INTERNAL POLICY NISM SERIES VII-SORM

ADOPTED BY

GIRIRAJ STOCK BROKING PRIVATE LIMITED

MEMBER: BSE LTD

NSE LTD

Internal policy w.r.t NISM Series VII – Securities Operation & Risk Management (SORM)

Introduction

Giriraj Stock Broking Private Limited is Securities and Exchange Board of India (SEBI) registered broker of the BSE LTD & NSE LTD.

Brief:

SEBI issued Notification according to which, following categories of associated persons associated with a registered stock broker /trading member/ clearing member in any recognized stock exchanges, who are involved in ,or deal with any of the following

a) Assets or funds of investors or clients
b) Redressal of investor grievances
c) Internal control or risk management
d) Activities having a bearing on operational risk

Shall be required to have a valid certificate of NISM Series VII- operation & Risk management (SORM) from (NISM). NSE & BSE has also issued circulars requesting the to company with the requirement of said SEBI Notification.

Need for Policy :

Giriraj Stock Broking Private Limited being a stock broker of Bombay Stock Exchange (BSE) & National Stock Exchange (NSE) and provisions of the aforesaid requirement is applicable to all its employees involved in the activities as mentioned above.

Definition of Associated Person:

"Associated Person" means a principal or employee of an intermediary or an Agent or distributor or other natural person engaged in the Securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in india.

As required in the aforesaid notification of SEBI, All existing persons associated with "Giriraj Stock Broking Private Limited " as on date of publication and engaged in dealing with

a)Assets or funds of investors or clients

b) Redressal of investor grievances

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c) Internal control or risk management

d) Activities having a bearing on operational risk

Shall obtain the valid certification of NISM Series VII- Securities Operation and Risk Management (SORM) within two years from the date of such notification. Simultaneously, whenever "Giriraj Stock Broking Private Limited " employs any associated person Specified as mentioned above, the said associated person shall obtain valid Certification of NISM Series VII- Securities Operation and Risk Management (SORM) within one year from the date of his or her employment.

Exemption:

Associated persons handling the basic clerical/elementary functions in the Aforesaid specified areas shall be exempted from obtaining the certification of NISM Series VII – Securities Operation and Risk Management (SORM). For this purpose, "Giriraj Stock Broking Private Limited " considers following activities as basic elementary level/ clerical level 1.

Internal Contral or Risk Management

1. In warding off collateral's / Cheques
2. Person performing market 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. In Warding of complaints
2. Seeking documents from clients
3. Person Performing maker entries
4. Make entry in the database
5. Photocopying ,printouts, scanning of documents
6. Preparing of MIS
7. Sending of letters/reports to clients, Exchanges , SEBI updating, data entry, uploading on SCORES
8. Attending Calls, etc.

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

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1. Person Performing maker entries
2. Make entry in the database
3. Preparing of MIS
4. Generating of 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.

However, any of the work (as stated herein above) being performed by such persons, obtaining NISM-SORM Certification shall be optional provided that they are supervised by his/her supervisor who shall have to obtain /continue to have NISM-SORM Certification or such other prescribed certification at all time.

In case of any Quary, employees are requested to obtain clarification from the Compliance Officer of the Company.

For Giriraj Stock Broking Private Limited

Vinay Jajodia

Vinay Jajodia
Compliance Officer