

Procedures

a.	Client Registration, Documents maintenance	Refer Internal Control Policy
b.	Sales Practices followed by the Trading Member	Research Department comes out with Morning New every day which use to contain financial activities in India & Abroad during last day. Apart from this we use to send updation message if there is abnormal rise/fall in the market during the day. Further, Dealer use to meet at least 5 Clients in a week to confirm their satisfaction with services as well as any further requirements.
c.	Closure of Client accounts/ Dormant accounts	On receipt of Request letter, we close the trading account of Client and then confirms the same to the client either by email or by Closure Letter. In case of dormant account, we use to send letter/email whether clients wishes to continue with their Trading account or want to close. Based on the reply of client we do the needful.
d.	Order Receipt and Execution	Normally, Client use to place order over phone call apart from some of clients who use to come to the office and places orders for them. Apart from this, we use to give a call if client is having stock in their account and are in profit or they want to come out with their position in respective stock. In case of Execution of Trade, we confirm the same to clients over phone once the trade has been executed against their order and once again confirms the same at the end of the day.
e.	Sending Contract Notes, Daily Margin statement, Quarterly Statement of Accounts to clients	Contract Notes are sent Digital Signed by email except for those clients who collects Contract Notes by themselves or by Authorised Representatives. These contract notes include daily margin report statement. In caes of Quarterly statement of Accounts and Securities, it is also been sent digitally signed except for those clients who collects Statements by themselves or by Authorised Representatives
f.	Collection of pay in, margin, limits setting for exposures & turnover for clients, terminals, branches & sub-broker level	We use to setup client limit base on VAR based Margin. For collection of dues, we send SMS for debit balances of Client at the end of the Day. Apart from this, Officers from Accounts Dept use to give a call next day in order to remind and arrangement for collection of Dues. Even Dealers also reminds clients whenever such clients' call comes for trading. As far as limits setting of Client is concerned, it is fully depends upon Margin/Collaterals lying with ACC. The Limit can be extended only if request is being received from Client/Sub-broker/Branch-Head base on the confirmation of payment is being received or promise that it will be received by EOD.
g.	Monitoring of debit balances	Accounts Dept use to monitor clients debit balance every day and in case Debit is of more than 4 Days, he or she use to intimate RM Head to do the needful for setting up limit of particular client. In case of Sub-broker and Branches, he or she use to send Client Control Statement everyday and in case is for more than 4 days, we request Sub-broker to contact client in order to clear their dues.
h.	Allotment, Surrender of trading terminals	Allotment of Trading Terminals in done on request from Sub-broker/Branch Head base of information received from them supported by NCFM Certificate for Capital/Derivatives Market. Surrender of Terminals is based upon request from Sub-broker/Branch-Head by either Call or email.

i.	Opening & Closing of branches / sub-broker offices	For Opening of Branch, Directors or Marketing person goes to the location, meet with probable person who wishes to open Branch or want to become Sub-broker, understand their needs as well as to discuss about the possible business and their commitments. After discussion, we take reference from local people about probable Branch Head or Sub-broker. Upon satisfaction, we proceed for further needful. In case of closure of Branch, we decide and do the same if branch is not coming into the profit for more than 6 months or the Incharge of Branch or Sub-broker is not enough capable to run office. After discussion, we proceed for closure of account, send letters to Clients followed by paper Advertisement in that regard.
j.	Payment, Receipt of funds from / to clients	In case of HO Clients, the release of funds is done on Settlement Day. In case of Clients of Sub-broker/Branch, the same is being done on the request of them by email or over phone. In case of Collection of Dues, the same being looked at Sub-broker/Branch Head for clients associated with them and for HO it is being followed by Officers of Accounts Department.
k.	Receipt, Delivery of Securities from / to clients	Delivery of Securities is being done on Settlement Day by way of Direct Pay-out if client is having Nil or Credit Balance in their ledger except for those clients who have requested not to release shares on Pay-out. In case of Pay-in, this is being done by Dealers at the time of confirmation of Trade followed by Officers from Operations Department. In case shortage, Officers from Operation Department use to call to client or sub-broker to arrange for delivery of shares due for Pay-in.
l.	Square off of positions / Liquidation of securities without consent of clients	In case of FO Segment, we use to call client or to Sub-broker/Branch-Head to speak to client to pay due amount. In case client do not reply satisfactorily, we want them to square off their position if fund is being not received within specific time. On expiry of dead-line we square off position followed by Call or email about the same. In case we are not able to reach client and client has not paid his dues within stipulated time, we square off their position followed by confirmation of the same by phone or email.
m.	Policy for internal shortages	In case of internal shortage, we use to call client or sub-broker intimating about the same and immediately covers the shortage of client mostly at HO level.
n.	Transfer of trades	Generally we insist not to transfer any trade from one client to other client except where client code does not exist and is a genuine mistake on the part of Dealer or Sub-broker or Branch.
o.	Investor Redressal Mechanism	Complaints Register is being placed at Reception Area for lodging their grievances. Apart from this, we have specific email ID for grievance redressal and the same is being placed on Letter-Head and Contract Notes as well as on Website. If the complaint is being received, we try resolve the same as quick as possible or otherwise intimate client to follow the process in order to resolve the issue. The designated email ID is accessible to all Directors as well as to Head-Compliance.
p.	PMLA	The PMLA Policy is framed and documented and we strictly follow said policy. For details please refer to the PMLA Policy.
q.	Power of Attorney	We have not system of obtaining Power of Attorney for any of purposes.

Systems

a.	Capacity of Systems with reference to volume	The Capacity of Systems with reference to volume is 300-400 concurrent (Dealer & Diet) with upto 30,000 retail clients and 70000-80000 Transactions per day.
b.	Connectivity to Exchange & / to branches / sub-brokers / clients	Head-Office is connected with Exchange by Lease Line backed by Internet.
c.	Back up in case of disruption of connectivity	We do not have disaster recovery site and in case of disruption of connectivity on both ways i.e. Lease Line and Internet, one or two of Dealers approaches NSE Office to get connected and then to call Sub-brokers or Branch or Client for carrying trades in limitation. However in case of System failure, the trading can be restored within 10-15 minutes using back-up tools or machines.