

## Internal Control Policy:

### 1.0 Objectives:

- To ensure that the company and its various departments are run in accordance with management policies
- To ensure that the company does not suffer any losses due to lack of controls
- To plug the loopholes that could lead to revenue leakages

### 2.0 Policy:

#### 2.1 Reporting Authorities:

Company has following functional divisions/ departments.

Staff in following departments would report to their respective function heads as under:

<b>Department</b>	<b>Function/ Department Head</b>
Dealings BSE cash	<b>Umang Sheth</b>
Internet Dealing [FOW]	<b>NA</b>
Compliance	<b>Kamlesh Sheth</b>
Accounts & Finance	<b>Umang Sheth</b>
Back Office	<b>Umang Sheth</b>
Back Office Software	Soham by Prism Cybersoft Pvt Ltd
Administration & HR	<b>Umang Sheth</b>

All functional heads would report to Proprietor (Mr. **Kamlesh Sheth**). In particular, matters relating to Compliances or High-value transactions should be reported to Director, Mr **Kamlesh Sheth**)

#### 2.2 Maker- Checker Policies:

All divisions will have a maker-checker system in place

There would be two levels of controls exercised. All transactions would be authorized by respective department heads. High value transactions (above 5 lakhs) would require additional authorization of directors.

Cheque signing authority would be restricted to following persons

	<b>Signing Authorities</b>
Client Payout Cheques	<b>Kamlesh Sheth</b> <b>Umang Sheth</b>
Expenses (Non- Client) Cheques	<b>Kamlesh Sheth</b> <b>Umang Sheth</b>

Delivery Instruction slips signing authority would be restricted to the following persons

- **Kamlesh Sheth**
- **Umang Sheth**

Further following activities would require the approval of directors

- Changes in brokerage master
- Changes in depository charges
- Capital Expenditure

### **2.3 Internal Audit:**

The company would be subjected to internal audit. Internal audit would be conducted by independent CA firm Kamlesh P Mehta & Associates.

Internal auditors would audit various departments as per audit program agreed mutually with the management.

Internal auditors would directly report to Board of Directors.

Client Registration, Documents maintenance:

KYC sent to the Clients through our Head/registered/corporate office who introduce new clients. We will not entertain the direct clients without knowing their past history & the financial details.

We have a proper & well trained staff who does the entire KYC activity.