

Action Taken Report (ATR)

Name of Investment Adviser:		SINCERE SYNDICATION AND CORPORATE SERVICES LLP				
SEBI Registration No.:		INA000017453				
BSE Enlistment No.:		1929				
Entity Type:		IA				
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 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	It is observed that validity of NISM XA certification of Principal officer was till 25th March 2025	Yes	We hereby inform that the lapse in NISM certificate is inadvertent We will ensure to renew the certifications well in advance henceforth
2	Regulation 15 other than sub point 7	General Responsibility Whether IA has followed all the responsibilities as mentioned regulation 15?	Not-Complied	It is observed that RIA is not registered with CKYC	Yes	We have completed the registration with CKYC, and have sent all the requisite documents for registration and the same is pending at CKYCs end
3	SEBI Circular Ref. No. SEBI/HO/MIRSD/ MIRSD-PoD-1/P/CIR/2025/003 (Dated January 08, 2025) Clause 2 (xi)	Agreement between IA and the client. The agreement shall also include the Most Important Terms and Conditions (MITC) to be disclosed by IAs. Consent of client to agreement between IA and client may be signed by the client in person or through any other legally acceptable mode including DigiLocker enabled Aadhaar based e-signature facility.	Not-Complied	The MITC was not included immediately in the agreements by the IA	Yes	It took us some time to make the changes in the agreement, due to which we were unable to get the MITC incorporated agreements signed We later on have included MITC in our agreements



Authorized Signatory
Date and Place : 31/10/2025 Chennai

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