



ANNEXURE 3

Internal Control Policy

Details

Rajgul Securities Pvt Ltd. Popularly Known as RSPL is one of today's upcoming equity research and broking houses of Delhi. RSPL offers a wide range of wealth generation solutions to individuals its strength lies in its customer-centric approach and a firm commitment to make your money work for you.

RSPL was incorporated on 22nd May 2007 by group of persons, having the rich heritage of vast & valuable experience in Capital and Derivative Market to provide financial services to Retail, High Net worth Individuals, Corporate and Institutional clients. Soon after, it becomes trading membership of National Stock Exchange of India Ltd. (NSEIL), Bombay Stock Exchange Ltd. (BSE). RSPL holds registration from Securities and Exchange Board of India (SEBI) to trade, in Equity & Derivatives NSEIL, Equity & Derivative segment of NSE we do offer depository services to our clients as a register DP of CDSL. We give personalized premium service with reasonable Brokerages & state of art technology on the NSE SEBI RegnNo:INB/INF 231302739 BSE SEBI RegnNo:INB/INF 011302735 We started Broking since december,2008 onwards.

We are a corporate stockbroker with experience in this highly complicated yet engrossing world of Stock Markets. Our name is backed by a stand-out and visionary Promoter and Management Team, high calibre human resource and state-of-the-art infrastructure with high investor & client friendly standards.

Trading:

Trading at all dealing terminal is done by certified dealers using a fair code practice. Having vast experience and well versed with the internal control, PMLA & other policy of exchange NSE BSE guideline.

Terminal

We have a RMS system for determining the trading limit for each terminal / client. We receive the order from clients manually as well as telephonically. We execute telephonically received orders after confirming the client identification by asking some personal information from the clients for ensuring their authenticity\identity. Dealer inform to clients regarding their transaction during the day or after the market hours as the case may be. In later stage after completion of back office activities, contract note sent to the clients. We have a proper system to check the validity of approved user on terminals and ensure that certificate of approved users has not expired. Also we have adopted a proper trade modification policy as per Sebi\Exchanges guidelines.



Collection and release of payments of funds & securities:

Collection & Release of Funds:

- Subsequent to the trades executed by respective clients, obligation payments are collected by cheques\RTGS\NEFT from the client and same is deposited into designated client account of RAJGUL SECURITIES PVT LTD.
- Payments are made via account payee cross cheque / Banker's chq / CMS / RTGS / NEFT in favour of respective clients as per their request.
 - No cash collections and/or payments are under taken or permitted.
 - We have a proper policy for receipt & payment of funds & securities including pre-funded instruments.

Collection & Release of Securities:

- Securities so sold in the market are called for Pay-in-obligation from each respective client.
- Delivery of securities is done as per respective client authorization i.e. either auto transfer facility and/or as per request to the designated client Beneficiary Account.
- We have a proper policy for receipt & payment of funds & securities.
We have maintained separate bank accounts & Demat accounts for client dealings & follow Sebi\Exchanges norms related to that.

Collections and maintenance of margins:

- Initial margin is collected through cash or collaterals and accordingly Margin limit for trading as per defined rules is provided to the client.
- Subsequent to the trading activities of the clients, Margin requirement of each client is confirmed and collected from the respective client.
 - Credits so received are posted into respective client ledger /margin statement accordingly.
- Client wise Risk monitoring\management is done in derivative segment, along with control on margin & MTM obligations.

Operation and compliance requirement:

- Unique client code allocated to the client is uploaded to NSE & BSE as required.
- Compliance Dept. ensures that Books, records and registers are kept and maintained as per prescribed rules and regulations.
- All activities regarding monitoring and redressal of the grievances of the investors is as per company policy for Investor Grievances. Compliance of rules, regulations, notifications and guidelines etc are controlled and monitored by designated Compliance Officer and is periodically reported to the Board.



Continuity planning / Alternate plan in case of disasters etc:

- We have installed proper power backup & state of art technology. We also have a proper backup system in place and have multiple mode of Connectivity for trading access and also for back office / support access.
- Routines / Specific back-up for the records and registers are kept and maintained by designated department and is retrieved at regular intervals for cross-checking its authenticity,etc.