

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:

Department	Function/ Department Head
Dealings BSE cash	Viral Jadav
Internet Dealing [FOW]	Hitesh Barot
Compliance	Hitesh Barot
Accounts & Finance	Harshad Rathod
Back Office	Priyank Patel
Back Office Software	Comtek Software technologies Pvt Ltd.
Administration & HR	Harshad Rathod

All functional heads would report to Board of Directors (Mr. **Harnish M. Shukla**). In particular, matters relating to Compliances or High-value transactions should be reported to Director, Ms. **Kanika H. Shukla**

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

	Signing Authorities
Client Payout Cheques	Harnish M. Shukla Kanika H. Shukla
Expenses (Non- Client) Cheques	Harnish M. Shukla Kanika H. Shukla

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

Harnish M. Shukla
Kanika H. Shukla

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 Mehta Sanghvi & 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.