SANJAY KADEL & CO.
chartered accountants

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ANNEXURE

Annual Compliance Audit Report for Financial Year 2024-2025

Name of the IA:	**FinIntent Investment Adviser** (Also referred to as 'FinIntent' or 'IA' or 'RIA')
SEBI Registration No.	INA000010919
BSE Enlistment No.	1407
Entity Type:	Non-Individual (Partnership Firm)

Financial Year:	2024-2025

	Name	*Mobile No.*	*Email ID*
Principal Officer	Bedanta Sahoo	9833152414	bedanta@finintent.com
Compliance Officer	Ravi Natarajan	9004030911	ravi@finintent.com

Clients as on 31-03-2025	199

Regulation	**Particulars**	**Compliance Status *1**	**Reason for Non-compliance / Non-applicability**	**Management Comments**	
				Accepted *2 (In case of Non-compliance) (Yes/No)	**Action taken on adverse finding *3**
Regulation 2(s)	Is ***"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	**✓ Complied** The IA is a Non-Individual as in Clause (i) and Principal Officer is the designated partner, responsible for the overall function of the business and operations of the IA.	–	–	–

	operations related to investment advisory services: Provided that in case of non-individual investment adviser being a partnership firm, one of the partners shall be designated as its principal officer.				
Regulation 3	Application for grant of certificate (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** SEBI Regn. No. INA000010919 BSE Enlistment ID: 1407	–	–	–
Regulation 6	Consideration of application and eligibility criteria Regulation 6 states all matters, which are relevant for the purpose of grant of certificate of registration.	✓ **Complied**	–	–	–
Regulation 7	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).	✓ **Complied**	–	–	–
		• Principal Officer – 1 ✓ • Compliance Officer (also PAIA) – 1 ✓ • Other PAIA – 0 ✓ Currently, there are no other PAIAs. Note: Mandate on Qualification, Experience and Certification (XA & XB) validated.			
SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause – 2(iv)	Qualification and certification requirement 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 accredited certifications and comply with other conditions as specified under Regulation 7(2) of the amended IA regulations at all times.	**Not Applicable**	Non-Individual IA (Partnership Firm)	–	–
Regulation 8	Net worth (1) Investment advisers who are non-individuals shall have a net worth of not less than fifty lakh rupees. (2) Investment advisers who are individuals shall have net tangible	✓ **Complied**	–	–	–
		Non-Individual IA – Net worth is more than 50 Lakhs. Networth as on 31-3-2025 as per the Financials: ₹ 91,77,272			

	assets of value not less than five lakh Rupees.				
Regulation 13(b)	Conditions of certificate 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**	–	–	–
Regulation 13(c)	Conditions of certificate 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** IA uses the terms "Investment Adviser" in its name.	–	–	–
Regulation 13(d)	Conditions of certificate An individual registered as investment advisers shall use the term 'investment adviser' in all their correspondences with their clients. 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.	**Not Applicable**	Non-Individual IA (Partnership Firm)	–	–
Regulation 13(e)	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. Apply for grant of in-principle registration as non-individual investment adviser; b. 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; c. On completion of the transition period or upon grant of certificate of	**Not Applicable**	Non-Individual IA (Partnership Firm)	–	–

<table>
<tr><td></td><td>registration as non-individual investment adviser, whichever is earlier, investment adviser shall surrender his registration as individual investment adviser.</td><td></td><td></td><td></td><td></td></tr>
<tr><td>Regulation 13(f)</td><td>The number of clients of a part-time investment adviser shall not exceed seventy-five in total at any point of time.</td><td>Not Applicable</td><td>Not a part-time IA</td><td>–</td><td>–</td></tr>
<tr><td rowspan="2">Regulation 15(7)</td><td rowspan="2">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.</td><td>✓ Complied</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td colspan="4">No such instance noted upon sample check and information obtained.</td></tr>
<tr><td rowspan="2">Regulation 15 other than sub-point 7</td><td rowspan="2">General Responsibility

