

**NIRMITI INVESTMENT ADVISORS LLP**

E403, Rohan Nilay Ph1, Nr. Spicer College,
Aundh, Pune 411007.
www.proinvestnirmiti.com

Actions taken report

Finding 1- The Firm is suggested to maintain records of supporting documents like demat statements, unit statements etc. of the client to demonstrate AUA.

Action taken1 - The firm has always kept the record of contract notes of all the clients on boarded. After the recommendations are sent to the client, firm always makes sure to collect the contract notes from the clients via registered email ID and keeps a record of the same.

Finding 2- The Firm is advised to disclose information about disciplinary history and affiliation with other intermediaries. The same can be disclosed in the agreement with its clients.

Action taken 2- The firm has no disciplinary history so far. The firm is registered on SCORES portal. The same is disclosed to the clients in our agreement. It has also been mentioned on our website.

Finding 3- The Firm is advised to disclose details about its holding in or position in financial products or services which are subject matter of investment advice. The same can be mentioned in the report / email / document where the investment advice is given.

Action taken 3- The firm has now disclosed details about its holding position or position in financial products or services which are subject matter of investment advice in the agreement which is signed by the both parties.

Finding 4 - The Firm is advised to obtain signatures on the client agreements and not OTP based confirmation. The signature can be obtained either through digital signature mode or through Aadhar eSign mode. It is also advised that both the parties sign the said agreement and maintain the copy on records.

Action taken 4- The Principal officer Avanti Doshi now signs the agreements after the client signs it. Now both the parties sign the agreement. For the clients on boarded through Smallcase, those agreements are now signed by Aadhar eSign mode.



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Finding 5 - The Firm is advised to keep a document for suitability assessment of the advice being provide.

Action taken 5- The firm always had a robust risk profile process for assessing the suitability of advice. The firm has now added and maintained a document for suitability assessment of the advice provided.

Finding 6- The Firm is advised to display information under clause 2 (ix) of the SEBI circular SEBI/HO/IMD/DF1/CIR/P/2020/182 dated September 23, 2020 on its printed or electronic materials, know your client forms, client agreements and other correspondences with the clients.

Action taken 6- The firm has displayed information under clause 2 (ix) of the SEBI circular SEBI/HO/IMD/DF1/CIR/P/2020/182 dated September 23, 2020 on its printed or electronic materials, know your client forms, client agreements and other correspondences with the clients.

Avanti Doshi

Dr. Avanti Doshi
Principal Officer
Nirmiti Investment Advisors LLP