CA INDIA
GANESH & SUDHIR
CHARTERED ACCOUNTANTS

1st Floor, Albuquerque Chambers,
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To,

The Board of Directors

Samvitti Capital Private Limited

Kalasha Nivas, D No 16/100(2)

Harihara Nagara, Karnad

Mulki – 574154

Annual Audit Report in respect of Compliance with SEBI (Investment Advisors) Regulations, 2013 for the Financial Year 2025-26

Pursuant to the engagement letter dated 01-07-2026, you have requested us to issue an Annual Audit Report in respect of Compliance with SEBI (Investment Advisors) Regulations, 2013 and the related circulars and guidelines issued thereunder of Samvitti Capital Private Limited ('the Company'), bearing SEBI IA Registration No. INA000019169 and a member of the BSE Administration and Supervision Ltd. (BASL) bearing BASL membership ID – 2164.

Management's Responsibility

The responsibility of the management of the Company includes ensuring compliance with the SEBI (Investment Advisors) Regulations, 2013, and related circulars and guidelines issued by SEBI.

This responsibility includes:

1. The design, implementation, and maintenance of adequate internal controls and compliance systems to ensure adherence to the applicable regulatory requirements;
2. Ensuring the availability and accuracy of all relevant records, documents, and data necessary to demonstrate compliance with the said regulations;
3. Providing unrestricted access to all relevant information, including books of accounts, internal policies, records, and documentation required for the purpose of our compliance audit;
4. Responding to any additional queries or requests for information made by us during the course of the audit to enable us to form a conclusion on regulatory compliance.

The Management is also responsible for ensuring that the Company complies with the requirements as specified by the Authority.

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Practitioner's Responsibility

Our responsibility is to conduct an annual compliance audit within the framework provided by SEBI/BASL and provide a reasonable assurance on whether the Company has complied with the applicable provisions of the SEBI (Investment Advisers) Regulations, 2013, and the related circulars and guidelines issued thereunder.

Our audit will be conducted with the objective of expressing an opinion on whether the processes, procedures followed, and the operations carried out by the Investment Adviser as per the applicable Acts, Rules, Regulations, Byelaws and Circulars prescribed by SEBI and BASL.

Opinion

In our opinion and to the best of our information and according to the explanations given to us by the company, we certify that in respect of advisory services offered to its clients, the Company has during the period, kept proper records, followed proper procedures and that the Company has performed its duties in accordance with SEBI (Investment Advisers) Regulations, 2013, and the related circulars and guidelines issued thereunder except otherwise mentioned in the **Annexure** to this report.

We have conducted the audit within the framework provided by SEBI/BASL for the purpose of this audit. This certificate is issued under regulation 19 (3) of SEBI (Investment Advisers) Regulations, 2013.

We declare that we do not have any direct / indirect interest in or relationship with the member or its directors / partners / proprietors / management, other than the proposed Audit assignment and also confirm that we do not perceive any conflict of interest in such relationship / interest while conducting audit of the said member.

In our opinion and to the best of our information and according to the explanations given to us by the compliance officer and principal officer, the Report provided by us as per the Annexure and subject to our observations, which covers the entire scope of the audit, is true and correct.

For **GANESH & SUDHIR**,

Chartered Accountants,

(Firm Registration No. 000866S)

GANESH & SUDHIR "ALBUQUERQUE CHAMBERS" PANDESHWAR MANGALURU-575 001 FIRM REGN. No. 000866S CHARTERED ACCOUNTANTS

GIRIDHAR KAMATH - M No. 203199

Partner

UDIN: 26203199ARUIOC7143

Place: Mangaluru

Date: 15-09-2026

ANNEXURE-1

NOTE:

1. **Annual Audit Compliance Report (ACR)** - An investment adviser 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(xiii)(c)(iii) of SEBI Circular No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 dated January 08, 2025, an investment adviser shall maintain on record an annual certificate from a member of ICAI/ ICSI/ ICMAI 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(xiii)(c)(ii) of SEBI Circular No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 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 2025-2026

