



**S. V. Bapat & Co.**  
**CHARTERED ACCOUNTANTS**

Office : 3, Sagar Apartments, S. No. 11/1A/3, Erandawana, Near Laxmi Narayan Nagar, Pune - 411 004.  
Tel.: 2546 0562, Email: svbapatandco@gmail.com

29<sup>th</sup> September 2022

To,  
The Board of Directors,  
Purnartha Investment Advisers Pvt. Ltd.,  
32/33, Rachana, Dr. Ketkar Road,  
Off Karve Road, Erandwane,  
Pune - 411 004.

**Sub: Audit Report regarding Compliance of SEBI (Investment Advisers) Regulations, 2013 for the period from 01.04.2021 to 31.03.2022**

Sir,

The Purnartha Investment Advisers Pvt. Ltd. ('Investment Adviser') is registered under SEBI (Investment Advisers) Regulations, 2013 from 26<sup>th</sup> December 2013. The assignment for audit under SEBI (Investment Advisers) Regulations, 2013 was given to us with respect to the compliance of the said regulations.

Based on above, we have audited the various aspects to be complied with and our Annual Compliance Audit Report for F.Y. 2021-22 is attached as Annexure.

**For S. V. Bapat & Co.**  
**Chartered Accountants**

**Aashay Hulyalkar**  
**(Partner)**

**M. No. 129434**

**UDIN: 22129434AWQNYT9696**

**Date: 29/09/2022**

**Place: Pune**



Name of BASL enrolled Investment Adviser	Purnartha Investment Advisers Pvt. Ltd
BASL Membership ID.	1682
SEBI Registration No.	INA000000672
Annual compliance Audit Report for FY ended	2021 -2022

Annual Compliance Audit Report for F. Y 2021-2022				
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 3	<u>Application for grant of certificate</u> (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.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 6	<u>Consideration of application and eligibility criteria</u> Regulation 6 states all matters, which are relevant for the purpose of grant of certificate of registration.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 7	<u>Qualification and certification requirement.</u>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		

SEBI/HO/IMD/DF1/CIR/P/2  
020/182 (Dated  
September 23, 2020)  
Clause (iv)

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).

Qualification and certification requirement.

Existing individual IAs above fifty years of age shall not be required to comply with the qualification and experience requirements specified under Regulation 7(1) (a) and 7(1) (b) of the amended IA Regulations. However, such IAs shall hold NISM accredited certifications and comply with other conditions as specifies under Regulation 7(2) of the amended IA regulations at all times.

- Complied
- Not- Complied
- Not Applicable

Regulation 8

Net worth

- (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

- Complied
- Not- Complied
- Not Applicable

<p>Regulation 13</p>	<p>assets of value not less than five lakh rupees.</p> <p><u>Conditions of certificate</u> (b) 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.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>
<p>SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(v)</p>	<p><u>Registration as Non-Individual Investment Advisor.</u> An individual IA, whose number of clients exceed one hundred and fifty in total, shall apply for registration as non- individual investment adviser within such time as specified under this clause.</p>	<p><input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> Not Applicable</p>
<p>Regulation 15</p>	<p><u>General Responsibility</u> The regulation 15 imposes certain responsibilities on the Investment Adviser for the transactions it undertakes on behalf of its clients.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>
<p>Regulation 15 A</p>	<p><u>Fees</u> Investment Adviser shall be entitled to charge fees for providing investment advice from a client in the manner as specified by the Board.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>

SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(iii) Regulation 16	<u>Fees</u> Investment Advisers shall charge fees from the clients in either Assets under Advice (AUA) mode or Fixed fee mode.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
	<u>Risk profiling</u> This involves profiling, assessing the risk appetite of each client individually, and communication of such profile to the respective client.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
Regulation 17	<u>Suitability</u> Investment adviser shall ensure suitability of the advice being provided to the client.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(viii)	<u>Risk profiling and suitability for non-individual clients.</u> (b) 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. (c)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.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable

Regulation 18	<u>Disclosure to clients</u> This involves disclosure of all necessary information by the investment adviser to its clients.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
Regulation 19	<u>Maintenance of records</u> This regulation requires maintenance of certain records, preservation of the same and audit of such records by the prescribed professional.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(vi)	<u>Maintenance of record.</u> IA shall maintain and preserve records of interactions, with all clients including prospective clients, where any conversation related to advice has taken place, in the form as specified under this clause.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ii)	<u>Agreement between IA and the client.</u> IA shall enter into an investment advisory agreement with its clients as prescribed under this clause and shall ensure that neither any investment advice is rendered nor any fee is charged until the client has Signed the aforesaid agreement.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
Regulation 20	<u>Appointment of Compliance officer</u> An investment adviser shall appoint a compliance officer who shall be	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable

Regulation 21

responsible for monitoring the compliance by the investment adviser.

Redressal of client grievances

Investment adviser shall redress client grievances promptly through an adequate procedure.

- Complied
- Not- Complied
- Not Applicable

Regulation 22

Client level segregation of advisory and distribution activities.

- (1) An individual investment adviser shall not provide distribution services.
- (2) The family of an individual investment adviser shall not provide distribution services to the client advised by the individual investment adviser and no individual investment adviser shall provide advice to a client who is receiving distribution services from other family members.
- (3) A non-individual investment adviser shall have client level segregation at group level for investment advisory and distribution services.
- (4) Non-individual investment adviser shall maintain an arm's length relationship between its activities as investment adviser and distributor by providing advisory services through a separately identifiable department or division.

- Complied
- Not-Complied
- Not Applicable

SEBI/HO/IMD/DF1/CIR/P/2  
020/182 (Dated  
September 23, 2020)  
Clause 2(i)

Regulation 22A

Client Level Segregation of Advisory and Distribution Activities

Compliance and monitoring process for client segregation at group or family level shall be in accordance with the guidelines as specified under this clause.

- Complied
- Not- Complied
- ✓ Not Applicable

Implementation of advice or execution

(1) Investment adviser may provide implementation services to advisory clients, provided no consideration shall be obtained directly or indirectly either at group level or at family level.

(2) Investment adviser shall provide implementation services only through direct 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.

- ✓ Complied
- Not- Complied
- Not Applicable

SEBI/HO/IMD/DF1/CIR/P/2  
020/182 (Dated  
September 23, 2020)  
Clause 2(ix)

Display of details on website and in other communication channels.

IAs shall prominently display the information as specified under this clause, on its website, mobile app, printed or electronic materials, know your client

- ✓ Complied
- Not- Complied
- Not Applicable



	forms, client agreements and other correspondences with the clients.			
(SEBI/HO/MIRSD2/DOR/CIR/P/2020/221)dated November 03, 2020)	Compliance of the SEBI circular for Advisory for financial Sector Organizations regarding Software as a Service (SaaS) based solutions for half-yearly ended 31 <sup>st</sup> March 2022.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
SEBI/HO/IMD/IMD-II CIS/P/CIR/2021/06 86 (Dated December 13, 2021)	<u>Publishing Investor Charter and disclosure of Investor Complaints</u> (2) All registered investment advisers are required to publish investor charter on their websites and mobile applications. If registered investment adviser does not have websites/mobile applications, then as a one-time measure, send investor charter to the investors on their registered e-mail address. (3) All registered investment advisers are required to disclose the details of investor complaints by seventh of the succeeding month on a monthly basis on their websites and mobile applications. If investment adviser does not have websites/mobile applications, then send status of investor complaints to the investors	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		

on their registered email on a  
monthly basis.

**For Purnartha Investment Advisers Pvt. Ltd.**

**Hemant  
Ashok Vispute**  
**Hemant Vispute**  
**(Managing Director)**

Digitally signed by  
Hemant Ashok Vispute  
Date: 2022.09.29  
16:54:07 +05'30'

**For S. V. Bapat & Co.**  
**Chartered Accountants**

**AASHAY DILIP  
HULYALKAR**

Digitally signed by AASHAY  
DILIP HULYALKAR  
Date: 2022.09.29 17:54:26  
+05'30'

**CA Aashay Hulyalkar**  
**(Partner)**

**M. No. 129434**  
**UDIN: - 22129434AWQNYT9696**  
**Date- 29/09/2022**  
**Place - Pune**