Whether IA has followed all the responsibilities as mentioned regulation 15.</td><td>✓ Complied</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td colspan="4">(1) Fiduciary duty, disclose conflicts - Complied.
(2) No third-party remuneration - Complied.
(3) Arms-length with other activities - No such activities.
(4) Segregate other activities - No such other activities.
(5) Disclose advisory conflicts - Complied.
(6) Maintain client confidentiality - Complied.
(7) No self-trades against advice - Complied.
(8) Follow KYC procedure - Complied.
(9) Abide by Code of Conduct - Complied.
(10) No self-dealing with clients - Complied.
(11) SEBI approval for control change - No such change.
(12) Report as specified to SEBI - Complied.
(13) Ensure qualification compliance u/r 7 - Complied.
(14) AI use—adviser responsibility - Complied.
(15) Comply with Investor Charter - Complied.</td></tr>
<tr><td rowspan="2">Regulation 15A

read with

SEBI Circular Ref. No. SEBI/HO/ MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025)

Clause – 2(viii)</td><td rowspan="2">Fees

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.</td><td>✓ Complied</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td colspan="4">Fixed Fee mode & AUA mode, as mutually agreed and in accordance to the regulations and circulars issued.</td></tr>
<tr><td>SEBI/HO/ MIRSD/MIRSD-PoD-1/P/CIR/2024/50</td><td>Restriction on free trial

IAs shall not provide free trial for any products/services to prospective clients.</td><td>✓ Complied

No such free trials provided.</td><td>–</td><td>–</td><td>–</td></tr>
</table>

Clause – 2(2.1)					
SEBI/HO/ MIRSD/MIRSD-PoD-1/P/CIR/2024/50 Clause – 2(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** No such advance fee is charged on trial basis for IA services.	–	–	–
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**	–	–	–
		Risk profiling tools: MatRisQ from PulseLabs. Risk Profile Report is communicated / available to the client on the MatRisQ portal. Risk profiling and suitability process followed.			
SEBI/HO/ MIRSD/MIRSD-PoD-1/P/CIR/2024/50 Clause – 2(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** Client provides consent for investment management advisory / implementation reports.	–	–	–
Regulation 17	<u>Suitability</u> Investment adviser shall ensure suitability of the advice being provided to the client.	✓ **Complied**	–	–	–
		As per Investment recommendation, Objectives, Risk tolerance / assessment, client profile and client requirements. Risk profiling and suitability process followed.			
SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause – 2(viii) and SEBI Circular Ref No. SEBI/HO/ MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated	<u>Risk profiling and suitability for non-individual clients</u> (a) In case of <u>non-individual clients</u>, 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.	**Not Applicable**	There are no non-individual clients.	–	–

January 08, 2025) Clause – 1.2(viii)(b) –(c)					
Regulation 18	<u>Disclosure to clients</u> This involves disclosure of all prescribed information by the investment adviser to its clients.	✓ **Complied** Disclosures ensured in Website, Emails, Letter of Engagement (LoE) and other Reports / Communications.	–	–	–
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** Physical / Electronic records maintained.	–	–	–
SEBI/HO/ MIRSD/MI RSD-PoD-1/P/CIR/20 24/50 Clause – 1.2(vi)	<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** Physical / Electronic records maintained. Further, records of interactions maintained. Conversations related to advice is maintained in the form of Emails, SMS, WhatsApp, and other electronic records like Financial Planning Report, Investment plan i.e. strategy (also called as Implementation report) and related documents, discussion minutes, transactions consent, etc.	–	–	–
SEBI/HO/ MIRSD/ MIRSD-PoD-1/P/CIR/20 25/003 (Dated January 08, 2025) Clause – 2(xii)	<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 <u>consent</u> 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** Implementation / Execution does not happen through telephonic calls, but carried out through client's transaction consents in the form of electronic approval / OTP.	–	–	–
SEBI/HO/I MD/DF1/C IR/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**	–	–	–
SEBI/HO/ MIRSD/ MIRSD-PoD-1/P/CIR/20	<u>Agreement between IA and the client.</u> The agreement shall also include the Most Important Terms and	✓ **Complied** MITC – Included in Agreement / Disclosed. Consent – In person / Other legally aceeptable mode / Aadhaar based e-signature.	–	–	–

