

## **INTERNAL CONTROL POLICY & PROCEDURES**

### **Introduction**

Siddhartha Commodities Private Limited (hereinafter referred to as the 'COMPANY') a body corporate, registered under the provisions of the Companies Act 2013, is a SEBI registered broker of Stock Exchange.

The company has adopted various policies & procedures for internal control measures & tools for compliance of various Acts, rules & regulations of the Exchanges.

### **A. CLIENT REGISTRATION POLICY**

New account opening form containing Rights and obligation documents, Risk Disclosure Document, Guidance for DO's and Don'ts for trading on Exchange, Policies & Procedure must be signed by the client. The client may or may not sign the Voluntary documents.

The required documents should be collected from the clients strictly as per the documents mentioned in the checklist of the agreement book.

- Thorough checking by back office in charge including in-person verification, tallying the supporting documents with the original and interview of client.
  - After Signature of the Director on behalf of Company, the new Client Code is allotted
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  - Uploading the client details to the NSE/BSE/CDSL/KRA
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  - On receipt of Valid Report, accompanying the codes allocated to clients the same is intimated over telephone and Welcome Letter along with zerox copy of KYC along with documents received from the client is send to the client.
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  - The KRA duly filled with supporting documents is sent to KRA agency
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  - The KYC Filing of Client Registration Kit & updation of Index
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  - Periodical Review of financial data
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  - Deactivation of Client Code on receipt of written documents from Client.
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  - Intimation in writing to Client regarding deactivation of client code & reason thereof
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  - Financial capability of the clients is assessed depending on their turnover and is assessed at the end of each financial year. For this, Siddhartha Commodities PVT. LTD. ensures to update the financial information of the active clients. Financial statements for all corporate clients who are active are collected.
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**Walk in Clients:** The company has decided not entertain Walk in Clients. All clients / would be Clients are required to submit proper references or introducers.

**Financial Documentation:** All clients are required to submit updated financial data, namely, their Balance Sheet, Salary Income Certificate. In case of re-activation of UCC, the clients are also required to submit written request. Clients, specially operating in F&O Segment are compulsorily required to submit their latest financial position every year without fail.

**Maker & Checker Concept:** The Company appoints different person for checking CRF/data submitted by client and data entered in computer for uploading to master file & the Exchanges. Even after uploading of data, the compliance officer checks the data entered from the CRF. All blank spaces in the CRF is crossed by the compliance officer, if found not crossed by the client.

**Closure of Client Accounts/ Dormant Accounts:** Clients accounts are closed either by client himself or action initiated by the company. On receipt of written request from the client, the compliance officer deactivates the client code in its front & back office. CRF form is marked closed only after proper verification of client's ledger account & clearance received from accounts department regarding dues & margin. Moreover written communication is also sent to client accompanying closure of his account.

Client's accounts are also closed on action initiated by the company in the following cases:

- a. If client fails to meet his obligation within stipulated time or time provided by the company
- b. If clients fails to provide proper documents as required under SEBI rules & regulations even after repeated request by the company.
- c. If client is declared fugitive under any law in India or abroad.
- d. If client is declared insolvent under any law in India or any criminal cases are filed or pending and such information is not disclosed at the time of registration with the company

The company also mark all inoperative client account as 'dormant' till the same is closed or reactivated after written request is received from the client. UCC allotted to closed account is not used for any other new client.

## **B. TRADING POLICY:**

Active Client master list should be uploaded in the NEAT/BOLT/ALGO/CTCL trading terminal and all the orders from the clients should be checked for the client codes in the list. This will ensure minimal wrong code punching by the dealers.

Dealers should be vigilant in executing the orders of the client. They should check & report to senior authorities / Compliance Officer if any client is giving order of



abnormal quantity or rates.

Every client should be contacted after the market hours for trade confirmation. The clients should be asked for the settlement of their obligation before settlement date of the exchange.

Every client must be attended by the staff allocated for the purpose and in his absence; compliance officer must ensure that client is attended by another dealer. Staff/ dealer should check the margin availability/credit limit of the client before executing any trade on his behalf.

No trades will be transferred to code other than entered in trading terminal after trading hours unless there is genuine mistake on part of the dealer or client mentioning the UCC at the time of placing the order. Transfer of code can be done only by the 'compliance officer' during the allowable time frame by the exchange on system provided by it.

This step will help us to trace any discrepancies in the trade as well as timely receipt of cheques and securities from the clients and provide better service.

**C. Contract Notes, Daily Margin Statement, Quarterly Statements of Accounts and Register of Securities to Clients**

All Contract Notes are electronically sent within 24 hours from the trading date.

In addition to Contract Notes Daily Margin Statement is sent to the clients within 24 hours. The clients are informed about their margin details with breakups in the form of Cash, FDR, BG securities in the daily margin statement sent to them.

Contract Notes, Daily Margin Statements, Quarterly Statements of Accounts and Register of Securities are all sent to clients either in Physical Form or in Electronic method.

All the documents dispatched to the client can be easily retrieved from the software. Further backup of all documents sent is kept separately to avoid any type of inconvenience.

**D. PAYMENT POLICY:**

1. Payments to clients shall be made on Pay out basis i.e. within 24 hours of pay out (T+2 day or T+1 Day).
2. For clients who are desirous of keeping the pay out money with us for future transactions can do so by submitting a letter to that effect mentioning therein to keep their account as 'running account' and periodical cheques may be paid or received.

However, the clients are required to neutralize and settle their account once in every one/three months of first transaction.

3. Clients, who have debit balance in one segment and credit balance in other segment, will be paid only if their net balance is credit.
4. Margin Money to the clients will be returned only after adjusting debit balance, if any, in their account and/or if they have not defaulted in their obligation to deliver shares/securities.
5. Payments to the clients will be directly deposited in their account if mandate is given by them to this effect and they have account in the same bank, where the company has its account.

#### **E. RECEIPT POLICIES**

1. Cheques from clients would be accepted only of those banks whose details have been provided during client registration.
2. No third party cheques would be accepted.
3. NO CASH PAYMENT IS ACCEPTED.
4. Clients are advised not deposit any cash/cheque directly to company's account. If cheque is deposited then intimation should be given in writing along with pay in slips otherwise credit will not be given to client till proper documents are received from client.
5. Local Cheques received within 2 PM will be posted to the ledger on the same day. The effect of the cheques received beyond 2 PM would be given on the next day.
6. While receiving RTGS / NEFT from client it must be ensured that the same has been received from clients registered account only. Proper record of the UTR number should be maintained.

#### **F. MARGIN POLICY**

1. No trading will be entertained unless up front margin is received in advance for value of trade to be executed on behalf of any client.
2. Margin will be accepted in 'Cheque' only unless management decides otherwise.
3. If margin is accepted in the form of shares, a haircut on and above 40% will be computed on the price at the day end. All short fall will have to be met immediately by the client in cash or before opening of next trading session, whichever is earlier. No letter or written communication in this regard will be sent to any client for shortage of margin. The client will be

responsible for any shortage of his margin with us for his outstanding trades.

4. No complaint will be entertained for squaring off of outstanding trades or liquidating of margin by the management in absence of short fall of margin at any stage by the client. It will be sole discretion of the management to decide on 'spot' whether to square off outstanding trades of a client and margin be liquidated to meet the short fall.
5. Any amount payable on account of 'Mart to market' has to be paid in cash by the client before opening of next trading session. Amount paid must be in the form of clear bank balance given on the day of trade. If clear balances of margin/ MTM are not available, the management will at its sole discretion square off the trades of any client, which in its opinion can put the company or its other clients to unnecessary market risk.
6. The company reserves the right to liquidate a client's position, if the client fails to maintain proper margin with the company. Further, company also reserves the right to liquidate/neutralize a client's position in extra ordinary fall or rise in market price sensitive index, which in the opinion of the company may have a bearing on the future survival of the company and its business.

#### **G. Opening & closing of branches**

**OPENING OF BRANCHES:** Opening of own branches and granting Authorised Person location is carried out after a survey of a local market. When we receive inquiry for any new Authorised Person, the authorized officer gets details of that entity. We have certain rules and regulations which are to be checked. We ask them to fill up the separate form which we used to keep for the registration of new sub brokers which includes his contact details, office details, and experience in the securities market, details of deposits and other details which are important. It is the responsibility of individual branch manager who introduced the sub broker to check the genuineness or financial capability of the said sub broker. Then their Authorised Person registration papers are sent to the concerned exchange for registration. After receiving registration we start sharing brokerage with that sub broker. We conduct regular inspection at each Authorised Person office.

