



KK SECURITIES LIMITED

Member : National Stock Exchange of India Ltd. (CM, F&O and Currency)

Member : BSE Ltd. (CM, F&O)

Member : Metropolitan Stock Exchange Ltd. (CM, F&O)

Participant : National Securities Depository Ltd.

CIN : U74899DL1994 PLC060238

Regd. Office : 76-77, Scindia House, 1st Floor,

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Policy - NISM Series VII-Securities Operation & Risk Management(SORM)

Brief

SEBI issued Notification no. LAD-NRO/GN/2010-11/21/29390 dated December 10, 2010 according to which, following categories of associated persons associated with a registered stock broker/trading member/clearing member in any recognized stock exchanges, who are involved in, or deal with any of the following:

- Assets or Funds of investors or clients
- Redressal of investor grievances
- Internal control or risk management
- Activities having a bearing on operational risk

shall obtain the valid certification of NISM Series VII - Securities Operation and Risk Management (SORM) within two years from the date of such notification. Simultaneously, whenever the company employs any associated person specified as mentioned above, the said associated person shall obtain valid certification of NISM Series VII - Securities Operation and Risk Management (SORM) within one year from the date of his /her employment.

Definition - Associated Person

"Associated Person" means a principal or employee of an intermediary or an agent or distributor or other natural person engaged in the securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in India.

Exemption

Associated persons handling the basic clerical / elementary functions in the aforesaid specified areas shall be exempted from obtaining the certification of NISM Series VII - Securities Operation and Risk Management (SORM). For this purpose, the company considers following activities as basic elementary level / clerical level.

S. no.	Internal Control or Risk Management.	Redressal of Investor Grievances	Activities having a bearing on operational risk and dealing with assets of funds of investors of clients
1	Inwarding or collateral's / Cheques	Inwarding of complaints	Person performing Maker entries
2	Person performing market entries	Seeking documents from clients	Maker entry in the database
3	Maker entry in the database	Person performing maker entries	Preparing of MIS
4	Photocopying, printouts, scanning of documents	Maker entry in the database	Generating of reports, Files
5	Preparing of MIS	Photocopying, printouts, scanning of documents	Photocopying, printouts, scanning of documents
6	Sending of letters / reports to clients, Exchanges, SEBI	Preparing of MIS	Dispatching documents to clients

For KK SECURITIES LTD.

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Director

7	Attending Calls, etc.	Sending of letters / reports to clients, Exchanges, SEBI updation, data entry, uploading on SCORES	Sending of letters / reports to clients, Exchanges, SEBI
8	--	Attending calls, etc	Attending calls, etc

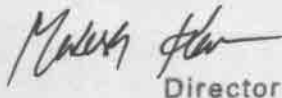
However, any of the work (as stated herein above) being performed by such persons, obtaining, NISM-SORM Certification shall be optional provided that they are supervised by his / her supervisor who shall have to obtain / continue to have NISM – SORM Certification or such other prescribed certification at all times.

In case of any query, employees are requested to obtain clarification from the Compliance Officer of the Company.

This revised policy was reviewed and approved at the Board meeting of KK Securities Limited held on December 19, 2022.

For Board of Directors of KK Securities Limited

For KK SECURITIES LTD.



Director

(Mukesh Rustagi)
Director Corp., Compliance Officer & Principal Officer

Dated : 19/12/2022

Place : New Delhi