



LLP Identification Number: AAX-1400

INTERNAL POLICY ON NISM CERTIFICATION ON SORM NISM SERIES VII

The policy approved by the Board of Directors.

The policy made as per SEBI notification no. LAD-NRO/GN/2010-11/21/29390 published in the Gazette of India on December 10, 2010 and the Exchange circular NSE/INSP/16536 dated December 15, 2010.

Introduction:-

SEBI issued Notification no. LAD-NRO/GN/2010-11/21/29390 dated December 10, 2010, according to which, following categories of associated persons associated with a registered stock broker/trading member/clearing member in any recognized stock exchanges.

Objective:

To ensure implementation of regulatory requirement of requisite standard minimum knowledge and certification for the personnel directly or indirectly involve in dealing with investors assets, grievance and risk.

- a) Assets or funds of investor or clients.
- b) Redressal of investor grievances
- c) Internal Control or risk management and
- d) Activities having a bearing on Operational risk

In the view above mentioned functions company initiate for completion of securities operation & Risk Management (SORM) examination of personnel supervising or head of the departments those involve in the above stated functions. Following roles have been identified which are associated with above mentioned activity & need to mandatory have NISM Series VII (SORM) certification.

- Client Registration Process
- Banking /Back-Office Department
- RMS Department
- Compliance / Investor grievances Department
- Dealing Room
- Business Associate Operation
- Branch

Following activities are identified as basic elementary level/clerical level & SORM exam certification requirement would be optional for the personnel perform under their ~~Relationship Manager/ Department head /Branch Head.~~



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Internal control or risk management

1. In warding of collateral's /cheques
2. Person performing maker entries
3. Maker entry in the database
4. Photocopying, printouts, scanning of documents
5. Preparing of MIS
6. Sending of letters/reports to clients, Exchanges, SEBI
7. Attending calls, etc.

Redressal of investor grievances

1. Inwarding of complaints,
2. Seeking documents from clients
3. Person performing maker entries
4. Maker entry in the database
5. Photocopying, printouts, scanning of documents
6. Preparing of MIS
7. Sending of letters/reports to clients, Exchanges, SEBI Updation, data entry, uploading on SCORES.
8. Attending calls, etc.

Activities having a bearing on operational risk and dealing with assets or funds of investors or clients

1. Person performing maker entries
2. Maker entry in the database
3. Preparing MIS
4. Generating reports, Files
5. Photocopying, printouts, scanning of documents
6. Dispatching documents to clients
7. Sending of letters/reports to clients, Exchanges, SEBI
8. Attending calls, etc.

Any personnel Associate with specific functions as & above ~~Relationship Manager / Manager~~ / department Head/ Branch Head shall ensure to obtain valid SORM certification within one year from their joining date.

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