



RISK MANAGEMENT POLICY

(Reviewed and updated upto 05.02.2022)

1. OBJECTIVE:

Mukul Amratlal Sonawala (hereinafter "Proprietorship") broadly takes into consideration the regulatory requirement, Client Profile, Internal Risk Management Policy, Market Conditions etc., while setting up the exposure limits for and on behalf of its clients.

The Policy envisage collection of pay in, margin, limits setting for exposures & turnover for clients, terminals, branches & sub-broker level, Monitoring of Debit Balances, Periodicity of such monitoring, periodic reconciliation wherein client has expressly accepted the balance confirmation, Steps taken for recovery of old debts, penal interest charged for long outstanding debts, Mechanism of pay-in and pay-out of funds and securities, Payment, Receipt of funds from/to clients, Policy of square off of positions.

2. RESPONSIBILITY:

The Compliance Officers shall be responsible for the implementation and supervision of this Policy.

The Compliance department and Risk Management department (RMS dept) shall assist and report to the Compliance Officer on a daily basis in respect of all RMS matter.

The Compliance Officer shall take all necessary steps to monitor, document, analyze and report the findings to the Board Members as well as the relevant Stock Exchanges and/or regulatory bodies, in a time bound manner, as detailed hereunder and/or as mandated by the Stock Exchanges and/or regulatory bodies.

The Compliance Officer shall exercise his/her independent judgment and take adequate precautions to ensure implementation of an effective monitoring mechanism, based on the day-to-day activities of the clients, general market information and the facts and circumstances.

The Board of directors shall peruse, review and provide necessary guidance with regard to the "Risk Management Policy", periodically, for strengthening the processes.

3. CLIENT'S ACCOUNT - ACTIVATION, MAINTENANCE ETC.:

For a new client, password should be auto generated, without human intervention and should be automatically mailed to the client from within the Surveillance system. Once a client is provided with a password, the client will be forced to change the password mandatorily after first login. If the password is forgotten or the client is unable to reset the same through the online portal, the request for password change shall be entertained only through written request or through mail from the registered mail ID of the client. Any changes made in the client account like unlocking, changes in Client Profile, and trading segment addition shall be done only based on the request made by the client either by way of letter or E Mail from his registered e mail ID duly supported by document proof wherever required.

