

Action Taken Report (ATR)

Name of Research Analyst:	JAMNADAS VIRJI SHARES & STOCK BROKERS PVT LTD
SEBI Registration No.:	INH000007483
BSE Enlistment No.:	5366
Entity Type:	Corporate body
Financial Year:	2024-2025

Sr. No	Regulation	Particulars	Compliance Status	Reason for non-compliance	Auditor Comments Accepted (Yes/No)	Action taken on adverse findings
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1	SEBI circular Ref no. SEBI/HO/MIRSD/MIRS D-PoD1/P/CIR/2025/004 dated January 08, 2024 point 2(i) And BSE Circular Ref. No. 20250313-10 Dated March 13, 2025	Certification requirement An individual registered as research analyst under the RA Regulations, 2014, a principal officer of a non-individual research analyst, individuals employed as research analysts, persons associated with research services, and in case of the research analyst being a partnership firm, the partners thereof if any, who are engaged in providing research services: (i) shall obtain certification(s) from NISM by passing the NISM-Series-XV: Research Analyst Certification Examination, as mentioned in the NISM communique No. NISM/Certification/Series-XV: Research Analyst/2015/01 dated February 16, 2015. (ii) shall, in order to ensure continuity in compliance with the certification requirements, before expiry of the validity of the existing certification as specified in clause (i), obtain certification from NISM by passing the NISM-Series-XV-B: Research Analyst Certification (Renewal) Examination as mentioned in the NISM communique No. NISM/Certification/ NISM-Series-XV-B: Research Analyst Certification (Renewal) Examination/2024/01 dated January 06, 2025.	Not-Complied	As per our understanding we have reported name of principal officer as per PMLA guidelines but our principal officer as per RE is different and he is having valid NISM certification We will rectify the name of principal officer in our next periodical reporting	Yes	WE HAVE RECTIFIED FOR HALF YEARLY SUBMISSION FOR MAR 26 AND CORRECTLY REPORTED IN HALF YEARLY SUBMISSION FOR SEP 26
2	Regulation 16 (1)	Limitations on trading by research analysts Personal trading activities of the individuals employed as research analyst by research entity shall be monitored, recorded and wherever necessary, shall be subject to a formal approval process.	Not-Complied	We are unable to verify the trades data executed by the associated Company due to the unavailability of the required information	Yes	WE HAVE GIVEN THE TRADE DATA TO THE AUDITOR FOR FY 2526

3	Regulation 16 (2)	Limitations on trading by research analysts Independent research analysts, part-time research analysts, individuals employed as research analyst by research entity or their associates shall not deal or trade in securities that the research analyst recommends or follows within thirty days before and five days after the publication of a research report.	Not-Complied	We are unable to verify the trades data executed by the associated Company due to the unavailability of the required information	Yes	WE HAVE GIVEN THE TRADE DATA TO THE AUDITOR FOR FY 2526
4	Regulation 16 (3)	Limitations on trading by research analysts Independent research analysts, part-time research analysts, individuals employed as research analysts by research entity or their associates shall not deal or trade directly or indirectly in securities that he reviews in a manner contrary to his given recommendation.	Not-Complied	We are unable to verify the trades data executed by the associated Company due to the unavailability of the required information	Yes	WE HAVE GIVEN THE TRADE DATA TO THE AUDITOR FOR FY 2526
5	Regulation 18 (7)	Limitations on publication of research report, public appearance and conduct of business, etc. Research analyst or research entity shall have adequate documentary basis, supported by research, for preparing a research report.	Not-Complied	RE has not kept record of adequate documentary basis supported by research for preparing a research report However RE is following general guidelines while preparing research reports	Yes	WE HAVE COMPLIED WITH THE SAME POST PERIOD OF AUDIT REPORT FOR FY 2425
6	Regulation 19	Disclosure in research reports This involves disclosure of all prescribed information by the Research Analyst in its research report.	Not-Complied	In Research reports certain additional disclosures are required as per Regulation 19	Yes	WE HAVE COMPLIED WITH THE SAME POST PERIOD OF AUDIT REPORT FOR FY 2425
7	Regulation 20	Contents of research report This involves prescribed contents of research report that a Research Analyst should adhere to.	Not-Complied	In the research reports issued during the audit period the rating matrix scrip performance and the name of the Research Analyst were not mentioned	Yes	WE HAVE COMPLIED WITH THE SAME POST PERIOD OF AUDIT REPORT FOR FY 2425
8	Regulation 25	Maintenance of records This regulation requires maintenance of prescribed records, preservation of the same and audit of such records by the prescribed professional.	Not-Complied	Research reports were not duly signed by Research analyst	Yes	WE HAVE COMPLIED WITH THE SAME FOR FY 2526

9	SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRS D-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause 6 and (SEBI/HO/MIRSD2/DO R/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	RE has not submitted half yearly undertaking on compliance of the advisory for Financial Sector Organizations regarding Software as a Service SaaS based solutions	Yes	WE HAVE COMPLIED WITH THE SAME FOR FY 2526
10	SEBI Master circular Ref. No. SEBI/HO/MIRSD/MIRSD-PoD-1/P/CIR/2024/49 (Dated May 21, 2024) Clause VI (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	RE has not submitted half yearly undertaking on compliance of the advisory for Financial Sector Organizations regarding Software as a Service SaaS based solutions	Yes	WE HAVE COMPLIED WITH THE SAME FOR FY 2526

**DIVYESH
PRAVIN SHAH**

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Signature of RA / Partner / Director:

Date and Place: _____