Annexure A

(Unless specifically indicated, the compliance relates to the year 2017-18. Hence the IPA needs to provide status for the year 2017-18)

SI.	Sectio	Does the IPA	Specific Details	Response to specific details	Reasons for Non-	Likely date of
No	n/	comply with the			Compliance/ Partial	Compliance
	Regula	provision? (Compliance	
	tion/	NA/YES/NO/				
	Clause	PARTIALLY)				
			Part A: Compliances with Provisions of	the Insolvency and Bankruptcy	Code, 2016	
1	204(a)	Yes	How many members were admitted	139		
			during the year?			
			Do all of them meet the requirements of	Yes		
			eligibility?			
			Have all of them provided documents	Yes		
			evidencing the qualification and			
			experience required under Regulation 5			
			of the IBBI (Insolvency Professionals)			
			Regulations, 2016?			
2	204(b)	Yes	How many standards of professional	IPA ICAI has adopted the code		
			conduct does the IPA have at the end of	of conduct for Insolvency		
			31st March, 2018?	Professionals as given in the		
			,	first schedule of Insolvency		
				and Bankruptcy Board of India		
				(Insolvency Professionals)		
				Regulations, 2016.		
	l					1

			How many standards were laid down prior to the current year?	Nil	
			How many standards were laid down during the year	Nil	
3	204(c)	Partially	Did the IPA monitor performance of its members during the year?	As per the directions from IBBI given from time to time, the information has been called from the members. The data in regards to the status of assignments, disclosures as per Circular dated 16 th January 2018 has been uploaded on the website. IPA is in the process of collecting Information as per the Monitoring policy.	
			How many members' performance did the IPA monitor during year?	All Registered Members	
			What are the parameters used for monitoring the performance of its members?	The details of the assignments are being called from the members monthly as per the formats specified in	

				Monitoring Policy. Also, as per the direction of IBBI, the analysis has been sent to IBBI in regards to the Disclosures as per Circular dated 16 th January, 2018.	
			How many members did not provide material required for monitoring performance?	The disclosures as per the circular dated 16 th January, 2018 were received from all the members.	
			In case of how many members, did the IPA find performance unsatisfactory?	IPA ICAI is in the process of collection of records from the members as per the Monitoring Policy.	
			What action was taken against the members whose performance was found unsatisfactory?	NA	
4	204(d)	Yes	Does the IPA have a policy to safeguard the rights, privileges and interest of the members?	A Joint documents prepared by all the three IPA's in regards to the policy to safeguard the rights, privileges and interest of members has been forwarded to IBBI.	

			What are the specific interventions the IPA did to safeguard the rights, privileges and interest of the members?	The Disciplinary, Monitoring and Grievance redressal Policies of IPA ICAI safeguards	
5	204(e)	Yes	How many members did the IPA suspend during the year?	the interest of the members. Nil	
			How many memberships did the IPA cancel during the year?	Nil	
			What was the most common violation of law for which a member was suspended or cancelled?	NA	
6	204 (f)	Yes	How many grievances did the IPA receive during the year?	Nil	
			How many grievances did the IPA redress during the year?	Nil	
			How many grievances are pending for disposal at the end of the year?	Nil	
			What was the most common type of grievance against members?	Nil	
			What was the average time taken for disposal of grievances?	Nil	
7	204(g)	Yes	Whether the IPA has published details about its functions on its website? At what frequency these details are updated?	Yes. Updated whenever there is a change.	
			Whether the IPA has published the list of	Yes. Monthly.	

			its members on its website?			
			At what frequency the list is updated?			
			At what inequency the list is apaated:			
			Whether the IPA has published the performance of its members on its website?	The collection and collating of information is in process. The number of assignments held by members and disclosures as per circular dated 16 th January, 2018 is uploaded on the website.		
			At what frequency these details are updated?	The status of assignments and disclosures are updated whenever any change is intimated by the member.		
8	205	Yes	Whether the bye-laws made by the IPA	Yes		
			are consistent with the model bye-laws			
			specified by the Board under section			
			196(2)?			
			Whether the IPA has modified any	No		
			provision in the Bye-laws during the			
			year?			
			Whether approval of the IBBI for change	NA		
			in bye-laws has been obtained?			
		•	th Provisions of the Insolvency and Bankrup	1	ofessional Agencies) Regulati	ons, 2016
9	3	Yes	Whether the IPA is a company registered	Yes		
			under Section 8 of the Companies Act,			
			2013?			
10	3(a)	Yes	Whether the IPA's sole object is to carry	Yes		

