

INTERNAL CONTROL POLICY:

CLIENT REGISTRATION

- A client is registered only after he had a meeting with the director / Sub broker / Authorized Person/Employee of the company.
- The Application forms for opening an account are issued only when the management is satisfied with the clients' financial capacity to trade in stock market and after the prospective client provides the valid reference & introducer for his account.
- Know your client form is duly accepted in compliance with the mandatory requirements specified by the SEBI & Exchange and processed further along with supporting documents with necessary proofs duly verified with original.
- In person verification is done by the Employee/Sub-Broker/Authorised Person of the company.
- The company has the policy of approval of all application forms by the Authorised persons of the company before allowing trading to applicant.
- Company has also advised its Associates to exercise proper diligence with respect to the client before introducing him to the organization and the final authority to approve client also vests with the Managing Committee of the company.
- All the KYC documents are finally stored at record centre which can be retrieved within 2-3 working days.

• ORDER RECEIPT AND EXECUTION

- Order Receipt : Most of the times the client is entertained by the dealer who regularly deals with the client. The trades of clients are carried out in the respective client code only. The dealers take utmost care while executing the trades of the clients regarding the accuracy of Client Code, Quantity and Price etc. The orders from the client's are promptly executed by the dealers and the oral confirmation of the placement of the orders is immediately provided to the clients. Moreover, only registered clients are allowed to enter the dealing room for placing the orders.
- Mechanism for order management and execution : The clients are divided into groups among the dealers and sub brokers at head office level, so that particular dealer can serve a particular group of clients which helps dealer to understand the client investment strategy in a better way & serve them accordingly. The orders are entered instantly by the dealer on the instruction given by the client. On execution of valid order into trade, dealers confirm the trade with the client so as to avoid any future dispute. At the end of the trading hours, the dealer informs the clients about the execution of the orders placed by the clients. Also a trade confirmation SMS message covering details of all the trades executed is forwarded to client after completion of trading hours on registered Mobile No. of the client.

- **II. SENDING CONTRACT NOTES, DAILY MARGIN STATEMENT, QUARTERLY STATEMENT OF ACCOUNTS TO CLIENTS**

- Printing of Contract notes is centralized and is done at Head Office. The same are dispatched within 24 Hrs of execution of trades.
- Company issues Physical as well as Electronic Contract notes (ECN) to its clients. The digitally signed ECN are emailed to respective clients on the same day of execution of trades on their email address which were provided by them at the time of opening an account with the company. The company maintains the dispatch log of the ECN.
- Client margin details are sent to all clients electronically on daily basis as digitally signed document. The dispatch log of the same is preserved
- Statement of accounts of fund and securities is sent to all the clients in physical form & also as electronically signed digital document on quarterly basis within the time limit prescribed by the exchange. The proof/Logs of delivery are preserved.
- In case if the client wants to change his email address which was earlier provided by him at the time of opening an account with the company the same should be done by filling up the modification form mentioning the old as well as new email id.