

Internal Control Procedure

We have adopted following internal control procedure in our company:

Trading

- 1. All trading staff to ensure that they take due precaution in taking orders from clients in accordance with the clients limit set by their supervisor daily.
- 2. To take the orders in respect of only those clients whose data have been uploaded and accepted in UCI.
- 3. To take orders only from the client himself and not from any other person.
- 4. To take precautions in trading in securities in which turnover is very low.
- 5. To keep updating their seniors regarding MTM and any suspicious trade of any client if any.
- 6. Not to trade in securities which are banned in F&O and inform the same to the client.
- 7. To give confirmation of trades executed to clients either immediately or at the end of trading hours in the evening.
- 8. To dispatch the contract notes and margin details daily in the evening to all the clients in respect of trades executed during the day.
- 9. Ensure at the end of every month that contract notes during that month along with daily margin statements have been sent to all the clients.

Accounts

- 1. Periodically we are getting the vouching, ledger scrutiny of our financial accounts.
- 2. Analyzing the debit balances of clients on an ageing basis and following up for recovery
- 3. To ensure that the payment is received in time as per pay in of stock exchange and also that payment is received strictly from the account of the client making the purchase.
- 4. To ensure that payment is made to clients in time as specified by the exchange unless otherwise directed by the client in writing. Also, that the payment is to be made only in the name of the client making the sale.
- 5. Reconciling our bank accounts on a monthly basis from the statements received from banks in respect of all our bank accounts at different banks.
- 6. Preparing the trial balance at the end of every month and reviewing the mistakes and correcting them.
- 7. Ensure at the end of every quarter that the accounts statements have been sent to all the clients



Delivery of Shares

- 1. Delivery staff must maintain a register for movement of deliveries.
- 2. To ensure that delivery is received only from the demat a/c of the client who has sold the shares.
- 3. To ensure that delivery is transferred in due time to the demat a/c of the clients who have purchased them unless otherwise directed by the clients in writing.

Miscellaneous

- 1. One of our senior staff member is scrutinizing the files of all our clients on a monthly interval and ensuring whether unique client code data is correctly uploaded or not.
- 2. To ensure that all grievances, if any, of the clients are resolved on a priority basis and a record of the same be maintained.
- 3. To ensure that all obligations in respect of NSE and all Govt Departments have been met in time.
- 4. To take due precaution in hiring staff for the company and also to organize training program for them on a periodic basis.