

Internal Control Procedure

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❖ **Acceptance of Client**

- No Walk-in clients should be registered as client or allowed to trade. In exceptional circumstances, if any walk in client is registered then he should be allowed to trade only after undergoing a proper procedure of client identification. In addition to the client identification procedure, such walk in client should be allowed to trade only to the extent of security provided initially till the period a confidence on the financial credibility is developed. With the passage of time and after development of sound business relationship with the client, such walk in client will be treated at par with any normally registered client.
- Only those new clients would be accepted and allowed to trade with us, who would be referred to us by any of the following:
 - 1) Directors;
 - 2) Relatives or Family Members of the Directors;
- On expression of wish for becoming a client by any person, a copy of Client Registration Form along with other documents and forms will be forwarded to the client. The copy of the CRF will also be accompanied with the list of documents and additional documents or proofs required.
- Client Registration Form after being signed and filled by the Client will be received at our Client Registration department.
- At the client registration department, the documents are checked and only after they are found proper they will be counter signed by us. The client code generated will be communicated to the client after completion of entire procedure.
- A prospective client will be allowed to trade only on satisfactorily submission of required documentary proof and proper signing of documents.

❖ **Client Identification**

The following procedure should be adopted for identification of Client:

- As far as possible, no clients will be registered without personal contact.
- In addition to personal contact, for client identification, proper address and identity proof as prescribed by SEBI as per Uniform Documentary Requirement will be obtained from the client.
- PAN number and a Copy of PAN card will be compulsorily obtained from the client. No trading will be allowed unless the proof of PAN proof is submitted by the client.
- All the documents collected will be verified with original by the Client Registration Department

❖ **Registration of Intermediaries:**

- The procedure as prescribed for registration of Approved Person's will be followed.
- Brokerage will be shared with the respective Approved person only after the Approval of Registration by the Exchange.
- No Brokerage will be paid to the Approved Person for the trades executed prior to registration.

❖ Issue of Trading Terminal

- The Terminal User should be NCFM/BCSM certified. Before allowing the user to operate the terminal, the copy of NCFM/BCSM certificate will be collected and verified with the original.
- The user will be asked to renew the NCFM/BCSM certificate on its expiry. If the user fails to renew the certificate then he would not be allowed to operate the same any further. The renewed copy of the certificate will be re-obtained and verified with original.
- The guidelines laid down by the Exchange for Approved User and Location of trading terminal 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 data regarding new user as well as modification in existing user should be immediately uploaded and documented on modification or issue to the new user as the case may be.

❖ **Margin Collection:**

- Any exposure to the client will be subject to the collection of adequate margins from the clients.
- The margins collected would be as per the requirements of the Exchange.
- Margins collected would be in the form of Shares, Cash or Credits.

Amit Jasani Financial Services Pvt. Ltd.

Member : National Stock Exchange of India Ltd.
Bombay Stock Exchange Ltd.

Registered Office : Hind Rajasthan Chambers, 3rd Floor, 6, Oak Lane, Fort, Mumbai-400 001.
Tel.: 6614 5678 / 6614 5641 • Fax: 6614 5656 • E-mail: ajfsl@nayaissue.com



❖ **Transactions of Clients:**

- Transactions of all major clients would be monitored, if required and in case of any suspicion from our side of possibility of any malfunctioning by the client. If required the client will be asked to stop such kind of malfunctioning or may be even asked to stop trading.

❖ Pay-in & Pay-out of funds & Securities

- All payments shall be received / made from / to the clients strictly by account payee crossed cheques / demand drafts or by way of direct credit into the bank account through EFT, or any other mode allowed by RBI.
- We shall accept cheques drawn only by the clients and also issue cheques in favour of the clients only, for their transactions. However, in exceptional circumstances we may receive the amount in cash, to the extent not in violation of the Income Tax/ SEBI requirement as may be in force from time to time.
- In case of securities, we shall give/ take delivery of securities in "demat mode" should be directly to / from the "beneficiary accounts" of the clients except delivery of securities to a recognized entity under the approved scheme of the stock exchange and / or SEBI.
- We shall make the clients pay-in from the securities purchased by him in the previous settlements & are lying with us.
- In case of internal shortage of shares the stock is recovered from the market on behalf of defaulting client (seller) and delivered to the buyer on receipt of the stock from the clearing corporation.

