

GAUTAM AGARWAL & CO

Chartered Accountants

Registered Office Address: 23, Gangadhar Babu Lane, 4th Floor, Room No. 4D, Kolkata - 700012.

Phone: 033 4071 7020; Mobile No. 9903392951; E-mail: gautam.agarwal@gacco.in

Research Analysts Annual Audit Report of M/s SMIFS Limited for the Financial Year ended 31st March 2025

Introduction

The Audit report Prepared by Gautam Agarwal & Co, Chartered Accountants in accordance with the rules/regulation/guidelines prescribed under SEBI (Research Analysts) Regulations 2014 for the purpose and compliance requirement of SEBI and presenting the findings to the Management of M/s SMIFS Limited registered office situated at Vaibhav, 5th Floor, 4 Lee Road, Kolkata-700020.

Scope & Objective of the Audit

The Audit conducted for the Period 01st April 2024 to 31st March 2025 with the main objectives of finding the deviation in the guidelines as prescribed under SEBI (Research Analysts) Regulations 2014 including but not limited to policies/procedures adopted by the company. It also covers the internal control mechanism adopted by the company to achieve the objectives set by the regulator.

Back ground of the company

The Company is a SEBI registered Intermediary and acting as Research Analysts. The company also deals in various segments of the exchange (Cash/Derivative/Currency Derivative/Commodity Derivative) and also acting as Depository Participant of CDSL and NSDL. The Main nature of the company is dealing in Stocks/ shares for clients with large penetration in the retail segment.

Basic Details

Place of Audit/Books of accounts and other records maintained	:	Vaibhav, 5 th Floor, 4 Lee Road, Kolkata-700020
Period of Scrutiny	:	01 st April 2024 to 31 st March 2025
Software used for Back-Office/Accounting	:	Share-Pro (Standard Software)
No of clients served during the period of Audit Period	:	482
Details of compliance Officer	:	Mr. Sudipto Dutta Manager & Compliance Officer Mob: 9831026480 Email Id: sudipta@smifs.com
Investor Grievance Email Id	:	investors@smifs.com
SEBI Registration Number along with date	:	INH300001474 Date of Registration: 20.08.2015





SINGHAL NAVEEN & ASSOCIATES

CHARTERED ACCOUNTANTS

E-mail : taxindia5249@gmail.com

Mob. : 98311 84086

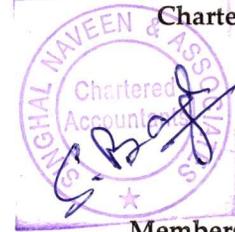
TO WHOMSOEVER IT MAY CONCERN

This is to certify that M/S SMIFS Limited has complied with Regulation 26C(5) of RA Regulations as mentioned in point no 2(x) of SEBI circular SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2025/004 dated January 08,2025 with respect to Client level segregation of Research and distribution activities.

Place: Howrah
Date: 30-09-2025

For, Singhal Naveen & Associates
Chartered Accountants

FRN: 329833E



Sourav Bagla
(Partner)

Membership. No.: 305536

UDIN- 25305536BMUNNB2204

ANNEXURE

NOTE:

1. **Annual Audit Compliance Report (ACR)** – As per RA regulation Clause 25(3) Research Analyst 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 71[or Institute of Cost Accountants of India] 72[and submit a report of the same as may be specified by the Board].
2. **Client Level Segregation** - As per Clause 2(x)(h) of SEBI Circular No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025, a Research Analyst shall maintain on record an annual certificate from a member of ICAI/ ICSI/ ICAI or from an auditor confirming compliance with client level segregation requirements. Such annual certificate shall be obtained within six months of the end of the financial year.
3. **Action Taken Report (ATR)** - As per Clause 2(xiv)(c)(ii) of SEBI Circular No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025, submit adverse findings of audit, if any, along with action taken thereof duly approved by the individual IA or management of non-individual IA to IAASB/SEBI within a period of one month from the date of the audit report but not later than October 31st of each year for the previous financial year.

Annual Compliance Audit Report for F. Y 2024-2025

Name of Research Analyst	SMIFS Limited
SEBI Registration No.	INH300001474
BSE Enlistment No.	5098
Entity type	Body Corporate
Financial Year	2024-2025
Name and Contact Details of Principal Officer	Mr. Saurabh Ginodia, 9748899164; research@smifs.com
Name and Contact Details of Compliance Officer	Mr. Sudipto Dutta +919831026480; sudipta@smifs.com
Total No. of Clients as on 31-03-2025	482(fees based client)



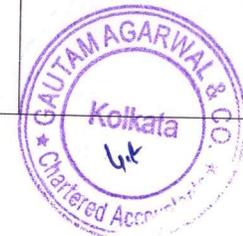
Regulation	Particulars	Compliance Status (anyone status as applicable to respective point to be retained)	Reason for non-compliance/non-applicability	Management Comments	
				Whether Auditor comments accepted in case of non-compliance reported by auditor? (Yes/No)	Action taken on adverse findings (duly approved by the individual R A/management of the non-individual R A)
Regulation 2 (oa)	<p>Is "principal officer" in case of non-individual research analyst engaged:</p> <p>(i) solely in providing research services, shall mean the managing director or designated director or managing partner or executive chairman of the board or equivalent management body who is responsible for the overall function of the business and operations of non-individual Research Analyst;</p> <p>(ii) in the activities other than Research services, through separate departments/divisions, may be the person at the management level who is a business head or unit head, responsible for the overall function of the business and operations</p>	Complied	NA	NA	NA



	related to research services: Provided that in case of non-individual Research Analyst being a partnership firm, one of the partners shall be designated as its principal officer.				
Regulation 3	<u>Application for grant of certificate</u> (1) No person shall act as a Research Analyst or hold itself out as an Research Analyst unless he has obtained a certificate of registration from the Board under these regulations.	Complied	NA	NA	NA
Regulation 6	<u>Consideration of application and eligibility criteria</u> Regulation 6 states all the matters, which are relevant for the purpose of grant of certificate of registration.	Complied	NA	NA	NA
Regulation 7 And SEBI circular Ref no. SEBI/HO/MIRSD/MIRSD- PoD1/P/CIR/2025/004 dated January 08, 2025 point 2(i)	<u>Qualification Requirement</u> An individual Research Analyst or a principal officer of a non-individual Research Analyst registered as a Research Analyst under these regulations and persons associated with research services shall have minimum qualification and certification requirements as mentioned in Regulation 7(1) and 7(2). For the RAs existing as on 16 December 2024: It is clarified that the revised qualification	Complied	NA	NA	NA



