

## **RISK MANAGEMENT POLICY**

### **INTRODUCTION:**

This is a policy document for guiding the operations of the organization. This Document is for internal use and not for circulation.

### **CLIENT REGISTRATION:**

This is first stage of contact with the client. It is very important to take adequate details from the clients to maintain a record of the details of the clients.

1. Company registers client by obtaining the Client Registration Form which is foremost requirement of exchange. In this form the basic details of the clients are obtained i.e.
  - a. Name of client: Which is used to identify the client.
  - b. As per SEBI circulars number MIRSD/Cir-23/2011, MIRSD/Cir- 26 /2011 dated December 2, 2011 & December 23, 2011 respectively client KYC has been carried out at the time of account opening.
  - c. For Corporate client Board Resolution, Memorandum of association & article of association of company, Shareholding pattern, Details of Authorised Persons and Directors.
  - d. Pan card of all Clients.  
All these documents form part of KYC Norms, which will be taken from all the clients
  - e. Bank Details of the client along with the proof of the same i.e. Xerox of the bank pass book or canceled cheque with sign so that company can keep track of the third party payment i.e. amount paid through other persons' account.
  - f. DP accounts details which is to giving & taking delivery of securities. Proof of the DP Account holder name will be taken. This is also for restricting third party delivery of the security i.e. security of client given to other persons or taking delivery of other persons.

**CLIENT BROKER AGREEMENT:**

Client broker agreement is executed at the time of client registration. It is as per the format prescribed by the exchange. This will cover all the responsibilities, Rights & Liabilities of client & member.

**RISK DISCLOSURE DOCUMENT:**

Trading in securities market involves risks of various nature. Clients need to be educated and informed about the risks involved and the company as a policy will issue the RDD to all its clients and obtain a signature on the copy.

**BANK ACCOUNTS:**

Client Bank Account will be used only for the purpose of receiving and paying funds from the clients. For the payments of expenses the business account will be used. Fund Transfers between all the bank accounts will be allowed as per requirements.

**RECEIPT FROM & PAYMENTS TO THE CLIENTS:**

The cheques from the clients will only be accepted from the accounts for which the client has submitted the proof to the company. In case of any receipt from the accounts for which the proof is not available the same will be demanded from the clients.

Payments for the payouts will only be made to the clients and not to any third party.

**DEMAT ACCOUNTS:**

The company will maintain client's securities in a designated account called the Client Beneficiary Account. The securities of the company will be kept in a separate demat account termed as Own Beneficiary Account. The clients and own securities will not be mixed with each other.

**RECEIPT AND DELIVERY OF SECURITIES:**

The securities from the clients will only be accepted from the accounts for which the client has submitted the demat proof to the company. In case of any receipt from the accounts for which the proof is not available the same will be demanded from the clients. Delivery for the payouts will only be made to the clients and not to any third party.

**CONTRACT NOTES:**

Company will issue contract notes to its clients within 24 hours from the day of trade takes place either through electronic or physical mode as opted by the client.

**STATEMENT OF ACCOUNTS:**

The statement of accounts will be sent to the clients on a quarterly basis within one month of the end of the relevant quarter, as it will help avoid discrepancies in future.

**EXPOSURE TO THE CLIENTS:**

The company will allow the trading margin to the clients as per the available ledger balance.

**MARGIN COLLECTION:**

The margin facility is not provided to the clients, the available ledger balance will only be allowed to client for trading.

**- BY MANAGEMENT ORDER**