

BHARAT BHUSHAN EQUITY TRADERS LTD

RMS Policy

Limit will be provided against available fund (Net balance in ledger) and securities (after haircut value of liquid stocks in Pool/Margin A/c and BO A/c, subject to BO Account with specific Power of Attorney (PoA) in favour of Bharat Bhushan Equity Traders Ltd(hereinafter referred to as “the Stock Broker”)as per following details:

1. **Share/Capital Market Trading:** Limit upto 33 times of available fund and approved securities for intraday trading and 8 times for delivery trading. The debit against delivery buying to be cleared within T+2 days.
2. **Futures Trading:** Initial (SPAN) Margin is required at time of placing the order and MTM is payable in T+2 days.
3. **Options Trading:** In case of buying, premium amount in full is payable in T+1 day basis. In case of sale, margin should be payable as per SPAN Margin.

The Stock Broker may reduce or impose new limits urgently on the basis of the risk perception, risk profile of the client and other factors considered relevant by the stock broker including but not limited to limits on account of exchange/ SEBI directions/ limits (such as broker level/ market level limits in security specific / volume specific exposures etc.).

In case margin is kept in securities, the Stock Broker would value these securities after applying such haircut as deemed appropriate. Similarly for providing exposure to client, Stock Broker can pledge such securities in favour of Clearing Member/ Clearing Corporation.

The Stock Broker may be unable to inform the client of such variation, reduction or imposition in advance. The client agrees that the Stock Broker shall not be responsible for such variation, reduction or imposition or the client's inability to route any order through the Stock Broker's trading system on account of any such variation, reduction or imposition of limits. Sometimes client's sauda may go to IOC (Immediate or Cancel) instead of normal bidding if Stock Broker terminal is on square off mode.

The Stock Broker at its sole discretion can give extra exposure or intraday limit to the client, such extra exposure will automatically be squared off by trading mechanism without any further reference to the client approximately 15 minutes before the scheduled closing.

The Stock Broker shall have right to sell client's securities, both unpaid as well as collaterals deposited towards margins, or close out client's open positions, without giving notice to the client where there is a delay/failure of the client to meet the pay-in obligations and /or there is a failure of the client to bring additional margin to cover the increase in risk in the dynamic market conditions.

a. Unpaid Securities in Capital Market:

- i. In case of unpaid obligation on T+3, the Stock Broker may sell the unpaid/ partially paid securities. In addition the Stock Broker may sell the collaterals deposited by the client towards margin and/or paid securities purchased by the client in earlier settlements where the sale of proceeds of unpaid securities are inadequate to cover the pay-in obligations and where the unpaid securities appear to be comparatively illiquid and cannot be sold at reasonable rates to the extent required.

b. The Margin Shortfall in F&O:

- I. Positions of the client may be closed out to the extent of margin shortfall on the T+1 basis.
- II. While computing margin shortfall, Value of unapproved securities shall not be considered.
- III. As per the current Exchange requirements, the Stock Broker is required to maintain 50:50 ratios between cash and collaterals margin deposited with the Exchange. The Stock Broker shall therefore have the prerogative to insist for at least 50% of margin in cash and may not consider the value of securities over and above the cash component for the purpose of calculating margins shortfall and close out the F&O Position wherever it finds the deviation. However, sales made in capital market segment shall not be considered while closing F&O Positions on T+1 basis due to margin shortfall.

c. Intra-day Positions:

The Stock Broker shall have right to close out any intra-day Positions taken by the client after a defined "Cut-off" time (Presently 20 minutes before close of market).

d. General

- i. While selling the securities/ closing the clients positions, the Stock Broker may take into account the sales made by the client, Positions closed by the client or collections received from the client till cut-off time (Presently 12.45 pm).
- ii. While selling the Securities/ Closing the clients positions, the Stock Broker may not take into consideration cheques/ Bank Drafts/ Pay orders deposited by the client with the Stock Broker until clear proceeds

of such instruments are received by the Stock Broker in its bank account.

- iii The Stock Broker shall have the right to sell client's securities or close out client's open positions but it shall not be under any obligations to undertake this exercise compulsorily. The Stock Broker shall therefore not be under any obligation to compensate/or provide reasons of any delay or omission on its part to sell client's securities or close open positions of the client.