25/003 (Dated January 08, 2025) Clause – 2(xi)	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 Digi-Locker enabled Aadhaar based e-signature facility.					
Regulation 19A and SEBI Circular Ref. No. SEBI/HO/ MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025) Clause – 2(xiv)	Whether an investment adviser has maintained a functional website containing such details as may be specified by the Board?	✓ **Complied**	–	–	–	Functional Website – https://www.finintent.com/
Regulation 20(1) and SEBI Circular Ref. No. SEBI/HO/ MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025) Clause – 2(v)(a)	Appointment of Compliance officer 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 certifications from NISM by passing the following certification examinations- •NISM-Series-X-A: Investment Adviser (Level 1) Certification Examination, •NISM-Series-X-B: Investment Adviser (Level 2) Certification Examination, •NISM-Series-X-C: Investment Adviser Certification (Renewal) Examination, and •NISM-Series-III A: Securities Intermediaries Compliance (Non-Fund) Certification Examination.	✓ **Complied**	–	–	–	Compliance Officer: Mr. Ravi Natarajan, Partner

Regulation 21 and SEBI Master Circular 2024/50 Clause – V(7)	<u>Redressal of investor grievances through SEBI Complaints Redress system (SCORES) Platform:</u> 7.2 - IAs shall prominently display in their offices the information about the grievance redressal mechanism available to investors. 7.3 - IAs shall also follow the Master Circular No. SEBI/HO/OIAE/IGRD/P/CIR/2022 and Circular No. 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**	–	–	–
		Grievance Redressal and Dispute Settlement Mechanism Process – In place. Grievance Redressal Mechanism Notice – Displayed in Office, LOE and Website. Complaints Register – In place. Complaints: Nil. SCORES Status – Login active. Complaints: Nil. Smart ODR Status – Login active. Disputes: Nil. Complaints status published on Website – Done monthly.			
Regulation 22 and SEBI Circular Ref. No. SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause – 2(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 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	**✓ Complied**	–	–	–
		(1) Auditor-certified client level segregation – Auditor Certificate dt. 20-Sep-2025. Note: IA does not provide any distribution services. (2) No distribution by Individuals – ***Not applicable***, as the IA is Non-Individual. (3) No family distribution overlap – ***Not applicable***, as the IA is Non-Individual. (4) Group-level client segregation for Non-Individual IA – ***Not applicable***, as the IA does not provide any distribution services. (5) Arms length and SIDD for Non-Individual IA – ***Not applicable***, as the IA does not provide any distribution services. (6) Compliance and Monitoring process for client level segregation – The IA adopts compliance and monitoring process, as prescribed.			

	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** (1) No consideration received for execution activities. (2) Implementation (execution) services provided only through direct schemes/products in the securities market. (3) No implementation fee charged either by the IA or family/group of IA. (4) The Client is not under any obligation to avail implementation services offered by the IA.	–	–	–
SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause – 2(ix)	<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** Specified details displayed in Website (<u>www.finintent.com</u>), LoE, Emails and other materials / reports / correspondences. Note: The IA does not have mobile app.	–	–	–
SEBI/HO/IMD/IMD-II CIS/P/CIR/2021/0686 (Dated December 13, 2021) and SEBI Master Circular 2024/50 Clause – V(8) & SEBI/HO/IMD/IMD-II CIS/P/CIR/	<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	✓ **Complied** IA has the Website (<u>www.finintent.com</u>) Note: The IA does not have mobile app. Disclosures covered in the page: https://www.finintent.com/disclosure.php (1) Investor Charter published. (2) Complaints disclosed every month.	–	–	–

2021/0686 (Dated December 13, 2021)	on their registered email ids on a monthly basis.				
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	Telecom Regulatory Authority of India (TRAI) - Guidelines to curb spam SMSs and misuse of Headers and Content Templates by unauthorised Telemarketers (UTM)	**Not Applicable**	No Bulk SMS are being sent by the IA	–	–
Usage of brand name/trade name - SEBI/HO/ MIRSD/ MIRSD-PoD-2/P/CIR/2023/52 (Dated April 06, 2023) and BASL Circular No. 20230411-1 dated April 11, 2023 and SEBI Master Circular 2024/50 Clause – 10(2)	Compliance to Usage of brand name/trade name by Investment Advisers (IA).	**✓ Complied**	–	–	–
		The brand name/trade name/logo “FinIntent” is related to the name of the IA. ____________________________________ 1. Name of the IA, registration number and other details are mentioned in website / documents / emails / etc. 2. Above specified details along with compliance officer details, grievance redressal contact details are mentioned in website / documents / emails / etc. 3. Specified disclaimer *“Registration granted by SEBI, membership of BASL… in no way guarantee performance……”* mentioned in website / documents / emails / etc. 4. SEBI logo not used anywhere.			

