

MACY SHARES & STOCK BROKERS PVT.LTD

Member, National Stock Exchange of India Ltd. Capital & Derivatives

SEBI Regn No.: INZ000271830 Member Code : 07140

Regd. Office : 6 C1-2, Court Chambers, 35, Vithaldas Thakersey Marg,

New Marine Lines, Mumbai-400 020.Tel: 022-6639 0005/6/7 E-Mail : : macysecurities@gmail.com / macyshares@rediffmail.com

MACY SHARES & STOCK BROKERS PVT LTD. RISK MANAGEMENT POLICY

Background legal requirements of this policy

1. Past requirements of exchanges/ good practice(s)
2. SEBI circular CIR/HO/MIRSD/DOP/CIR/P/2019/75 dated June 20, 2019 as modified by SEBI/HO/MIRSD/DOP/CIR/P/2019/95 dated August 29, 2019
3. Frequently Asked Questions issued by
 - a. BSE vide notice no. 20190927-39 dated 30-Sep-2019
 - b. NSE vide circular no. NSE/INSP/42229 dated 30-Sep-2019

MACY SHARES & STOCK BROKERS PVT LTD. (MACY) is a member of the National Stock Exchange of India Limited (NSE) and is registered with SEBI as a Stock Broker with SEBI Registration Number INZ000271830. MACY is currently active in the Cash Market and the Equity Derivatives Segment.

As per the Stock Broking Operations, client trade with MACY. To manage the risk of such trading and to comply with the requirements of law and as a good practice, the following Risk Management Policy is being issued for the knowledge and information of the clients, employees, Authorized Persons and other stakeholders of MACY.

1. Risk Officers

Mr. Mahesh CKhubchandani, Director is designated as the Chief Risk Officer (CRO) of MACY. All decision relating to risk matters will be taken himself.

2. Limits setting - offline business (cash market)

MACY business model is more towards an offline business rather than online business. Most of the clients have relationship based business. All clients would have to provide 100% funds before purchasing the securities before trading. However, based on the past relationship, trading behavior of the client, the known financial standing and the value of collateral deposited/ lying with MACY, dealers and Authorized Persons have the discretion to permit additional exposure to the clients, both intra-day and on delivery basis, in the Cash Market. However, the said exposure cannot exceed the minimum margins payable per the Clearing Corporation.

3. Square up - online business

Internet trading clients will be set limits according to their track record and margin available with MACY. Where the limit is breached, clients will not be permitted to take additional exposure by the system.

All online business is carried through the software provided by BSE (BOW) Currently, MACY has not activated any feature of do not have any policy of auto square-up of the clients positions, and the positions have to be squared up by the clients manually.



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4. Restriction of further exposure on T + 5 days

For any client continuously in debit for more than 5 days, further buying is to be stopped immediately and only sale will be permitted. As soon as the account comes in credit, further buying will be allowed.

5. Non-payment of pay-in obligations/ dues

Where the client is in debit and no request/ intimation has been received from the client (either directly or through the Authorised Person) for permitting continuation of the debit, the positions of the client may be squared off after due notice of one working day.

In case of account still being in debit, notices to be issued and thereafter arbitration to be filed.

6. Transfer of

SecuritiesIn cases where:

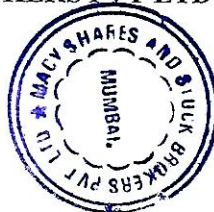
- in any situation as seen expedient by the DCRO securities will be transferred to the demat account of the client even if the account of the client with MACY SHARES & STOCK BROKERS PVT LTD. is in debit. MACY SHARES & STOCK BROKERS PVT LTD. shall have a lien on such securities till such time payment is received by MACY SHARES & STOCK BROKERS PVT LTD. for the same.

In all other cases, the securities will be transferred to demat account called Client Unpaid Securities Pledge Account (CUSPA) maintained by MACY SHARES & STOCK BROKERS PVT LTD. and all regulatory directives relating to CUSPA will be followed.

MACY SHARES & STOCK BROKERS PVT LTD



(Udhayakumar Mani Nadar)
Compliance Officer



The above revised policy was approved by Macy Shares & Stock Brk.Pvt.Ltd at the Board meeting held on 10-Nov-2022.