Name of Investment Adviser	Samvitti Capital Private Limited
SEBI Registration No.	INA000019169
BSE Enlistment No.	2164
Entity type	Body Corporate
Financial Year	**2025-2026**
Name and Contact Details of Principal Officer	Mr. V Shivaram Kamath +91 9845082607
Name and Contact Details of Compliance Officer	Mr. V Shivaram Kamath +91 9845082607
Total No. of Clients as on 31-03-2026	115

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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 IA/management of the non-individual IA)
Regulation 2 (s)	"Principal officer" in case of non-individual investment adviser engaged: (i) solely in providing investment advisory 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 investment adviser; (ii) in the activities other than investment advisory 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 related to investment advisory services	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(ix)	In case the Investment Adviser is a partnership firm, has one of the partners been designated as the Principal Officer, and where no partner meets the minimum qualification and certification requirements under the IA Regulations, has the firm applied for registration as an Investment	☐Complied ☐Not- Complied ☑Not Applicable	It is Applicable if the Investment Advisor is a partnership firm		

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	Adviser in the form of a Limited Liability Partnership or a body corporate within the prescribed timeline (i.e., on or before 30 September 2025)?				
Regulation 3	<u>Application for grant of certificate</u> (1) No person shall act as an investment adviser or hold itself out as an investment adviser unless he has obtained a certificate of registration from the Board under these regulations.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 6	<u>Consideration of application and eligibility criteria</u> Regulation 6 states all matter, which are relevant for the purpose of grant of certificate of registration.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 7 And SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(v)	<u>Qualification and certification requirement.</u> 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).	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(iv)	<u>Qualification and certification requirement.</u> Existing individual IAs above fifty years of age shall not be required to comply with the qualification and experience requirements specified under Regulation 7(1) (a) and 7(1) (b) of the amended IA Regulations. However, such IAs shall hold NISM certifications and comply with other conditions as specified under Regulation 7(2) of the amended IA regulations at all times.	☑Complied ☐Not- Complied ☐Not Applicable			

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Regulation 8 **And** **SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(iv)**	Compliance to deposit based on the maximum number of clients on any day during the previous financial year. **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	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 13(b)	<u>Conditions of certificate:</u> The investment adviser 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.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 13(c)	<u>Conditions of certificate:</u> The investment adviser, not being an individual, shall include the words 'investment adviser' in its name: Provided that if the investment advisory service is being provided by a separately identifiable department or division or a subsidiary, then such separately identifiable department or division or subsidiary shall include the words 'investment adviser' in its name;	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 13(d)	<u>Conditions of certificate:</u> An individuals registered as investment advisers shall use the term 'investment adviser' in all their correspondences with their clients53[:] 54[Provided that part-time investment adviser registered under these regulations shall use the term 'part-time investment adviser' in all their correspondences with their clients.]	☐Complied ☐Not- Complied ☑Not Applicable	It is Applicable to Individual Investment Advisor		GANESH & SUDHIR C.A.'s MANGALURU

Regulation 13(e-g) And SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(vi)	Registration as Non-Individual Investment Advisor Individuals registered as investment advisers whose number of clients exceed three hundred at any point of time or the fee collected during the financial year exceeds three crore rupees, whichever is earlier shall - a. (i) immediately intimate the Administration and Supervisory Body and initiate the process of transition from individual to non-individual investment adviser; and b. (ii) apply for grant of in-principle approval for registration as non-individual investment adviser within 3 months from the date on which the threshold is reached;] c. The in-principle registration shall be valid for a period of three months to assist in the transition from registration as individual investment adviser to non-individual investment adviser; d. On completion of the transition period or upon grant of certificate of registration as non-individual investment adviser, whichever is earlier, investment adviser shall surrender his registration as individual investment adviser.	☐Complied ☐Not- Complied ☑Not Applicable	It is Applicable to Individual Investment Advisor		
Regulation 13(h)	The number of clients of a part-time investment adviser shall not exceed seventy-five in total at any point of time.	☐Complied ☐Not- Complied ☑Not Applicable	It is Applicable to a part time Investment Advisor		

