

Confidential  
**ANNUAL AUDIT REPORT**

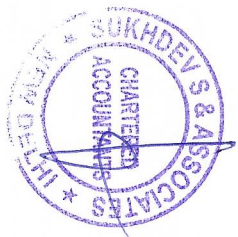
Annual Audit of Investment Adviser  
1<sup>st</sup> April, 2022 to 31<sup>st</sup> March, 2023

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1<sup>st</sup> April, 2022 to 31<sup>st</sup> March, 2023

**BACKGROUND**

*PAGE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED IS SEBI REGISTERED INVESTMENT ADVISOR.*

Name of BASL enrolled Investment Adviser	PAGE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED
BASL Membership ID.	BASL -1272
SEBI Registration No.	INA100013737
Annual compliance Audit Report for FY ended	2022-2023

*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 INSTITUTE OF CHARTERED ACCOUNTANTS OF INDIA OR INSTITUTE OF COMPANY SECRETARIES OF INDIA.*

*SUKHDEV S & ASSOCIATES HAVE BEEN ASSIGNED THE INTERNAL AUDIT OF INTERNAL CONTROL SYSTEMS OF INVESTMENT ADVISER ACTIVITIES OF PAGE FINANCIAL INVESTMENT ADVISER 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 SEBI.*

**Audit Period:**

*THE AUDIT PERIOD FOR THE CURRENT ANNUAL AUDIT IS APRIL 2022 TO MARCH 2023.*



## SCOPE OF OUR ASSIGNMENT

*THE SCOPE OF AUDIT FOR THE AUDIT PERIOD APRIL 2022 TO MARCH 2023 INCLUDED THE FOLLOWING:*

<b>Sr. No.</b>	<b>Areas/ Scope of work covered</b>
1.	Review of Internal Policies & procedures
2.	Website review
3.	Certificate of Registration
4.	KYC procedure and client agreement
5.	Qualification & certification requirement and Capital Adequacy
6.	Personal Trading by Investor Advisor
7.	Client Communication and Disclosures to clients
8.	Risk Profile & Assessment and Suitability assessment
9.	Rationale behind investment advice
10.	Maintenance of records
11.	Grievance redressal process
12.	Segregation of Distribution and execution services
13.	SEBI Communication



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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	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.	<input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not-Complied  <input type="checkbox"/> Not Applicable	NA	NA
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.	<input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not-Complied  <input type="checkbox"/> Not Applicable	NA	NA
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)	<input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not-Complied  <input type="checkbox"/> Not Applicable	NA	NA
SEBI/HO/IMD/ DF1/CIR/P/2 020/182 (Dated	Qualification and certification requirement.  Existing individual IAs above fifty years of age shall not be required to comply with the	<input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not-Complied	IA has not given any investment advice to any client during the audit period.	



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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)
September 23, 2020) Clause (iv)	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.	<input type="checkbox"/> Not Applicable	Principal officer possess NISM-Series-V-A. No other person associated with investment advice activity.	
Regulation 8	<u>Net worth</u> (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.	<input checked="" type="checkbox"/> <b>Complied</b> <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable	NA	NA
Regulation 13	<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.	<input checked="" type="checkbox"/> <b>Complied</b> <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable	NA	NA
SEBI/HO/IMD/DF1/CIR/P/2	Registration as Non-Individual Investment Advisor.	<input type="checkbox"/> Complied	IA has not given any investment advice to any client	NA



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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)
020/182 (Dated September 23, 2020) Clause 2(v)	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.	<input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	during the audit period.	NA
Regulation 15	<u>General Responsibility</u> The regulation 15 imposes certain responsibilities on the Investment Adviser for the transactions it undertakes on behalf of its clients.	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
Regulation 15 A	<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.	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(iii)	<u>Fees</u> Investment Advisers shall charge fees from the clients in either Assets under Advice (AUA) mode or Fixed fee mode.	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
Regulation 16	<u>Risk profiling</u> This involves profiling, assessing the risk	<input type="checkbox"/> Complied	IA has not given any investment advice to any client	NA



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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 17	appetite of each client individually, and communication of such profile to the respective client.  <u>Suitability</u> Investment adviser shall ensure suitability of the advice being provided to the client.	<input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	during the audit period.	NA
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(viii)	<p><u>Risk profiling and suitability for non-individual clients.</u></p> <p>(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.</p> <p>(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.</p>	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
Regulation 18	<u>Disclosure to clients</u>	<input type="checkbox"/> Complied	IA has not given any investment advice to any client	NA



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Regulation 19	This involves disclosure of all necessary information by the investment adviser to its clients.  <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 type="checkbox"/> Not-Complied <input checked="" type="checkbox"/> <u>Not Applicable</u>	during the audit period.	NA
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 type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input checked="" type="checkbox"/> <u>Not Applicable</u>	IA has not given any investment advice to any client during the audit period.	NA
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 type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input checked="" type="checkbox"/> <u>Not Applicable</u>	IA has not given any advice to any client during the audit period.	NA
Regulation 20	<u>Appointment of Compliance officer</u>	<input checked="" type="checkbox"/> Complied	IA has not given any	NA





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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)
	An investment adviser shall appoint a compliance officer who shall be responsible for monitoring the compliance by the investment adviser.	<input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable	investment advice to any client during the audit period.	
<b>Regulation 21</b>	<b>Redressal of client grievances</b> Investment adviser shall redress client grievances promptly through an adequate procedure	<input type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
<b>Regulation 22</b>	<b>Client level segregation of advisory and distribution activities:</b> (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	<input type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA



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SEBI/HO/IMD/ DF1/CIIR/P/2 020/182 (Dated September 23, 2020) Clause 2(i)	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.  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.	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
Regulation 22A	<p>(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.</p> <p>(2) Investment adviser shall provide implementation services only through direct schemes.</p> <p>(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</p>	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA



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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)
	avail implementation services offered by the investment adviser.			
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ix)	<u>Display of details on website and in other communication channels.</u> IA shall prominently display the information as specified under this clause, on its website, mobile app, printed or electronic materials, know your client forms, client agreements and other correspondences with the clients	<input type="checkbox"/> <b>Complied</b> <input type="checkbox"/> Not-Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
SEBI/HO/MIRS D2/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 on 30th September 2022 and 31st March 2023.	<input type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any investment advice to any client during the audit period.	NA
SEBI/HO/IMD/I MD-II CIS/P/CIR/2021 /0686 (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	<input type="checkbox"/> <b>Complied</b> <input type="checkbox"/> Not-Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	IA has not given any advice to any client during the audit period.	NA



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	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 on their registered email on a monthly basis.			
Name and Contact Details of Principal Officer	Amit Goel  9818774181			
Name and Contact Details of Compliance Officer	Shah Nawaz  7838241438			
Total No. of Clients as on 31-03-2023	0			



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Cyber Security Awareness	Whether any planned Cyber Security Awareness carried out among employees, stakeholders and clients. If Yes, details of Cyber Security Awareness programme conducted in the Audit FY	Yes, on 23 <sup>rd</sup> January 2023	A meeting of employees conducted to make aware them how to protect users systems , various data and point to consider for safe browsing so that they prevent themselves from any cyber security frauds.	
SEBI / BASL Inspections	Last SEBI / BASL Inspection carried out date and Whether complied with inspection Observations.	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> <b>Not Applicable</b>	No Inspection carried out till date.	

**For Sukhdev S & Associates**

**Chartered Accountants**  
**For SUKHDEV S & ASSOCIATES**  
**CHARTERED ACCOUNTANTS**

*Sukhdev S*  
 Proprietor



Sukhdev S Soi  
 Membership no:091202  
 Proprietor  
 P.R.N. No - 037448N  
 UDDIN: 23091202BGYGUL5460

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PACE FINANCIAL INVESTMENT ADVISER PRIVATE LIMITED  
INVESTMENT ADVISER HAVING SEBI REGISTRATION No.: INA100013737  
SEBI ANNUAL AUDIT (FINANCIAL YEAR 2022-23)

## COMPLIANCE AUDIT REPORT

PREPARED BY

SUKHDEV SINGH SOI

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