<table>
<tr><td>SEBI / BASL Inspections</td><td>Last SEBI / BASL Inspection carried out date and period of inspection. Whether complied with inspection observations.</td><td>✓ Complied

There is no SEBI / BASL/BSE inspection during FY 2024-25</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td>SEBI Master Circular 2024/50 – Point II(2)</td><td><u>Whether IAs have complied with the following points:</u>

2.1 - Restriction on free trial

2.2 - Proper risk profiling and consent of client on risk profiling

2.3 - Receiving fees though banking channel only

2.4 - Display of complaints status on website</td><td>✓ Complied</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td rowspan="2">SEBI/HO/ MIRSD/MI RSD-PoD-1/P/CIR/20 24/50

Clause – IV(6)

and

SEBI/HO/ MIRSD2/D OR/CIR/P/ 2020/221 dated November 03, 2020</td><td rowspan="2"><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.</td><td>✓ Complied</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td colspan="4">SAAS Undertaking for FY 2024-25 dated 26-May-2025

Submission on usage of SaaS based models/solutions – on BSE portal on 27-5-2025</td></tr>
<tr><td>SEBI Circular no. SEBI/HO/ MIRSD/ MIRSD-PoD-2/P/CIR/20 23/51 dated April 05, 2023

Clause – VI(9)

and

SEBI Master Circular 2024/50

Clause – 10(1)</td><td><u>Advertisement code</u>

Investment Advisers shall ensure compliance with the Advertisement Code.</td><td>✓ Complied

No advertisements were issued by the IA during FY 2024-25</td><td>–</td><td>–</td><td>–</td></tr>
</table>

SEBI Master Circular 2024/50 Clause – 10(1)(d)(i)	Advertisement code Whether advertisements were published with the prior approval of Exchange?	✓ **Complied** No advertisements were issued by the IA during FY 2024-25	–	–	–
SEBI Master Circular 2024/50 Clause – VI(11)	Facilitating transaction in Mutual Fund schemes through the Stock Exchange Infrastructure Compliance of aforementioned point VI(11) of Master Circular by registered investment advisers.	✓ **Complied**	–	–	–
SEBI Master Circular 2024/50 Clause – VI(12)	Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication: Compliance of aforementioned point VI(12) of Master Circular by registered investment advisers	✓ **Complied**	–	–	–
SEBI Master Circular 2024/50 Clause – VI(13)	Guidelines on Outsourcing of Activities by Intermediaries Compliance of aforementioned point VI(13) of Master Circular by registered investment adviser.	✓ **Complied** Note: No such outsourcing during the year 2024-25	–	–	–
SEBI Master Circular 2024/50 Clause – VI(14)	Framework for Regulatory Sandbox: Compliance of aforementioned point VI(14) of Master Circular by registered investment advisers.	✓ **Complied**	–	–	–
SEBI Master Circular 2024/50 Clause – VI(15)	General Guidelines for dealing with Conflicts of Interest of intermediaries and their Associated Persons in Securities Market: Compliance of aforementioned point VI(15) of Master Circular by registered investment advisers.	✓ **Complied**	–	–	–
SEBI Master Circular 2024/50 Clause – VI(16)	Approach to securities market data access and terms of usage of data provided by data sources in Indian securities market: Compliance of aforementioned point VI(16) of Master Circular by registered investment advisers.	✓ **Complied**	–	–	–
SEBI Master Circular 2024/50	Guidelines on Anti-Money Laundering (AML) Standards and Combating the Financing of Terrorism (CFT) / Obligations of	✓ **Complied** The specified guidelines are considered and complied. • The IA is registered with FIU-IND.	–	–	–