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(viii)	Whether Part time IA has complied with all the regulatory requirements?	☐Complied ☐Not- Complied ☑Not Applicable	It is Applicable to a part time Investment Advisor		
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	☐Complied ☑Not- Complied ☐Not Applicable	This is not complied. *Refer note below[1]*	Yes	The Management has implemented corrective measures by liquidating the proprietary equity portfolio and discontinuing proprietary equity investments to prevent recurrence of such instances.
[1]***Note:*** *The Management submits that the proprietary and advisory portfolios were managed independently by separate fund managers without access to each other's 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. To rectify the same and prevent recurrence, 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.*					
Regulation 15 other than sub point 7	<u>General Responsibility</u> Whether IA has followed all the responsibilities as mentioned regulation 15?	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 15A read with SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(iii)	<u>Fees</u> Investment Adviser shall be entitled to charge fees for providing investment advice from a client in the manner as specified by the Board namely - Assets under Advice (AUA) mode or Fixed fee mode.	☑Complied ☐Not- Complied ☐Not Applicable			

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 2.1	<u>Restriction on free trial</u> IAs shall not provide free trial for any products/services to prospective clients.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 2.1	<u>Non acceptance of part payments</u> IAs shall not accept part payments (where some part of the fee is paid in advance) for any product/service.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 16	<u>Risk profiling</u> This involves profiling, assessing the risk appetite of each client individually, and communication of such profile to the respective client.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 2.2	<u>Risk profiling</u> Whether IA has obtained consent of the client on completed risk profile either through registered email or physical document.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 17	<u>Suitability</u> Investment adviser shall ensure suitability of the advice being provided to the client.	☑Complied ☐Not- Complied ☐Not Applicable			

GANESH & SUDHIR C.A.'s MANGALURU

SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(viii) **And SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(xv)(b) – (c)**	<u>Risk profiling and suitability for non-individual clients.</u> (a) In case of non-individual clients, IA shall use the investment policy as approved by board/management team of such non-individual clients for risk profiling and suitability analysis. (b) The discretion to share the investment policy/relevant excerpts of the policy shall lie with the non-individual client. However, IA shall have discretion not to onboard non-individual clients if they are unable to do risk profiling of the non-individual client in the absence of investment policy.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 18	<u>Disclosure to clients</u> This involves disclosure of all prescribed information by the investment adviser to its clients.	☐ Complied ☑Not- Complied ☐Not Applicable	Regulation 18(4) is not complied.	Yes	*Refer note below[2]*

[2]***Note:***
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). However, security-specific disclosure of proprietary holdings at the time of advice was not made. As a conservative measure, the Management has liquidated the proprietary equity portfolio and discontinued proprietary equity investments (except via F&O), which eliminates the possibility of the Company holding positions in advised securities.

Regulation 19	<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.	☑Complied ☐Not- Complied ☐Not Applicable			

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(xiii A)	<u>Maintenance of record.</u> IA shall maintain and preserve records of interactions, with all clients including prospective clients, where any conversation related to advice has taken place as prescribed.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(xiii B)	<u>Maintenance of record</u> Regulation 22A of the IA Regulations provides that IAs may provide implementation services to the advisory clients in securities market. In this regard, IAs providing implementation/execution services shall maintain call recording of every consent for implementation/execution obtained from the client if advice/execution is given through telephone call. All such communications shall have time stamped to maintain clear audit trail.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 Clause 1(xiii C)	IAs shall be required to maintain these records for a period of five years. However, in case wheredispute 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.	☑Complied ☐Not- Complied ☐Not Applicable			