			on the functions of an insolvency		
			professional agency under the Code?		
11	3(b)	Yes	Whether the IPA has its bye-laws and	Yes	
			governance structure in accordance with		
			the Insolvency and Bankruptcy Board of		
			India (Model Bye-Laws and Governing		
			Board of Insolvency Professional		
12	2/0\	Yes	Agencies), 2016? Whether the IPA has a minimum net	Yes	
12	3(c)	res		res	
			worth of ten crore rupees as on 31st March, 2018?		
			iviaicii, 2018:		
			What is the net worth of the IPA as on	Rs 11,46,79,936 as per	
			31st March, 2018	Unaudited Balance Sheet.	
13	3(d)	Yes	Whether the IPA has a paid-up share	Yes	
	(4)	. 55	capital of five crore rupees as on 31st		
			March, 2018?		
			, ,		
			What is the paid-up share capital of the	11 Crore	
			IPA as on 31st March, 2018?		
14	3(e)	Yes	Whether the IPA is under the control of	No	
			person(s) resident outside India?		
			List out the names of persons who are in	NA	
			control of the IPA as on 31st March,		
			2018?		
15	3(f)	Yes	Whether more than 49% of its share	No	
	3(.,	. 55	capital is held, directly or indirectly, by		
			persons resident outside India?		
			,		
			What is the share of resident Indians in	100% by Institute of Cost	
			shareholding of the IPA as on 31st March,	Accountants of India	

			2018?		
16	3(g)	Yes	Whether the IPA is a subsidiary of a body	No	
			corporate through more than one layer?		
17	3(h)	Yes	Whether the IPA is fit and proper person?	Yes	
			Whether the promoters of the IPA are fit and proper persons?	Yes	
			Whether the directors of the IPA are fit and proper persons?	Yes	
			Whether every person holding more than 10% of its share capital as on 31st March, 2018 is a fit and proper person?	Yes	
18	5(1)(b)	Yes	Does the IPA have adequate infrastructure to perform its functions under the law?	Yes	
			Provide brief details infrastructure as on 31st March, 2018 in terms of office premises, computing resources and human resources	There is adequate infrastructure for IPA ICAI including sitting space for staff at 4 th Floor and 1 st Floor, CMA Bhawan, Institutional Area 3, Lodi Road with adequate hardware and software facilities and IT Support from the regular specialised staff of Institute of Cost Accountants of India which are co-located in the same premises. IPA ICAI is in the process of recruitment of further 5 personnels.	

19	5(1)(c)	Yes	Does the IPA have a Managing Director?	No		
			Does the IPA have a Compliance Officer?	No		
			How many persons with professional and	1		
			relevant experience are in employment of the IPA?	Further recruitment of 5 more persons is in pipeline.		
20	5(2)(a)	Yes	Any contravention of the Code, rules, regulations or guidelines noticed by the IPA during the year?	No		
21	5(2)(b)	Yes	How many people are engaged full time to ensure compliances?	1		
22	5(2)(c)		When did the IPA pay fee for 2017-18? What is the amount paid?	28-11-2017		
			·	5,00,000		
				GST amount of Rs 90,000 paid in April 2018		
23	5(2)(d)	Yes	How many persons hold more than 10% share capital, directly or indirectly, of the IPA?	1 – Institute of Cost Accountants of India		
24	5(2)(e)	Yes	How many grievances did the IPA receive during the year?	Nil		
25	5 (3)	Yes	Is the certificate of registration valid as on 31st March, 2018?	Yes		
			When is the renewal of registration due?	30/11/2021		
Pa	rt C: Com	pliances with Insolv	ency and Bankruptcy Board of India (Model	Bye-Laws and Governing Board o 2016	f Insolvency Professional Age	ncies) Regulations,
26	3(2)	Yes	Whether the bye-laws provide for all	Yes		

			matters specified in the model bye-laws?		
27	3(3)	Yes	Whether the bye-laws of the IPA are	No	
			inconsistent with the model bye-laws?		
			Whether there has been any change in the bye-laws during the year?	No	
28	3(4)	Yes	Whether the IPA has published its bye- laws on its website?	Yes	
			When was this published?	2017	
			Whether the IPA has published composition of all its committees formed under the bye-laws on its website?	Yes	
			When was this last updated?	The composition of committees were updated in December 2017.	
			Whether the IPA has published all its policies created under the byelaws on its website?	Yes	
			When was it published for the first time?	Grievance Redressal Policy was published in Oct 2017. Monitoring Policy was published in Feb 2018. Disciplinary Policy was published in Apr 2018	

