

**RISK MANAGEMENT POLICY OF THE FIRM WITH RESPECT TO
PROCEDURE TO BE FOLLOWED FOR CLIENT REGISTRATION &
DOCUMENTATION AND FURTHER DEALINGS WITH THE CLIENT**

The operations of the firm are on a small scale & the firm has a very strict system of analyzing the clients & only if the client meets the various parameters they are registered as clients and their account is opened. The firm will follow the following procedure (internal controls) with respect to Client Registration & Documentation, Order Management & Margin Collection and dealing with client's funds and securities based on the guidelines issued by SEBI and Stock exchange in this regard:

I) CLIENT REGISTRATION & DOCUMENTATION

1. The clients will be given KYC FORMS for being registered as a client Only if the client is either known to directors of the firm or introduced By any existing clients or either introduced by sub-broker or Remisier, which needs to be filled in completely by them and duly Signed and submitted personally to the firm along with the original Supporting documents
2. The Compliance Officer or partners of firm will personally meet the client, will check all documents given by client with original, check genuineness of client & also will assess client's financial position, risk appetite, investment objectives, past credentials, qualification, current working position etc and after being satisfied will register the client & will allot a UCC (Unique Client Code) to the client. On allotment of UCC client will be given entire set of KYC form with UCC mentioned on same and same will be uploaded to the respective exchanges before execution of trade.

II) ORDER MANAGEMENT & MARGIN COLLECTION

1. Every client will be dealing directly either with authorised staff or sub-broker/remisier of the firm as due diligence was done while registering client, they are in a proper position to analyze the

- capability, the risk appetite & investment pattern of the client thus proper risk assessment of the client can be made.
2. As the clients are personally known to directors/sub-broker, overall exposure will be determined for each client on the basis of client Financial capability & risk appetite.
 3. The risk with respect to trades done by the client is regularly assessed by the directors/sub-broker. directors/sub-broker being regularly interacting with client is aware of the trading pattern & thus in a position to determine the risk vis-à-vis every trade done by the client.
 4. Though the firm will collect the upfront margin from the client as and when required by the exchanges as per the segments however firm will strictly follow
 - a) Collection of full margins as per the exchanges
 - b) In case of large value transactions part or full advance will be insisted from the client
 5. The exposure with respect to every sub-broker/ terminal will be controlled by compliance officer/directors. As sub-brokers are having direct terminals the exposure limit will be defined to control the risk exposure of sub-broker/terminal.
 6. Compliance officer will regularly assess the trades being executed by Clients/sub-brokers/sub-broker's client to check the trades in illiquid/ Risky stocks. The past operation will also be tracked, to assess the risk Level of the firm in dealing with such clients. The trades in high risk category stocks as specified by BSE and NSE will not be allowed, unless a special permission granted & only after due consideration. The compliance officer/ directors will allow temporarily a specific exposure limit for dealing in Z group stocks
 7. In case of a failure/default of a client to make the payment for the Shares purchased/traded, the shares purchased & lying in firm's pool Account will be squared off within the time limit prescribed in exchanges Bye-laws & arbitration to be filed against the client to recover the Money, however to square off the position in prescribe time or not & Enough opportunity to be given to client & to make the payment will Be at sole discretion of the directors of the firm

III) DEALING WITH CLIENTS FUND & SECURITIES

1. Firm will not accept/give any cash to any client for execution of any Trade
2. The client payment/shares will be tracked to have been received only from the designated bank account/dp accounts mentioned in KYC form which will be tallied with master detail on back office software. In case of any deviation in bank detail, proof of same will be obtained from the client & master detail will be updated accordingly in back office software.
3. Pay-in/ pay-out of funds & securities will be made to the Respective client only

Approval by the directors of the firm

We have approved this Risk Management policy as reasonably designed to achieve and monitor our firm's ongoing compliance with the requirements of the exchanges/SEBI.

For Ina Stock Broking Co. Pvt Ltd

Director