

Annexure – I

Name of BASL enrolled Investment Adviser	PIONEER CLIENT ASSOCIATES PRIVATE LIMITED
BASL Membership ID.	BASL1671
SEBI Registration No.	INA100010660
Annual compliance Audit Report for FY ended	2022-2023

Annual Compliance Audit Report for F. Y 2022-2023				
Regulation	Particulars	Compliance Status	Reason for non-compliance/ Non-applicability	Action taken on adverse findings (duly approved by the individual IA / management of the non-individual IA)
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.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
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.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 7	Qualification and certification requirement.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		



SEBI/HO/IMD/DF1/CIR/P/2
020/182 (Dated September
23, 2020) Clause (iv)

Regulation 8

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).

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 specifies under Regulation 7(2) of the amended IA regulations at all times.

- Complied
- Not- Complied
- Not Applicable

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
- Not- Complied
- Not Applicable



<p>Regulation 13</p>	<p>assets of value not less than five lakh rupees.</p> <p>Conditions of certificate (b) 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.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>
<p>SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(v)</p>	<p>Registration as Non-Individual Investment Advisor. An individual IA, whose number of clients exceed one hundred and fifty in total, shall apply for registration as non-individual investment adviser within such time as specified under this clause.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>
<p>Regulation 15</p>	<p>General Responsibility The regulation 15 imposes certain responsibilities on the Investment Adviser for the transactions it undertakes on behalf of its clients.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>
<p>Regulation 15 A</p>	<p>Fees Investment Adviser shall be entitled to charge fees for providing investment advice from a client in the manner as specified by the Board.</p>	<p><input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable</p>



SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(iii)	Fees Investment Advisers shall charge fees from the clients in either Assets under Advice (AUA) mode or Fixed fee mode.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
Regulation 16	Risk profiling This involves profiling, assessing the risk appetite of each client individually, and communication of such profile to the respective client.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
Regulation 17	Suitability Investment adviser shall ensure suitability of the advice being provided to the client.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(viii)	Risk profiling and suitability for non-individual clients. (b) 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. (c) 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.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable



Regulation 18	<p>Disclosure to clients This involves disclosure of all necessary information by the investment adviser to its clients.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable
Regulation 19	<p>Maintenance of records This regulation requires maintenance of certain records, preservation of the same and audit of such records by the prescribed professional.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(vi)	<p>Maintenance of record. IA shall maintain and preserve records of interactions, with all clients including prospective clients, where any conversation related to advice has taken place, in the form as specified under this clause.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable
SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ii)	<p>Agreement between IA and the client. IA shall enter into an investment advisory agreement with its clients as prescribed under this clause and shall ensure that neither any investment advice is rendered nor any fee is charged until the client has signed the aforesaid agreement.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable
Regulation 20	<p>Appointment of Compliance officer An investment adviser shall appoint a compliance officer who shall be</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not-Complied <input type="checkbox"/> Not Applicable



Regulation 21

responsible for monitoring the compliance by the investment adviser.

Redressal of client grievances
Investment adviser shall redress client grievances promptly through an adequate procedure.

- Complied
- Not- Complied
- Not Applicable

Regulation 22

Client level segregation of advisory and distribution activities.

- (1) An individual investment adviser shall not provide distribution services.
- (2) 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.
- (3) A non-individual investment adviser shall have client level segregation at group level for investment advisory and distribution services.
- (4) 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.

- Complied
- Not-Complied
- Not Applicable



SEBI/HO/IMD/DF1/CIR/P/2
020/182 (Dated September
23, 2020) Clause 2(i)

Regulation 22A

SEBI/HO/IMD/DF1/CIR/P/2
020/182 (Dated September
23, 2020)
Clause 2(ix)

Client Level Segregation of Advisory and
Distribution Activities

Compliance and monitoring process for
client segregation at group or family level
shall be in accordance with the guidelines
as specified under this clause.

- Complied
- Not- Complied
- Not Applicable

Implementation of advice or execution

(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

Display of details on website and in other
communication channels.

IAs shall prominently display the
information as specified under this clause,
on its website, mobile app, printed or
electronic materials, know your client

- Complied
- Not- Complied
- Not Applicable



(SEBI/HO/MIRSD2/DOR/CIR /P/2020/221) dated November 03, 2020)

forms, client agreements and other correspondences with the clients.

SEBI/HO/IMD/IMD-II
CIS/P/CIR/2021/0686
(Dated December 13, 2021)

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 2023 and 30th September 2023.

- Complied
 Not- Complied
 Not Applicable

Publishing Investor Charter and disclosure of Investor Complaints

- Complied
 Not- Complied
 Not Applicable

(2) All registered investment advisers are required to publish investor charter on their websites and mobile applications. If registered investment adviser does not have websites/mobile applications, then as a one-time measure, send investor charter to the investors on their registered e-mail address.

(3) All registered investment advisers are required to disclose the details of investor complaints by seventh of the succeeding month on a monthly basis on their websites and mobile applications. If investment adviser does not have websites/mobile applications, then send status of investor complaints to the investors



on their registered email on a monthly basis.

Name and contact of Principal officer	Pawan Kumar, pawankumar@clientassociates.com Mobile No. 9910943355		
Name and contact of Compliance officer	Rakesh Khanna, rakeshkhanna@clientassociates.com Mobile No. 983413207		
Total No. of clients as on 31.03.2023	125		
Cyber security Awareness	Whether any planned Cyber Security awareness carried out among employees, stakeholders and clients. If yes, details of cyber security Awareness Programme conducted in the Financial under Audit.	The Technology division at Client Associates shares regular updates on cyber security and privacy protection good practices with our universe of clients and employees.	
SEBI/BASL Inspections	Last SEBI/BASL Inspection carried out date and whether complied with inspection observations	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not applicable	There was no BASL Inspection for company during the period under audit.

For Prakash Barnwal & Associates
Chartered Accountants
(Regn. No. 0031284C)


Prakash Barnwal
(Proprietor)
Membership No. 512224
UDIN: 23512224BGXUJL1684



For Pioneer Client Associates Private Limited

For Pioneer Client Associates Pvt. Ltd.

(Compliance Officer)


Authorised Signatory

Date: 26th September, 2023
Place: Noida