



21st September, 2021

To,
The Board of Directors
M/s Narnolia Investment Advisors Private Limited
58, 2nd Floor, A. C. Market,
Gel Church Complex, Main Road,
Jharkhand, Ranchi 834 001.

Reg.: Audit Report of Investment Advisory Activity under SEBI (Investment Advisers) Regulations, 2013

Dear Sir(s),

We give here under our report with respect to the audit of Investment Advisory (IA) business of **M/s Narnolia Investment Advisors Private Limited (formerly known as Eastwind Capital Advisors Private Limited) (henceforth referred to as "NIAPL")**. The audit is with the objective of assuring that the research activity are as per the various requirements as specified in **SEBI (Investment Advisers) Regulations, 2013**.

We would be happy to provide you with any other information as may be required by you.

We take this opportunity to thank the staff for extending support, sharing the information and to help us collate and consolidate this report.

Thanking you
Yours truly,

For **SCM Associates**
Chartered Accountants
FRN: 314173E

Sandeep Maheshwari
Partner
Membership Number: 103293
UDIN: 21103293AAABAE1094

Encl.: Detailed Investment Advisory Audit report.



REPORT ON

**AUDIT OF OPERATIONS
OF
INVESTMENT ADVISORY OPERATIONS**

OF

M/S NARNOLIA INVESTMENT ADVISORS PRIVATE LIMITED.

(FORMERLY KNOWN AS EASTWIND CAPITAL ADVISORS PVT. LTD.)

(SEBI IA Registration No. INA300005439)

For the Period April 2020 to March 2021

STATEMENT OF LIMITING CONDITIONS

This report has been prepared for the purpose as stated in the Introduction section. Our audit conclusions are based on the information provided by the management of **M/s Narnolia Investment Advisors Pvt. Ltd.** Neither partners nor any employee of M/s. SCM Associates undertakes responsibility in any way whatsoever to any person in respect of any errors in this report arising from incorrect information provided by management. We have no obligation to update this report because of events or transactions occurring subsequent to the date of the report.

During audit, M/s. SCM Associates was provided with both written and verbal information. Nothing has come to M/s. SCM Associates attention that reasons a belief that the facts and data set forth in this report are not true or correct.

The management of the Company understands that any omissions or misstatements may materially affect our report.

Our audit report and recommendation were based on information provided by the Company. We did not independently investigate or otherwise verify the data provided and do not express an opinion or offer any form of assurance regarding its accuracy or completeness.

Neither **M/s. SCM Associates** nor its employees have any financial interest in the entity.

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A. INTRODUCTION...

Pursuant to your request, we have reviewed the operations of Investment Advisory Business for **M/s Narnolia Investment Advisors Pvt. Ltd.**, a company incorporated in India registered with the Registrar of Companies, Jharkhand on 27/04/2007 as a limited company, with liability by shares having Corporate Identification Number **U67120JH2007PTC012791**.

This report is intended solely for use by the management of NIAPL for:

- i. Audit of the operations of the Investment Advisory services provided by the company.
- ii. Ensuring the compliance with the various requirements as specified in the **SEBI (Investment Advisers) Regulation, 2013** (also has been referred to as the “**Regulation**”) have been adhered to.

We have determined the report of the Company considering the purpose for which this audit has been taken.

B. BACKGROUND...

The company is a SEBI licensed Investment Adviser registered under the SEBI (Investment Advisers) Regulations, 2013 having **SEBI Registration No. INA300005439** and is providing Investment Advisory services to its clients.

C. SCOPE...

- ✓ Review of Internal Policy and Procedure
- ✓ Review of Qualification and Certification of Investment Advisers
- ✓ Disclosures made in Investment Advisory agreement
- ✓ Documentation maintained
- ✓ Review of client level segregation as per Regulation 22
- ✓ Other Compliance with respect to the SEBI Regulatory requirements

D. AUDIT METHODOLOGY...

- ✓ Discussion with the Management/ employees of the company engaged in Investment Advisory Business.
- ✓ Review the various disclosures as applicable within the company.
- ✓ Review the Investment advisory agreement with Client and risk profiling done of the clients as per the requirement of the Regulation and services offered by Investment advisor to such clients.
- ✓ Review the KYC forms.
- ✓ Review the transaction between Investment advisor and distribution / execution service provider.
- ✓ Review the fee collected from clients
- ✓ Review and verification of the various documents maintained by the company.

E. AUDIT COVERAGE...

- ✓ Reviewed the Agreement specifying the terms & conditions of the Investment Advisory service to the Clients registered during the audit period.
- ✓ Reviewed the process of risk profiling & its suitability with respect to Investment objectives of the client
- ✓ Reviewed the Process of Investment advice given to the client.
- ✓ Reviewed the trades done by Investment advisers (individuals) and process of approval taken from the Compliance department.
- ✓ Reviewed rationale for providing investment advice to the client & documents maintained for the same.
- ✓ Reviewed Investor grievance register of Investment advisory business.

F. OBSERVATIONS AND RECOMMENDATION...

- ✓ No adverse observations have been found during the audit period.