❖ **Monies & securities deposited with the exchange towards margin:**

- Adequate margin in the form of monies/ securities/ collaterals shall always be kept with the exchange
- The form and mode of the margin shall be as per the guidelines of the clearing corporation issued from time to time
- In case the clients shares/ monies are utilized for depositing margin with the exchange the same shall be utilized only with the specific written consent of the clients.

❖ **Payment of Dividend:**

- Dividend/ other corporate benefits shall be paid/ credited to customers account within a reasonable time but not exceeding 30 days.
- In case of delay beyond 30 days the matter shall be reported to compliance officer
- The dividend/ corporate benefits of client shall be kept in a separate client bank/ client beneficiary account till the time the said is passed on to the customer.

❖ **Placement of Order:**

- The orders will be placed by the respective Dealer as per the instructions from the clients.
- However, it should be made sure that the priced put up should not be unrealistic or not representing the correct market price.
- Everytime before execution of order a final confirmation of the entire order should be made to the client.
- The clients should not be induced to either Buy or sell.

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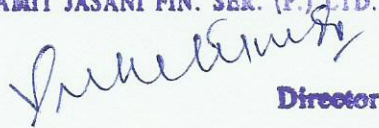
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❖ Other Areas:

- 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 statutes will be maintained.
- Customer complaints should be immediately attended by the concerned department and in case the complain remains unresolved within 1 week the same should be escalated to the Compliance officer. If the complain remains unresolved for a further period of 1 month the same should be reported to the Director-Operations who shall personally look into the customer's complain. A specific (designated) email ID is created for customer complaint and shall be regularly monitored by the compliance officer.

For AMIT JASANI FIN. SER. (P.) LTD.


Director

Contract Note

- Whether printing of contract note is centralized?

Yes, We send ECN to all of our clients and we are issuing physical contract notes to few clients only those who have requested for the same and not having email ids.

- Procedure for printing CN in case of outstation clients/sub broker clients:

Outstation clients registered with us very less and ECN send to them. Issuing of CN to all clients including sub broker clients from our registered office only.

- Basis of numbering

Serially starting from 1st April

- System for maintaining duplicates and acknowledgement for CNs

POD affixing on the duplicate copies

- Whether consent for change in e-mail id is obtained through physical letter from the clients?

Yes

Statements of Accounts:

- Statement of accounts for funds and securities are issued to clients on quarterly basis
- No statement of accounts are issued from the branch/sub broker's office
- Statement of accounts are issued through digitally

Execution of POA

The company is not accepting any POA from the clients.

Opening and Closing of branches

The company is having only one branch and the number of client is very less.

Closure of client accounts/dormant account

- The number of clients registered with us is not huge and all clients are regularly trading with us. If the client wants to close the account, we are requesting them to issue a letter for the same.
- In case of dormant account (six month) before executing the trade, we normally check the outstanding balances from the accounts department and with an intimation to the management, the orders are placed.
- For old dormant account we are asking the financial details i.e. I.T. Return, Bank statement for the last 6 month and addendum to KYC documents.

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Receiving and Execution of Orders

Our sub brokers does not have any office and placing orders on behalf of its clients through our dealers only.

Clients walk into the office and place the order is very rare

All the orders are placed by the respected dealers/key management personnel from their respective clients, so they are identifying authenticity of the caller

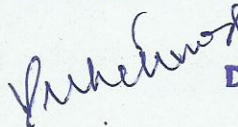
Portfolio Manager

We are not acting as a portfolio manager

Brokerage Charges

Brokerage schemes are provided to our clients in the KYC documents.

For AMIT JASANI FIN. SBR. (P.) LTD.


Director