ABHISHEK MISHRA
PRACTICING COMPANY SECRETARY
Email: abhishekmishrapcs@gmail.com
Mobile: +91 9617286847

Compliance Audit Report

2023-24

Primeinvestor Financial Research Private Limited

SEBI Reg. No.: INH200008653

ABHISHEK MISHRA
PRACTICING COMPANY SECRETARY
Email: abhishekmishrapcs@gmail.com
Mobile: +91 9617286847

The Compliance Audit Report of even date, for the Financial Year ended 31st March, 2024 is to be read along with this letter.

Research Analyst's Responsibility

1. It is the responsibility of the Research Analyst to maintain all the requisite records, devise proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operate effectively.

Auditor's Responsibility

2. My responsibility is to express an opinion on the compliances followed by the Research Analyst with respect to SEBI (Research Analysts) Regulations, 2014.

3. I believe that audit evidence and information obtained from the Research Analyst is adequate and appropriate for me to provide a basis for my opinion.

4. Wherever required, I have obtained the representation from Research Analyst about the compliance of laws, rules and regulations and happening of events etc.

Disclaimer

5. The Compliance Audit Report is neither an assurance as to the future viability of the Research Analyst nor of the efficacy or effectiveness with which the Research Analyst has conducted the affairs of the firm.

6. I have not verified the correctness and appropriateness of financial records and books of account of the Research Analyst.

7. The report is the opinion of the Auditor and in no way assures the compliances done by the Research Analyst.

ABHISHEK MISHRA * M. No. 56048 CP No. 24511 * PRACTICING COMPANY SECRETARY *

Abhishek Mishra

Digitally signed by Abhishek Mishra
Date: 2024.10.24 17:20:54 +05'30'

Date: 24th October 2024

Abhishek Mishra
Practicing Company Secretary
ACS 56048 | CP 24511

ABHISHEK MISHRA
PRACTICING COMPANY SECRETARY
Email: abhishekmishrapcs@gmail.com
Mobile: +91 9617286847

COMPLIANCE AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024
[PURSUANT TO REGULATION 25(3) OF THE SEBI (RESEARCH ANALYSTS) REGULATIONS, 2014]

I have conducted the Compliance Audit with respect to the compliance of SEBI (Research Analysts) Regulations, 2014 ("Regulations") of M/s. Primeinvestor Financial Research Private Limited, a SEBI Registered Research Analyst having Registration Number – INH200008653 (hereinafter called "the Research Analyst"). Compliance Audit was conducted remotely on a sample basis.

Based on my review of the records as shared with me by the Research Analyst and also the information provided by the Research Analyst during the conduct of compliance audit, I hereby report that in my opinion, the Research Analyst has, during the audit period covering the Financial Year ended 31st March 2024, has complied with the Regulations listed hereunder to the extent, in the manner and subject to the reporting made hereinafter:

- The Research Analyst holds a valid certificate of registration from the SEBI dated August 19, 2021.

- The Research Analyst is also registered as a mutual fund distributor bearing the ARN-266860.

- The Research Analysts are in compliance with the certification and qualification requirement as provided under the regulations.

- The Research Analyst has not acted as a manager or co-manager for any company in its Initial Public Offer/Further Public Offer.

ABHISHEK MISHRA
PRACTICING COMPANY SECRETARY
Email: abhishekmishrapcs@gmail.com
Mobile: +91 9617286847

- The Research Analyst had maintained the sufficient Net worth as on 31st March 2024 based on the Net worth certificate issued by Sheetal & Co., Chartered Accountants dated 01st August 2024.

- The Research Analyst has confirmed that it has not received any complaint on the SEBI SCORES portal during the Financial Year 2023-24. However, the same could not be verified due to inactive portal as on the date of signing the report.

- The Research Analyst has confirmed that it had not received any compensation during the year which results in conflict of interest.

- The Research Analyst has maintained the relevant records as applicable and provided under the regulation 25(1) of SEBI (Research Analysts) Regulations, 2014 during the Financial Year 2023-24.

- The Research Analyst has ensured the compliance with respect to the limitation of trading as provided under the regulation 16 of SEBI (Research Analyst) Regulations, 2014 during the Financial Year 2023-24.

- The Research Analyst had an active website in the name of primeinvestor.in during the Financial Year 2023-24.

- The Research Analyst has provided the relevant disclosures to its clients as provided under the regulation 19 of SEBI (Research Analysts) Regulations, 2014.

- The Research Analyst was in compliance with the SEBI Circular dated 13th December 2021 titled "Publishing of Investor Charter and disclosure of Investor Complaints by Research Analysts on their websites/mobile applications", during the Financial Year 2023-24.

ABHISHEK MISHRA
PRACTICING COMPANY SECRETARY
Email: abhishekmishrapcs@gmail.com
Mobile: +91 9617286847

- The Research Analyst has ensured compliance of the SEBI circular dated April 05, 2023 titled "Advertisement code for Investment Advisers (IA) and Research Analysts (RA)", during the Financial Year 2023-24.

- The Research Analyst has published the information on its website as provided under the SEBI Circular dated April 06, 2023 titled "Usage of brand name/ trade name by Investment Advisers (IA) and Research Analysts (RA)" during the Financial Year 2023-24.

- The Research Analyst has confirmed that it has not made any public appearance during the F.Y 2023-24.

- The Research Analyst has changed his office address during the F.Y 2023-24 and has confirmed that it has applied for change in address on the SEBI's intermediary portal.

- The Research Analyst had a change in shareholding pattern during the Financial Year 2023-24 and the same was not intimated to the SEBI.

- The Research Analyst has not received any Inspection Notice/Show Cause Notice from SEBI during the Financial Year 2023-24.

ABHISHEK MISHRA * PRACTICING COMPANY SECRETARY * M. No. 56048 CP No. 24511

Abhishek Mishra

Digitally signed by Abhishek Mishra
Date: 2024.10.24 17:21:24 +05'30'

Date: 24th October 2024

UDIN: A056048F001737167

Abhishek Mishra
Practicing Company Secretary
ACS 56048 | CP 24511