Clause – VI(17)	<u>Securities Market Intermediaries under the Prevention of Money Laundering Act, 2002 and Rules framed there under:</u> Compliance of aforementioned point VI (17) of Master Circular by registered investment advisers.	• KYC Policy and PMLA Policy/Processes are in place.			
SEBI/HO/ MIRSD/MIRSD-PoD-1/P/CIR/2024/50 dated May 21, 2024 Clause – VI(18)	<u>Know Your Client (KYC) Norms for the Securities market</u> Whether IA had followed the Master Circular no. SEBI/HO/MIRSD/SECFATF/P/CIR/2023/169 dated October 12, 2023 on 'Know Your Client (KYC) norms for securities market'.	✓ **Complied**	–	–	–
SEBI Master Circular 2024/50 Clause – VI(19)	<u>Simplification of requirements for grant of accreditation to investors</u> Compliance of aforementioned point VI (19) of Master Circular by registered investment advisers.	✓ **Complied** No such requirement arose for accreditation during the year 2024-25	–	–	–
SEBI Master Circular 2024/50 Clause – VI(20)	<u>Periodic reporting format for Investment Advisers</u> Whether IA had submitted the periodic submission for half year ended as on 31-03-2024 and 30-09-2024.	✓ **Complied**	–	–	–
		Half-yearly periodic submission is made on the BSE portal, as follows: For the Half-year ended 31-03-2024: Submitted on 26/07/2024 (Case ID 17369) For the Half-year ended 30-09-2024: Submitted on 14/10/2024 (Case ID 20739)			
SEBI Master Circular 2024/50 Clause – VI(21.1)	<u>Other reporting requirements</u> Whether Complaint Data has been displayed by IAs on their website/ mobile application by 7th of the succeeding month.	✓ **Complied**	–	–	–
		IA has the Website (www.finintent.com) Note: The IA does not have mobile app. Complaints disclosed every month by 7th in the page: https://www.finintent.com/disclosure.php Linked document – as pdf. For instance - https://www.finintent.com/images/pdf/Publish_Complaints-Status%202025-08-new.pdf			
SEBI Master Circular 2024/50 Clause – VI(21.2)	<u>Other reporting requirements</u> 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**	–	–	–
		SAAS Undertaking for FY 2024-25 dated 26-May-2025 Submission on usage of SaaS based models/solutions – on BSE portal on 27-5-2025			
SEBI Master	<u>Reporting Requirements:</u>	✓ **Complied**	–	–	–
		1. Complaint data published monthly on website of the IA. (Note: The IA does not have mobile app)			

<table>
<tr><td>Circular 203/89
Clause – VII</td><td>IA has followed and complied to all reporting requirement as per VII of Master Circular.</td><td colspan="4">2. SAAS Undertaking for FY 2024-25 dated 26-May-2025.
3. Annual compliance audit for FY 2023-24 conducted and Report issued dt. 23-Sep-2024.</td></tr>
<tr><td rowspan="2">SEBI Master Circular 203/89
Clause – VIII</td><td rowspan="2"><u>Annexures</u>
Has IA followed all the annexures as prescribed in point VIII of Master Circular.</td><td>✓ Complied</td><td>–</td><td>–</td><td>–</td></tr>
<tr><td colspan="4">• Annexure-A: Terms and Conditions between IA and client – Complied in the LoE entered by IA.
• Annexure-B: Investor Charter – Published on the website of IA.
• Annexure-C: Complaint data – Published monthly on website of IA.
• Annexure-D: SAAS Advisory – Followed and SAAS Undertaking for FY 2024-25 dated 26-May-2025.
• Annexure-E: Change in control declaration – No such change in control during the year 2024-25.
• Annexure-F: Outsourcing principles – No such outsourcing during the year 2024-25.</td></tr>
</table>

*1 Anyone status as applicable to respective point to be retained.
*2 Whether Auditor comments accepted in case of non-compliance reported by auditor? (Yes/No)
*3 Action taken on adverse findings (duly approved by the individual IA/management of the non-individual IA)

SEBI Master Circular 2024/50 – SEBI Master Circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 dated May 21, 2024

SEBI Master Circular 203/89 – SEBI Master Circular Ref. No. SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89/ dated June 15, 2023

For FinIntent Investment Adviser

eSigned using Aadhaar (Leegality.com - 01K6AZ9622ZBK8RSZ5WGF0MEDZ)
Ravi Natarajan
Date: Mon Sep 29 21:04:42 IST 2025

Name: Ravi Natarajan
Designation: Partner

……………………………………………………
Signature of IA / Partner / Director

Place: Mumbai
Date: 29-Sep-2025

For Sanjay Kadel & Co.
Chartered Accountants
Firm Registration No. 010651S

SANJAY KADEL & CO. CHENNAI CHARTERED ACCOUNTANTS

eSigned using Aadhaar (Leegality.com - 01K6AZ9622ZBK8RSZ5WGF0MEDZ)
Sanjay Kadel
Date: Mon Sep 29 20:23:12 IST 2025

Sanjay Kadel
Proprietor
Membership No. 214026

UDIN: 25214026BMUMBG2950
Place: Chennai
Date: 29-Sep-2025