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD- POD/I/4300/2026 Clause 1(xiv) and 31.2	<u>Audit</u> Has the Investment Adviser conducted the annual compliance audit as per Regulation 19(3), completed and submitted the audit report and ATR within prescribed timelines, obtained the client-level segregation certificate, and disclosed the audit status and findings as required?	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(ii)	<u>Agreement between IA and the client.</u> IA shall enter into an investment advisory agreement with its clients as prescribed and shall ensure that neither any investment advice is rendered, nor any fee is charged until the client has signed the aforesaid agreement and a copy of the signed agreement is provided to the client.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD- POD/I/4300/2026 clause 1(ii)(a-d)	<u>Agreement between IA and the client.</u> The agreement shall also include the Most Important Terms and Conditions (MITC) to be disclosed by IAs. Consent of client to agreement between IA and client may be signed by the client in person or through any other legally acceptable mode including DigiLocker enabled Aadhaar based e-signature facility.	☑Complied ☐Not- Complied ☐Not Applicable			

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(ii)(e-f)	Investment Advisers shall, through the client agreement, provide guidance on the optional Centralised Fee Collection Mechanism for IA and RA (CeFCoM), may include additional terms and conditions provided they do not dilute the provisions of the IA Regulations and related circulars,	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(ii)(g)	IA shall ensure that neither any investment advice is rendered nor any fee is charged until the client has signed the aforesaid agreement and provided copy of signed agreement to the client	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 19A And SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(xvi)	Whether an investment adviser has maintained a functional website containing such details as specified by the Board?	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 20 and SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(x)	<u>Appointment of Compliance officer</u> An investment adviser shall appoint a compliance officer who shall be responsible for monitoring the compliance by the investment adviser. Whereas an independent professional appointed as compliance officer holds relevant NISM certifications as prescribed in the regulation.	☑Complied ☐Not- Complied ☐Not Applicable			

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Regulation 21 **And** **SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 6**	<u>Redressal of investor grievances through SEBI Complaints Redress system (SCORES) Platform:</u> 6.2 - IAs shall prominently display in their offices the information about the grievance redressal mechanism available to investors. 6.3 - IAs shall also followed the Master Circular (SEBI/HO/OIAE/IGRD/P/CIR/2022) and Circular (SEBI/HO/OIAE/IGRD/CIR/P/2023/156 dated September 20, 2023) Issued by SEBI on the redressal of investor grievances through the SEBI Complaints Redress System (SCORES) and complied with it.	☑Complied ☐Not- Complied ☐Not Applicable			
Regulation 22, SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 1(i)	<u>Client level segregation of advisory and distribution activities.</u> (1) Has the annual client level segregation requirement been certified by an auditor (in case of individual IA) and its statutory auditor (in case of a non-individual IA) [Certificate of auditor to be attached along with] (2) An individual investment adviser shall not provide distribution services. (3) The family of an individual investment adviser shall not provide distribution services to the client advised by the individual investment adviser and no individual investment adviser shall provide advice to a client who is receiving distribution services from other family members. (4) A non-individual investment adviser shall have client level segregation at group level for investment advisory and distribution services. (5) Non-individual investment adviser shall	☑Complied ☐Not- Complied ☐Not Applicable			GANESH & SUDHIR C.A.'s MANGALURU

	maintain an arm's length relationship between its activities as investment adviser and distributor by providing advisory services through a separately identifiable department or division. (6) Compliance and monitoring process for client segregation at group or family level shall be in accordance with the guidelines as prescribed in the referred circular.				
Regulation 22A	<u>Implementation of advice or execution</u> (1) Investment adviser may provide implementation services to advisory clients, provided no consideration shall be obtained directly or indirectly either at group level or at family level. (2) Investment adviser shall provide implementation services only through direct schemes. (3) Investment adviser or group or family of investment adviser shall not charge any implementation fees from the client. (4) The client shall not be under any obligation to avail implementation services offered by the investment adviser.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(xvii)	<u>Display of details on website and in other communication channels.</u> IAs shall prominently display the information as prescribed, on its website, mobile app, printed or electronic materials, know your client forms, client agreements and other correspondences with the clients.	☑Complied ☐Not- Complied ☐Not Applicable			

