



ABHISHEK MISHRA
PRACTICING COMPANY SECRETARY
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Compliance Audit Report

2022-23

Sapna Tiwari

SEBI Reg. No.: INA100007675

BASL Membership ID: 1817



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The Compliance Audit Report of even date, for the Financial Year ended 31st March, 2023 is to be read along with this letter.

Investment Adviser's Responsibility

1. It is the responsibility of the Investment Adviser 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 Investment Adviser with respect to SEBI (Investment Advisers) Regulations, 2013.
3. I believe that audit evidence and information obtained from the Investment Adviser is adequate and appropriate for me to provide a basis for my opinion.
4. Wherever required, I have obtained the representation from Investment Adviser 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 Investment Adviser nor of the efficacy or effectiveness with which the Investment Adviser 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 Investment Adviser.
7. The report is the opinion of the Auditor and in no way assures the compliances done by the Investment Adviser.



Date: 05th September 2023

Abhishek Mishra
Practicing Company Secretary
ACS 56048 | CP 24511



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COMPLIANCE AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2023
[PURSUANT TO REGULATION 19(3) OF THE SEBI (INVESTMENT ADVISERS)
REGULATIONS, 2013]

I have conducted the Compliance Audit with respect to the compliance of SEBI (Investment Advisers) Regulations, 2013 ("Regulations") of Sapna Tiwari, a SEBI Registered Investment Adviser, having Registration Number - INA100007675 (hereinafter called "the Investment Adviser"). Compliance Audit was conducted remotely.

Based on my review of the records as shared with me by the Investment Adviser and also the information provided by the Investment Adviser during the conduct of compliance audit, I hereby report that in my opinion, the Investment Adviser has, during the audit period covering the Financial Year ended 31st March 2023, has complied with the Regulations listed hereunder to the extent, in the manner and subject to the reporting made hereinafter.

Name of BASL enrolled Investment Adviser	Sapna Tiwari
BASL Membership ID	1817
SEBI Registration No.	INA100007675
Annual compliance Audit Report for FY ended	2022-23



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- The Investment Adviser holds a valid certificate of registration from the SEBI dated May 16, 2017. Further, during the period under review, the Investment Adviser had duly paid the renewal fee to the SEBI.
- The Investment Adviser holds a certificate of Certified Financial Planner from Financial Planning Standards Board Ltd.
- The Net worth of the Investment Adviser could not be verified due to non-availability of Net Worth certificate.
- The Investment Adviser has not received any complaint on the SEBI SCORES Portal in F.Y 2022-23.
- There was no material change in the activity of Investment Adviser during the F.Y 22-23.
- The Investment Adviser has not offered any advisory services during the F.Y 2022-23 and has not received any fees while representing herself as an Investment Adviser.
- The Investment Adviser does not have any active website during the F.Y ended 31" March 2023.
- The compliance of client level segregation of advisory and distribution activities for F.Y 2022-23 is not applicable to the Investment Adviser.
- The compliance of SaaS reporting is not applicable to the Investment Adviser.
- The compliance of cyber security awareness was not applicable to the Investment Adviser for the F.Y 2022-23.
- No inspection has been carried out by the SEBI/BASL during the financial year 2022-23.



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- The compliance of the SEBI Circular SEBI/HO/IMD/DF1/CIR/P/2 020/182 (dated September 23, 2020) Clause 2(ix) and SEBI/HO/IMD/IMD-II CIS/P/CIR/2021/0686 (dated December 13, 2021) is not applicable to the Investment Adviser for the F.Y 2022-23.

Name of Principal/Compliance Officer	Sapna Tiwari
Contact Address	O - 503, Green Valley Apartments, Plot No 18, Sector 22, Dwarka, New Delhi, National Capital Territory of Delhi, 110077
Contact Details	Mobile No.: +91 96863 99407 Email Id.: sapna3031@gmail.com



Date: 05th September 2023

UDIN: A056048E000941603

Abhishek Mishra
Practicing Company Secretary
ACS 56048 | CP 24511