**CLOSING OF BRANCHES:** In case of closure of sub brokers, we give advertisement in one newspaper as per the rules and regulations of Exchange for cancellation of sub brokers/ Authorised person. Further we write letter to their clients to intimate them about closure of the said sub broker and also ask them whether they wish to continue working with us directly or not. In case if the clients wish to continue their trading with us, they have to give us their consent in writing. And then we transfer the code of the said client in the list of our direct clients and start treating them as direct clients.

#### **H. Limit Setting**

The stock broker may from time to time impose and vary limits on the orders that the clients can place through the stock brokers trading system (including exposure limits, turnover limits, limits as to number, value and / or kind of securities in respect of



which orders can be placed. The client is aware and agrees that the stock broker may need to vary or reduce the limits or impose new limits urgently on the basis of the stock brokers risk perception and other factors considered relevant by the stock broker including but not limited to limits on account of exchange / SEBI directions / limits (such as broker level / market level limits in security specific / volume specific exposures etc. and the stock broker may be unable to inform the client of such variation, reduction or imposition in advance. The Client agrees that the stock broker shall not be responsible for such variations, reduction or imposition of client's inability to route any order through the stock brokers trading system on account of such variation, reduction or imposition of limits. The client further agrees that the stock broker may at any time, at its own discretion and without prior notice, prohibit or restrict the clients ability to place orders or trade in securities through the stock broker or it may subject any order placed by the client to a review before its entry into the trading systems and may refuse to execute / allow orders. The client agrees that the losses if any on account of such refusal or due to delay caused by such review, shall be borne exclusively by the client alone.

We have margin based RMS System. Total Deposits of the clients are uploaded in the system and the clients may take exposure basis of margin applicable for respective security as per VAR based margining system of the stock exchange and / or margin defined by the RMS based on its risk perception. Client may take benefit of "Credit for sale" i.e. benefit of shares held as margin by selling the same by selecting Delivery option through order entry window on the trading platform. The value of shares sold will be added to the value of deposit and on the basis of that client may take fresh exposure. In case of exposure taken on the basis of shares margin the payment is required to be made before the exchange pay in date otherwise it will be liable to square off after the payin time or any time due to shortage of margin.

#### **I. INVESTOR REDRESSAL SYSTEM/ MECHANISM**

1. The company has a separate manual register for recording all clients related complaints either received personally or via post or via email.
2. The company has also designated email ID for sending complains by its investors or clients. The email Id has been disclosed in the KYC Kit sent to all clients at the time of registration as well as is mentioned on the contract note.
3. The company has also kept manual investors complaint register at its all branches and the same are verified by the compliance officer or its team of official from time to time.
4. On receiving the complaint, the Compliance officer is authorized to dispose of the complaint on its merit and write personally to the client of all action taken by him for satisfaction of the client.
5. If the compliance officer deserves the attention of the higher management or if the compliance officer is unable to dispose of complaint to the satisfaction of the client or the exchange or the SEBI, the designated directors are informed of the situation by the compliance officer and all

documents are placed before them within seven days of the receipt of the complaint.

6. The designated director's review the pending complains every seven days along with matters needed their attention.

#### **J. BACKUPPOLICY**

All important data backup is taken on daily basis. Backup is taken to prevent loss of data in the event of equipment failure or destruction.

##### *Backup Storage*

There shall be a separate or set of storage for each backup day. The old data is kept for 7 days and after that the storage media is reused.

##### *Monthly Backups*

Every month a monthly backup shall be made using the latest backup on the USB hard disk and the same is taken to separate location by the directors.

#### **K. Policy on unauthenticated news circulation and internal code of conduct**

- 1 We do not provide any kinds of tips and unauthenticated news circular to our clients, nor allowed any of our employees to circulated unauthenticated news.
- 2 We even do not permit any of our employees to indulge in daily trading activities.
- 3 We are very particular to enter the orders as per the instruction of our clients.
- 4 Many a times client asks to us about our opinion on market movement & Market forecast but we have instructed all our employees to refrain from giving any kind of stock specific market forecast.
- 5 It has been decided no employees / Authorised person shall not circulate any kind of script related information in any forum or social media
- 6 All social media sites have been blocked
- 7 Compliance officer has been directed that no such activity is being carried out by any one associated with the organization.