			When was it updated last?	No Change
29	4(1)	Yes	Whether the IPA amended its byelaws during the year?	No
			Did it comply with the process for amendment provided in the regulations?	NA NA
30	5(1)	Partially	Whether the Governing Board of the IPA had a minimum of seven directors throughout the year?	The Governing Board has 7 Directors since May 2017.
			How many meetings of the Governing Board were held during the year?	7
			How many members of the Governing Board attended all meetings during the year?	5
			How many members did not attend 50% of the meetings during the year? Please name them.	Nil
31	5(2)	Yes	Whether more than half of the directors of the IPA are persons resident in India throughout the year?	Yes
			How many directors are non-resident Indians as on 31st March, 2018?	NA
32	5(3)	Partially	Whether more than one fourth of the directors are insolvency professionals at any time during the year?	Yes. Initially during the period under review

				3 Directors were Insolvency	
				Professionals, out of which 1	
				director surrendered	
				Membership in May 2017 and	
				other two were under	
				Regulation 9 which	
				automatically got terminated	
				in July 2017.	
				Post July, only 1 Director is an	
				Insolvency Professional	
				Since July 2018, there is only	
				one Insolvency Professional	
			How many directors of the IPA are	1	
			insolvency professionals?	_	
33	5(4)	Partially	Whether more than half of the directors	Independent Directors were	
	` `		are independent directors at all times	appointed in May 2017. Post	
			during the year?	which More than half of the	
				directors are Independent	
				Directors.	
			Have many dispersions of the IDA core		
			How many directors of the IPA are	4	
34	5(5)	Yes	independent directors? Whether every independent director of	Yes.	
"	3(3)	103	the IPA met the eligibility criteria	165.	
			specified in regulation 5(5) throughout		
			the year?		
			·		
			How many independent directors are	None	

			insolvency professionals as on 31st March, 2018?			
35	6	Partially	Is the Chairperson of the Governing Board an independent director throughout the year?	From May 2017, the Chairperson of the Governing Board is an Independent Director		
			How many meetings of the Governing Board did the Chairperson of the Governing Board chair during the year?	6		
			Part D: Compliance with the Model By	e-laws of an Insolvency Profession	nal Agency	
36	5(2)	Yes	Did the IPA carry on any function or activity other than activities and functions of an IPA during the year?	Nil		
37	6(1)	Yes	Whether IPA has maintained high ethical and professional standards in the regulation of its professional members during the year?	Yes		
38	6(2)(a)	Yes	Whether the IPA has ensured compliance with the Code and rules, regulations and guidelines issued thereunder governing the conduct of insolvency professional agencies during the year?	Yes.		
			Whether the IPA has ensured compliance with the Code and rules, regulations and guidelines issued thereunder governing the conduct of insolvency professionals during the year?	Yes. Directions have been issued from time to time in regards to compliance with the rules, regulations specifically with regards to the disclosures as per Circular dated 16 th January, 2018. A		

			Did any non-compliance come to the notice of the IPA?	compilation of all the circulars issued during the year 2017-18 was sent to all the members. Directions were also issued to comply with clause 22 of the code of conduct regarding adequacy of resources. Also directions have issued to comply with Monitoring Policy of IPA ICAI.	
39	6(2)(b)	Yes	Whether the IPA has employed fair, reasonable, just, and non-discriminatory practices for the enrolment and regulation of its professional members?	Yes	
40	6(2)(c)	Yes	How many directions the IPA has issued to its professional members during the year?	Directions were issues to the Members from time to time to report the status of Assignments as per the Monthly MIS formats given to the members, Disclosures in the interest of Transparency, Reasons for appointment of 2 or more than 2 registered valuers, certification in regards to conducting transactions on arm's length price, To comply with the	

