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Internal Controls Manual

1. Registration of clients

- 1. All client forms received will be screened with reference to the following:
 - A. Form is properly filled and signed: brokerage rate is mentioned; introducer's name is mentioned.
 - B. All requisite documents are attached: DP Proof, Bank Proof, Residence Proof, Identity proof, photograph, Pan Card copy, Stamp papers are duly signed.
 - C. Pan No. is verify with original & IT Website.
 - D. Brokerage is mentioned on each form.
 - E. Form for office use only at page 24 is filled up as far as possible.
 - F. Allot code no. and upload all details on NSE
 - G. In person verification.
- 2. After checking the forms, it will be sent to Designated Person for a final check up before allotment of any code. DESIGNATED PERSON will also mention the name of the dealer.
- 3. Once it is okayed by DESIGNATED PERSON, a code no. will be allotted and forms will be uploaded in all segments; NSE & F&O and the date of uploading will be mentioned on the front side of the back page.
- 4. Then the format will be made in 2 copies; one copy for client; one for record and back office.
- 5. The format will be signed by AUTHORISED SIGNATORY and dispatched to client.

Subsequent changes in client records		: Person designate	: Remarks
1.	All changes regarding name change/address	Authorised	
	change/DP change/brokerage change is to be carried	Person	
	out on receipt of written communication from the sub		
	broker/client along with documentary proof, as		
	required		
2.	Upload the change on NSE and mark this fact and	-do-	
	date on letter received and give the same to Filing		
	Department for filing.		
Changes in User Ids			
1.	Different formats are available for change of user; for	Back office/	
	new user; for shift of user; shift of ID from one	Authorised	
	place/one connectivity/to another place/another	Person	
	connectivity under the file 'approved user'		

Dogular shooking of NSE singulars	
Regular checking of NSE circulars	Camaliana.
1. Daily basis checking NSE sites for circulars relevant to	
us is required to ensure proper compliance on different	
matters	office
Keep record of Stamp papers distributed/utilized	Authorised
	Person
Timely follow-up of matters listed in Compliance Check	All concerned
List	
Collection & Release of Payments & Securities from/to	
clients	
All clients, who have preferred to give us an authority for	
maintaining a running account for shares and funds in the	
credit of their accounts for regular trading on day to day	
basis, must be delivered payment and/or shares within 24	
hours of the request received from them.	
A	
Payment of Dividend /Bonus shares:	
All dividends/Bonus received by us on the holdings of the	
clients must be paid. A person will be specially designated	
for the purpose	
Tot the purpose	
Compliance Requirements	
Computation requirements	
A month wise compliance chart containing compliance	
requirement for Stock Exchanges, SEBI is already in place.	
It will be updated as and when required and will be strictly	
adhered to by the compliance officer.	
De de con conservationes	
Back up procedures:	<u> </u>
m1: 1 1 0d 1 : 1 0d	
Taking back up of the data is one of the most important	
steps for the continuity of the business. Designated person	
will take back up of the following records on a weekly basis	
These CDs will be kept at a location different from the	
registered office of the Company either in a locker or at the	
residence of the Managing Director at a safe place so that in	
the event of any disaster management, the continuity of the business is not lost.	