## **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.

Annual Co	ompliance	<b>Audit Report</b>	for F. \	/ 2024-2025
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Name of Investment Adviser	Compounding Wealth Advisors LLP
SEBI Registration No.	INA000011219
BSE Enlistment No.	1770
Entity type	LLP
Financial Year	2024-2025
Name and Contact Details of Principal Officer	Rakesh Pujara Contact No: 9821638712 Email id: cwadvisors18@gmail.com
Name and Contact Details of Compliance Officer	Rakesh Pujara Contact No: 9821638712 Email id: cwadvisors18@gmail.com
Total No. of Clients on an 24 02 2025	202
Total No. of Clients as on 31-03-2025	393

		Compliance		Management Comments	
Regulation	Particulars	Status (anyone status as applicable to respective point to be retained)	compliance/ non-	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	Complied			

	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.			
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		
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		
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		

SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(iv)	Qualification and certification and certification and certification and certification and amended IA Regulation such IAs shall hold NISM certifications and compoundations as specified Regulation and compoundations as specified Regulation 7(2) of the aregulations at all times.	bove fifty years aired to comply and experience under 7(1) (b) of the as. However, of accredited bly with other under amended IA	Not Applicable	Investment Advisor is a Non-Individual Entity	
Regulation 8	Net worth  (1) Investment advisers individuals shall have a not less than fifty lakh r  (2) Investment advisers individuals shall have not assets of value not less rupees.	net worth of rupees. s who are et tangible	Complied		
Regulation 8  And SEBI circular Ref no. SEBI/HO/MIRSD/MIRSD- PoD1/P/CIR/2025/003 dated January 08,	Deposit requirement por December 2024 Compliance to deposit post 15 <sup>th</sup> December 202 basis the no. of clients:  No. of clients Up to 150 clients	requirement 24 as below Deposit 1 Lakh	Complied		
2024 point 2(ii)	151 to 300 clients 301 to 1000 clients 1001 and above clients	2 lakhs 5 lakhs 10 Lakhs			

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		
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		
Regulation 13(d)	Conditions of certificate: An individuals registered as investment advisers shall use the term 'investment adviser' in all their correspondences with their clients53[:] 54[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.]	Not Applicable	Investment Advisor is a Non-Individual Entity	

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	Investment Advisor is a - Individual Entity	
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	Investment Advisor is a Non-Individual Entity	

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		
Regulation 15 other than sub point 7	General Responsibility Whether IA has followed all the responsibilities as mentioned regulation 15?	Complied		
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		
SEBI Circular Ref. No. SEBI/HO/MIRSD/MIRSD-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		
SEBI Circular Ref. No. SEBI/HO/MIRSD/MIRSD-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		

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		
SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD- 1/P/CIR/2024/50 Clause 2(2.2)	Risk profiling Whether IA has obtain consent of the client on completed risk profile either through registered email or physical document.	Complied		
Regulation 17	Suitability Investment adviser shall ensure suitability of the advice being provided to the client.	Complied		
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		

Regulation 18  Regulation 19	Disclosure to clients This involves disclosure of all prescribed information by the investment adviser to its clients.  Maintenance of records This regulation requires maintenance of prescribed records, preservation of the same and audit of such records by the prescribed professional.	Complied		
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD- 1/P/CIR/2024/50 Clause 1.2(vi)	Maintenance of record.  IA shall maintain and preserve records of interactions, with all clients including prospective clients, where any conversation related to advice has taken place as prescribed.	Complied		
SEBI Circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD- 1/P/CIR/2025/003 (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		

SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated 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		
SEBI Circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD- 1/P/CIR/2025/003 (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 e-signature facility.	Complied		
Regulation 19A And SEBI Circular Ref. No.	Whether an investment adviser has maintained a functional website containing such details as may be specified by the Board?	Complied		
Regulation 20 (1) and SEBI Circular Ref. No.	Appointment of Compliance officer An investment adviser shall appoint a compliance officer who shall be responsible for monitoring the compliance by the investment adviser.	Complied		

SEBI/HO/MIRSD/ MIRSD-PoD- 1/P/CIR/2025/003 (Dated January 08,	Whereas an independent			
2025) Clause 2 (v) (a)	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			
	Redressal of investor grievances			
	through SEBI Complaints Redress			
	system (SCORES) Platform:			
	7.2 - IAs shall prominently display in			
Regulation 21	their offices			
Negulation 21	the information about the grievance			
And	redressal mechanism available			
riiw	to investors.	Complied		
SEBI Master circular Ref. No.	7.3 - IAs shall also followed the Master	Complica		
SEBI/HO/MIRSD/MIRSD-PoD-	Circular			
1/P/CIR/2024/50 Clause - V(7)	(SEBI/HO/OIAE/IGRD/P/CIR/2022) and			
1,1, cm, 101 i, 50 clause 1(1)	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.			
Regulation 22, SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(i)	Client level segregation of advisory and distribution activities.  (1) Has the annual client level segregation requirement been certified by an auditor (in case of individual IA) 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	Complied		

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	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 referred circular.				
	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.		Investment		
	(2) Investment adviser shall provide		Advisor Entity		
	implementation services only through		does not		
Regulation 22A	direct schemes.	Not Applicable	provided such		
	(3) Investment adviser or group or		services		
	family of investment adviser shall not		during the		
	charge any implementation fees from		audit period		
	the client.				
	(4) The client shall not be under any				
	obligation to avail implementation				
	services offered by the investment				
	adviser.				
	Display of details on website and in				
SEBI Circular Ref. No.	other communication channels.				
SEBI/HO/IMD/DF1/CIR/P/2020/182		Complied			
(Dated September 23, 2020) Clause 2(ix)	IAs shall prominently display the				
	information as prescribed, on its				
2	-				

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	website, mobile app, printed or				
	electronic materials, know your client				
	forms, client agreements and other				
	correspondences with the clients.				
	Publishing Investor Charter and disclosure				
	of Investor Complaints				
	(1) All registered investment advisers				
	are required to publish investor				
SEBI/HO/IMD/IMD-II	charter on their websites and mobile				
CIS/P/CIR/2021/0686 (Dated December	applications. If registered investment				
13, 2021)	adviser do not have websites/mobile				
•	applications, then as a one-time				
and	measure, investor charter to be sent				
	to the investors on their registered e-				
SEBI Master circular Ref. No.	mail address.	Complied			
SEBI/HO/MIRSD/MIRSD-PoD-	(2) All registered investment advisers are				
1/P/CIR/2024/50 Clause - V (8) &	required to disclose the details of investor				
SEBI/HO/IMD/IMD-II	complaints by 7th of the succeeding				
CIS/P/CIR/2021/0686 (Dated December	month on a monthly basis on their				
13, 2021)	websites and mobile applications. If				
13, 2021)	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.		Investment		
			Advisor does		
	Telecom Regulatory Authority of India		not provide		
TRAI Guidelines - SEBI/HO/MIRSD/DoS-	(TRAI) - Guidelines to curb spam SMSes		SMS Services		
2/P/OW/2023/0000011041/1 (Dated	and misuse of Headers and Content	Not Applicable	hence not		
March 16, 2023) and BASL Circular No.	Templates by unauthorised Telemarketers		registered		
20230329-1 dated March 29, 2023	(UTMs)		with TRAI as		
	, ,		principal		
			Entity		

Usage of brand name/trade name - 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)	Compliance to Usage of brand name/trade name by Investment Advisers (IA)	Complied			
SEBI / BASL Inspections	Last SEBI / BASL Inspection carried out date and period of inspection. Whether complied with inspection observations.	Complied			
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			
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.	Not Complied	Undertaking on Compliances for SAAS based solution not submitted on half yearly basis to Exchange	Yes	Noted for Compliance

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 dated May 21, 2024 - 10 (1)	Advertisement code Investment Advisers shall ensure compliance with the advertisement code	Not Applicable	No Advertisement were issued during the audit period	
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	No Advertisement were issued during the audit period	
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	Investment Advisor does not provide such service	
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		
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	Complied		

	(13) of master circular by registered investment advisers			
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	Investment Advisor does not provide such service	
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD- 1/P/CIR/2024/50 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 (15) of master circular by registered investment advisers	Complied		
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		
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		

	Know Your Client (KYC) Norms for the				
	Securities market				
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD- 1/P/CIR/2024/50 dated May 21, 2024 - VI(18)	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			
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	Investment Advisor does not have such clients		
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			
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD- 1/P/CIR/2024/50 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			
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD- 1/P/CIR/2024/50 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.	Not Complied	Undertaking on Compliances for SAAS based undertaking not submitted	Yes	Noted for Compliance

			on half yearly basis to Exchange		
SEBI Master circular Ref. No. SEBI/HO/MIRSD-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	Not Complied	Undertaking on Compliances for SAAS based solution not submitted on half yearly basis to Exchange	Yes	Noted for Compliance
SEBI Master circular Ref. No. SEBI/HO/MIRSD-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	Not Complied	Undertaking on Compliances for SAAS based solution not submitted on half yearly basis to Exchange	Yes	Noted for Compliance

KMS & Associates
Chartered Accountants

for Compounding Wealth Advisor LLP

**CA Kinjal Shah** 

Membership no.: 11420

Firm Registration no.: 130048W UDIN No.: 25111420BMJKJC5063

Date: 30-09-2025 Place: Mumbai Rakesh Pujara

Partner