

# *Sanjay Rane & Associates LLP*

CHARTERED ACCOUNTANTS

Phone : +91 (22)49198585  
Email : admin@ssrane.net  
Website : www.ssraneandco.com  
LLP IN : ABZ-0863

## TO WHOMSOEVER IT MAY CONCERN

We have verified the records of **360 ONE Investment Adviser and Trustee Services Limited** (“The Company”) (SEBI IA Registration No. INA000000888) having its registered office at 360 One Centre, Kamala City, Senapati Bapat Marg, Lower Parel, Mumbai – 400013, with respect to investment advisory services for the year ended 31<sup>st</sup> March, 2023.

On the basis of such verification and information and explanations given to us by the company, we certify that in respect of advisory services offered to its clients, the Company has on date, kept proper records, followed proper procedures and that the Company has performed its duties in accordance with SEBI (Investment Advisers) Regulations, 2013.

The certificate is issued under regulation 19 (3) of SEBI (Investment Advisers) Regulations, 2013.

For Sanjay Rane & Associates LLP  
Chartered Accountants  
Firm Membership No. 121089W/W100878

(CA Abhijeet Deshmukh)  
Partner  
Membership No. 129145

Date: August 21, 2023  
Place: Mumbai

UDIN:23129145BGQKMD3483

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Website [www.ssraneandco.com](http://www.ssraneandco.com)  
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Date : August 21, 2023

To,

**360 One Investment Adviser and Trustee Services Limited.**

360 One Centre, Kamala City,  
Senapati Bapat Marg,  
Lower Parel (West),  
Mumbai- 400013.

Dear Sir/Madam,

**Sub: - Internal Audit Report of 360 One Investment Adviser and Trustee Services Limited (Investment Advisor) for the Period from April, 2022 to March, 2023.**

Sir,

We have completed the Internal audit of **360 One Investment Adviser and Trustee Services Limited** with respect to Investment Advisory Services of the Period from April, 2022 to March, 2023 as per SEBI guidelines. We herewith submit the report of the same for your perusal.

Thanking you.

For Sanjay Rane & Associates LLP  
Chartered Accountants  
Firm Reg. No.: - 121089W/W100878

(CA. Abhijeet Deshmukh)  
Partner  
Membership No: 129145

## Annexure-I

Name of BASL enrolled Investment Adviser	360 One Investment Adviser and Trustee Services Limited.
BASL Membership ID.	1357
SEBI Registration No.	INA000000888
Annual compliance Audit Report for FY ended	2022-2023

Regulation	Particulars	Compliance Status	Reason for noncompliance/ Non applicability	Action taken on adverse findings (duly approved by the individual IA / management of the non- individual IA)
Regulation 3	<p><b><u>Application for grant of certificate</u></b></p> <p>(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</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 6	<p><b><u>Consideration of application and eligibility criteria</u></b></p> <p>Regulation 6 states all matters, which are relevant for the purpose of grant of certificate of registration.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		

<p>Regulation 7</p>	<p><b><u>Qualification and Certification requirement.</u></b></p> <p>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).</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		
<p>SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause (iv)</p>	<p><b><u>Qualification and certification requirement.</u></b></p> <p>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.</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		
<p>Regulation 8</p>	<p><b><u>Net worth</u></b></p> <p>(1) Investment advisers who are non-individuals shall have a net worth of not less than fifty lakh rupees.</p> <p>(2) Investment advisers who are</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		

	individuals shall have net tangible assets of value not less than five lakh rupees.			
Regulation 13	<p><b><u>Conditions of certificate</u></b></p> <p>(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.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(v)	<p><b><u>Registration as Non-Individual Investment Advisor.</u></b></p> <p>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.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 15	<p><b><u>General Responsibility</u></b></p> <p>The regulation 15 imposes certain responsibilities on the Investment Adviser for the transactions it undertakes on behalf of its clients.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		

Regulation 15 A	<p><b><u>Fees</u></b></p> <p>Investment Adviser shall be entitled to charge fees for providing investment advice from a client in the manner as specified by the Board.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
sSEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(iii)	<p><b><u>Fees</u></b></p> <p>Investment Advisers shall charge fees from the clients in either Assets under Advice (AUA) mode or Fixed fee mode.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 16	<p><b><u>Risk profiling</u></b></p> <p>This involves profiling, assessing the risk appetite of each client individually, and communication of such profile to the respective client.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 17	<p><b><u>Suitability</u></b></p> <p>Investment adviser shall ensure suitability of the advice being provided to the client.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(viii)	<p><b><u>Risk profiling and suitability for non-individual clients.</u></b></p> <p>(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.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		

	<p>(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.</p>			
Regulation 18	<p><b><u>Disclosure to clients</u></b></p> <p>This involves disclosure of all necessary information by the investment adviser to its clients.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 19	<p><b><u>Maintenance of records</u></b></p> <p>This regulation requires maintenance of certain records, preservation of the same and audit of such records by the prescribed professional.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(vi)	<p><b><u>Maintenance of record.</u></b></p> <p>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.</p>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		

SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(ii)	<b><u>Agreement between IA and the client.</u></b> 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 signed the aforesaid agreement	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 20	<b><u>Appointment of Compliance officer</u></b> An investment adviser shall appoint a compliance officer who shall be responsible for monitoring the compliance by the investment adviser.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 21	<b><u>Redressal of client grievances</u></b> Investment adviser shall redress client grievances promptly through an adequate procedure.	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		
Regulation 22	<b><u>Client level segregation of advisory and distribution activities.</u></b> (1) An individual investment adviser shall not provide distribution services. (2) The family of an individual investment adviser shall not provide distribution services to the client advised by the individual investment adviser and no individual investment adviser shall provide advice to a client who is receiving	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable		



	<p>distribution services from other family members.</p> <p>(3) A non-individual investment adviser shall have client level segregation at group level for investment advisory and distribution services.</p> <p>(4) Non-individual investment adviser shall maintain an arm's length relationship between its activities as investment adviser and distributor by providing advisory services through a separately identifiable department or division.</p>			
<p>SEBI/HO/IMD/DF1/CIR/P/2 020/182 (Dated September 23, 2020) Clause 2(i)</p>	<p><b><u>Client Level Segregation of Advisory and Distribution Activities</u></b></p> <p>Compliance and monitoring process for client segregation at group or family level shall be in accordance with the guidelines as specified under this clause.</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		
<p>Regulation 22A</p>	<p><b><u>Implementation of advice or execution</u></b></p> <p>(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.</p> <p>(2) Investment adviser shall provide implementation services only through</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		

	<p>direct schemes.</p> <p>(3) Investment adviser or group or family of investment adviser shall not charge any implementation fees from the client.</p> <p>(4) The client shall not be under any obligation to avail implementation services offered by the investment adviser.</p>			
<p>Regulation 22A</p>	<p><b><u>Implementation of advice or execution</u></b></p> <p>(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.</p> <p>(2) Investment adviser shall provide implementation services only through direct schemes.</p> <p>(3) Investment adviser or group or family of investment adviser shall not charge any implementation fees from the client.</p> <p>(4) The client shall not be under any obligation to avail implementation services offered by the investment adviser.</p>	<p><input checked="" type="checkbox"/> Complied</p> <p><input type="checkbox"/> Not- Complied</p> <p><input type="checkbox"/> Not Applicable</p>		

<p>SEBI/HO/IMD/DF1/CIR/P/2020/182 (Dated September 23, 2020) Clause 2(ix)</p>	<p><b><u>Display of details on website and in other communication channels.</u></b></p> <p>IAs shall prominently display the information as specified under this clause, on its website, mobile app, printed or electronic materials, know your client forms, client agreements and other correspondences with the clients.</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		
<p>(SEBI/HO/MIRSD2/DOR/CIR/P/2020/221 dated November 03, 2020)</p>	<p>Compliance of the SEBI circular for Advisory for financial Sector Organizations regarding Software as a Service (SaaS) based solutions for half-yearly ended 31<sup>st</sup> March 2022 and 30<sup>th</sup> September 2022.</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		
<p>SEBI/HO/IMD/IMD II CIS/P/CIR/2021/0686 (Dated December 13, 2021)</p>	<p>(2) All registered investment advisers are required to publish investor charter on their websites and mobile 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.</p> <p>(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</p>	<p><input checked="" type="checkbox"/> Complied  <input type="checkbox"/> Not- Complied  <input type="checkbox"/> Not Applicable</p>		

the investors on their registered email on a monthly basis.

Principal Officer

**Name and Contact Details of Principal Officer**

Mr. Rohit Wadhwa  
SEBI Registration No.  
INA000000888  
Contact: +91 9811129635  
Email:  
Rohit.wadhwa@360.one  
Address: 360 ONE Centre,  
Kamala Mills, Senapati  
Bapat Marg, Lower Parel,  
Mumbai, Maharashtra,  
400013

Compliance officer

**Name and Contact Details of Compliance Officer**

Ms. Sonali Tendulkar  
SEBI Registration No.  
INA000000888  
Email-id:  
sonali.tendulkar@iiflw.com  
Mobile no.: +91 7304400718  
Direct no.: +912248765153  
Address: 360 ONE Centre,  
Kamala Mills, Senapati  
Bapat Marg, Lower Parel,  
Mumbai, Maharashtra,  
400013

No of Clients	<u>Total No. of Clients as on 31-03-2023</u>	138		
Cyber Security Awareness	<u>Whether any planned Cyber Security Awareness carried out among employees, stakeholders and clients, If Yes, details of Cyber Security Awareness programme conducted in the Audit FY 2022-23.</u>	<input checked="" type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input type="checkbox"/> Not Applicable	Yes, Conducted.  Details:  (1) Cyber Security Awareness and Data Leakage Prevention campaign carried out on 05-09-2022 to 13-09-2022          (2) Cyber Security Awareness, Information Communications Technology, Internet Services , Mobile App Security , Email Security , Financial Transaction Security, Social Media and Social Engineering , Secure usage of Systems, Applications, Facilities and Services ,Data Security and Privacy carried out on 30-09-2022.	

<b>SEBI / BASL Inspections</b>	<b><u>Last SEBI / BASL Inspection carried out date and Whether complied with inspection Observations</u></b>	<input type="checkbox"/> Complied <input type="checkbox"/> Not- Complied <input checked="" type="checkbox"/> Not Applicable	No inspection has been carried out till date at 360 One IATSL-Advisory company.	
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