

Date: 18/08/2022

To
The officer in Charge
Investment Management Department, Division of Funds
Securities and Exchange Board of India
5th Floor, Bank of Baroda Building,
Parliament Street,
New Delhi-110001

**Sub: Submission of documents in compliance of the SEBI Circular No. SEBI /HO
/IMD /DF / CIR /P/2020/26 dt. Feb 13th 2020**

Respected Sir / Madam,

This is with reference to the captioned subject and through this communication we wish to inform you that we are submitting the following documents in compliance of the captioned circular.

1.	Improvement in Corporate Governance	The same has been annexed hereto and marked as Annexure-A
2.	Certificate of compliance with PMS Regulations and circulars issued thereunder	The same has been annexed hereto and marked as Annexure-B
3.	Report on audit of firm-level performance data.	The same has been annexed hereto and marked as Annexure-C & D

Hope you will find above in order

For Trustline Securities Limited

Vinay Kumar Gupta
Principal Officer
Place: Delhi



----- FINANCIAL MARKETS • INSURANCE • WEALTH • BULLIONS • REAL ESTATE -----

IMPROVEMENT IN CORPORATE GOVERNANCE REPORT

The Corporate Governance Report of the Portfolio Manager is submitted as follows: -

1. No compliant/grievance of any client has been received during the period
2. The performance of the portfolio of clients has been reviewed on monthly basis, if any.
3. The monthly PMS report has been duly submitted to SEBI on its portal.
4. The performance of the funds managed by Portfolio Manager has been duly reviewed (If any) and corrective action has been taken (If necessary).
5. Audit of firm level performance has been carried out by taking into consideration the relevant guidelines issued by SEBI and circulars issued thereunder time to time.

For Trustline Securities Limited

Vinay Kumar Gupta
Principal Officer



Place: Delhi
Date: 18.08.2022

----- FINANCIAL MARKETS • INSURANCE • WEALTH • BULLIONS • REAL ESTATE -----

(Annex-B)

**CERTIFICATE OF COMPLIANCE OF SEBI (PORTFOLIO MANAGERS)
REGULATIONS, 1993**

This is to certify we have duly complied with the PMS Regulations of SEBI, 1993 and circulars issued under thereunder time to time

For Trustline Securities Limited

Vinay Kumar Gupta
Principal Officer
Place: Delhi



----- FINANCIAL MARKETS • INSURANCE • WEALTH • BULLIONS • REAL ESTATE -----

CERTIFICATE OF PERFORMANCE BY PORTFOLIO MANAGERS

This is to certify that we have duly audited the performance of the portfolio manager M/s Trustline Securities Limited and the points mentioned by SEBI vide its circular No.SEBI/HO/IMD/DF/CIR/P/2020/26 dt. Feb 13th 2020 under point. no. 13 (i) to 13 (vi) mentioned as under were taken into consideration while carrying out the audit.

- (i) All cash holdings and investments in liquid funds, for calculation of performance.
- (ii) Report on performance data net of all fees and all expenses (including taxes).
- (iii) Disclosure on any change in investment approach that may impact the performance of client portfolio, in the marketing material.
- (iv) Ensuring that performance reported in all marketing material and website of the Portfolio Manager is the same as that reported to SEBI.
- (v) Ensuring that the aggregate performance of the Portfolio Manager (firm-level performance) reported in any document shall be same as the combined performance of all the portfolios managed by the Portfolio Manager.
- (vi) Disclaimer in all marketing material that the performance related information provided therein is not verified by SEBI.

The above certificate is issued on the request of the management and its true and correct to the best of knowledge and information and explanation provided by the management in this regard.

For CA. Sunil Patel
Chartered Accountants


Sunil Patel
Proprietor
M. No. 535954



Place: Delhi
Date: 29th June 2022
UDIN : 22535954APIQCH4698

(Ammu-D)

Date: 18/08/2022

To
The officer in Charge
Investment Management Department, Division of Funds
Securities and Exchange Board of India
5th Floor, Bank of Baroda Building,
Parliament Street,
New Delhi-110001

**Sub: Confirmation of compliance of the SEBI Circular No. SEBI /HO /IMD /DF /
CIR /P/2020/26 dt. Feb 13th 2020**

Respected Sir / Madam,

This is with reference to the captioned subject and through this communication we wish to inform you that we have duly complied with the above-mentioned circular and further undertake to abide by any guideline / circular issued thereunder time to time.

For Trustline Securities Limited

Vinay Kumar Gupta
Principal Officer
Place: Delhi



----- FINANCIAL MARKETS • INSURANCE • WEALTH • BULLIONS • REAL ESTATE -----