

Internal Control Procedures

1. Client Registration :

- Every new client shall be interviewed by the designated Staff member who shall also verify the supporting documents with the originals and seeks such other information which necessary to satisfy the identity/ address and financial status of the client.
- Staff Member opening the account shall do the in person verification and verify the supporting documents with the Originals.
- Client shall be asked for financial background and in case of client want to work in F&O & CD account shall not be opened unless client submits proof of financial details.
- Details of the client shall be searched in SEBI List of debarred Entities to confirm that client does not figure therein.
- After verification of all the particulars the account will be opened and UCC will be allotted to the client
- Duly executed client registration documents shall be provided to all the clients through courier except in the case where the client is available to take the hand delivery of the documents.
- Clients Data shall be punched in Back Office Software by the designated Employee and will be subsequently verified by Senior Staff member for the accuracy of the Same.
- UCC Data shall be uploaded to the Exchange and only on the receipt of Successful report the client shall be allowed to trade.
- Clients details shall be sent to KRA for Clients KRA Registration within 7 days from the opening of the Account.
- Client Registration Documents shall be kept in a centralized store with proper number and the documents can be retrieved as an when required.

2. Clients Data Modification :

- Any Request for modification in Clients Data (e.g. change in Address, Email, Contact No, Addition / Modification of Bank Details, Demat Account Details, Opting for additional Segment) shall be entertained only when such request is submitted in writing / via registered email along with necessary supporting documents.
- Client shall be required to submit the copy of Pan Card along with all such requests.
- A letter intimating change shall be sent to the client through courier / registered email.
- In case of change in registered address / Email the Intimation must be sent to both old and new addresses.

3. Account Closure :

- The client shall submit the Account closure request in writing.
- The Balance confirmation for Funds and Securities shall be required to process further such requests.
- The Account shall be closed and balance Funds and securities shall be transferred to designated client's account.
- Account Closure Intimation and final statement of accounts for funds and securities shall be sent to client by registered post.

4. Contract Notes, Daily Margin Report & Statement of Account for Funds & Securities:

- All the contract notes and daily margin statement shall be dispatched to client via digitally Signed emails within 24 hours of execution of trades.
- All the Contract notes and Daily Margin Statements, Periodic Statement of Account for Funds and Securities shall be sent periodically in electronically from centralized Back Office Software and Dispatch logs shall be maintained for the same.
- A log shall be maintained for all the bounced mails. Reasons for bounced mail shall be analyzed and client shall be asked to rectify any problem, if any, related to his mail box. Further document bounced back shall be sent to client by post or through courier with proper record of dispatch.

5. Policy for Internal Shortage

The policy and procedure for settlement of shortages in obligations arising out of internal netting of trades is as under:-

- a. The short delivering client is debited by an amount equivalent to the selling rate of the security. The securities delivered short are purchased/received from the market/client on T+3 day which is the Auction Day of the Exchange and the purchase consideration (inclusive of all statutory taxes & levies) is debited to the short delivery seller client along with reversal entry of provisionally amount debited earlier.
- b. If Securities cannot be purchased from market due to any force majeure condition, the short delivering seller is debited at the closing rate on T+3 day or Auction day on Exchange +10%. Where the delivery is matched partially or fully at the Exchange Clearing, the delivery and debits/credits shall be as per Exchange Debits and Credits.
- c. In cases of securities having corporate actions all cases of short delivery of cum transactions which cannot be auctioned on cum basis or where the cum basis auction payout is after the book closure/record date, would be compulsory closed out at higher of 10% above the official closing price on the auction day or the highest traded price from first trading day of the settlement till the auction day.

6. Registration / Surrender of APs/Sub Brokers:

- Prospective AP/Sub Broker will be required to fill the Application Form for becoming the AP/Sub Broker
- Sales Person will visit the AP/Sub Broker office to assess the adequacy of infrastructure, provisions of logistics and ascertain the business potential of the area
- Prospective AP/Sub Broker will be interviewed by the Directors / VPs
- All the documents related to AP/Sub Broker Registration will be executed and forwarded to Exchange(s) for Registration
- After Getting the Registration User Ids for trading terminals / online back office will be allotted to APs/ Sub Brokers,
- Glow Sign Board / Notice Board / Sebi Registration Certificate / Account Opening Forms and other stationery will be forwarded to AP / Sub Broker
- A Periodic Audit shall be conducted as per the norms of Exchange.

7. Policy for Prefunded Instruments :

In terms of Sebi Circular No. : CIR/MIRSD/03/2011 dated June 2011 regarding the acceptance of Pre Funded Instruments (Demand Draft / Pay Orders / Bankers Cheque etc) the company has decided to accept Demand Draft / Pay Orders / Bankers Cheque etc only if following documents are submitted by the client namely ;

- Written Request from the client
- Documentary Evidence in support of issuance of pre funded instrument from the bank account of the client which may include ;
 - Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank.
 - Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument.
 - Certified copy of the passbook/bank statement for the account debited to issue the instrument.
 - Authentication of the bank account-number debited and name of the account holder by the issuing bank on the reverse of the instrument.

Compliance Officer: