

POLICY AND PROCEDURES

INTRODUCTION

Samdhyan Commodities Brokers Private Limited (hereinafter referred to as the 'PCAS') a body corporate registered under the provisions of the Companies Act 1956, is a SEBI registered stock broker of the Multi Commodity Exchange (MCX).

The company has adopted various policies & procedures for internal control measures & tools for compliance of various Acts, rules & regulations of the SEBI and Exchange.

➤ APPLICABLE BROKERAGE RATES & CHARGES

The Schedule of Brokerage and other charges applied by PCAS on the clients are provided under the heading "Tariff Sheet" in the client account Opening Form. Within the mentioned scale, the brokerage and other charges as agreed by the client is indicated and duly signed by the client in that section.

If there is any upward revision of brokerage, the same will be informed to the client with 30 days prior notice. However, all the brokerage and other charges are subject to the maximum limits as prescribed by SEBI/ Exchanges/ Government and other Regulatory authorities from time to time.

➤ PAYMENT POLICY:

Payments to clients shall be made on Settlement basis (i.e. T+2). All payouts request will have to be compulsorily placed on the back office access provided to the clients. All payout requests will be processed electronically and the credit shall come to the client's primary bank account within 24 hours of having processed the payout request.

For clients who are desirous of keeping the pay out money with us for future transactions can do so by submitting a letter to that effect mentioning therein to keep their account as 'running account' and periodical cheques may be paid or received. However, the clients are required to neutralize and settle their account once in ever one/three months.

Clients, who have debit balance in one segment and credit balance in other segment, will be paid only if their net balance is credit.

Margin Money to the clients will be returned only after adjusting debit balance, if any, in their account and/or if they have not defaulted in their obligation to deliver shares/securities.

➤ RECEIPT POLICIES

Clients can transfer funds into the Trading Account only from such bank accounts which are registered with PCAS. Any transfer from a non-registered bank account will not be considered

and the client does not get any trading limit credit for such transfers.

No cash payment will be received from/ made to the client as per the extract SEBI/ Exchange/ Income Tax/ PMLA Regulation, Guidelines, Circulars, etc. accordingly PCAS will not be responsible for any claim of receipt/ payment in cash by client from/ to PCAS.

Client can choose to transfer funds through NEFT or by means of cheque and there will be no cost for that.

If the client transfers funds via cheque, the details of the transfer along with a copy of the cheque should be made available to PCAS for the credit to be updated on the trading account.

While receiving RTGS / NEFT from client it must be ensured that the same has been received from clients registered account only. Proper record of the UTR number should be maintained.

➤ **PRE-FUNDED INSTRUMENTS POLICY**

If the aggregate value of Pre-funded instruments is Rs. 50,000/- (Rupees Fifty Thousand Only) or more, per day per client, we 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 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.

We may maintain an audit trail of the funds received through electronic funds transfer to ensure that the funds are received from their clients only.

➤ **SHORTAGES IN OBLIGATION AND INTERNAL AUCTION:**

The stock broker shall not be obliged to deliver any securities or pay any money to the client unless and until the same has been received by the stock broker from Exchange, the clearing corporation/house or other company or entity liable to make the payment and the client has fulfilled his / her / its obligation first. In case of default in security pay in by the client and the shortage is at member level i.e. internal shortage then the benefit calculated at the next day's closing rate after pay-out day shall be recovered from the defaulting client and passed on to the respective beneficiary client.

In case of the default of securities pay-in by the client and the shortage is from the exchange, auction value of the respective exchange plus penalty (decided by the member from time to

time) plus brokerage and other statutory charges shall be recovered from the defaulting client. In the case of funds default by the client, the member shall be liquidating the stocks to recover the money. Any shortfall arising out of liquidating securities by the members shall also be recovered from the defaulting client along with interest (decided by the member from time to time).

➤ **INVESTOR REDRESSAL SYSTEM/MECHANISM**

The Compliance Officer shall be the designated officer for handling the Investors Grievances and Client Complaints. The email ID you can write to in case you have any grievance is compliance@samdhyan.com and the same displayed on our website and the same also mentioned on the contract notes and other correspondence if any sent to the client from time to time.

The company has also kept manual investors complain register at its all branches and the same are verified by the compliance officer or its team of official from time to time.

On receiving the complaint, the Compliance officer is authorized to dispose off the complain on its merit and write personally to the client of all action taken by him for satisfaction of the client.

➤ **POLICY ON UNAUTHENTICATED NEWS CIRCULATION**

Employees / Temporary Staffs / Voluntary Workers etc employed/working in our office shall not be encouraged or they shall not circulate rumors or unverified information obtained from client, industry, any trade or any other sources without verification.

Access to BLOGS / Chat Forums / Messenger sites etc. are either restricted under supervision of some responsible employees of the company or access shall not be allowed.

Logs for any usage of such BLOGS / Chat Forums / Messenger sites (called by any nomenclature) shall be treated as records and the same should be maintained as specified by the respective Regulations which govern our company.

Employees are directed that any market related news received by them either in their official mail / personal mail / Blog or in any other manner, should be forwarded only after the same has been seen and approved by the Compliance Officer of our Company. If any employee fails to do so he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for actions. The Compliance Officer shall also be held liable for breach of duty in this regard.

All the above policies and procedures of Samdhyan Commodities Brokers Private Limited as applicable to the client's trading account are subject to change/updation by Samdhyan Commodities Brokers Private Limited from time to time. The updated policies and procedures of Samdhyan Commodities Brokers Private Limited shall be posted on the website of www.samdhyan.com and communicated to client through circulars and e-mails.