				circulars issued by IBBI, To comply with clause 22 of Code of Conduct etc.	
			Whether the IPA has ensured compliance with the directions issued to its professional members?	Yes. Reminders are being sent to the members who are not complying.	
41	6(2)(d)	Yes	How many programmes did the IPA organise during the year to develop the profession of IPs: a. Seminars / Conferences b. Workshops c. Training	IPA ICAI in collaboration with the Institute of Cost Accountants of India has done 53 Sessions, 5 Webinars, 4 Round table Discussion 1 Workshop	
			How many IPs benefited from / participated in these programmes during the year?	Data not available.	
			How many IPs did not participate in any of the programmes organise by the IPA?	Data Not Available	
42	6(2)(e)	Yes	How many programmes did the IPA organise for continuing professional development of the profession of IPs during the year: a. Seminars / Conferences b. Workshops c. Training	IPA ICAI in collaboration with the Institute of Cost Accountants of India has done 53 Sessions, 5 Webinars, 4 Round table Discussion	

				1 Workshop	
			How many IPs benefited from / participated in these programmes during the year? How many IPs did not participate in any	Data not available. Data not available	
			of the programmes organised by the IPA? Are the programmes in row 41 different from the programmes under row 42?	The Guidelines for Continuing Professional Development are in process of development.	
43	6(2)(f)	Yes	What is the specific intervention the IPA did to ensure high standards of professional and ethical conduct of its members?	IPA ICAI has adopted the code of conduct for Insolvency Professionals as given in the first schedule of Insolvency and Bankruptcy Board of India (Insolvency Professionals) Regulations, 2016.	
			Did the ethical standards of its members improve during the year? What is the matrix used to indicate improvement?	Primae facie, nothing unethical has come to the notice. The performance and evaluation matrix will be developed with passage of time.	
44	6(2)(g)	Yes	What details did the IPA provide to the Board	The details regarding the activities of the IPA have been provided to the Board from time to time in the Monthly Meeting of the CEOs of IPAs	

				including the developmental,	
				monitoring and other	
				functions performed by the	
				Insolvency Professional	
				Agencies.	
45	7(1)	Yes	Whether any advisory committee has been constituted?	Yes	
			How many times the Committee met during the year?	1	
			Whether the advices of the Advisory	The final advice of the	
			•		
			Committee were considered by the Governing Board of the IPA?	committee has not comeforth.	
			Which specific advice, if any, was rejected	Nil	
			by the Governing Board?		
46	8(1)(a)	Yes	How many Membership Committees did	1	
			the IPA constitute during the year?		
			How many meetings the Committee(s)	1	
			had during the year?		
			Whether the Chairpersons of the	Yes	
			Committee(s) are independent directors		
			of the IPA?		
47	8(1)(b)	Yes	Whether the IPA has constituted the	Yes	
			Monitoring Committee?		
			How many mostings the Committee had	_	
			How many meetings the Committee had during the year?	5	
			daring the year.		
			Whether the Chairperson of the	Yes	

			Committee is an independent director of the IPA?		
48	8(1)(c)	Yes	How many Grievance Redressal Committees did the IPA constitute during the year?	1	
			How many meetings the Committee(s) had during the year?	3	
			Whether the Chairperson(s) of the Committee(s) are independent directors of the IPA?	Yes	
			Did each of the Committees have at least one professional member at all times during the year?	Yes	
			Please write the names of professional members who was / were member of the Committee during the year.	CMA Anil Kumar Kaushik	
49	8(1)(d)	Yes	How many Disciplinary Committees did	1	
49	0(1)(u)	res	the IPA constitute during the year?		
			How many meetings the Committee(s) had during the year?	3	
			Whether the Chairpersons of the Committee(s) are independent directors of the IPA?	Yes	
			Did the nominee of the IBBI attend all meetings of the Committee?		