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SEBI/HO/MIRSD/MIRSD-PoD/P/CIR/2025/80 and SEBI Master Circular HO/38/12/11(2)2026-MIRSD-POD/I/4300/2026 clause 7	<u>Publishing Investor Charter and disclosure of Investor Complaints</u> (1) All registered investment advisers are required to publish investor charter on their websites and mobile applications. If registered investment adviser do not have websites/mobile applications, then as a one-time measure, investor charter to be sent to the investors on their registered e-mail address. (2) All registered investment advisers are required to disclose the details of investor complaints by 7th of the succeeding month on a monthly basis on their websites and mobile applications. If investment adviser do not have websites/mobile applications, status of investor complaints to be sent to the investors on their registered email ids on a monthly basis.	☑Complied ☐Not- Complied ☐Not Applicable			
TRAI Guidelines - SEBI/HO/MIRSD/DoS-2/P/OW/2023/0000011041/1 (Dated March 16, 2023) and BASL Circular No. 20230329-1 dated March 29, 2023 And BSE Circular no. 20251126-3 20250625-27 20250513-9	Telecom Regulatory Authority of India (TRAI) - Guidelines to curb spam SMSes and misuse of Headers and Content Templates by unauthorised Telemarketers (UTMs)	☑Complied ☐Not- Complied ☐Not Applicable			
Usage of brand name/trade name - SEBI/HO/MIRSD/MIRSD-PoD-2/P/CIR/2023/52 (Dated April 06, 2023) and BASL	Compliance to Usage of brand name/trade name by Investment Advisers (IA)	☑Complied ☐Not- Complied ☐Not Applicable			

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Circular No. 20230411-1 dated April 11, 2023 And SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 10.2					
SEBI / BSE Inspections	Last SEBI / BSE Inspection carried out date and period of inspection. Whether complied with inspection observations.	☐Complied ☐Not- Complied ☑Not Applicable	No inspection has been carried out by SEBI or BASL till date. Accordingly, there are no inspection observations requiring compliance.		
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 1(xii)	<u>Use of Artificial Intelligence ('AI') tools in IA services</u> Where AI tools are used, has the Investment Adviser ensured compliance with Regulation 15(14) by assuming responsibility for data security, confidentiality, and AI-based advice, and disclosed the extent of AI usage to clients at the time of entering into the agreement and whenever required, in accordance with Regulation 18(9)?	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 2.3	<u>Receiving fees though banking channel only</u> Has the Investment Adviser accepted advisory fees only through permitted non-cash modes (account-payee cheque, demand draft, or direct bank credit via NEFT/RTGS/IMPS/UPI) and ensured that no cash deposits are accepted, thereby maintaining a proper audit trail of fees received?	☑Complied ☐Not- Complied ☐Not Applicable			GANESH & SUDHIR C.A.'s MANGALURU

SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 2.4	<u>Display of complaints status on website</u> Has the Investment Adviser displayed the prescribed disclosures on the homepage (without scrolling) of its website/mobile application in font size 12 or above, in the format specified under Annexure C, and updated the same on a monthly basis within 7 days from the end of the previous month?	☑Complied ☐Not- Complied ☐Not Applicable			
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)	<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.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 8	<u>Procedure for seeking prior approval for change in control</u> Has the Investment Adviser obtained prior approval from SEBI in accordance with the procedure prescribed under Point 8 of the this circular for change in control?	☐Complied ☐Not- Complied ☑Not Applicable	There has been no change in control.		
SEBI Circular no. SEBI/HO/MIRSD/MIRSD-PoD-2/P/CIR/2023/51 dated April 05, 2023 - VI(9) And SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-	<u>Advertisement code</u> Investment Advisers shall ensure compliance with the advertisement code	☑Complied ☐Not- Complied ☐Not Applicable			

