

# Megha Kyal & Associates

Your Compliance Partner

### **CERTIFICATE FOR ANNUAL AUDIT COMPLIANCE**

We have examined the relevant books of accounts, records and documents maintained by Ramesh Khatuwala Proprietor of M/S Eminent Investments, (name of the Investment Adviser) bearing **SEBI registration number INA000013697** and a member of the BSE Ltd. bearing **BSE Enlistment ID 1808** to fulfil the Annual Audit Compliance requirement as prescribed vide SEBI (Investment Advisers) Regulations, 2013, guidelines and circulars, for the year ended 2024-2025.

The purpose of this audit is to examine the processes, procedures followed, and the operations carried out by the Investment Adviser as per the applicable Acts, Rules, Regulations, Byelaws and Circulars prescribed by SEBI and BSE.

We have obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of this audit. In our opinion proper books of accounts, records & documents, as per the regulatory requirement have been maintained by the member, so far as it appears from examination of the books.

We have conducted the audit within the framework provided by SEBI/BSE for the purpose of this audit.

Based on the scrutiny of relevant books of accounts, records and documents, we certify that the member has complied with the relevant provisions of SEBI Act, 1992, SEBI (Investment Advisers) Regulations, 2013 and various circulars of SEBI & various circulars issued by the BSE except otherwise mentioned in the **Annexure** to this report.

We declare that we do not have any direct / indirect interest in or relationship with the member or its directors / partners / proprietors / management, other than the proposed Audit assignment and also confirm that we do not perceive any conflict of interest in such relationship / interest while conducting audit of the said member.

In our opinion and to the best of our information and according to the explanations given to us by the individual IA/proprietor/partner(s)/director(s)/compliance officer and principal officer, the Report provided by us as per the Annexure and subject to our observations, which covers the entire scope of the audit, is true and correct.

CS Megha Kyal Megha Kyal & Associates

**Practicing Company Secretary** 

CP. No.: 22896

UDIN No.: F013680G001309194

Date: 22.09.2025 Place: Navi Mumbai

## **SEGREGATION CERTIFICATE**

Annual certificate confirming compliance with the client level segregation requirements as specified in Regulation 22 of the IA Regulations

The annual audit of Ramesh Khatuwala Proprietor of M/S Eminent Investments (herein referred as "IA"), SEBI Registration no-INA000013697 and a member of the BSE Ltd. bearing BSE Enlistment ID 1808 has been conducted for Investment Advisory activities as required by SEBI Regulations, for the year ended 2024-2025.

**SEBI, vide circular no SEBI/HO/IMD/DF1/CIR/P/2020/182 dated September 23, 2020,** issued guidelines for Investment Advisers. As per clause 3 of the said circular:

Client level segregation of advisory and distribution activities, agreement and fees to be charged are aligned together. IA shall ensure compliance with measures stated above at clause 2(i), 2(ii) and 2(iii) latest by April 01, 2021.

This is to certify that IA is not involved in distribution activities during the period from April 2024 to March 2025.

CS Megha Kyal Megha Kyal & Associates

**Practicing Company Secretary** 

CP. No.: 22896

UDIN No.: F013680G001309194

Date: 22.09.2025 Place: Navi Mumbai

#### **ANNEXURE**

#### **NOTE:**

- 1. <u>Annual Audit Compliance Report (ACR)</u> 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 January 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. <u>Action Taken Report (ATR)</u> 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.

