## A <u>Back Ground of company</u>:

JambuwalaGroup has been considered to be one of the most professionally managed organization and a distinguished business house in the field of financial services in Ahmadabad, India.

Separate policies are developed to the following:

- 1. Insider Trading
- 2. Error Trade Policy
- 3. Dormant client activation
- 4. Risk Management
- 5. Pre-funded instrument receipts
- 6. PMLA
- 7. Customer Acceptance policy

Reference to be taken individually from each policy with respect to internal control of the company.

## **Operations & Compliance requirements:**

- 1. The broking activity of NSE as well as BSE is being conducted within the prescribed rules and regulations.
- 2. All compliance requirements are being fulfilled.
- 3. A Principal Officer and a Compliance Officer has been designated for taking care of the operational as well as compliance requirement.
- 4. Each day, the concerned designated person checks for new circulars and notices being released by the Exchange.
- 5. All the circulars and notices, as well as various other intimations received from the Exchange are read carefully and understood by the designated person.

6. Details of all such circulars and notices are also being provided as well as explained to all the concerned staff members of each department in order to ensure full and complete compliance from the grass root level.

## **Collection and maintenance of Margins:**

- 1. Margin is collected only from those clients who trade in Derivatives segment of the NSE.
- Margin money is usually collected by us in monetary form by way of cheque or as collateral (securities). This margin is collected on the trading day itself. Towards fulfillment of margin requirement by way of collaterals, we collect only NSE approved securities with a haircut.
- We do not provide Margin Trading Facility in the Cash segment of NSE as well as BSE.
- 5. However, in case of any large transactions i.e. when any order for purchase of shares for a large amount is received, a part of the purchase value is collected by us upfront as margin money.
- Similarly, when a large amount of shares are being sold by a client, the delivery instruction for the same is also collected upfront before executing the order of such clients.

## <u>Receiving, validating & entering the orders of clients in the trading</u> <u>platform</u>:

- 1. For executing the orders of the clients the trading platform used is ODIN.
- 2. Usually, most of the clients place their orders for trading in shares either through visiting any of our offices.

- 4. The orders received during the day are entered in the trading platform for which an order file is generated.
- 5. Similarly, for all the trades executed through the trading platform during the day, a trade file is generated.
- 6. At the end of the trading session, once the trade file is generated, this file is uploaded in our back-office software.
- After uploading the trade file in the back-office software, the trades are then informed as well as confirmed with the clients for validating the trades.
- 8. Thereafter, the client-wise, Exchange-wise contract notes and bills for the trades are printed in the prescribed format of the Exchange. These contract notes and bills are then sent to the clients place by our Executives within the time limit as prescribed by SEBI/Exchange. In some cases, the clients collect it from our office where the dealing has taken place.
- 9. An acknowledgement for receipt of the contract notes and bills are also obtained from the clients.
- 10. Besides, the transaction details of the clients are also disseminated on our website. In order to view these details the client has to log in by using a secured user ID and password. By this, the client can view all his trades as well as payment details from our website.