

Policy for Pre-funded Instrument**Objective:**

The objective of the policy is to prevent acceptance of third party funds and to prescribe process to deal with instruments issued by third party when received.

Background:

SEBI vide circular no. SEBI/MRD/SE/Cir-33/2003/27/08 dated August 27, 2003 has specified that the stock brokers can accept demand drafts from their clients. However, SEBI vide circular no. CIR/MIRSD/03/2011 dated June 9, 2011, National Stock Exchange vide its circular no. NSE/INSP/18024 dated 09-Jun-11 and accordingly other Exchanges have also advised the stock brokers to maintain an audit trail while receiving funds from such clients through Demand Draft (DD) / Pay Order (PO) / Bankers Cheque (BC) since such third party pre-paid instruments do not contain the details like name of the client, bank account number are not mentioned on such instruments. Non maintenance of audit trail may result in flow of third party funds or unidentified money which may result into breach of regulations issued under PMLA and SEBI circulars.

Policy:

As a Policy of the Company, discourages receipt of funds from the Clients through Pre-funded Instrument which includes Demand Draft, Pay Orders, Banker's Cheque, Fund Transfer of third party through Internet.

This is to discourage the flow of third party funds or unidentified money into the System to avoid future litigations and comply with the Regulations of the regulatory bodies.

The Prefunded Instruments may be accepted under special circumstances with the permission of the Senior Management, The special circumstances include:

- Continuous Bank Holidays
- Client having account in other Banks or in Co-operative bank
- To Meet Immediate Margin / Settlement Shortfall
- To take Fresh Position
- Client's Bank / Branch or City does not have clearing facility
- Non Availability of cheque book or delay in procuring cheque book
- Default Client

If the aggregate value of pre-funded instruments is Rs. 50,000/- (fifty thousand rupees) or more, per day per client, the stock brokers 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 the certification may include the following:

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

In case of any receipt of funds by way of Electronic fund transfer, an audit trail to ensure that funds are received from the respective client only has to be maintained. Necessary details may be collected from banker through which the amount is received. If the pre-paid instrument is received through post or any other method where client does not directly interface for submission of the instrument and the instrument does not contain the information as required above, the following action may be taken:

- Contact the client immediately and seek information. Not to be credit the instrument until the information is given by the client.
- If the pre-paid instrument is bank transfer, contact banker immediately for the details and not to utilize the amount so credited until the details are received and not to give credit to the Client until banker gives the details/certification.

All such Credits which are directly credited into the bank, where details are unidentifiable or received from third party, may be credited to suspense account.

While giving credit to respective client's ledger, Head office needs to cross check / verify with documents that such instrument is received from respective client Account only. The Audit trail record of all such pre funded instruments received is maintained in the prescribed format.

Policy Review:

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.