Name of Investment Adviser	Ramesh Khatuwala Proprietor of M/S Eminent Investments
SEBI Registration No.	INA000013697
BSE Enlistment No.	1808
Entity type	Proprietor
Financial Year	2024-2025
Name and Contact Details of Principal Officer	Name: Ramesh Khatuwala Phone No: 7878778206 Email Id: contact@eminentinv.com
Name and Contact Details of Compliance Officer	Not Applicable
Total No. of Clients as on 31-03-2025	27

Regulation	Particulars	Compliance Status (anyone status as applicable to respective point to be retained)	Reason for non- compliance/ non- applicability	Whether Auditor comments accepted in case of non- compliance reported by auditor? (Yes/No)	Action taken on adverse findings (duly approved by the individual IA/management of the non-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.	Not Applicable	IA is registered in Individual capacity	NA	NA
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	NA	NA	NA

Regulation 6	Consideration of application and eligibility criteria	Complied	NA	NA	NA
	Regulation 6 states all matters, which are relevant for				
	the purpose of grant of certificate of registration.	0 1: 1	77.4	NY 4	374
Regulation 7	Qualification and certification requirement.	Complied	NA	NA	NA
	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).				
SEBI Circular Ref. No.	Qualification and certification requirement.	Complied	NA	NA	NA
SEBI/HO/IMD/DF1/CIR/	Existing individual IAs above fifty years of age shall not				
P/2020/182	be required to comply with the qualification and				
(Dated September 23,	experience requirements specified under Regulation				
2020)	7(1) (a) and 7(1) (b) of the amended IA Regulations.				
Clause 2(iv)	However, such IAs shall hold NISM accredited				
	certifications and comply with other conditions as				
	specified under Regulation 7(2) of the amended IA				
	regulations at all times.				
Regulation 8	Net worth	Complied	NA	NA	NA
	(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.				
Regulation 13(b)	Conditions of certificate:	Complied	NA	NA	NA
	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.				
Regulation 13(c)	Conditions of certificate:	Not Applicable	IA is registered	NA	NA
	The investment adviser, not being an individual, shall		in Individual		
	include the words 'investment adviser' in its name:		capacity		
	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;				
Regulation 13(d)	Conditions of certificate: An individuals registered as investment advisers shall use the term 'investment adviser' in all their correspondences with their clients [Provided that part-time investment adviser registered under these regulations shall use the term 'part-time investment adviser' in all their correspondences with their clients.]	Complied	NA	NA	NA
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.	Not Applicable	IA has not reached the ceiling limit.	NA	NA
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.	Not Applicable	IA is registered in full time capacity		
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 period of fifteen days from the day of such advice	Complied	NA	NA	NA
Regulation 15 other than sub point 7	General Responsibility Whether IA has followed all the responsibilities as mentioned regulation 15?	Complied	NA	NA	NA

Regulation 15A read with	Fees	Complied	NA	NA	NA
SEBI Circular Ref. No.	Investment Adviser shall be entitled to charge fees for	-			
SEBI/HO/MIRSD/ MIRSD-	providing investment advice from a client in the manner				
PoD-1/P/CIR/2025/003	as specified by the Board namely - Assets under Advice				
(Dated January 08, 2025)	(AUA) mode or Fixed fee mode.				
Clause 2(viii)					
SEBI Circular Ref. No.	Restriction on free trial	Complied	NA	NA	NA
SEBI/HO/MIRSD/MIRSD-	IAs shall not provide free trial for any products/services				
PoD-1/P/CIR/2024/50	to prospective clients.				
Clause 2(2.1)					
SEBI Circular Ref. No.	Non acceptance of part payments	Complied	NA	NA	NA
SEBI/HO/MIRSD/MIRSD-	IAs shall not accept part payments (where some part of				
PoD-1/P/CIR/2024/50	the fee is paid in advance) for any product/service.				
Clause 2(2.1)					
Regulation 16	Risk profiling	Complied	NA	NA	NA
	This involves profiling, assessing the risk appetite of				
	each client individually, and communication of such				
	profile to the respective client.				
SEBI Master Circular Ref.	Risk profiling	Complied	NA	NA	NA
No.	Whether IA has obtain consent of the client on				
SEBI/HO/MIRSD/MIRSD-	completed risk profile either through registered email				
PoD-1/P/CIR/2024/50	or physical document.				
Clause 2(2.2)					
Regulation 17	Suitability	Complied	NA	NA	NA
	Investment adviser shall ensure suitability of the advice				
	being provided to the client.				
SEBI Circular Ref. No.	Risk profiling and suitability for non-individual clients.	Complied	NA	NA	NA
SEBI/HO/IMD/DF1/CIR/					
P/2020/182 (Dated	(a) In case of non-individual clients, IA shall use the				
September 23, 2020)	investment policy as approved by board/management				
Clause 2(viii)	team of such non-individual clients for risk profiling and				
A J	suitability analysis.				
And	(b) The discretion to share the investment policy/				
SEBI Circular Ref No.	relevant excerpts of the policy shall lie with the non-				
SEBI/HO/MIRSD/ MIRSD-	individual client. However, IA shall have discretion not				
PoD-1/P/CIR/2025/003	to onboard non-individual clients if they are unable to				

