

OTHER POLICIES AND PROCEDURES

Adopted by:

**SHREE TISAI CONSULTANT
PRIVATE LIMITED**

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Redressal Mechanism for Investor Grievances

- It shall be mandatory to maintain an Investor Grievances Register at Head Office, Branch and Sub-Broker or Authorized Person Office.
- The person –incharge of Branch/ Sub-Broker/ Authorized Person shall verify the said register on a daily basis.
- There shall be a dedicated email id ig@shreetisai.com where the clients can register their complaints if any. It shall be the duty of the Compliance Officer the said ID and the IG register maintained at the Head Office.
- The Branches/ Sub-Broker shall immediately inform the Head office or Compliance Officer or the receipt of client compliant. The Compliance Officer shall enter all complaints received through email, SCORE or through physical letter in the said Register.
- On receipt the compliance officer shall suitably categorize the compliant. He may analyse the complaint and ask the concerned department to produce the necessary documents and evidences for the same. Further, he may talk to the concerned Employee/ Sub-Broker/ Authorized Person and the Client.
- Suitable steps shall be taken for and the compliant shall be replied/ resolved within 30 days of receipt.
- A letter of resolution shall be sent to clients.
- The Compliance Officer shall update the status of Investor Complaints to the Management on regular intervals. Any long pending complaints shall be monitored and reviewed by the Managing Director and the senior management on a daily basis.

Unauthenticated News Circulation Policy

As per code of conduct for Stock Broker in SEBI (Stock Brokers and Sub-brokers) Regulations, 1992 and SEBI circular Cir/ISD/1/2011 dated March 23, 2011, all SEBI registered market intermediaries are required to have proper internal code of conduct to govern the conduct of its Employees. In view of same, We implements code of conduct for communicating through various modes of communication. Employees/temporary staff/voluntary workers are prohibited from:

1. Circulation of unauthenticated news related to various scrips in blogs/chat forums/email etc.
2. Encouraging or circulating rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
3. Forwarding any market related news received either in their official mail/personal mail/blog or in any other manner except after the same has been seen and approved by the Compliance Officer.

If an employee fails to do so, he/ she shall be deemed to have violated the various provisions contained in Act/ Rules/ Regulations etc. and shall be liable for actions penalty etc as applicable.

Error Accounting Policy

- Genuine punching errors in client codes while placing orders shall be allowed to be modified.
- Client code modification facilities shall be disabled from all the dealer terminals.
- Client code modification shall be carried out only from the admin terminals located at H.O.
- While carrying out code modification, genuineness of the punching errors shall be verified against corroborative circumstantial evidences like similarities of codes, trades in immediately preceding codes, square off trades without holdings or position or any such other evidences shall have to be taken into account.
- Complete records of daily online trade modifications shall be maintained in soft form.
- All trades will be modified through Error Account only.
- Any position lying unsettled at the end of day shall be carried forward and settled in the Error Account only. No internal transfers shall be permitted in any manner.

Pre Funded Instruments Acceptance Policy

- Aggregate value of pre-funded instruments is ` 50,000/- or more, per day per client may be accepted only if the same are accompanied by the name of the bank account holder and number of the bank account debited for the purpose, duly certified by the issuing bank.
- The mode of certification may include the following:
 - 1) Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank.
 - 2) Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument.
 - 3) Certified copy of the passbook/bank statement for the account debited to issue the instrument.
 - 4) Authentication of the bank account-number debited and name of the account holder by the issuing bank on the reverse of the instrument.
- Appropriate audit trail of the funds received through electronic fund transfers to ensure that the funds are received from their clients only.