Name of BASL enrolled Investment Adviser	N SUBRAMANIAN (PROPRIETOR OF WSIM INVESTMENT ADVISORS
BASL Membership ID.	1105
SEBI Registration No.	INA200007159
Annual compliance Audit Report for FY ended 2021-2022	2021-2022

	Regulation	Regulation 3	Regulation 6	Regulation 7
Annual Compliance Audit Report for F. Y 2021-2022	Particulars	Application for grant of certificate (1) No person shall act as an investment adviser or hold itself out as an investment adviser unless he has obtained a certificate of registration from the Board under these regulations.	Consideration of application and eligibility criteria Regulation 6 states all matters, which are relevant for the purpose of grant of certificate of registration.	Qualification and certification requirement.
eport for F. Y 2021-202	Compliance Status	Complied Not-Complied Not Applicable	Complied Not-Complied Not Applicable	Complied Not-Complied Not Applicable
2	Reason for non- compliance/ Non-applicability			
	Action taken on adverse findings (duly approved by the individual IA / management of the non-individual IA)			

Regulation 8	SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause (iv)
Net worth (1) Investment advisers who are non- individuals shall have a net worth of not less than fifty lakh rupees. (2) Investment advisers who are individuals shall have net tangible	An individual investment adviser or a principal officer of a non-individual investment adviser registered as an 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). Qualification and certification requirement. Existing individual IAs above fifty years of age shall not be required to comply with the qualification and experience requirements specified under Regulation 7(1) (a) and 7(1) (b) of the amended IA Regulations. However, such IAs shall hold NISM accredited certifications and comply with other conditions as specifies under Regulation 7(2) of the amended IA regulations at all times.
☑ Complied☐ Not-Complied☐ Not Applicable	Complied Not-Complied Not Applicable
SERV SERVICES	

Regulation 15 A	Regulation 15	SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(v)	Regulation 13	
Fees Investment Adviser shall be entitled to charge fees for providing investment advice from a client in the manner as specified by the Board.	General Responsibility The regulation 15 imposes certain responsibilities on the Investment Adviser for the transactions it undertakes on behalf of its clients.	Registration as Non-Individual Investment Advisor. An individual IA, whose number of clients exceed one hundred and fifty in total, shall apply for registration as non-individual investment adviser within such time as specified under this clause.	Conditions of certificate (b) The investment adviser shall inform the Board in writing, if any information or particulars previously submitted to the Board are found to be false or misleading in any material particular or if there is any material change in the information already submitted.	rupees.
	Complied Not-Complied Not Applicable	☐ Complied☐ Not-Complied☐ Not Applicable	Complied Not-Complied Not Applicable	



SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(viii)	SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(iii) Regulation 16 Regulation 17
Risk profiling and suitability for non-individual clients. (b) In case of non-individual clients, IA shall use the investment policy as approved by board/management team of such non-individual clients for risk profiling and suitability analysis. (c) The discretion to share the investment policy/relevant excerpts of the policy shall lie with the non-individual client. However, IA shall have discretion not to onboard non-individual clients if they are unable to do risk profiling of the non-individual client in the absence of investment policy.	Investment Advisers shall charge fees from the clients in either Assets under Advice (AUA) mode or Fixed fee mode. Risk profiling This involves profiling, assessing the risk appetite of each client individually, and communication of such profile to the respective client. Suitability Investment adviser shall ensure suitability of the advice being provided to the client.
Complied Not-Complied Not Applicable	Complied Not-Complied Not-Applicable Complied Not-Complied Not-Applicable Not-Complied Not-Complied Not-Complied

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Regulation 20	SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ii)	SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(vi)	Regulation 19	Regulation 18
Appointment of Compliance officer An investment adviser shall appoint a compliance officer who shall be	Agreement between IA and the client. IA shall enter into an investment advisory agreement with its clients as prescribed under this clause and shall ensure that neither any investment advice is rendered nor any fee is charged until the client has given the aforestid agreement.	Maintenance of record. IA shall maintain and preserve records of interactions, with all clients including prospective clients, where any conversation related to advice has taken place, in the form as specified under this clause.	Maintenance of records This regulation requires maintenance of certain records, preservation of the same and audit of such records by the prescribed professional.	Disclosure to clients This involves disclosure of all necessary information by the investment adviser to its clients.
Complied Not-Complied Not Applicable	Complied Not-Complied Not Applicable	✓ Complied□ Not- Complied□ Not Applicable	Complied Not-Complied Not Applicable	Complied Not-Complied Not Applicable



																							Regulation 22				Regulation 21		
department or division.	through a separately identifiable	by providing advisory services	investment adviser and distributor	relationship between its activities as	shall maintain an arm's length	(4) Non-individual investment adviser	and distribution services.	group level for investment advisory	shall have client level segregation at	(3) A non-individual investment adviser	services from other family members.	client who is receiving distribution	adviser shall provide advice to a	adviser and no individual investment	advised by the individual investment	distribution services to the client	investment adviser shall not provide	(2) The family of an individual	services.	shall not provide distribution	(1) An individual investment adviser	distribution activities.	Client level segregation of advisory and	procedure.	grievances promptly through an adequate	Investment adviser shall redress client	Redressal of client grievances	responsible for monitoring the compliance by the investment adviser.	
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Compliance and monitoring process for Not Applicable	(2) Investment adviser shall provide	implementation services only through	direct schemes.	(3) Investment adviser or group or family	of investment adviser shall not charge	any implementation fees from the	client.	(4) The client shall not be under any	obligation to avail implementation	services offered by the investment		Display of details on website and in other Complied	IAs shall prominently display the Not Applicab	information as specified under this clause,		electronic materials, know your client	shall be in accordance with the guidelines as specified under this clause. Implementation of advice or execution (1) Investment adviser may provide implementation services to advisory clients, provided no consideration shall be obtained directly or indirectly either at group level or at family level. (2) Investment adviser shall provide implementation services only through direct schemes. (3) Investment adviser or group or family of investment adviser or group or family of investment adviser shall not charge any implementation fees from the client. (4) The client shall not be under any obligation to avail implementation services offered by the investment adviser. Display of details on website and in other communication channels. As shall prominently display the information as specified under this clause, on its website, mobile app, printed or electronic materials, know your client
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	SEBI/HO/IMD/IMD-II CIS/P/CIR/2021/0686 (Dated December 13, 2021)	(SEBI/HO/MIRSD2/DOR/CIR /P/2020/221) dated November 03, 2020)
applications. If registered investment adviser does not have websites/mobile applications, then as a one-time measure, send investor charter to the investors on their registered e-mail address. (3) All registered investment advisers are required to disclose the details of investor complaints by seventh of the succeeding month on a monthly basis on their websites and mobile applications. If investment adviser does not have websites/mobile applications, then send status of investor complaints to the investors	September 2022. Publishing Investor Charter and disclosure of Investor Complaints (2) All registered investment advisers are required to publish investor charter on their websites and mobile	forms, client agreements and other correspondences with the clients. 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 2022 and 30th
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on their registered email on a monthly basis.

UDIN: 22024317ALBKVK 6255

Date: 16.6, 2022

Place: Chennai