	<p>requirements shall not be required to existing individual RAs, Principal officer of non-individual RAs or research entity, individuals employed as research analysts and partners of research analyst, if any, engaged in providing research services [Para 2.i. of SEBI/HO/MIRSD/MIRSD-PoD1/P/CIR/2025/004]</p>				
<p>SEBI circular Ref no. SEBI/HO/MIRSD/MIRSD-PoD1/P/CIR/2025/004 dated January 08, 2024 point 2(i) And BSE Circular Ref. No. 20250313-10 Dated March 13, 2025</p>	<p><u>Certification requirement</u> An individual registered as research analyst under the RA Regulations, 2014, a principal officer of a non-individual research analyst, individuals employed as research analysts, persons associated with research services, and in case of the research analyst being a partnership firm, the partners thereof if any, who are engaged in providing research services: (i) shall obtain certification(s) from NISM by passing the "NISM-Series-XV: Research Analyst Certification Examination", as mentioned in the NISM communique No. NISM/Certification/Series-XV: Research Analyst/2015/01 dated February 16, 2015. (ii) shall, in order to ensure continuity in compliance with the certification requirements, before</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



	expiry of the validity of the existing certification as specified in clause (i), obtain certification from NISM by passing the NISM-Series-XV-B: Research Analyst Certification (Renewal) Examination as mentioned in the NISM communiqué No. NISM/Certification/ NISM-Series-XV-B: Research Analyst Certification (Renewal) Examination/2024/01 dated January 06, 2025.										
Regulation 8	<u>Net worth requirement till 15th December 2024 as below:</u> (1) A research analyst who is individual or partnership firm shall have net tangible assets of value not less than one lakh rupees. (2) A research analyst who is body corporate or limited liability partnership firm shall have a networth of not less than twenty five lakh rupees.	Complied	NA	NA	NA						
Regulation 8 And SEBI circular Ref no. SEBI/HO/MIRSD/MIRSD-PoD1/P/CIR/2025/004 dated January 08, 2024 point 2(ii)	<u>Deposit requirement post 15th December 2024</u> Compliance to deposit requirement post 15 th December 2024 as below basis the no. of clients:	Complied	NA	NA	NA						
	<table border="1"> <thead> <tr> <th>No. of clients</th> <th>Deposit</th> </tr> </thead> <tbody> <tr> <td>Up to 150 clients</td> <td>1 Lakh</td> </tr> <tr> <td>151 to 300 clients</td> <td>2 lakhs</td> </tr> </tbody> </table>					No. of clients	Deposit	Up to 150 clients	1 Lakh	151 to 300 clients	2 lakhs
	No. of clients					Deposit					
	Up to 150 clients					1 Lakh					
151 to 300 clients	2 lakhs										



	301 to 1000 clients 5 lakhs 1001 and above clients 10 Lakhs				
Regulation 13(ii)	<u>Conditions of certificate:</u> The Research Analyst 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.	Not Applicable	There is no such instance hence point has been marked as Not Applicable.	NA	NA
Regulation 13(iii)	<u>Conditions of certificate:</u> Research analyst registered under RA regulations shall use the term 'research analyst' in all correspondences with its clients. Provided that part-time Research Analyst registered under these regulations shall use the term 'part-time Research Analyst' in all their correspondences with their clients	Complied	NA	NA	NA
Regulation 13(iv)	<u>Conditions of certificate:</u> The number of clients of a part-time research analyst shall not exceed	Not Applicable	The RA is not registered as a part time	NA	NA



	seventy-five in total at any point of time.		research analyst		
Regulation 14 And SEBI circular Ref No. SEBI/HO/MIRSD/MIRSD-POD- 1/P/CIR/2024/101 dated July 12, 2024	Whether the RA is enlisted with RAASB?	Complied	NA	NA	NA
Regulation 15 (1)	<u>Establishing Internal policies and procedures</u> Research analyst or research entity shall have written internal policies and control procedures governing the dealing and trading by any research analyst.	Complied	NA	NA	NA
Regulation 15 (2)	<u>Establishing Internal policies and procedures</u> Research analyst or research entity shall have in place appropriate mechanisms to ensure independence of its research activities from its other business activities.	Complied	NA	NA	NA
Regulation 15A read with SEBI Circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD- 1/P/CIR/2025/004 (Dated January 08, 2025) Clause 2(ix)	<u>Fees</u> Research Analyst shall be entitled to charge fees for providing Research services from a client in including an	Complied	NA	NA	NA



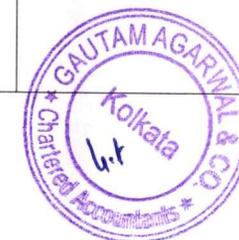
	accredited investor in the manner as specified by the Board				
Regulation 16 (1)	<u>Limitations on trading by research analysts</u> Personal trading activities of the individuals employed as research analyst by research entity shall be monitored, recorded and wherever necessary, shall be subject to a formal approval process.	Complied	NA	NA	NA
Regulation 16 (2)	<u>Limitations on trading by research analysts</u> Independent research analysts, part-time research analysts, individuals employed as research analyst by research entity or their associates shall not deal or trade in securities that the research analyst recommends or follows within thirty days before and five days after the publication of a research report.	Complied	NA	NA	NA
Regulation 16 (3)	<u>Limitations on trading by research analysts</u> Independent research analysts, part-time research analysts, individuals employed as research analysts by research entity or their associates	Complied	NA	NA	NA



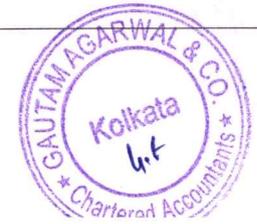
	shall not deal or trade directly or indirectly in securities that he reviews in a manner contrary to his given recommendation.				
Regulation 16 (4)	<p><u>Limitations on trading by research analysts</u> Independent research analysts, part-time research analysts, individuals employed as research analysts by research entity or their associate shall not purchase or receive securities of the issuer before the issuer's initial public offering, if the issuer is principally engaged in the same types of business as companies that the research analyst follows or recommends.</p>	Complied	NA	NA	NA
Regulation 16 (5)	<p><u>Limitations on trading by research analysts</u> Provisions of sub-regulations (2) to (4) shall apply mutatis mutandis to a research entity unless it has segregated its research activities from all other activities and maintained an arms-length relationship between such activities</p>	Complied	NA	NA	NA



<p>Regulation 16 (6)</p>	<p><u>Limitations on trading by research analysts</u></p> <p>Notwithstanding anything contained in sub-regulations (2) to (4), such restrictions to trade or deal in securities may not apply in case of significant news or event concerning the subject company or based upon an unanticipated significant change in the personal financial circumstances of the research analyst, subject to prior written approval as per the terms specified in the approved internal policies and procedures.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 17</p>	<p><u>Compensation of research analysts</u></p> <p>Whether compensation of research analyst is in compliance with regulation 17</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 18 (1)</p>	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>(1) Research analyst or research entity shall not publish or distribute research report or research analysis or make public appearance regarding a subject company for which he has</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



	<p>acted as a manager or co-manager at any time falling within a period of:</p> <p>(a) Forty days immediately following the day on which the securities are priced if the offering is an initial public offering; or</p> <p>(b) Ten days immediately following the day on which the securities are priced if the offering is a further public offering:</p> <p>Provided that research analyst or research entity may publish or distribute research report or research analysis or make public appearance within such forty day and ten day periods, subject to prior written approval of legal or compliance personnel as specified in the internal policies and procedures.</p>				
<p>Regulation 18 (2)</p>	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>A research entity who has agreed to participate or is participating as an underwriter of an issuer's initial public offering shall not publish or distribute a research report or make public appearance regarding that issuer before expiry of twenty five days from the date of the</p>	<p>Not Applicable</p>	<p>The RE has not participated as an underwriter of an IPO</p>	<p>NA</p>	<p>NA</p>



	<p>offering. Explanation.-For the purposes of sub-regulations (1) and (2), the date of the offering refers to the first date on which the security was offered to the public.</p>				
<p>Regulation 18 (3)</p>	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>Research analyst or research entity who has acted as a manager or co-manager of public offering of securities of a company shall not publish or distribute a research report or make a public appearance concerning that company within fifteen days prior to date of entering into and fifteen days after the expiration/waiver/termination of a lock-up agreement or any other agreement that the research analyst or research entity has entered into with a subject company that restricts or prohibits the sale of securities held by the subject company after the completion of public offering of securities:</p> <p>Provided that research analyst or research entity may publish or</p>	<p>Not Applicable</p>	<p>The RE HAS not acted as a manager or co manager of public offering of securities.</p>	<p>NA</p>	<p>NA</p>



	distribute research report or research analysis or make public appearance regarding that company within such fifteen days subject to prior written approval of legal or compliance personnel as specified in the internal policies and procedures.				
Regulation 18 (4)	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>Research analyst or individuals employed as research analyst by research entity shall not participate in business activities designed to solicit investment banking or merchant banking or brokerage services business, such as sales pitches and deal road shows.</p>	Complied	NA	NA	NA
Regulation 18 (5)	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>Research analyst or individuals employed as research analyst by research entity shall not engage in any communication with a current or prospective client in the presence of personnel from investment banking or merchant</p>	Complied	NA	NA	NA



	banking or brokerage services divisions or company management about an investment banking services transaction.				
Regulation 18 (6)	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>Investment banking or merchant banking or brokerage services division's personnel of research entity shall not direct the individuals employed as research analyst to engage in sales or marketing related to an investment banking or merchant banking or brokerage services and shall not direct the research analyst to engage in any communication with a current or prospective client about such division's transaction: Provided that sub-regulations (4) to (6) shall not prohibit research analyst or research entity from engaging in investor education activities including publication of pre-deal research and briefing the views of the research analyst on the transaction to the sales or marketing personnel.</p>	Complied	NA	NA	NA
Regulation 18 (7)	<u>Limitations on publication of</u>	Complied	NA	NA	NA



	<p><u>research report, public appearance and conduct of business, etc.</u></p> <p>Research analyst or research entity shall have adequate documentary basis, supported by research, for preparing a research report.</p>				
Regulation 18 (8)	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>Research analyst or research entity shall not provide any promise or assurance of favourable review in its research report to a company or industry or sector or group of companies or business group as consideration to commence or influence a business relationship or for the receipt of compensation or other benefits.</p>	Complied	NA	NA	NA
Regulation 18 (9)	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u></p> <p>Research analyst or research entity shall not issue a research report that is not consistent with the views of the individuals employed as research analyst regarding a subject company.</p>	Complied	NA	NA	NA



<p>Regulation 18 (10)</p>	<p><u>Limitations on publication of research report, public appearance and conduct of business, etc.</u> Research entity shall ensure that the individuals employed as research analyst are separate from other employees who are performing sales trading, dealing, corporate finance advisory or any other activity that may affect the independence of its research report: Provided that the individual employed as research analyst by research entity can receive feedback from sales or trading personnel of brokerage division to ascertain the impact of research report.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 19</p>	<p><u>Disclosure in research reports</u> This involves disclosure of all prescribed information by the Research Analyst in its research report.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 19A And SEBI Circular Reference No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 (Dated January 08, 2025) Clause 2 (xv)</p>	<p><u>Website</u> A Research analyst or research entity shall maintain a functional website containing such details as may be specified by the Board</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



<p>Regulation 20</p>	<p><u>Contents of research report</u> This involves prescribed contents of research report that a Research Analyst should adhere to.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 21</p>	<p><u>Recommendations in public media</u> 1) Research analyst or research entity including its director or employee shall disclose the registration status and details of financial interest in the subject company, if he makes public appearance. (2) If any person including a director or employee of an investment adviser or credit rating agency or asset management company or fund manager, makes public appearance or makes a recommendation or offers an opinion concerning securities or public offers through public media, all the provisions of regulations 16 and 17 shall apply mutatis mutandis to him and he shall disclose his name, registration status and details of financial interest in the subject company at the time of,- (i)making such recommendation or offering such opinion in personal capacity; (ii)responding to queries from audiences or journalists in personal capacity;</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



	(iii)communicating the research report or substance of the research report through the public media.				
Regulation 22	<p><u>Distribution of research reports</u></p> <p>(1) A research report shall not be made available selectively to internal trading personnel or a particular client or class of clients in advance of other clients who are entitled to receive the research report.</p> <p>(2) Research analyst or research entity who distributes any third party research report shall review the third party research report for any untrue statement of material fact or any false or misleading information.</p> <p>(3) Research analyst or research entity who distributes any third party research report shall disclose any material conflict of interest of such third party research provider or he shall provide a web address that directs a recipient to the relevant disclosures.</p> <p>(4) Provisions of sub-regulations (2) and (3) shall not apply to a research analyst or research entity if he has no direct or indirect business or contractual relationship with such third party research provider.</p>	Complied	NA	NA	NA



<p>Regulation 24</p>	<p><u>General Responsibility</u> Whether RA has followed all the responsibilities as mentioned regulation 24?</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 25</p>	<p><u>Maintenance of records</u> This regulation requires maintenance of prescribed records, preservation of the same and audit of such records by the prescribed professional.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 26 And SEBI Circular Reference No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 (Dated January 08, 2025) Clause 2 (vi)</p>	<p><u>Appointment of compliance officer</u> a. In terms of Regulation 26 of the RA Regulations, a non-individual research analyst may appoint either a) a compliance officer; OR b) an independent professional who is a member of ICAI or ICSI or ICMAI or member of any other professional body as may be specified by the SEBI, provided such a professional holds a relevant certification from NISM, as may be specified by the SEBI. In such cases where an independent professional is appointed as compliance officer as above, the principal officer shall submit an undertaking to RAASB/SEBI to the effect that principal officer shall be responsible for monitoring the compliance in respect of the requirements of the Act, regulations, notifications, guidelines, instructions issued by SEBI/RAASB.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



	<p>b. A non-individual RA may appoint such an independent professional as compliance officer who holds certifications from NISM by passing the following certification examinations-</p> <p><input type="checkbox"/> NISM-Series-XV: Research Analyst Certification Examination</p> <p><input type="checkbox"/> NISM-Series-XV-B: Research Analyst Certification (Renewal) Examination, and</p> <p><input type="checkbox"/> NISM-Series-III A: Securities Intermediaries Compliance (Non-Fund) Certification Examination</p>				
Regulation 26B	<p><u>Redressal of investor grievances.</u></p> <p>1) The Research Analyst shall redress investor grievances promptly but not later than twenty-one calendar days from the date of receipt of the grievance and in such manner as may be specified by the Board.</p> <p>(2) The Board may also recognize a body corporate for handling and monitoring the process of</p>	Not Applicable	There is no investor grievance during the audit period.	NA	NA



	grievance redressal within such time and in such manner as may be specified.				
Regulation 26C (1)	<u>Client level segregation of research services and distribution activities.</u> An individual research analyst shall not provide distribution services.	Not Applicable	The RA is not an individual research analyst.	NA	NA
Regulation 26C (2)	<u>Client level segregation of research services and distribution activities.</u> The family of an individual research analyst shall not provide distribution services to the client to whom research services are being rendered by the individual research analyst and no individual research analyst shall render research services to a client who is receiving distribution services from other family members.	Not Applicable	The RA is not an individual research analyst.	NA	NA
Regulation 26C (3)	<u>Client level segregation of research services and distribution activities.</u> A non-individual research analyst or research entity shall have client level segregation at group level for research services and distribution services. Explanation.	Complied	NA	NA	NA



(i) The same client cannot be offered both research and distribution services within the group of the non-individual entity.

(ii) A client can either be receiving research services where no distributor consideration is received at the group level or distribution services where no research services fee is collected from the client at the group level.

(iii) 'Group' for this purpose shall mean an entity which is a holding, subsidiary, associate, subsidiary of a holding company to which it is also a subsidiary, an investing company or the venturer of the company as per the provisions of Companies Act, 2013 for non-individual research analyst or research entity which is a company under the said Act and in any other case, an entity which has a controlling interest or is subject to the controlling interest of a non-individual research analyst.



<p>Regulation 26C (4)</p>	<p><u>Client level segregation of research services and distribution activities.</u></p> <p><u>Non-individual research analyst or research entity shall maintain an arm's length relationship between its activities as research analyst and distributor by providing research services through a separately identifiable department or division.</u></p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>Regulation 26C (5)</p>	<p><u>Client level segregation of research services and distribution activities.</u> Compliance and monitoring process for client segregation at group or family level shall be in accordance with the guidelines specified by the Board.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 4.2</p>	<p><u>Redressal of investor grievances through SEBI Complaints Redress system (SCORES) Platform and Online Dispute Resolution (ODR) Platform</u> As an additional measure and for information of all investors who deal/ invest/ transact in the market, the research analysts shall prominently display in their offices the following information about the</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



	grievance redressal mechanism available to investors.				
SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 4.3	<u>Redressal of investor grievances through SEBI Complaints Redress system (SCORES) Platform and Online Dispute Resolution (ODR) Platform</u> Whether Research analysts has followed the circulars on the redressal of investor grievances through the SEBI Complaints Redressal System (SCORES) platform and Online Dispute Resolution (ODR) Platform as per this clause	Complied	NA	NA	NA



<p>SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 5.1</p>	<p><u>Publishing Investor Charter and disclosure of Investor Complaints</u> In order to facilitate investor awareness about various activities which an investor deals with while availing the services provided by research analysts, SEBI has developed an Investor Charter for Research Analysts. This Charter is a brief document containing details of services provided to investors, their rights, dos and don'ts, responsibilities, investor grievance handling mechanism and estimated timelines thereof etc., at one single place, in a lucid language, for ease of reference.</p>	Complied	NA	NA	NA
<p>SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 5.2</p>	<p><u>Publishing Investor Charter and disclosure of Investor Complaints</u> All registered Research Analysts are advised to bring to the notice of their clients the Investor Charter as provided at Annexure A by prominently displaying on their websites and mobile applications. Research Analysts not having websites/mobile applications shall, as a one-time measure, send Investor Charter to the investors on their registered e-mail address.</p>	Complied	NA	NA	NA



<p>SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 5.3</p>	<p><u>Publishing Investor Charter and disclosure of Investor Complaints</u> In order to enhance transparency in grievance redressal, Research Analyst (RA) shall disclose on their websites/mobile applications, all complaints including SCORES complaints received by them in the format mentioned in Annexure B on a monthly basis. The information shall be made available by 07th of the succeeding month. Research Analysts not having websites/mobile applications shall send status of Investor Complaints to the investors on their registered email on a monthly basis.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 5.4</p>	<p><u>Publishing Investor Charter and disclosure of Investor Complaints</u> Research Analysts are advised to display link/option to lodge complaint with them directly on their websites and mobile apps. Additionally, link to SCORES website/ link to download mobile app (SEBI SCORES) may also be provided.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 5.5</p>	<p><u>Publishing Investor Charter and disclosure of Investor Complaints</u> The disclosure requirements under this clause came into effect from January 01, 2022.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 6 and (SEBI/HO/MIRSD2/DOR/CIR/P/2020/221 dated November 03, 2020)</p>	<p><u>Advisory for Financial Sector Organizations regarding Software as a Service (SaaS) based solutions</u> Compliance of the SEBI circular for Advisory for financial Sector Organizations regarding Software as a Service (SaaS) based solutions for half-yearly ended 31st March and 30th September.</p>	Complied	NA	NA	NA
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 8.1</p>	<p><u>Advertisement code</u> Research Analysts shall ensure compliance with the advertisement code</p>	Not Applicable	RA has not done any advertisement	NA	NA
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 8.1 (d) (i)</p>	<p><u>Advertisement code</u> Whether the advertisement , issued subsequent to recognition of Exchange as an RAASB by SEBI and operationalization of advertisement approval mechanism by the Exchange, ts were published with the prior approval of Exchange?</p>	Not Applicable	RA has not done any advertisement	NA	NA
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 9</p>	<p><u>Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication:</u> Compliance of Clause 9 of master circular by registered Research Analysts</p>	Complied	NA	NA	NA
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 10</p>	<p><u>Guidelines on Outsourcing of Activities by Intermediaries</u> Compliance of aforementioned clause 10</p>	Not Applicable	RA has not outsourced any activity	NA	NA