	1				1	
				Yes		
50	9	Yes	How many members were enrolled during the year?	139		
			How many of them were eligible for enrolment?	139		
51	9	Yes	Whether Governing Board provided additional eligibility requirement for enrolment as a professional member?	No		
			Whether the additional eligibility requirements discriminate on grounds of religion, race, caste, gender, place of birth or professional affiliation?	No		
52	10	Yes	Number of applications received	141		
			Number of applications accepted	139		
			Number of applications rejected	1		
			Number of applications pending	1		
			Number of professional members as on 01.04.2017	13		
			Number of professional members as on	152		
			31.03.2018 Number of new members enrolled during the year	139		

			Number of members who left the IPA during the year.	Nil	
53	10(8)	Yes	How many appeals did the Membership Committee receive during the year?	Nil	
54	10(9)	Yes	How many appeals did the Membership Committee dispose of during the year?	Nil	
			How many appeals did the Membership Committee dispose of within 30 days of receipt of the appeal?	NA	
55	11	Yes	What is the fixed sum of money charged annually from each professional member?	Rs 5900 (5000 + 18% GST)	
			How many members did not pay the membership fee?	8 members did not pay their fee.	
56	12(1)	Yes	Whether the IPA has a register of its professional members containing their particulars as per clause 12(1)?	Yes	
57	14	Yes	Whether the IPA has a Code of Conduct that is consistent with and provides for all matters in the Code of Conduct as specified in the Insolvency and Bankruptcy Board of India (Insolvency Professionals) Regulations, 2016?	Yes	
			How many members violated any provision of the Code of Conduct during the year?	No Report of Non-Compliance came to our notice.	
58	15	Yes	Whether the IPA has a Monitoring Policy	Yes	

59	16	Yes	to monitor the professional activities and conduct of professional members for their adherence to the provisions of the Code? Whether the IPA has prescribed the	Yes	
			manner and format for collecting information from professional members as IPs, including records of ongoing and concluded engagements?		
			Did the IPA receive information from all members as required above?	The status of assignments held by the members in capacity of IRP, RP, Liquidator and disclosures received from the members as per Circular dated 16 th January 2018 is updated on website. The other Information as required by the Monitoring policy is being sought from the members. The evaluation of performance is in progress.	
60	16	Yes	How many members submitted information in the prescribed format at least twice during the year? Has the IPA taken appropriate action against those members who did not submit the information?	IPA ICAI is in the process of collection of information and records as per the Monitoring Policy. Members performance is to be evaluated after records are being collated.	
61	17	Yes	Did the Monitoring Committee review	The Status of Assignments and	

			the information and records submitted by the members?	Disclosures as per IBBI Circular dated 16 th January 2018 and analysis of the disclosures has been reviewed by the Monitoring Committee.	
62	18	Yes	Did the Monitoring Committee evaluate the performance of members?	The data regarding the status of the assignments and disclosures received from the members as per the Circular dated 16 th was reviewed by the Monitoring Committee.	
			What is the assessment of the performance of the members, according to the Monitoring Committee?	The assessment of performance will be done after the records have been collated.	
63	20	Yes	Whether the IPA has submitted a report to IBBI?	Periodic reports in regards to the Status of Assignments, Disclosures in regards to the Circular dated 16 th January 2018 was timely given to the IBBI.	
64	21	Yes	Whether the IPA has a Grievance Redressal Policy providing the procedure for receiving, processing, redressing and disclosing grievances against the Agency or any professional member of the Agency?	Yes	
			Have the details of grievances been disclosed during the year?	No Grievances received.	

65	21	Yes	No. of grievances received:	Nil	
			No. of grievances dismissed:	NA	
			No. of grievances where mediation was initiated between parties for redressal of grievance:	NA	
			No. of matters referred to Disciplinary Committee:	Nil	
66	24	Yes	How many disciplinary proceedings were initiated by the IPA based on reference made by the Grievance Redressal Committee during the year?	Nil	
			How many of them have been disposed of?	NA	
			How many disciplinary proceedings were initiated by the IPA based on monitoring of professional members during the year?	NA	
			How many of them have been disposed of?	NA	
			How many disciplinary proceedings were initiated by the IPA based on directions of the IBBI or any Court of Law during the year?	NA	
			How many of them have been disposed of?	NA	

	1				
			How many disciplinary proceedings were initiated by the IPA suo moto during the year?	Nil	
			How many of them have been disposed of?	NA	
67	24(4)	NA	Whether all orders passed by the Disciplinary Committee have been placed on the website of the IPA within seven days from passing of the said order?	NA	
68	24(5)	NA	How much monetary penalty was imposed by the Disciplinary Committee during the year?	NA	
			How much of penalty imposed has been realised during the year?	Nil	
			What is the highest penalty imposed on a member?	NA	
69	25(1)	Yes	Whether the Governing Board of the IPA has constituted an Appellate Panel, as required?	Yes	
			How many members are common to the Disciplinary Committee and the Appellate Panel?	Nil	
			How many meetings of the Appellate Panel were held during the year?	Nil	
			Did the IBBI Nominee attend all the meetings of the Appellate Panel?	NA	