(Dated January 08, 2025)	do risk profiling of the non-individual client in the				
Clause 1.2(viii)(b) - (c)	absence of investment policy.				
Regulation 18	<u>Disclosure to clients</u>	Complied	NA	NA	NA
	This involves disclosure of all prescribed information by				
	the investment adviser to its clients.				
Regulation 19	<u>Maintenance of records</u>	Complied	NA	NA	NA
	This regulation requires maintenance of prescribed				
	records, preservation of the same and audit of such				
	records by the prescribed professional.				
SEBI Master circular Ref.	Maintenance of record.	Complied	NA	NA	NA
No.	IA shall maintain and preserve records of interactions,				
SEBI/HO/MIRSD/MIRSD-	with all clients including prospective clients, where any				
PoD-1/P/CIR/2024/50	conversation related to advice has taken place as				
Clause 1.2(vi)	prescribed.				
SEBI Circular Ref. No.	Maintenance of record	Not Applicable	IA is not	NA	NA
SEBI/HO/MIRSD/ MIRSD-	Regulation 22A of the IA Regulations provides that IAs		providing		
PoD-1/P/CIR/2025/003	may provide implementation services to the advisory		execution or		
(Dated January 08, 2025)	clients in securities market. In this regard, IAs providing		Implementatio		
Clause 2 (xii)	implementation/execution services shall maintain call		n of advice		
	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.			_	
SEBI Circular Ref. No.	Agreement between IA and the client.	Complied	NA	NA	NA
SEBI/HO/IMD/DF1/CIR/					
P/2020/182 (Dated	IA shall enter into an investment advisory agreement				
September 23, 2020)	with its clients as prescribed and shall ensure that				
Clause 2(ii)	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.				
SEBI Circular Ref. No.	Agreement between IA and the client.	Complied	NA	NA	NA
SEBI/HO/MIRSD/ MIRSD-	The agreement shall also include the Most Important				
PoD-1/P/CIR/2025/003	Terms and Conditions (MITC) to be disclosed by IAs.				
(Dated January 08, 2025)	Consent of client to agreement between IA and client				
Clause 2 (xi)	may be signed by the client in person or through any				

					_
	other legally acceptable mode including DigiLocker				
Regulation 19A	enabled Aadhaar based e-signature facility.  Whether an investment adviser has maintained a	Complied	NA	NA	NA
And	functional website containing such details as may be	Complied	INA	INA	INA
SEBI Circular Ref. No.	specified by the Board?				
SEDI GII CUIUI IVOI	Specified by the Board.				
Regulation 20 (1)	Appointment of Compliance officer	Not Applicable	IA is registered		
and	An investment adviser shall appoint a compliance officer		in Individual		
SEBI Circular Ref. No.	who shall be responsible for monitoring the compliance		capacity		
SEBI/HO/MIRSD/ MIRSD-	by the investment adviser.				
PoD-1/P/CIR/2025/003					
(Dated January 08, 2025)	Whereas an independent professional appointed as				
Clause 2 (v) (a)	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				
D 1 1 24	Compliance (Non-Fund) Certification Examination	C 1: 1	N/A	N/A	N.A.
Regulation 21	Redressal of investor grievances through SEBI	Complied	NA	NA	NA
And	Complaints Redress system (SCORES) Platform: 7.2 - IAs shall prominently display in their offices				
Allu	the information about the grievance redressal				
SEBI Master circular Ref.	mechanism available to investors.				
No.	7.3 - IAs shall also followed the Master Circular				
SEBI/HO/MIRSD/MIRSD-	(SEBI/HO/OIAE/IGRD/P/CIR/2022) and Circular				
PoD-1/P/CIR/2024/50	(SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated				
Clause - V(7)	September 20, 2023) Issued by SEBI on the redressal of				
	investor grievances through the SEBI Complaints				
	Redress System (SCORES) and complied with it.				
Regulation 22,	Client level segregation of advisory and distribution	Complied	NA	NA	NA
SEBI Circular Ref. No.	activities.				
SEBI/HO/IMD/DF1/CIR/					
P/2020/182 (Dated	(1) Has the annual client level segregation requirement				

