

RAJIT AGGARWAL
SEBI Regn No: INH000012777; BSE Enlistment No: 5828
Email: rajit.aggarwal@gmail.com; Mobile: 9599851762

Action Taken Report (ATR)

Name of Research Analyst:	Rajit Aggarwal
SEBI Registration No.:	INH000012777
BSE Enlistment No.:	5828
Entity Type:	RA
Financial Year:	2024-2025

Sr. No	Regulation	Particulars	Compliance Status	Reason for non-compliance	Auditor Comments Accepted (Yes/No)	Action taken on adverse findings
1	Regulation 13(iii)	Conditions of certificate: Research analyst registered under RA regulations shall use the term 'research analyst' in all correspondences with its clients. Provided that part-time Research Analyst registered under these regulations shall use the term 'part-time Research Analyst' in all their correspondences with their clients	Not-Complied	As per the records provided to us the term research analyst is not being used at the time of client correspondence during the period under review	Yes	Some of my correspondences may have inadvertently missed out mentioning that i was a Research Analyst, however, all my recommendations and initial verbal discussions that may have gone unrecorded captured that I was indeed a registered RA, most of my clients are people who have been known to me personally and they are well aware that I am an RA, I have subsequently ensured that all my correspondences capture that I am a registered RA

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2	Regulation 24	General Responsibility Whether RA has followed all the responsibilities as mentioned regulation 24?	Not-Complied	Auditee has not fully complied with the Code of Conduct under the Third Schedule of the RA Regulations during the period under review due to certain specific instances of noncompliance as detailed in this report	Yes	The breach of code of conduct is due to the other two non compliances reported in the auditor report, I have taken remedial actions on the adverse findings to ensure I am not in breach of those two regulations and therefore will not be in breach of Code of Conduct
3	SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause VI (3) And SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2025/04 (Dated January 08, 2025) Clause 2 (xiv)(a-e)	To conduct annual audit and submit a report and adverse findings, if Any Whether R Institute of Cost Accountants of India within six months from the end of each financial year. Submit a report of the same and adverse findings of the audit, if any, along with action taken thereof duly approved by the individual R A/management of the non-individual R A 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.	Not-Complied	Auditee has not conducted Compliance Audit for the FY 2024	Yes	I did not have any client during FY 2024 as I had received my registration only on 30 August 2023 and for the remaining months of FY 2024 I was not able to onboard any client, I have now got the audit done and have complied with most of the requirements



Signature of RA / Partner / Director:

Date and Place: 01-10-2025, GURGAON