SAMVITTI CAPITAL

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Action Taken Report (ATR)

Name of Investment Adviser:	Samvitti Capital Private Limited
SEBI Registration No.:	INA000019169
BSE Enlistment No.:	2164
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 15 (7)	Has an investment advisor entered into transactions on its own account which is contrary to its advice given to clients for a period of fifteen days from the day of such advice	Not-Complied	The Management submits that the proprietary and advisory portfolios were managed independently by separate fund managers without access to each others trading information, which resulted in the observed instances of transactions on the Company's own account contrary to advice given to clients within fifteen days of such advice.	Yes	To prevent recurrence of the observation, the Management has taken the following corrective conservative measure viz The entire proprietary equity portfolio has been liquidated on 31st July 2026 and shifted to a SEBI registered AIF managed by the company for its investors This ensures no conflict and more alignment of interest.

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2	Regulation 18	**Disclosure to clients**: This involves disclosure of all prescribed information by the investment adviser to its clients.	Not-Complied	Security-specific disclosure of proprietary holdings at the time of advice was not made. As the proprietary and advisory portfolios were managed independently by separate fund managers without access to each others trading information.	Yes	The Disclosure Document provided to clients contains a general disclosure that the Company, its employees or directors may hold positions in securities advised to clients, along with the mitigation framework Insider Trading Policy, Code of Conduct, trading restrictions and periodic holding disclosures to the Compliance Officer. As a conservative measure, the Management has liquidated the proprietary equity portfolio and discontinued proprietary equity investments except via FO, which eliminates the possibility of the Company holding positions in advised securities.

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V Shivaram Kamath

Signature of IA Director:

Date and Place: 27-Oct-2026 Mulki