

Risk Management Policy

Client Registration, Documents maintenance

For all the active clients in Cash & Derivatives Segment of NSE, We are maintaining client registration document duly filled in the prescribed format from all the clients. We maintain KYC, Risk Disclosure form, Member client Agreement, and all other proofs and documents as required. We have maker- checker concept to avoid misuse by filling up data on the unfilled areas viz. segment, space provided for giving e-mail id, etc. We do not entertain walk in clients In case of non corporate client financial capability is assessed based on Income declaration submitted by client on annual basis. In case of Non corporate client it is assessed basis of Audited Financial statement / ITR of the client. We have In house client registration modalities All records regarding client registration documents are stored in fire-proof cabinet.

Sales Practices followed by the Trading Member

We do not have separate Marketing division for Retail Segment. Although the Institutional desk have sales team which caters to Institutional clients. We have never launched any promotional schemes for sales. We make every client aware of the risk associated with trading / Investing in derivatives segment. We do not any freebies like free demat a/c etc. Regarding closure of a/c we take request letter to close the A/c from client.

Closure of Client accounts/ Dormant accounts

Clients who have not traded for more than 1 year or such other reasonable period as may deem fit to the concerned officer/ Director are treated as dormant accounts. In case any other request are received in such UCC the same is informed to the concerned officer/ Director. customer has to place the order personally to the dealer. The orders are confirmed with the client on telephone / personally at the end of the day by the concerned officer/ Director, however the same is not documented.

Order Receipt and Execution

We have telephone recording System for Institutional Clients and records are maintained for 6 months. After execution of trade we confirm the trades executed with clients. We have never exercised discretionary powers to execute client orders. For FII clients we receive order through Bloomberg only. For domestic Institutional clients it is through Bloomberg or through recording lines.

Sending Contract Notes, Daily Margin statement, Quarterly Statement of Accounts to clients

The contract notes are sent to clients through Hand delivery or courier within next working day of completion of trade . The register is maintained for when contract is send through courier. We also send contract notes through email or ECN for derivatives segment.

Collection of pay in, margin, limits setting for exposures & turnover for clients, terminals, branches & sub-broker level

We have no branches and Sub Brokers. Regarding limit setting of terminals, all the trading terminals are installed at Head Office only and are under the direct supervision of concerned director. So limit setting and mapping of clients is done on their instructions. 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 Cheque, Shares, or Intergroup company balance. No cash is accepted.

Monitoring of debit balances

The Debit balances of clients is monitored on daily basis and confirmations are send to them on quarterly basis. Regarding recovery of old debts regular Follow up is done with clients for collection. We do not charge any penal interest for long outstanding debts. We do not allow clients to trade if long out standing debit balance is there. How ever in exceptional cases directors take the call on case to case basis for further trading and penal interest.

Allotment, Surrender of trading terminals

Regarding limit setting of terminals, all the trading terminals are installed at Head Office only and are under the direct supervision of concerned director. So limit setting and mapping of clients is done on their instructions. All the necessary information is submitted to the Exchange from time to time as required. Regarding receipt of funds from clients is done within next working day of trade and payment is made to them on request by client. Delivery of Securities to clients is done within next working day of pay out subject to receipt of funds from clients and on request by client We do not have any sub broker or branches.

Square off of positions / Liquidation of securities without consent of clients

Regarding Squaring off of clients position, till date not squared any positions of clients.

Policy for internal shortages

If there is an internal shortages between inter client then immediately the relative quantity of stock is purchased from exchange and it is debited to the client who has failed to deliver the stock. And the same stock is delivered to the buying client. There is no waiting period for after payin time for purchase of non delivered internal position.

Transfer of trades

Transfer of trades is done only in case of Change of Schemes given by Institutions. The above transfer of trades is only permitted in case of Institutional Trades. Only in couple of Instances wherein there is punching mistake for the same client the code can only be changed in post closing session of the exchange. Transfer of Trades in Back office is strictly not permitted. To find out reason for such transfer Order Log checked for changing the client code.

Investor Redressal Mechanism

Regarding Investor Redressal, we maintain complaints register centrally. The clients are well informed about email id for redressal of investor grievances. Till now none of our clients have registered any complaints against us with the exchange. Our clients have not registered any complaints against us. Till date we have no complaints pending against us. We have compliance officer to resolve the complaint if any. We maintain acknowledgement on 2nd copy or POD of courier for receipt of contract notes by clients. Regarding collection of margins debits, daily review of clients ledger is done and any pending debits are immediately called for. Only one back office software is used for billing and accounting purpose ie. Comtek bizsoft. Regarding authenticity of transactions carried out in dormant accounts (not being operated in last six months) The contract Notes are send by Back office and debit if any is called from Back office. So the client will immediately reject the contract if he has not traded for. We do not take any POA is taken from clients.

Internal Audit System

Internal Audit is undertaken on regular basis and Half yearly report is submitted to exchanges made mandatory by SEBI.

For ULJK Financial Services Pvt. Ltd

**Madhavi Vora
(Director)**

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