Swapnil Nadkar

Action Taken Report (ATR)

Name of Investment Adviser:	Swapnil Satish Nadkar
SEBI Registration No.:	INA000018595
BSE Enlistment No.:	2099
Entity Type:	Individual
Financial Year:	2024-2025

Sr. No	Regulation	Particulars	Compliance Status	Reason for non - compliance	Auditor Comments Accepted	Action taken on adverse findings
1	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).	Not-Complied	The Investment adviser does not have a valid NISM XA certification during the audit period	Yes	I am in the process of complying with the NISM certification requirement

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2	SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 Clause - IV(6) and (SEBI/HO/MIRSD2/DOR/CIR/P/2020/221 dated November 03, 2020)	Advisory for Financial Sector Organizations regarding Software as a Service (SaaS) based solutions 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.	Not-Complied	The investment adviser has not complied with SaaS reporting	Yes	I have not used any SaaS, as I have not yet commenced my investment advisory business and have not onboarded any clients, I have shared SaaS declaration over email to the respective BSE team
3	SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI(20)	Periodic reporting format for Investment Advisers Whether IA had submitted the periodic submission for half year ended as on 31-03-2024 and 30-09-2024	Not-Complied	The investment adviser has not filed periodic reports during the audit period	Yes	I have not onboarded any clients during the said period and there is no option to complete the reporting
4	SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/50 dated May 21, 2024 - VI(21.2)	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.	Not-Complied	The investment adviser has not complied with compliance with SaaS reporting	Yes	I have not used any SaaS, as I have not yet commenced my investment advisory business and have not onboarded any clients, I have shared SaaS declaration over email to the respective BSE team
5	SEBI Master circular Ref. No. SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89/ dated June 15, 2023 - VII	Reporting Requirements: IA has followed and complied to all reporting requirement as per VII of Master Circular	Not-Complied	The investment adviser has not complied with periodic reporting and SaaS reporting compliance requirements	Yes	I am unable to complete the periodic reporting for the said period, and I have I have shared SaaS declaration over email to the respective BSE team

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6	SEBI Master circular Ref. No. SEBI/HO/MIRSD-PoD-2/P/CIR/2023/89/ dated June 15, 2023 - VIII	ANNEXURES Has IA followed all the annexures as prescribed in point VIII of Master circular	Not-Complied	The investment adviser has not complied with Annexure E - SaaS reporting compliance	Yes	I have not used any SaaS, as I have not yet commenced my investment advisory business and have not onboarded any clients, I have shared SaaS declaration over email to the respective BSE team

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Date: 28/08/2026
Place: AHMEDABAD