September 23, 2020)	been certified by an auditor (in case of individual IA)				
Clause 2(i)	and its statutory auditor (in case of a non-individual IA)				
	[Certificate of auditor to be attached along with]				
	(2) An individual investment adviser shall not provide				
	distribution services.				
	(3) 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.				
	(4) A non-individual investment adviser shall have				
	client level segregation at group level for investment				
	advisory and distribution services.				
	(5) 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.				
	(6) Compliance and monitoring process for client				
	segregation at group or family level shall be in				
	accordance with the guidelines as prescribed in the				
D 1 1 20 4	referred circular.	NT . A 1: 11	TA	BY A	37.4
Regulation 22A	Implementation of advice or execution	Not Applicable	IA is not	NA	NA
	(1) Investment adviser may provide implementation		providing		
	services to advisory clients, provided no consideration		execution or		
	shall be obtained directly or indirectly either at group		Implementatio n of advice		
	level or at family level.		n of advice		
	(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.				

SEBI Circular Ref. No.	Display of details on website and in other	Complied	NA	NA	NA
SEBI/HO/IMD/DF1/CIR/	communication channels.				
P/2020/182 (Dated					
September 23, 2020)	IAs shall prominently display the information as				
Clause 2(ix)	prescribed, on its website, mobile app, printed or				
	electronic materials, know your client forms, client				
	agreements and other correspondences with the clients.				
SEBI/HO/IMD/IMD-II	Publishing Investor Charter and disclosure of Investor	Complied	NA	NA	NA
CIS/P/CIR/2021/0686	<u>Complaints</u>				
(Dated December 13,	(1) All registered investment advisers are required to				
2021)	publish investor charter on their websites and mobile				
_	applications. If registered investment adviser do not				
and	have websites/mobile applications, then as a one-time				
	measure, investor charter to be sent to the investors on				
SEBI Master circular Ref.	their registered e-mail address.				
No.	(2) All registered investment advisers are required to				
SEBI/HO/MIRSD/MIRSD-	disclose the details of investor complaints by 7th of the				
PoD-1/P/CIR/2024/50	succeeding month on a monthly basis on their websites				
Clause - V (8) &	and mobile applications. If investment adviser do not				
SEBI/HO/IMD/IMD-II	have websites/mobile applications, status of investor				
CIS/P/CIR/2021/0686 (Dated December 13,	complaints to be sent to the investors on their registered email ids on a monthly basis.				
2021)	registered email ids on a monthly basis.				
TRAI Guidelines -	Telecom Regulatory Authority of India (TRAI) -	Not Applicable	IA is not using	NA	NA
SEBI/HO/MIRSD/DoS-	Guidelines to curb spam SMSes and misuse of Headers	Not Applicable	SMS as a	INA	IVA
2/P/OW/2023/0000011	and Content Templates by unauthorised Telemarketers		service.		
041/1 (Dated March 16,	(UTMs)		Service.		
2023) and BASL Circular	(OTMS)				
No. 20230329-1 dated					
March 29, 2023					
Usage of brand	Compliance to Usage of brand name/trade name by	Complied	NA	NA	NA
name/trade name -	Investment Advisers (IA)	•			
SEBI/HO/MIRSD/ MIRSD-					
PoD-2/P/CIR/2023/52					
(Dated April 06, 2023)					
and BASL Circular No.					

