



NIRMITI INVESTMENT ADVISORS LLP

A-201 Rohan Nilay 2 Near Spicer School, Aundh, Pune 411007
www.proinvestnirmti.com

Actions taken report

Finding 1- The Firm has not obtained consent from some of the clients serviced directly, on the completed risk profile. In case of clients serviced through the third-party, the risk profile of the client is mentioned in the agreement which is accepted by the client, but not signed, as required under SEBI Master Circular SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89 dated June 15,2023.

Action taken 1 - The firm has implemented the policy to repeat risk assessment for all the active clients serviced directly every 3 years. The clients are also informed to convey to us if there is any change in their risk profile from time to time. Thus all the risk profiles of old clients were repeated in FY 22-23. The risk profile score and suitability report as per their risk profile was communicated to the directly serviced client via email on their registered email ID. Now to further boost the risk profiling process, the risk profile score after completing the risk profile questionnaire is immediately communicated to directly serviced client on their agreement. Client provides his/her consent to the Risk Profile via the signed agreement. For the clients on boarded through Smallcase, the risk profile of the client is mentioned in the agreement and those agreements are now signed by Aadhar eSign mode.

Finding 2- The Firm has not conducted / obtained investment policy from non-individual clients for risk profiling and suitability assessment as required under the SEBI Master Circular SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89 dated June 15, 2023.

Action taken 2- The firm has taken copy of board resolution passed by the board of directors of existing non-individual clients. We will soon incorporate the practice of having a robust investment policy statement (IPS) in place for all our future non-individual clients.



NIRMITI INVESTMENT ADVISORS LLP

A-201 Rohan Nilay 2 Near Spicer School, Aundh, Pune 411007
www.proinvestnirmti.com

Finding 3- The firm has maintained documents but not all the agreements are signed by the Firm, and the Agreements serviced through the third parties is confirmed through OTP only, and not signed by both parties.

Action taken 3- The Principal officer Avanti Doshi now signs the agreements after the client signs it. Now both the parties sign the agreement. This was implemented from October 2022. So clients on boarded after that has both signatures of the client as well as Principal Officer Avanti Doshi. For the clients on boarded through Smallcase, those agreements are now signed by Aadhar eSign mode. This was also implemented from October 2022. No new client was on boarded on Smallcase after that.

Finding 4 - Some of the rationales for providing investment advice / research reports are not dated.

Action taken 4- The rationales are now dated and signed by Principal Officer Avanti Doshi.

Avanti Doshi

Dr. Avanti Doshi
Principal Officer
Nirmiti Investment Advisors LLP