



#### Compliance Report

To
The Board of Directors
M/s. Vivekam Financial Services Private Limited

We have verified the registers, records, books and papers of M/s. Vivekam Financial Investment Advisers, a unit of M/s Vivekam Financial Services Private Limited, a company registered under the Companies Act, and registered with the Securities Exchange Board of India (SEBI) as an Investment Adviser vide Registration No. INA200000316 ('the Investment Adviser'), for the financial year 2022-23, as required under SEBI (Investment Advisers) regulations, 2013 ('the regulation').

## **Management Responsibility**

The management is responsible for the maintenance of the records, compliance of provisions and for the adhering to the general obligations and Responsibilities as specified in the Chapter III of the regulations. This responsibility includes design, implementation and maintenance of controls relevant to rendering of investment advisory services in a manner that are prudent and in accordance with appetite of the client and generally accepted investment principles.

### Auditor's Responsibility

Based on assessment, our responsibility is to express an opinion on compliance of the provisions specified under the regulations. We conducted our assessment in accordance with the generally accepted auditing principles.

Our assessment involves performing procedure to obtain conclusive evidence about investment advisor services offered to the clients. Our assessment includes evaluating appropriateness of advisory services made by the management as well as evaluating overall working and controls of the investment Adviser. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our Compliance report.

## Report on Legal and Regulatory Requirements

1. As required by the regulations, we hereby report, in the annexure, a statement on the matters as may be necessary to ensure compliance under the regulations.

2. We further report that:

a. We have obtained all information and explanation which to the best of our knowledge and belief were necessary for the purpose of our audit; and

b. Proper records and registers as required by the Regulations have been maintained or kept by the Investment Adviser, either in electronic or physical form, so far as appears from our examination of these record and registers.

Place: Hyderabad

Date: 26th September 2023

CA. Sriramulu Reconstruction Membership No.227395

# Annexure to the Compliance Report for the Financial Year 2022-23

- 1. The Investment Adviser has been granted the Certificate of Registration by the Securities Exchange Board of India.
- 2. The Investment Adviser uses the name and designation of Investment Adviser in all its correspondences with the client.
- 3. The Investment Adviser acts in fiduciary capacity and any conflict of interest is disclosed
- 4. The Investment Adviser maintains an arm's length relationship between the activates as an Investment Adviser and other Activities.
- 5. The Investment Adviser has not disclosed any confidential information of the clients.
- 6. The Investment Adviser has received consideration or remuneration from the clients for investment advisory services provided to the clients.
- 7. The Investment Adviser has complied with KYC norms pertaining to the clients and has followed up on pending cases.
- 8. The Investment Adviser has abided by the code of Conduct as specified under schedule III of the Regulations
- 9. There was no change in control of the Investment Adviser.
- 10. Representatives of the Investment Adviser offering investment advice holds valid certificate and qualification as prescribed under Regulation 7 of the Regulations.
- 11. The Investment Adviser offering investment advice has net worth of more than 50 lakhs as prescribed under Regulation 8 of the Regulations.
- 12. The Investment Adviser uses software tools under computerized environment to carry out risk profiling of the clients
- 13. The Investment advisor has complied with Regulation 13(b) of the Regulations with respect to inform to the board in writing regarding material change in the information already submitted.
- 14. The Investment Adviser has obtained necessary documents and information for risk profiling of the clients.
- 15. The risk profile assessment is shared with the client. However, the client has final say in choosing or deciding nature or type of product.
- 16. The Investment Adviser has documented all advises given to the clients.
- 17. The Investment advisor has entered into an investment advisory agreement with its clients as prescribed by the regulations
- 18. The Investment Adviser has maintained all necessary records under the Regulation in electronic or physical form.



19. The investment advisor are complying with regard to publishing investor charter on their websites and on mobile applications regularly as prescribed by the regulations

For DVAK & Co

Chartered Accountants

FRN No. 0163368

CA. Sriramulu Patcha

Hyderabad

Membership No.227395

UDIN: 23227395BGPXRF5282

Place: Hyderabad Date: 26<sup>th</sup> September 2023