20230411-1 dated April 11, 2023 And SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - 10 (2)					
SEBI / BASL Inspections	Last SEBI / BASL Inspection carried out date and period of inspection. Whether complied with inspection observations.	Not Applicable	No inspections conducted till date	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 - 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 2.4 - Display of complaints status on website	Complied	NA	NA	NA
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)	Advisory for Financial Sector Organizations 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	NA	NA	NA
SEBI Circular no. SEBI/HO/MIRSD/ MIRSD- PoD-2/P/CIR/2023/51 dated April 05, 2023 - VI(9) And SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50	Advertisement code Investment Advisers shall ensure compliance with the advertisement code	Not Applicable	IA has not made any advertisements during the year under review.	NA	NA

dated May 21, 2024 - 10 (1)					
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - 10 (1) (d) (i)	Advertisement code Whether advertisements were published with the prior approval of Exchange?	Not Applicable	IA has not made any advertisements during the year under review.	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI (11)	Facilitating transaction in Mutual Fund schemes through the Stock Exchange Infrastructure  Compliance of aforementioned point VI (11) of master circular by registered investment advisers	Not Applicable	IA is not facilitating transaction in Mutual Fund schemes	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI(12)	Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication: Compliance of aforementioned point VI (12) of master circular by registered investment advisers	Complied	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI (13)	Guidelines on Outsourcing of Activities by Intermediaries Compliance of aforementioned point VI (13) of master circular by registered investment advisers	Complied	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI(14)	Framework for Regulatory Sandbox: Compliance of aforementioned point VI (14) of master circular by registered investment advisers	Not Applicable	IA has not used regulatory sandbox framework	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50	General Guidelines for dealing with Conflicts of Interest of intermediaries and their Associated Persons in Securities Market: Compliance of aforementioned point VI (15) of master circular by registered investment advisers	Complied	NA	NA	NA

dated May 21, 2024 - VI (15)					
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 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 (16) of master circular by registered investment advisers	Complied	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 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	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated 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	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI(19)	Simplification of requirements for grant of accreditation to investors  Compliance of aforementioned point VI (19) of master circular by registered investment advisers	Not Applicable	IA is not having any accredited investor as client	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD- PoD-1/P/CIR/2024/50 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	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-	Other reporting requirements	Complied	NA	NA	NA

PoD-1/P/CIR/2024/50	Whether Complaint Data has been displayed by IAs on					
dated May 21, 2024 -	their website/ mobile application by 07th of the					
VI(21.1)	succeeding month					
CEDI Martan simular Daf	Otherwood	Combina	NI A	NI A	NI A	
SEBI Master circular Ref.	Other reporting requirements	Complied	NA	NA	NA	
No.						
SEBI/HO/MIRSD/MIRSD-	Whether Undertaking on compliance of the advisory for					
PoD-1/P/CIR/2024/50	Financial Sector Organizations regarding Software as a					
dated May 21, 2024 -	Service (SaaS) based solutions to be submitted half					
VI(21.2)	yearly.					
SEBI Master circular Ref.	Reporting Requirements:	Complied	NA	NA	NA	
No. SEBI/HO/MIRSD-PoD-	IA has followed and complied to all reporting	_				
2/P/CIR/2023/89/ dated	requirement as per VII of Master Circular					
June 15, 2023 - VII						
SEBI Master circular Ref.	<u>ANNEXURES</u>	Complied	NA	NA	NA	
No. SEBI/HO/MIRSD-PoD-	Has IA followed all the annexures as prescribed in point					
2/P/CIR/2023/89/ dated	VIII of Master circular					
June 15, 2023 - VIII						

CS Megha Kyal Megha Kyal & Associates

Practicing Company Secretary CP. No.: 22896

UDIN No.: F013680G001309194

Date: 22.09.2025 Place: Navi Mumbai Ramesh Khatuwala **Proprietor of M/S Eminent Investments** Date: