Action Taken Report (ATR)

Name of Investment Adviser:	Finkasturi Nivesh Private Limited
SEBI Registration No.:	INA000014128
BSE Enlistment No.:	1643
Entity Type:	Corporate body
Financial Year:	2025-2026

Sr. No	Regulation	Particulars	Compliance Status	Reason for non-compliance	Auditor Comments Accepted (Yes/No)	Action taken on adverse findings
1	Regulation 7 And SEBI Master Circular HO/38/12/11(2)2026-MIRSD-POD/I/4300/2026 clause 1(v)	Qualification and certification requirement. An individual investment adviser or a principal officer of a non-individual investment adviser registered as an investment adviser under these regulations and persons associated with investment advice shall have minimum qualification and certification requirements as mentioned in Regulation 7(1) and 7(2).	Not-Complied	NISM was not valid during the period April2025 to August2025 The certification gap happened as company was going through a change in control process, a new PO was proposed for the role which was subsequently rejected by BSE, as PO was not meeting the expected criteria, and the freshly introduced NISM Series-XC renewal guidelines delayed the certification renewal process	Yes	The gap in NISM Certifications was triggered by two significant changes, 1 Change of Management Control and SEBI waiver of PO from NISM XA XB exams with the introduction of X C Certificate, However, we have now put in place a compliance calendar for continuous monitoring to avoid recurrence of such gaps in future
2	SEBI Master Circular HO/38/12/11(2)2026-MIRSD-POD/I/4300/2026 clause 5 and (SEBI/HO/MIRSD2/DOR/CIR/P/2020/221 dated November 03, 2020)	Advisory for Financial Sector Organizations regarding Software as a Service (SaaS) based solutions 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.	Not-Complied	IA has complied with the SaaS compliance and have undertakings from the service providers, It is to note that submission was on the portal was not made or the period	Yes	Finkasturi has put in a Compliance Calendar based reminder process on 1st Oct and1st April each FYto avoid future instances Also we will take screen shots of all BSESEBI submissions to retain proof of submission and not depend on portal records

3	SEBI Master Circular HO/38/12/11(2)2026-MIRSD-POD/I/4300/2026 clause 31.1	Other reporting requirements Whether Undertaking on compliance of the advisory for Financial Sector Organizations regarding Software as a Service (SaaS) based solutions to be submitted half yearly.	Not-Complied	IA has complied with the SaaS compliance and have undertakings from the service providers It is to note that submission was on the portal was not made or the period	Yes	Finkasturi has put in a Compliance Calendar based reminder process on 1st Oct and1st April each FYto avoid future instances Also we will take screen shots of all BSESEBI submissions to retain proof of submission and not depend on portal records

ASHWIN ALBERT DSOUZA

Digitally signed by ASHWIN ALBERT DSOUZA
Date: 2026.09.28 21:00:15 +05'30'

Signature of IA / Partner / Director:
Date and Place: ____________________