Levy of Delay Penalty:

Client shall be liable to penalty and other charges on non-payment of margin money, short selling of securities or units, failure on payment of auction, cheque bounce, non delivery of shares, increase open position or on any orders / trades / deals / actions of the client which are contrary to this agreement / rules / regulations / bye laws of the exchange or any other law for the time being in force as per Rules, Regulations, Guidelines and Circulars issued by SEBI and stock exchange time to time. Similarly in case of non receipt of full payment of value of delivery purchased, margin imposed (initial + MTM) interest will be charged at 15% p.a. calculated on daily basis on shortfall amount till the date of actual realization of money.

All fines/penalties and charges levied upon the Client due to its acts / deeds or transactions will be recovered by the Stock Broker directly from the client's account.

SURVEILLANCE POLICY

The company has laid down policy guidelines which have been framed in the light of National Stock Exchange (NSE) Circular No. : 831/2013 Ref. No. : NSE/INVG/22908. In pursuance of above said circular M/s Bharat Bhushan Equity Traders Ltd is implementing this surveillance policy applicable to all our clients.

Objective of this policy

- i. To establish a surveillance mechanisms and controls in the operations /trading activity of our clients.
- ii. To put in place appropriate controls for the detection and reporting of suspicious trading activities in accordance with applicable laws/laid down procedures.
- iii. To comply with applicable laws and regulatory guidelines.

Duties and Responsibilities

This Surveillance policy is approved by the al Board of Directors of M/s Bharat Bhushan Equity Traders Ltd and A quarterly MIS shall be put up to the Board on the number of alerts pending at the beginning of the quarter, generated during the quarter, disposed off during the quarter and pending at the end of the quarter. Further, reasons for pendency alongwith appropriate action taken to resolve them shall be discussed. Board shall be apprised of any exception noticed during the disposition of alerts.

Designated directors/ Compliance officer shall be the responsible for all surveillance activities carried out by M/s Bharat Bhushan Equity Traders Ltd, maintenance of record and reporting of such activities.

Internal auditor of M/s Bharat Bhushan Equity Traders Ltd shall review the surveillance policy, its implementation, effectiveness and the alerts generated during the period of audit. Internal auditor shall record the observation with respect to the same in their report.

Transaction Alerts

Our surveillance desk shall download all the below mentioned alert based on the trading activity of client provided by the exchange vide Circular No. : 831/2013 Ref. No. : NSE/INVG/22908.

S. No.	Transaction Alerts	Segment
1	Significantly increase in client activity	Cash
2	Sudden trading activity in dormant account	Cash
3	Clients/Group of Client(s), deal in common scrips	Cash
4	Client(s)/Group of Client(s) is concentrated in a few illiquid scrips	Cash
5	Client(s)/Group of Client(s) dealing in scrip in minimum lot size	Cash
6	Client / Group of Client(s) Concentration in a scrip	Cash
7	Circular Trading	Cash
8	Pump and Dump	Cash
9	Wash Sales	Cash & Derivatives
10	Reversal of Trades	Cash & Derivatives
11	Front Running	Cash
23	Concentrated position in the Open Interest / High Turnover concentration	Derivatives
13	Order book spoofing i.e. large orders away from	Cash

Clients Due Diligence:

We shall carry out the Due Diligence of client(s) on a continuous basis and shall update all the KYC parameters as prescribed by SEBI and latest information of the client in Unique Client Code (UCC) database of the Exchange.

Analysis:

In order to analyze the trading activity of the Client(s) / Group of Client(s) or scrips identified based on above alerts, the weshall require to:

1. Weshall require explanation from such identified Client(s) / Group of Client(s) for entering into such transactions.
2. We shall require documentary evidence such as bank statement / demat transaction statement or any other documents .In case of funds, Weshall require Bank statements of the Client(s) / Group of Client(s) from which funds pay-in have been met, to be sought. In case of securities, Weshall require demat account statements of the Client(s) / Group of Client(s) from which securities pay-in has been met, to be sought.
3. Weshall analyze the documentary evidences, including the bank / dematstatement,Weshall record its observations for such identified transactions or Client(s) / Group of Client(s).
4. In case adverse observations are recorded, We shall report all such instances to the Exchange within 45 days of the alert generation.
5. In case of extension is required, We shall send a request to exchange for a period of extension.
6. If explanation on the same shall not satisfactory / reply shall not receive within time period as above mentioned then Wesuspend the client from trading / report the instance to Regulators (if suspicious)

Ramanjeet Kaur

Compliance Officer