

Majortrend Capital Private Limited

(MCPL)

Internal Control Policy

A. CLIENT REGISTRATION POLICY

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.

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 KNA the new Client Code is allotted
- Uploading the client details to the NSE/BSE/CDSL/KRA
- 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.
- The KRA duly filled with supporting documents is sent to KRA agency
- The KYC Filing of Client Registration Kit & updation of Index
- Periodical Review of financial data
- Deactivation of Client Code on receipt of written documents from Client.
- Intimation in writing to Client regarding deactivation of client code & reason thereof
- Financial capability of the clients is assessed depending on their turnover and is assessed at the end of each financial year. For this KNA ensures to update the financial information of the active clients. Financial statements for all corporate clients who are active are collected.

Apart from this the company has started from November 2009 to review the delivery turnover Of clients on monthly basis and acts on it as per their policy mentioned in their Prevention of Money Laundering Act (PMLA) Procedures?

Assessment of financial capability of client:

We take from clients networth/financial standing details which has to be supported by one of the following documents:

- (a) Copy of ITR acknowledgement.
- (b) Copy of Annual Returns.
- (c) Copy of Form No. 16: In case of salary income.
- (d) Networth certificate from a Chartered Accountant.
- (e) Salary slip duly stamped, signed by employer.
- (f) Bank Account Statement for last six months.
- (g) Copy of Demat Account holding statement.
- (h) Any other document substantiating ownership of assets.

Process of record keeping and retrieval of client registration documents All client registration documents, once checked, found complete and verified as such and the accounts opened, are securely stored.

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/USE/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 of 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.

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

- Issues contract notes to its clients within 24 hours of the trade taking place.
- MCPL will issue the contract note, margin statement and trade to the mail IDs mentioned in the Client registration Form. So kindly ensure that the correct mail IDs and mobile numbers are mentioned and submitted in the KYC form.

Policy on Quarterly/Monthly Settlement-

MCPL takes the preference of settlement of clients" at the time of account opening through the Account Opening Form. While settling the accounts, **MCPL** may retain the requisite securities/funds towards such obligations and may also retain the funds expected to be required to meet margin obligations for next 5 trading days, calculated in the manner specified by the exchanges.

In respect of derivative market transactions, apart from margin liability as on the date of settlement, additional margins (maximum up-to 125% of margin requirement on the day of settlement) to take care of any margin obligation arising in next 5 days may be retained.

In respect of capital market transactions, entire pay-in obligation of funds & securities due from clients as on date of settlement may be retained. Further, in the capital market segment, for next day's business, member may retain funds/securities/margin to the extent of value of transactions executed on the day of such settlement in the capital market only.

In case of settling the accounts of regular trading clients (active clients), the Member can't retain amount of any client and transferring funds in case of non-trading over 30 days.

The above threshold limit on retention of amount shall not be applicable in case of clients who have not traded even once during the last one month/quarter, as the case may be; i.e. settlement shall be done as per the aforesaid SEBI circular, in such cases.

MCPL send a statement of Accounts to its clients along with the settlement of funds and also a Retention statement in case the funds are retained, explaining the utilization of funds to the clients" registered mail id.

C.PAYMENT POLICY:

1. Payments to clients shall be made on Pay out basis i.e. within 24 hours of pay out (T+1 day). For other branches cheques would be couriered to them from HO or direct deposit/RTGS/NEFT to clients registered Bank Accounts.
2. For clients who are desirous of keeping the pay out money with us as margin money can do so by submitting a letter to that effect mentioning therein not to issue cheques until a written request is made. However, such request at a time will be valid for one financial year only and/or until the same is being revoked by the client as the case may be.
3. 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.

4. Clients, who have debit balance in one segment and credit balance in other segment, will be paid only if their net balance is credit.
5. 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.
6. 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.

D. 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.**

Clients are advised not deposit any cash to company's account we accept fund through NEFT/RTGS Only.

4. 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.

E. PRE-FUNDED INSTRUMENTS POLICY

If the aggregate value of Pre-funded instruments is Rs. 50,000/- (Rupees Fifty Thousand Only) or more, per day per client, we may accept the instruments only if the same are accompanied by the name of the bank account holder and number of the bank account debited for the purpose, duly certified by the issuing bank. The mode of certification may include the following:

1. Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank.
2. Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument.
3. Certified copy of the passbook / bank statement for the account debited to issue the instrument.
4. Authentication of the bank account number debited and name of the account holder by the issuing bank on the reverse of the instrument.

We may maintain an audit trail of the funds received through electronic funds transfer to ensure that the funds are received from their clients only.

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. We allowed client to trade only after receiving full amount in upstream Account.
3. We will not provide Margin Trading Facility to any client. If client want to Purchase Security he or she has to deposit Full Margin in Upstream Account. After confirmation of Deposit we allowed to Trade. And if Client Want sale securities He or she has to do early pay in of security then after we allowed to trade.
4. Any amount payable on account of 'Mark 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.
5. 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. INVESTOR REDRESSAL SYSTEM/ MECHANISM

1. The company has a separate manual register for recording all clients related complain 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 complain 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 complain, the Compliance officer is authorized to dispose off the complain 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 off complain 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 complain.
6. The designated director's review the pending complains every seven days along with matters needed their attention.

H. POLICY ON UNAUTHENTICATED NEWS CIRCULATION

1. Employees / Temporary Staffs / Voluntary Workers etc employed/working in our office shall not be encouraged or they shall not circulate rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
2. Access to BLOGS / Chat Forums / Messenger sites etc. are either restricted under supervision of some responsible employees of the company or access shall not be allowed.
3. Logs for any usage of such BLOGS / Chat Forums / Messenger sites (called by any nomenclature) shall be treated as records and the same should be maintained as specified by the respective Regulations which govern our company.
4. Employees are directed that any market related news received by them either in their official mail / personal mail / Blog or in any other manner, should be forwarded only after the same has been seen and approved by the Compliance Officer of our Company. If nay employee fails to do so he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for actions. The Compliance Officer shall also be held liable for breach of duty in this regard.

I. BACKUP POLICY

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

Director

Kushal M Dalal