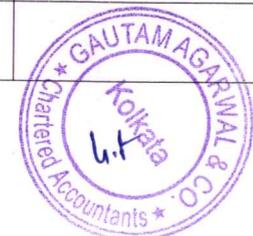
	of master circular by registered Research Analysts				
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 11	Framework for Regulatory Sandbox: Compliance of aforementioned clause 11 of master circular by registered Research Analysts	Not Applicable	RA is not providing sandbox facility.	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 12	General Guidelines for dealing with Conflicts of Interest of intermediaries and their Associated Persons in Securities Market: Compliance of aforementioned clause 12 of master circular by registered Research Analysts	Complied	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 13	Approach to securities market data access and terms of usage of data provided by data sources in Indian securities market: Compliance of aforementioned clause 13 of master circular by registered Research Analysts	Complied	NA	NA	NA
SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 14	Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) / Obligations of Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under: Compliance of aforementioned Clause 14 of master circular by registered Research Analysts	Complied	NA	NA	NA



<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause VI (1)</p>	<p><u>Reporting requirements</u></p> <p>Whether Complaint Data has been displayed by RAs on their website/ mobile application by 07th of the succeeding month</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause VI (2)</p>	<p><u>Other reporting requirements</u> Whether Undertaking on compliance of the advisory for Financial Sector Organizations regarding Software as a Service (SaaS) based solutions to be submitted half yearly.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause VI (3) And SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 (Dated January 08, 2025) Clause 2 (xiv)(a-e)</p>	<p><u>To conduct annual audit and submit a report and adverse findings, if Any</u></p> <p>Whether RA has conducted an annual compliance audit in respect of compliance with the RA regulations and circulars issued thereunder from a member of Institute of Chartered Accountants of India or Institute of Company Secretaries of India or Institute of Cost Accountants of India within six months from the end of each financial year. Submit a report of the same and adverse findings of the audit, if any, along with action taken thereof duly approved by the individual RA/management of the non-individual RA within a period of one month from the date of the audit report but not later than October 31st of each year for the previous financial year.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>



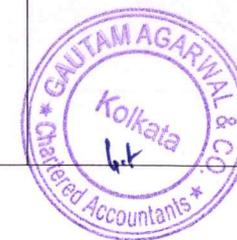
<p>SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) – Part VII. Annexures</p>	<p><u>ANNEXURES</u> Has RA followed all the annexures as prescribed in para VII. of Master circular (as applicable):</p> <p><u>Annexure A: Investor Charter</u> <u>Annexure B: Complaints Data</u> <u>Annexure C: CERT-In Advisory for SaaS</u> <u>Annexure D: Declaration-cum-undertaking for seeking prior approval for change in control</u> <u>Annexure E: Principles for outsourcing</u> <u>Annexure F: Detailed Framework for RAASB</u></p>	Complied	NA	NA	NA
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 (Dated January 08, 2025) Clause 2 (iii)</p>	<p><u>Registration both as Investment Adviser and Research analyst:</u></p> <p>IA registered as RA has maintained an arms-length relationship between its activity as IA and RA and has ensured that its investment advisory services and research services are clearly segregated from each other</p>	Not Applicable	The RA is not registered as an IA	NA	NA
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(iv)</p>	<p><u>Registration as part-time Research Analyst</u></p> <p>Compliance of aforementioned point 2 (iv.) of SEBI circular by registered part time Research Analysts</p>	Not Applicable	The RA is not registered as a part time RA.	NA	NA



<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(v)</p>	<p><u>Designation as ‘principal officer’</u></p> <p>Compliance of aforementioned point 2 (v) of SEBI circular by registered Research Analysts:</p> <p>“A partnership firm registered as a research analyst, where no partner of the firm has the minimum qualification and certification requirements provided under the Regulations, shall apply for registration as a research analyst in the form of a limited liability partnership or a body corporate latest by September 30, 2025.”</p>	<p>Not Applicable</p>	<p>The RA is a body corporate and not a partnership firm hence the point has been marked as Not Applicable.</p>		
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(vi)</p>	<p><u>Appointment of an independent professional as Compliance Officer</u></p> <p>Compliance of aforementioned point 2 (vi) of SEBI circular by registered Research Analysts</p>	<p>Not Applicable</p>	<p>RA has not appointed an independent compliance officer.</p>	<p>NA</p>	<p>NA</p>
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(vii)</p>	<p><u>Use of Artificial Intelligence (‘AI’) tools in R A services</u></p> <p>Research Analyst shall provide the disclosure of the extent of use of Artificial Intelligence tools by them in providing research services to their clients at the time of disclosing the terms and conditions of the research services to the client and make such</p>	<p>Not Applicable</p>	<p>RA has not used AI tools while providing research services.</p>	<p>NA</p>	<p>NA</p>



	additional disclosure whenever required.				
	<u>Research services provided by research analyst or research entity</u> a. In terms of Regulation 20(4) of RA Regulations, research services provided by				
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(viii)(a)	RA or research entity shall be corroborated by research report containing the relevant data and analysis forming the basis for such research service. RA or research entity shall maintain record of such research report. [Regulation 20(4) applicable w.e.f. 16 December 2024]	Complied	NA	NA	NA
	<u>Research services provided by research analyst or research entity</u> b. In terms of Regulation 2(1)(u) read with Regulation 2(1)(fa) of RA Regulations, research analyst means a person providing research services ‘for consideration’ wherein consideration shall include direct or indirect consideration in any form whether from client or otherwise for providing research services. In this regard, it may be clarified that the research services being provided by research analyst or research entity to any of its clients availing its other services as registered intermediary in				
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(viii)(b)		Complied	NA	NA	NA



	another capacity shall be considered as research services provided 'for consideration' even though no fee is charged by such research analyst or research entity directly from the client. [Applicable w.e.f. 16 December 2024]				
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(a)	<u>Client level segregation of Research and distribution activities</u> Existing clients, who wish to avail services of the RA, will not be eligible for availing distribution services within the group/family of the RA. Similarly, existing clients who wish to take distribution services will not be eligible for availing research services within the group/family of the RA.	Complied	NA	NA	NA
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(b)	<u>Client level segregation of Research and distribution activities</u> New client will be eligible to avail either research services or distribution services within the group/family of RA. However, the option to avail either research services or distribution services shall be made available to such client at the time of on-boarding	Complied	NA	NA	NA
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(d)	<u>Client level segregation of Research and distribution activities</u> The client shall have discretion to continue holding assets prior to the applicability of this segregation under the existing research/ distribution arrangement. However,	Complied	NA	NA	NA



	the client shall not be forced to liquidate/ switch such existing holdings.				
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(e)	<u>Client level segregation of Research and distribution activities</u> Has the PAN of each client been recorded for identification and client-level segregation.	Complied	NA	NA	NA
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(f)	<u>Client level segregation of Research and distribution activities</u> In case of an individual client, “family of client” ² shall be reckoned as a single client and PAN of all members in “family of client” would jointly and severally be the control record. However, the same shall not be applicable for non-individual clients.	Complied	NA	NA	NA
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(g)	<u>Client level segregation of Research and distribution activities</u> The dependent family members shall be those members whose assets originate from income of a single entity, i.e., the earning client (individual) in the family. The client shall provide an annual declaration or periodic updation, as the case maybe, in respect of such dependent family members.	Complied	NA	NA	NA



<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(h)</p>	<p><u>Client level segregation of Research and distribution activities</u> RA shall maintain on record an annual certificate from a member of ICAI/ ICSI/ ICMAI or from an auditor (in case of individual RA)/statutory auditor (in case of a non-individual RA or research entity) confirming compliance with the client-level segregation requirements. Such annual certificate shall be obtained within six months from the end of the financial year starting from for the financial year ending March 31, 2025 and the same shall form part of compliance audit, in terms of regulation 25(3) of the RA Regulations.</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(x)(i)</p>	<p><u>RAs providing research services exclusively to institutional clients and accredited investors may not be subject to compliance with the requirements of segregation of research and distribution activities provided that the client/investor signs a standard waiver stating the above.</u></p>	<p>Not Applicable</p>	<p>RA is exclusively not providing research services to institutional clients and accredited investors only,</p>	<p>NA</p>	<p>NA</p>
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xi)</p>	<p><u>Guidelines for recommendation of 'model portfolio' by RAs</u> Whether research analyst or research entity engaged in providing model portfolio has abided by the guidelines issued by the SEBI from time to time?</p>	<p>Not Applicable</p>	<p>RA is not providing model portfolio service.</p>	<p>NA</p>	<p>NA</p>



					<p>It may be kindly noted that the Company had sent the Terms & Conditions and MITC of Research Analyst over email to all its Clients (both Non-Fee & Fee Payable Clients) to obtain consent for receiving the research services offered by SMIFS, considering the dead line as 30-Sep-2025 and had also disclosed the Terms & Conditions and MITC of Research Analyst to all Institutional Clients over email as per the stipulated time frame.</p>
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xii)</p>	<p><u>Disclosure of terms and conditions to the client</u></p> <p>Whether RA or research entity has disclosed the terms and conditions of research services to the client and consent of the client has been taken on such terms and conditions while providing the research services as per this clause.</p>	<p>Not Complied</p>	<p>Research entity has not disclosed the terms and conditions to the clients.</p>	<p>Yes</p>	<p>Please note, that apart from the above activity we are in process to obtain seamless Client consent on the Terms & Conditions and MITC sent at the registered email id. of the Clients by getting the same validated through Mobile OTP and currently the program being developed is at its final stage to be rolled out by 30.10.2025 whereby the consent of the Client would be Obtained, failing which the services would be discontinued by 15.11.2025.</p>



					It may be further noted that the Company, also being a SEBI registered Stock Broker, provides research services as a value added service, to its active Clients which is more than 9000 and currently striving with sincere efforts to obtain the consent from all such Clients for providing uninterrupted research services as before.
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(a)	<u>KYC Requirements</u> RA or research entity shall follow the KYC procedure for their fee paying clients and maintain KYC records for their clients as specified by SEBI from time to time.	Complied	NA	NA	NA
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(b)	<u>Maintenance of record</u> RA shall maintain records of interactions, with all clients including prospective clients (prior to onboarding), where any conversation related to its services has taken place inter alia, in the form of: (i) Physical record written & signed by client, (ii) Telephone recordings (iii) mail from registered email id, (iv) Record of SMS messages (v) Any other legally verifiable record.	Not Complied	RA is not maintaining records of interactions with all clients where any conversation related to its services has taken place.	Yes	It may be noted that the Company / Research Entity is also a SEBI registered Stock Broker and provides research services as a value added service to its Active Clients which is more than 9000. The Company had communicated on Investor Charter, MITC of Research Analyst to all the registered Clients over email. It is also pertinent to mention that the Tariff Sheet a part and



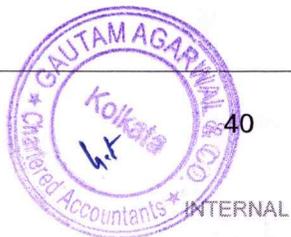
				<p>parcel of the offline Trading Account Opening Form (AOF) comprises detailed fee baskets for broking operations as well as the additional services rendered such as research and other value added services to the Clients and accordingly upon explained by the respective Relationship Managers and/ or Helpdesk Officers the forms get executed and signed by the Clients for account opening and preserved and maintained as per applicable laws.</p> <p>However, upon issuance of the referred SEBI Circular dated 08-Jan-2025 and based on the observations made by the Auditor, the Company has imparted necessary training and instructed the Customer Care Officers that during the routine practice of welcome calls made to the onboarding clients and/or interactions taking place with the prospective Clients and during the periodical feedback calls with the existing Clients, awareness and guidance on research services and other value added services offered</p>
--	--	--	--	--



					<p>by the Company shall be mandatorily explained to the Clients and simultaneously other modes of legally verifiable records of interactive telephonic conversations over recorded lines or through mails, sms, hand written signed and acknowledged copies of communications with the Client shall be made and preserved as per usual routine practice.</p> <p>The Company undertakes to take adequate steps to implement and carry out necessary actions to comply with the mandated guidelines of the SEBI Circular.</p>
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(c)</p>	<p><u>Maintenance of record</u></p> <p>Such records shall begin with first interaction with the client and shall continue till the completion of research services to the client.</p>	<p>Not Complied</p>	<p>RA is not maintaining records of interactions with all clients where any conversation related to its services has taken place.</p>	<p>Yes</p>	<p>As mentioned herein above all communications that had been sent over emails w.r.t. circulation of Investor Charter, MITC, Terms and Conditions and executed signed copies of AOF & Tariff Sheet(s) are preserved and maintained as per applicable laws.</p> <p>The Company undertakes to give all possible efforts and take adequate steps to</p>



					implement and carry out all necessary activities in compliance with the mandated guidelines of the SEBI Research Regulations and relevant Circulars.
<p>SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(d)</p>	<p><u>Maintenance of record</u> RA or research entity are required to maintain these records for a period of five years. However, in case where dispute has been raised, such records shall be kept till resolution of the dispute or if SEBI desires that specific records be preserved, then such records shall be kept till further intimation from SEBI.</p>	Not Complied		Yes	<p>As mentioned herein above all communications that had been sent over emails w.r.t. circulation of Investor Charter, MITC, Terms and Conditions and executed signed copies of AOF & Tariff Sheet(s) are preserved and maintained as per applicable laws.</p> <p>The routine practice of record keeping and maintaining the records as per the mandated guidelines are in place and being strictly followed by the Company.</p> <p>However, additional requirements of maintaining records of the interaction and conversations with the client in respect of availing research services shall be mandatorily adhered and the Company undertakes to give all possible efforts and take adequate steps to implement and carry out all necessary activities in</p>



					compliance with the mandated guidelines of the SEBI Research Regulations and relevant Circulars.
SEBI circular Ref. No. SEBI/HO/ ITD-1/ITD_CSC_EXT/P/CIR/2024/113 dated August 20, 2024 SEBI/HO/ ITD-1/ITD_CSC_EXT/P/CIR/2024/184 dated December 31, 2024	<u>Cybersecurity and Cyber Resilience Framework (CSCRF) for SEBI Regulated Entities (REs)</u> Compliance to aforementioned SEBI circular by registered Research Analysts	Not Applicable	The revised deadline applicable to framework has been extended to 31 st August 2025 hence marked as Not Applicable.	NA	NA
SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2024/143 dated October 22, 2024 SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/11 dated January 29, 2025	<u>Association of persons regulated by the Board and their agents with certain persons</u> Compliance to aforementioned SEBI circular by registered Research Analysts	Complied	NA	NA	NA
BSE notice no. 20230329-1 dated March 29, 2023 and the Exchange notice no. 20241029-38 dated October 29, 2024	<u>TRAI SoPs to guide PEs in registering their PE-TM chain binding on the DLT platform -reg</u> Compliance to aforementioned TRAI guidelines by registered Research Analysts	Complied	NA	NA	NA



<p>BSE Notice no. 20241209-41 dated 09th December 2024</p>	<p><u>Grievance Redressal/ Escalation Matrix to be displayed by Research Analysts</u></p> <p>Compliance to aforementioned SEBI circular by registered Research Analysts</p>	<p>Complied</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>
<p>BSE Notice no. 20241227-35 dated 27th December 2024</p>	<p><u>Mandatory Compliance with SHE-Box Portal Requirements under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013</u></p> <p>Research Analyst has submitted the details of their Internal Committee, including the names, designations, email addresses, and contact numbers of members and the details of Nodal Officers responsible for SH Act compliance on <u>women-welfare1@gov.in</u> within 15 days from the date of this circular</p> <p>This compliance requirement is only applicable for the entities having more than 10 employees.</p>	<p>Not Complied</p>	<p>RA has not submitted the details of Internal committee within 15 days from the date of the circular.</p>	<p>Yes</p>	<p>Please note that the submission of the details of the internal committee for mandatory compliance with She-Box Portal Requirement got delayed as due to a shift in role and responsibilities in the concerned department, the matter skipped the attention of the official in the transition period and was not submitted within the stipulated timeframe.</p> <p>The Company undertakes to be more vigilant to avoid any recurrences of such instances in future.</p>

SMIFS LIMITED

Sudipta Datta

Director/Authorised Signatory

Signature of RA / Partner / Director

Date: 30-09-2025



Chartered Accountant / ~~Company Secretary~~ / Cost Accountant

*Gautam
Agarwal*



Gautam Agarwal

Membership no. / ~~CP. No.~~: 406254

UDIN No.: 25406254BMKZTL9223

Date and Place: 30-09-2025, Kolkata

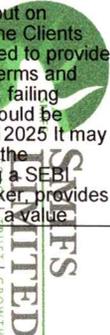
THIS PAGE IS KEPT INTENTIONALLY BLANK.

Action Taken Report (ATR)

Name of Research Analyst:	SMIFS LIMITED
SEBI Registration No.:	INH300001474
BSE Enlistment No.:	5098
Entity Type:	RA
Financial Year:	2024-2025

Sr. No	Regulation	Particulars	Compliance Status	Reason for non-compliance	Auditor Comments Accepted (Yes/No)	Action taken on adverse findings
1.	SEBI circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xii)	<p>Disclosure of terms and conditions to the client</p> <p>Whether RA or research entity has disclosed the terms and conditions of research services to the client and consent of the client has been taken on such terms and conditions while providing the research services as per this clause.</p>	Not-Complied	Research entity has not disclosed the terms and conditions to the clients	Yes	<p>It may be kindly noted that the Company had sent the Terms Conditions and MITC of Research Analyst over email to all its Clients both NonFee Fee Payable Clients to obtain consent for receiving the research services offered by SMIFS, considering the dead line as 30Sep2025 and had also disclosed the Terms Conditions and MITC of Research Analyst to all Institutional Clients over email as per the stipulated time frame Further, post audit, we were in process to obtain seamless Client consent on the Terms Conditions and MITC sent at the registered email id of the Clients by getting the same validated through Mobile OTP and currently the program has been developed and subsequently rolled out on 17102025 whereby the Clients have been approached to provide their consent to the terms and conditions and MITC, failing which the services would be discontinued by 15112025 It may be further noted that the Company, also being a SEBI registered Stock Broker, provides research services as a value</p>

SMIFS LIMITED
Sudip B Datta
 Compliance Officer



SMIFS Limited
 Registered Off. : Vaibhav 4 Tree Road, Kokkara - 700 020
 T : +91 33 4011 5400 / 4057 2600 Email : helpdesk@smifs.com
 Corporate Member : NSE, BSE, CDSL, NSDL, MCX, ICEX, MSEI
 SEBI Reg No. : INZ000220635, IN-DP-414-2019
 Portfolio Manager & Research Analyst

CIN : U66220WB1993PLC060987

www.smifs.com

added service, to its active Clients which is more than 9000 and currently striving with sincere efforts to obtain the consent from all such Clients for providing uninterrupted research services as before

--	--	--	--	--	--

2	SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(b)	Maintenance of record RA shall maintain records of interactions, with all clients including prospective clients (prior to onboarding), where any conversation related to its services has taken place inter alia, in the form of: (i) Physical record written & signed by client, (ii) Telephone recordings (iii) mail from registered email id, (iv) Record of SMS messages (v) Any other legally verifiable record.	Not-Complied	RA is not maintaining records of interactions with all clients where any conversation related to its services has taken place	Yes	It may be noted that the Company Research Entity is also a SEBI registered Stock Broker and provides research services as a value added service to its Active Clients which is more than 9000 The Company had communicated on Investor Charter, MITC of Research Analyst to all the registered Clients over email It is also pertinent to mention that the Tariff Sheet a part and parcel of the offline Trading Account Opening Form AOF comprises detailed fee baskets for broking operations as well as the additional services rendered such as research and other value added services to the Clients and accordingly upon explained by the respective Relationship Managers and or Helpdesk Officers the forms get executed and signed by the Clients for account opening and preserved and maintained as per applicable laws However, upon issuance of the referred SEBI Circular dated 08Jan2025 and based on the observations made by the Auditor, the Company has imparted necessary training and instructed the Customer Care Officers that during the routine practice of welcome calls made to the onboarding clients and/or interactions taking place with the prospective Clients and during the periodical feedback calls with the existing Clients, awareness and guidance on research services and other
---	--	---	--------------	---	-----	--

SMIFS LIMITED

Subir B Datta

Compliance Officer

SMIFS LIMITED
JUST | GROWTH

SMIFS Limited

Registered Off.: Vaibhav, 4 Lee Road, Kolkata - 700 020

T. : +91 33 4011 5400 / 4057 2600 Email : helpdesk@smifs.com

Corporate Member : NSE, BSE, CDSE, NSDL, MCX, ICDX, MSEI

SEBI Reg.No. : INZ0002206935, JN-DP-414-2019

Portfolio Manager & Research Analyst

CIN. U66220WB1993PLC060987

www.smifs.com

value added services offered by the Company shall be mandatorily explained to the Clients and simultaneously other modes of legally verifiable records of interactive telephonic conversations over recorded lines or through mails, sms, hand written signed and acknowledged copies of communications with the Client shall be made and preserved as per usual routine practiceThe Company undertakes to take adequate steps to implement and carry out necessary actions to comply with the mandated guidelines of the SEBI Circular

As mentioned herein above all communications that had been sent over emails wrt circulation of Investor Charter, MITC, Terms and Conditions and executed signed copies of AOF Tariff Sheets are preserved and maintained as per applicable lawsThe Company undertakes to give all possible efforts and take adequate steps to implement and carry out all necessary activities in compliance with the mandated guidelines of the SEBI Research Regulations and relevant Circulars

3	SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(c)	Maintenance of record Such records shall begin with first interaction with the client and shall continue till the completion of research services to the client.	Not-Complied	RA is not maintaining records of interactions with all clients where any conversation related to its services has taken place	Yes	

SMIFS LIMITED

Sudipto Datta

Compliance Officer



SMIFS Limited
 Registered Off.: Vaibhav, 4 Lee Road, Kolkata - 700 020
 T : +91 33 4011 5400 / 4057 2600 Email : helpdesk@smifs.com
 Corporate Member : NSE, BSE, CDSL, NSDL, MCX, IEX, MSEI
 SEBI Reg.No.: INZ000220695, IN-DP-414-2019
 Portfolio Manager & Research Analyst

CIN: U66220WB1993PLC060987

www.smifs.com

SMIFS Limited

Registered Off. : Vaibhav, 4 Lee Road, Kolkata - 700 020
 T : +91 33 4011 5400 / 4057 2600 Email : helpdesk@smifs.com
 Corporate Member : NSE, BSE, CDSL, NSDL, MCA, ICEX, MSEI
 SEBI Reg No. : INZ000220635, IN-DP-414-2019
 Portfolio Manager & Research Analyst

CIN : U66220WB1993PLC060987

4	SEBI circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/004 dated January 08, 2025 – point no. 2(xiii)(d)	Maintenance of record RA or research entity are required to maintain these records for a period of five years. However, in case where dispute has been raised, such records shall be kept till resolution of the dispute or if SEBI desires that specific records be preserved, then such records shall be kept till further intimation from SEBI.	Not-Complied	RA is not maintaining records of interactions with all clients where any conversation related to its services has taken place	Yes	As mentioned herein above all communications that had been sent over emails wrt circulation of Investor Charter, MITC, Terms and Conditions and executed signed copies of AOF Tariff Sheets are preserved and maintained as per applicable laws. The routine practice of record keeping and maintaining the records as per the mandated guidelines are in place and being strictly followed by the Company. However, additional requirements of maintaining records of the interaction and conversations with the client in respect of availing research services shall be mandatorily adhered and the Company undertakes to give all possible efforts and take adequate steps to implement and carry out all necessary activities in compliance with the mandated guidelines of the SEBI Research Regulations and relevant Circulars
5	BSE Notice no. 20241227-35 dated 27th December 2024	Mandatory Compliance with SHe-Box Portal Requirements under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 Research Analyst has submitted the details of their Internal Committee, including the names, designations, email addresses, and contact numbers of members and the details of Nodal Officers responsible for SH Act compliance on women-welfare1@gov.in within 15 days from the date of this circular This compliance requirement is only applicable for the entities having more than 10 employees.	Not-Complied	RA has not submitted the details of Internal Committee within 15 days from the date of the circular	Yes	Please note that the submission of the details of the internal committee for mandatory compliance with SheBox Portal Requirement got delayed as due to a shift in role and responsibilities in the concerned department, the matter skipped the attention of the official in the transition period and was not submitted within the stipulated timeframe. The Company undertakes to be more vigilant to avoid any recurrences of such instances in future

SMIFS LIMITED
Sudipto Datta
 Compliance Officer

Signature of RA / Partner / Director:
 Date and Place: 27-10-2025,

