



PROFIRMART SECURITIES PVT LTD(PSPL)

“Code of Conduct for Authorized Person”

This code shall be applicable to AP & his/her employees. The AP is responsible to ensure that AP and his/her employees strictly adhere to this code.

1. Authorized Persons need to maintain a Visitors register at their end and compulsorily ensure to take signatures of all the clients visiting the branch on daily basis.
2. Order instruction of those clients who are not visiting the branch and calling the branch for the same shall be taken from recorded landline only on daily basis. AP needs to maintain records of the voice loggers on a weekly basis. Ensure that recording shall be maintained/preserved at least for a period of 5years.
3. All the dealers in the Branch need to maintain sauda register mentioning details of trade, client code, exchange and all such details mentioned in the sauda register format available with them and take client’s signature on the same.
4. Clients shall NOT be allowed to operate the trading terminals in any circumstances.
5. Daily trade confirmation on recorded line shall be given by dealer to the client’s after-market hour.
6. Contract notes shall be sent through a centralized processing office. If the AP is willing to provide the contract notes to the clients, it can be provided through portal.
7. AP/Branch in charge needs to daily confirm whether trade confirmation SMS, ledger confirmation SMS, margin shortfall SMS, contract note, daily margin statement and quarterly statements (on quarterly basis) are received by the client even if they are sent by PSPL.
8. AP needs to maintain an investor grievance register carefully noting down client complaints and details related to it. Also, the exchange to which the complaint belongs.
9. AP needs to ensure the grievance/complaint of the client is resolved within due date.

10. Following records/documents are generally required to be maintained under the Shop & Establishment Act
 - Attendance Register
 - Leave book of the employees in “Form N”
 - Visitors Book
 - Wage Register – Monthly
11. Any client who is providing a DD worth Rs 50000(Single or multiple DD) must provide Bank’s letter certifying the identity of the client.
12. AP shall NOT indulge in any activity that can dilute the brand image of PSPL.
13. AP shall NOT charge any commission/fees/brokerage directly from the client and shall not share any profits of the client.
14. AP shall maintain confidentiality of all client Information.
15. AP Shall NOT make any improper use of the details of the personal investments and other information of a confidential nature of the client, which he comes to know in his business relationship.
16. AP shall NOT issue any communication to the client/anybody in electronic or physical form including via SMS, e-mail, letters, circulars, website, etc without prior approval of PSPL, except communication published by PSPL. There should be no addition/deletion in the content published by PSPL.
17. AP shall NOT promise or guarantee any returns/profits.
18. AP shall NOT misrepresent the features of the product/services being offered to the client.
19. AP shall NOT furnish false or misleading quotations to the clients. No commitment outside PSPL policy/scheme/any law, without prior written approval from PSPL.
20. The AP should have adequately trained staff and shall ensure continuous compliance requirements as specified by any regulatory authority/PSPL.
21. AP shall use only the letter heads envelopes, visiting cards, etc. as approved by PSPL. All PSPL branding materials should be as specified by PSPL

22. AP shall NOT issue any advertisements / Press releases/ have media appearance / make any information available on public domain without prior written approval of PSPL.
23. AP shall advise clients only if the advice given is consistent with communication from PSPL.
24. AP shall NOT accept any blank cheques or delivery instruction slips from the client.
25. AP shall NOT accept any power of attorney from the client.
26. AP shall NOT accept any password of the client, shall prevent unauthorized usage of passwords.
27. AP shall NOT resort to unfair business means for introducing clients.
28. AP shall NOT indulge in manipulative fraudulent or deceptive transactions or schemes
29. AP shall inform PSPL about any suspicious trading activities of the clients and take containment measures.
30. The AP shall display the notice boards as specified by PSPL under registration details in a prominent place in his/her office.
31. The AP shall NOT accept cash from clients. DD if accepted shall be only along with bank advise.
32. AP shall NOT issue any communication/ give any advice or perform any acts with the object of personal pecuniary profits NOT rightly due to the AP.
33. The AP shall always serve the clients in a fair and just manner and with integrity.
34. Any communication/request received by the AP from the client shall be promptly forwarded to PSPL.
35. AP shall cooperate in all respects with PSPL in providing best services to the clients.
36. The AP shall NOT encourage sale/purchase with the object of generating brokerage.
37. AP shall abide by the terms and conditions contain stockbroker-AP agreement entered and submitted to the stock exchanges.

38. AP shall abide by the policies and guidelines including but not limited to policies/ guidelines framed by PSPL for account opening/ margin/ risk management/ release of advertisement/ audit/ closure of business/withdrawal of registration application / cancellation of registration.
39. The AP shall NOT tamper or forge any documents /financial instruments/ statements provided by clients.
40. The AP shall NOT associate with any advisory firms, directly or indirectly introducing clients.
41. The AP shall NOT mis sell any product any product to the client.

Amendment

This Code may be modified/ amended at the sole discretion of PSPL. All persons to whom this code is applicable is required to keep himself/herself updated of the same and adhere to such amended code as intimated by PSPL from time to time.

Breach of Code

Any authorized person who violates this code of conduct shall be penalized and appropriate action may be taken against him which may include termination of AP. The action taken by PSPL shall not preclude SEBI & exchanges from taking any action in case of violation of any statutory regulation.

This code shall be in addition to the code of conduct and other rules, regulations, bylaws, and notifications issued by SEBI, the exchanges or other regulatory authorities and as amended from time to time. The AP shall strictly adhere to the rules, regulations, bylaws, and notifications issued by SEBI, the exchanges or other regulatory authorities and as amended from time to time.