# Action Taken Report (ATR)

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| Name of Investment Adviser: | Vipin Khandelwal |
| SEBI Registration No.: | INA000003643 |
| BSE Enlistment No.: | 1517 |
| Entity Type: | Individual |
| Financial Year: | 2025-2026 |

| Sr. No | Regulation | Particulars | Compliance Status | Reason for non-compliance | Auditor Comments Accepted (Yes/No) | Action taken on adverse findings |
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| 1 | Regulation 15 other than sub point 7 | General Responsibility Whether IA has followed all the responsibilities as mentioned regulation 15? | Not-Complied | The investment Adviser has not provided copy of investor charter as part of client onboarding process to its new clients However, the same is uploaded on the website | Yes | I will provide a copy of the Investor Charter to all new clients as part of the onboarding process to ensure compliance with this requirement I have included the Investor Charter as a part of the welcome email for new clients |
| 2 | 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 HO/38/12/11(2)2026-MIRSDPOD/I/4300/2026 clause 10.2 | Compliance to Usage of brand name/trade name by Investment Advisers (IA) | Not-Complied | The Investment Adviser has not displayed its logo in all correspondence with his clients | Yes | I am in the process of updating my files and email for correspondence with the clients to include the logo I will ensure that my logo is included in all client correspondence going forward |

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| 3 | SEBI Master Circular HO/38/12/11(2)2026-MIRSD-POD/I/4300/2026 clause 20 | 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. | Not-Complied | The Investment Adviser has maintained KYC records of the clients and has conducted the KYC procedure by checking and ensuring that the clients are KYC compliant However, he is not registered with the CKYC Registry due to the requirement of one more admin person or with any KRA | Yes | I have kept the KYC documents of the clients on record for registration with CKYC Registry, one needs to have a maker and the checker Since I am an individual and do not have any employee, I am unable to register with the CKYC registry For KRA registration, I will start the process |
| 4 | SEBI Master Circular HO/38/12/11(2)2026-MIRSD-POD/I/4300/2026 clause 29 | Rights of Persons with Disabilities Act, 2016 and rules made thereunder-mandatory compliance by all Regulated Entities Compliance of aforementioned point of master circular by registered investment advisers | Not-Complied | The Investment Adviser is the process of complying with the accessibility circular | Yes | There was a delay in complying with the reporting requirement due to my medical condition The same has been complied now |

VIPIN KHANDELWAL

Digitally signed by VIPIN KHANDELWAL
Date: 2026.10.19 17:03:54 +05'30'

**Vipin Khandelwal**

**Date: 19-10-2026**
**Place: Pune**