



ANNEXURE 1

Procedure for Client Registration, Documents maintenance

Persons are added as clients only after they had a meeting with the Employees / Authorised Persons of the company

The company has taken due care in the preparation of the Client Registration Forms in the format as prescribed by SEBI and Stock exchanges.

The forms which are duly filled and signed are collected at the office of the company.

In-person Verification is done by employees / authorized persons on behalf of the company.

Verifying Personnel's Name, signature is stamped in the Registration form as well as on the copy proofs enclosed

Defective forms are sent back to clients for rectification with a covering note.

For all satisfactory forms, PAN is checked with IT site.

Then information are keyed in back office software based on the Original form.

Another official generates the Unique Client Code and thereby activates the account after cross verification of all the details once again.

The required client details are then uploaded to Stock Exchange site.

After obtaining the Success file, the same mapped in the trading terminal.

A welcome kit including a welcome letter mentioning the Client code, Xerox copy of the Client registration form, Rights & Obligations of stock broker and clients, RDD Policy & Procedure are sent to the Client by post.

The Unique Client Code activated for the client is intimated to the client by means of E-mail.

All the Client forms and the supporting documents are kept in safe custody at the Head Office Premises in a boxed file in its serial order.

All client registration documents, once checked, found complete and verified are stored in safe vaults in a sequential manner.

Procedure for UCC Upload

From our back-end, we generate file for the client containing data of market segment, client code, client name, PAN, address in the format prescribed by NSE /BSE. The data generated are thereafter verified with KYC. On the data being found fully correct, the client is uploaded on UCC – site of NSE / WEBX – Site of BSE. After uploading, we run a check, on the UCC-

site, by entering the specific client, whether or not the client details are actually uploaded on UCC-site.

Procedure for Closure of Client accounts/ Dormant accounts

Dormant Accounts

All dormant accounts (inactive for six months and more) are made inactive in our system. Hence it is not possible to execute a transaction in dormant accounts. However, a client can re-activate his/her/its dormant account by giving us in writing in prescribed format to activate the account and also stating the reason for keeping the account dormant.

Old dormant a/c (2 years old)

In case of clients who have not traded for more than two years, the time they call up execution of any trade then enquiry is made about their non activeness in the share market.

Additionally, their updated financial information is also enquired & called for. Only after they have given the updated financials only then further actions for execution of transaction are carried out.

Closure of account

Closure request letter from the client is obtained in the prescribed format, specifying the reason for closure. The form should be duly signed by the client. The signatures are verified. Any pending settlements in the existing code are also thoroughly cross verified. An exit interview over telephone is taken from the client.

Then the existing code is deactivated in Back office software. Closure intimation is sent to the client either post through E-mail or through

Procedure for Order Receipt and Execution

The company setup is small and all the clients are personally known to employees, their financial position is known and the dealer is aware of the risk appetite of the client which helps in better control.

The company has restricted the access to the dealing office only to the employees. The clients are informed of the dealers who would be responsible for receiving, validating and entering the orders on behalf of them.

The orders are received over phone, through employees, personal instructions when they are in the office.

The company does not have a telephone recording system as the orders are duly confirmed at the time of entry itself when the orders are inputted in the system.

Procedure for Sending Contract Notes, Daily Margin statement, Quarterly Statement of Accounts to clients

The company sends contract notes and daily margin statements within 24 hours of execution of the trade (ie. Within 1 day) by digitally signed emails to the email id of all the clients, who have an email id.

The activity of sending contract notes, daily margin statement and quarterly statement of accounts to clients has not been outsourced to any person.

The log reports are maintained for the documents sent electronically and in case of documents sent by courier the proof of dispatch (POD) is maintained and in case of hand delivery, acknowledged copies of the documents sent are maintained.