



NIRMITI INVESTMENT ADVISORS LLP

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

Date: 18-9-2024

To,
Securities and Exchange Board of India
Market Intermediaries Regulation & Supervision Department
SEBI Bhavan II, Bandra Kurla Complex,
Bandra (E), Mumbai - 400 051

Sub: Action Taken Report on the adverse findings in the compliance audit report for FY 23-24

Dear Sir / Madam,

Following are the details of the action taken by the management on the adverse findings in the compliance audit report for FY 23 - 24:

Sr. No.	Observation of the auditor	Action taken by the management
1.	The agreement of a few older clients is not signed by the authorised signatory of the Firm.	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.
2.	The Firm has displayed details on the website and in other communication channels as per SEBI master circular clause 1.2(ix) SEBI Circular Ref. No. SEBI/HO/MIRSD-PoD 2/P/CIR/2023/89/ dated June 15, 2023 but not in the rationale and risk profile questionnaire.	The firm now has added details as per SEBI master circular clause 1.2(ix) SEBI Circular Ref. No. SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89/ dated June 15, 2023 on the rationale and risk profile questionnaire PDF. Prior to that email signature carried these details when the rationale and risk profile questionnaire PDF was emailed to the client. All the email communications, signature always carries these details.
3.	The Firm has disclosed about the brand name on the website as per SEBI master circular Ref. No. SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89/ dated June 15, 2023 – clause VI (9) and, but the not in the agreements with the old clients and also in some email correspondence with the clients.	The Firm has now disclosed about the brand name as per SEBI master circular Ref. No. SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89/ dated June 15, 2023 – clause VI (9) in the agreement and all the email correspondence with the old and new clients. Further all the clients were always provided the website link in all the communications where the firm had disclosed the brand name as per the SEBI circular.



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Thanking you,

With regards,

For Nirmiti Investment Advsiors LLP

Avanti Doshi

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Avanti Doshi

Principal Officer

c.c. : BSE Administration & Supervision Ltd.
25th Floor, P. J. Towers, Fort
Mumbai 400 023.