 2023<br>And<br>SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - 10 (2) | Compliance to Usage of brand name / trade<br>name by Investment Advisers (IA)  | Complied<br>Not Complied<br>Not Applicable |   |      |
|---|--|--|---|------|
| SEBI / BASL Inspections   | Last SEBI / BASL Inspection carried out date and period of inspection. Whether complied with inspection observations.  | Complied<br>Not Complied<br>Not Applicable | No inspection<br>carried out 31 <sup>st</sup><br>March 2025 as<br>the RIA<br>Certification<br>was received<br>on 24 <sup>sh</sup> March<br>2025 |      |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 -<br>Point II(2)   | Whether IAs have complied with the following points:- 2.1 - Restriction on free trial 2.2 - Proper risk profiling and consent of client on risk profiling 2.3 - Receiving fees though banking channel only | Complied<br>Not Complied<br>Not Applicable | 2025  |      |
| SEBI Circular no. SEBI/HO/MIRSD/ MIRSD-PoD-<br>2/P/CIR/2023/51 dated April 05, 2023 - VI(9)<br>And<br>SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>ated May 21, 2024 - 10 (1)  | 2.4 - Display of complaints status on website  Advertisement code Investment Advisers shall ensure compliance with the advertisement code  | Complied<br>Not Complied<br>Not Applicable | No<br>Advertisement<br>till 31 <sup>st</sup> March<br>2025  |      |
| EBI Master circular Ref. No.<br>EBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>ated May 21, 2024 - 10 (1) (d) (i)  | Advertisement code  Whether advertisements were published with the prior approval of Exchange?   | Complied<br>Not Complied<br>Not Applicable | No<br>Advertisement<br>till 31 <sup>st</sup> March<br>2025  | DVIC |

|  | Advisory for Financial Sector Organizations  |  |   |        |
|--|--|--|---|--------|
| SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 Clause - IV(6) and (SEBI/HO/MIRSD2/DOR/CIR/P/2020/221 dated November 03, 2020) | regarding Software as a Service  (SaaS) based solutions  Compliance of the SEBI circular for Advisory for financial Sector Organizations regarding Software as a Service (SaaS) based solutions for half-yearly ended 31st March and 30th September. | Complied<br>Not-Complied<br>Not Applicable |   |        |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI (11)   | Facilitating transaction in Mutual Fund schemes through the Stock Exchange Infrastructure  Compliance of aforementioned point VI (10) of master circular by registered investment advisers   | Complied<br>Not Complied<br>Not Applicable | No clients /<br>transactions till<br>31st March<br>2025 |        |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(12)  | Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication: Compliance of aforementioned point VI (11) of master circular by registered investment advisers                                     | Complied<br>Not Complied<br>Not Applicable |   |        |
| EBI Master circular Ref. No.<br>EBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>ated May 21, 2024 - VI (13)  | Guidelines on Outsourcing of Activities by Intermediaries Compliance of aforementioned point VI (12) of master circular by registered investment advisers  | Complied<br>Not Complied<br>Not Applicable | No activities<br>outsourced till<br>31st March<br>2025  |        |
| ated May 21, 2024 - VI(14)   | Framework for Regulatory Sandbox:<br>Compliance of aforementioned point VI (13)<br>of master circular by registered investment<br>advisers   | Complied<br>Not Complied<br>Not Applicable |   | ADVISO |

| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI (15) | General Guidelines for dealing with Conflicts of Interest of intermediaries and their Associated Persons in Securities Market: Compliance of aforementioned point VI (14) of master circular by registered investment advisers  | Complied<br>Not Complied<br>Not Applicable                       |         |
|--|---|--|---------|
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(16)  | Approach to securities market data access and terms of usage of data provided by data sources in Indian securities market:  Compliance of aforementioned point VI (15) of master circular by registered investment advisers   | Complied<br>Not Complied<br>Not Applicable                       |         |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(17)  | Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) / Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under: Compliance of aforementioned point VI (17) of master circular by registered investment advisers | Complied<br>Not Complied<br>Not Applicable                       |         |
| SEBI Master circular Ref. No.<br>EBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>ated May 21, 2024 - VI(18)    | Know Your Client (KYC) Norms for the Securities market  Whether IA had followed the master circular no.  SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169 dated October 12, 2023 on 'Know Your Client (KYC) norms for securities market'.   | Complied<br><del>Not Complied</del><br><del>Not Applicable</del> | ADVISO, |

|   | Simplification of requirements for grant of   |  |   |  |
|---|---|--|---|--|
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(19)   | accreditation to investors  Compliance of aforementioned point VI (22) of master circular by registered investment advisers   | Complied Not Complied Not Applicable       |   |  |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(20)   | Periodic reporting format for Investment Advisers  Whether IA had submitted the periodic submission for half year ended as on 31-03-2024 and 30-09-2024   | Complied Not Complied Not Applicable       | IA Registration<br>Certificate was<br>obtained on<br>24 <sup>th</sup> March<br>2025 |  |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(21.1) | Other reporting requirements  Whether Complaint Data has been displayed by IAs on their website/ mobile application by 07th of the succeeding month   | Complied<br>Not Complied<br>Not Applicable |   |  |
| SEBI Master circular Ref. No.<br>SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50<br>dated May 21, 2024 - VI(21.2) | Other reporting requirements  Whether Undertaking on compliance of the advisory for Financial Sector  Organizations regarding Software as a Service (SaaS) based solutions to be submitted half yearly. | Complied<br>Not Complied<br>Not Applicable | Not used any<br>Saas based<br>solutions till<br>31st March<br>2025                  |  |
| SEBI Master circular Ref. No. SEBI/HO/MIRSD-<br>PoD-2/P/CIR/2023/89/ dated June 15, 2023 - VII            | Reporting Requirements:  IA has followed and complied to all reporting requirement as per VII of Master Circular  | Complied<br>Not Complied<br>Not Applicable |   |  |

| SEBI Master circular Ref. No. SEBI/HO/MIRSD-<br>PoD-2/P/CIR/2023/89/ dated June 15, 2023 - VIII | ANNEXURES Has IA followed all the annexures as prescribed in point VIII of Master circular | Complied Not Complied Not Applicable |  |
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Director

Date: 25/09/2025
Place: Ahmedabad

For Prakash Bhavsar & Associates

Proteon 1

CA. Prakash B. Bhavsar

Proprietor

Membership No. 044048 UDIN : 25044048BMHKKH4490

Date: 25/09/2025 Place: Ahmedabad