

SAMCO SECURITIES LIMITED

Member: BSE, NSE, MCX-SX

Depository Participant: CDSL

INTERNAL CONTROL POLICY

ACCOUNT OPENING

We have a centralized in-house account opening team at Corporate Office in Mumbai; all the account opening forms along with relevant documents will be received at Corporate Office and processed further.

The word "Account Opening Form (AOF)" means a set of uniform documents / forms as prescribe in the SEBI circular No. CIR/MIRSD/16/2011 dated August 22, 2011 and additional voluntary documents / forms required to open Trading / Demat Account.

KNOW YOUR CLIENT / CLIENT REGISTRATION

On expression of wish or showing interest for becoming a client by any person, a copy of Client Registration Forms accompanied with the list of documents / proof require will be forwarded to the client.

Client Registration Forms after being signed and filled by the client will be received at our account opening department along with necessary documents & proof will be first entered in inward register.

At the client registration department all the client registration forms / documents received are checked and verified by our team as per check list, incomplete AOF if any to be intimated to concerned client, branch, AP or Sub-broker. If the deficiency in the form completed then form will process for open a account otherwise return the form to the concern client, branch, AP or Sub-broker.

If client registration documents found proper along with necessary supporting documents like copy of self-attested PAN, proof of Address / Identity and other supporting documents for Bank and Demat as prescribed by SEBI as per Uniform Documentary Requirement obtain from client then the details of client first enter in back office after finishing necessary documentation and generate client code from back office. Files generated from back office of clients are uploaded in the UCC / UCI system as per the selection of Exchange – Segment by client. After verifying correctly uploading of UCC file welcome letter will be send to client along with copy of KYC documents and all such KYC documents should be scanned and stored and physical forms should be arranged serial wise and stored. Send EOD email to Accounts, Dealing and Risk Management Team for all account opened during the day.

UPDATION / MODIFICATION

For each request for updation or modification of records; written request along with proofs should be collected and updated after proper verification. Updated proof should be scanned and immediately filed in the respective forms.

CLOSER OF ACCOUNTS

The client is required to submit written request for closure of account or for temporary suspension of account clearly stating period of suspension to respective branch, AP, Sub-broker office or Corporate Office. Upon receipt of request and after satisfying itself with respect to all information and settlement of client outstanding dues if any, act upon the request in reasonable time but not more than 30 days from the date of request.

CLIENT MAPPIN

As soon as the client account is open same will be map in the respective Branch, AP, Sub-broker terminals. The limit file is uploaded as per the policy of RMS policy. The internet Trading Clients connects to the company's network through its website or internet trading applications. In case of loss of connectivity the clients can call up the HO and get their orders place.

ORDER ACCEPTANCE AND PLACEMENT

The order will be placed by the respective dealer as per the instructions received from the clients; however it should be take care that the price put up should not be unrealistic or not representing the correct market price. Clients should not be induced to buy or sell. The dealer should take utmost care while executing trades of the clients regarding the accuracy of client code, quantity and price etc.

CLIENT TRANSACTIONS

Transaction of few major clients like HNIs, High Risk and of special category etc. would be monitored, and in case of any suspicious or doubt from our side of any malfunctioning if require client will be asked for explanation or if necessary to stop such kind of malfunctioning or may even ask for stop trading.

REGISTRATION OF INTERMEDIATERIES

The procedure as prescribed for registration of AP or Sub-broker will be followed. Brokerage will be shared with registered Approved Persons only after the Registration by the Exchange / SEBI.

TRADING TERMINALS

The trading terminals would be provided to the dealers who are appointed by the company or its registered sub-brokers / authorised persons. The guidelines laid down by the exchange for approved users and locations of trading terminals will be strictly followed. It would be made sure that there is no issue of trading terminals to unauthorized persons or at unauthorized locations.

The NCFM certifications norms of exchange will be followed. The data for new User ID as well as modifications of existing User ID should be immediately uploaded and documented.

RECEIPT AND PAYMENT OF FUNDS AND SECURITIES

The cheques from the clients will only be accepted from the accounts for which the client has submitted the proof to the company. In case of any receipt from the accounts for which the proof is not given by the clients the same will be demanded from the clients. Third party cheques will not be accepted from the clients and incase of any clients directly deposited any third party cheques in our Bank Accounts the same shallbe refunded to the third party.

Payments for the payouts will only be made to the clients through account payee cheques or through electronic transfer to the bank account mapped with us as primary bank account in back office. In no case DD / Pay Orders / Cash or Third Party cheques will be issued.

In case of pre funded instruments like pay order(s), demand draft(s), Bankers Cheques etc. the client has to produce a letter from issuing authority on its letterhead mentioning the following details along with the instruments;

- Date of creation
- Mode of Fund raised – Cash, debiting Saving / Current / OD A/c no _____ of Mr. /Mrs. _____
- Instrument Number
- Amount
- Favoring to

Only the instrument where the issuing Authority Name (Bank Name), A/c no and instrument funder name matches with our back office records will be accepted. The shares from the clients will only be accepted from the accounts for which the client has submitted the proof to the company. In case of any receipt from the accounts for which the proof is not available the same will be demanded from the clients. In case we receive shares from third party account the same will be returned to the third party.

Delivery for the payout will only be made to the clients and not to any third party. The delivery of shares will be withheld in our margin account as collateral until the debit balance of the client is cleared in full.

CONTRACT NOTES AND MARGIN STATEMENT

Company issues contract notes to all the clients at the end of trade day. Along with the contract note the company provides daily margin statement of the clients.

STATEMENTS OF ACCOUNS (FUNDS AND SECURITIES)

The statement of Accounts will be sent to the clients on quarterly or monthly basis or as instructed by client within one month of the end of the relevant quarter, as it will help avoid discrepancies in future. It would be also send as soon as account is settled.

OTHERS

Complete confidentiality of client information should be maintained. No client information would be given except if required by law. Proper records as required by various statues will be maintained.