70	25(2)	Yes	How many appeals were received by the Appellate Panel during the year?	Nil
			How many appeals were disposed of by the Appellate Panel during the year?	Nil
			How many appeals were disposed of after 30 days of the receipt of the appeal?	Nil
			How many appeals were dismissed?	Nil
			How many appeals are pending for disposal as on 31st March, 2018?	Nil
71	26	Yes	How many members applied for temporary surrender of professional membership during the year?	Nil
			How many applications were accepted?	Nil
			How many applications were rejected?	Nil
			How many applications are pending, if any, as 31st March, 2018?	Nil
72	26(3)	Yes	How many members revived their membership during the year?	Nil
73	26		Whether the details regarding applications accepted for temporary surrender of professional membership and revival of temporary surrendered membership, intimated to the IBBI?	Nil
74	27		How many applications were received for surrender of membership during year?	Nil

			How many applications were accepted? How many applications rejected? How many applications are pending, if	NA NA Nil
			any, as on 31st March, 2018?	
75	30	NA	How many members were expelled by the IPA during the year?	Nil
			Part E: Compliances wit	h Circulars issued by the IBBI
76	Circula r 1 Dated 3 rd Januar y 2018.		How many members complied with the circular during the year?	The Circular was shared with the Members directing that strict adherence to the same needs to be done
	2010.		How many members did not comply with the circular?	Once Inspection is done, or comes to notice of IPA- ICAI from any other source, about violation /non-compliance, then appropriate action in accordance with law shall be initiated forthwith.
			Have you taken action against the members who did not comply with the circular?	NA
77	Circula r 2- dated		How many members complied with the circular during the year?	The Circular was shared with the Members directing that strict adherence to the same

	3 rd		needs to be done.	
	Januar y 2018			
		How many members did not comply with the circular?	Once Inspection is done, or comes to notice of IPA- ICAI from any other source, about violation /non-compliance, then appropriate action in accordance with law shall be initiated forthwith.	
		Have you taken action against the members who did not comply with the circular?	NA	
78	Circula r 3 Dated 3 rd Januar y 2018	How many members complied with the circular during the year?	The Circular was shared with the Members directing that strict adherence to the same needs to be done.	
		How many members did not comply with the circular?	Once Inspection is done, or comes to notice of IPA- ICAI from any other source, about violation /non-compliance, then appropriate action in accordance with law shall be initiated forthwith.	
		Have you taken action against the members who did not comply with the circular?	NA	
79	Circula	How many members complied with the	The Circular dated 16 th	

	r 4 Dated 16 th Januar y 2018	circular during the year? How many members did not comply with the circular?	January has been shared with all the members and no instance of non-compliance has been reported to IPA ICAI.	
		Have you taken action against the members who did not comply with the circular?	NA	
80	Circula r 5 Dated 16 th Januar y 2018	How many members complied with the circular during the year?	The Circular was shared with the Members directing that strict adherence to the same needs to be done.	
	y 2010	How many members did not comply with the circular?	Once Inspection is done, or comes to notice of IPA- ICAI from any other source, about violation /non-compliance, then appropriate action in accordance with law shall be initiated forthwith.	
		Have you taken action against the members who did not comply with the circular?	NA	
81	Circula r 6 Dated 23 rd	How many members complied with the circular during the year?	The Circular was shared with the Members directing that strict adherence to the same needs to be done.	

	Feb 2018	How many members did not comply with the circular?	Once Inspection is done, or comes to notice of IPA- ICAI from any other source, about violation /non-compliance, then appropriate action in accordance with law shall be initiated forthwith.	
		Have you taken action against the members who did not comply with the circular?	NA	
82	Circula r 7 Dated 23 rd Februa	How many members complied with the circular during the year?	The Circular was shared with the Members directing that strict adherence to the same needs to be done.	
	ry 2018	How many members did not comply with the circular?	Once Inspection is done, or comes to notice of IPA- ICAI from any other source, about violation /non-compliance, then appropriate action in accordance with law shall be initiated forthwith.	
		Have you taken action against the members who did not comply with the circular?	NA	