

INTERNAL CONTROL POLICY AND SYSTEM

Registration of clients

1. Client should be registered only after receiving KYC, risk disclosure and other required documents duly completed and filled up with all supporting.
2. Verify the documents given by the clients with original documents.
3. Verify the PAN detail from the site of Income Tax Department/NSDL.
4. Verify whether client name appearing in RBI/CIBIL Black & defaulter list.
5. Client should be introduced by Director, any existing client, Authorised Person or employee of the company.

Receiving, validating & entering the orders of clients in the trading platform

1. Order from client may be received on phone, fax or in physical presence of clients.
2. Order should be received directly from clients or person authorized by him for giving order.
3. In case of big order the after consultation with Compliance officer the same is reconfirm with the clients before placing the order.
4. All orders are received on recorded phone lines

Collection and Release of Payments to clients

1. Cheques against purchase should be received from the client's Bank A/c and no third party cheques will be accepted.
2. Payment should be made only in the clients Name and only to his account.
3. No cash payment will be made to any client.
4. Payment should be made after pay-out by the exchange only.
5. Pay-out to client should be made after confirming that client has delivered the commodities in pay-in.

Collection and Maintenance of Margins

1. Margin from client may be collected in the form of cash, fixed deposits, bank guarantee.
2. We collect upfront margin from clients.

Monitoring of Branches / Authorised Persons etc.

1. Authorized Person should not be allowed to register the clients directly.
2. Authorized Person can be allowed to execute the trade only after client registration with us and exchange.
3. Limit should be set for every users.
4. We inspect the Authorized Persons at regular interval, so that each Authorized Person/Sub-broker will be covered at least once in five year.

Operations & Compliance Requirements

1. The Compliance officer monitors all the routine compliances.
2. Compliance officer should go through all the circulars and directives of Exchanges /SEBI and direct to implement it with immediate effect.
3. Compliance officer will ensure to comply with the directive of Exchanges / SEBI within time frame set by the exchange.

Risk Management System

1. Collect the margin from clients in cash, fixed deposits, bank guarantee.
2. Limit should be set for all users.
3. Set the value of order and quantity limit of all users to avoid the big losses from errors.
4. Clients should not be allowed to take huge position without collecting sufficient upfront margin.
5. We Manage the Risk as per the policy of Risk Management

Settlement of Clients Accounts

1. As per Exchange circular we have to settle our clients accounts every quarter.
2. As per Exchange circular we can retain the amount below Rs.10,000/- in NSE & BSE
3. As per Exchange circular we can retain the amount below Rs.50,000/- in MCX
4. The clients who have open position on quarterly settlement date we retain the 225% of margin required.

Trade Confirmation of Offline Trade

1. If any offline client is not responding to system generated Trade confirmation call or we found anything suspicious on that company can temporary suspend or block the trading until we get the clarification.

2. We will intimation to Client and his Branch via email or sms if trading code is Temporary suspension or block the trading account if we get the satisfactory reason we will unblock the trading code on immediate basis.
3. Temporary suspension or blocked trading account client can square off his open position.
4. Temporary suspension or blocked trading account client can't place any fresh order.