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POD/I/4300/2026 clause 10 (1)					
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 10 (1) (d) (i)	Advertisement code Whether advertisements were published with the prior approval of Exchange?	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 11	Facilitating transaction in Mutual Fund schemes through the Stock Exchange Infrastructure Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 12	Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication: Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 13	Guidelines on Outsourcing of Activities by Intermediaries Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 14	Framework for Regulatory Sandbox: Compliance of aforementioned point of master circular by registered investment advisers	☐Complied ☐Not- Complied ☑Not Applicable	The IA has not provided/utilised such facilities		

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 16	General Guidelines for dealing with Conflicts of Interest of intermediaries and their Associated Persons in Securities Market: Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 17	Approach to securities market data access and terms of usage of data provided by data sources in Indian securities market: Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 18	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 point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 19	Norms for sharing of real time price data to third parties Compliance of aforementioned point of master circular by registered investment advisers	☐Complied ☐Not- Complied ☑Not Applicable	The Investment Adviser does not share any real-time price data with third parties.		
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 20	Know Your Client (KYC) Norms for the Securities market Whether IA had followed the master circular no.	☑Complied ☐Not- Complied ☐Not Applicable			GANESH & SUDHIR C.A.'s MANGALURU

	SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169 dated October 12, 2023 on 'Know Your Client (KYC) norms for securities market'.				
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 22	<u>Association of persons regulated by the Board and their agents with certain persons</u> Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 23	<u>Simplification of requirements for grant of accreditation to investors</u> Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 25	<u>Communication of certified past performance by Investment Advisers (IAs).</u> Has the Investment Adviser communicated past performance to clients only in the prescribed certified format, using the mandated performance metrics, and in compliance with SEBI guidelines on performance reporting by Investment Advisers?	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 28	<u>Adoption of Standardised, Validated and Exclusive UPI IDs for Payment Collection by SEBI Registered Intermediaries from Investors</u> Whether IA has applied for valid UPI ID with IAASB and is in compliance with this point of master circular?	☑Complied ☐Not- Complied ☐Not Applicable			

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SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 29	Rights of Persons with Disabilities Act, 2016 and rules made thereunder-mandatory compliance by all Regulated Entities Compliance of aforementioned point of master circular by registered investment advisers	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 30	Periodic reporting format for Investment Advisers Whether IA had submitted the periodic submission for half year ended as on 31-03-2025 and 30-09-2025 to IAASB?	☑Complied ☐Not- Complied ☐Not Applicable			
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.	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause VIII	ANNEXURES Has IA followed all the annexures as prescribed in point VIII of Master circular	☑Complied ☐Not- Complied ☐Not Applicable			
SEBI Master Circular HO/38/12/11(2)2026 -MIRSD-POD/I/4300/2026 clause 27 And SEBI Circular SEBI/HO/ITD-1/ITD_CSC_EXT/P/CI	Cybersecurity and Cyber Resilience Framework (CSCRF) Compliance of aforementioned point of master circular by registered investment advisers in reference to Point number Para 2.3, Para 2.4.1 and Para 10 of SEBI circular dated April 30,2025.	☑Complied ☐Not- Complied ☐Not Applicable			GANESH & SUDHIR C.A.'s MANGALURU

R/2025/60 dated April 30, 2025					

For SAMVITTI CAPITAL PVT. LTD.

Director

Signature of IA / Partner / Director

Date: 15-09-2026

For **GANESH & SUDHIR**,

Chartered Accountants,

(Firm Registration No. 000866S)

GANESH & SUDHIR CHARTERED ACCOUNTANTS "ALBUQUERQUE CHAMBERS" PANDESHWAR MANGALURU-575 001 FIRM REGN. No. 000866S

GIRIDHAR KAMATH

M No. 203199

Partner

UDIN: 26203199ARUIOC7143

Place: MANGALORE

Date: 15-09-2026