SEBI Registration No: INZ000006635 (Stock Broker) | NSE Member ID: 14323 | BSE Member ID: 6414 SEBI Registration No: IN-DP-267-2016 (Depository Participant) | NSDL DP ID: IN303997 Regd. Office: 451, Krishna Apra Business Square, Netaji Subhash Place, Pitampura, New Delhi-110034 E-Mail Id: <u>compliance@maashitla.com</u> | Tel: 011-45121795

Reference 1.

SEBI Notification No.LAD-NRO/GN/2010-11/21/29390 NSE Circular no. NSE/INSP/16536 December 15, 2010 NSE Circular no. NSE/INSP/27495 September 02, 2014 BSE Notice no.20101215-19 dated December 15,2010 BSE Notice no. 20140902-8 dated September 02,2014

Brief

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, 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 – Securities Operation & Risk Management (SORM) from National Institute of Securities Market(NISM). NSE and BSE has also issued circulars requesting the members to comply with the requirement of said SEBI Notification.

Need For the Policy

The Company being a trading member BSE, NSE & MCX-SX, provisions of the aforesaid requirement is applicable to all its employees & sub-brokers 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 Circulars, **Our Director Mr. Mukul Agrawal** associated with Maashitla Securities (P) Limited in deal with

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- 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.

Has obtain the valid certification of NISM Series VII - Securities Operation and Risk Management (SORM)

Policy

As required in the aforesaid notification of SEBI, all existing persons associated with the Company as on date of publication and engaged in deal with:

- (a) Assets of 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 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 the company 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 /her employment/registration as sub-broker.

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, the company considers following activities as basic elementary lever / clerical level

Sr. No	Internal Control or Risk Management.	Redressal of Investor Grievances	Activities having a being on operational risk and dealing with assets of funds of investors of clients
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SEBI Registration No: INZ000006635 (Stock Broker) | NSE Member ID: 14323 | BSE Member ID: 6414 SEBI Registration No: IN-DP-267-2016 (Depository Participant) | NSDL DP ID: IN303997 Regd. Office: 451, Krishna Apra Business Square, Netaji Subhash Place, Pitampura, New Delhi-110034 E-Mail Id: <u>compliance@maashitla.com</u> | Tel: 011-45121795

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1	Inwarding or collateral's / Cheques	Inwarding of complaints	Person performing maker entries Person performing maker entries
2	Person performing market entries	Seeking documents from clients	Maker entry in the database
3	Maker entry in the database	Person performing maker entries	Preparing of MIS
4	Photocopying, printouts, scanning of documents	Maker entry in the database	Generating of reports, Files
5	Preparing of MIS	Photocopying, printouts, scanning of documents	Photocopying, printouts, scanning of documents
6	Sending of letters / reports to clients, Exchanges, SEBI	Preparing of MIS	Dispatching documents to clients
7	Attending Calls, etc.	Sending of letters / reports to clients, Exchanges, SEBI updation, data entry, uploading on SCORES	Sending of letters / reports to clients, Exchanges, SEBI

SEBI Registration No: INZ000006635 (Stock Broker) | NSE Member ID: 14323 | BSE Member ID: 6414 SEBI Registration No: IN-DP-267-2016 (Depository Participant) | NSDL DP ID: IN303997 Regd. Office: 451, Krishna Apra Business Square, Netaji Subhash Place, Pitampura, New Delhi-110034 E-Mail Id: <u>compliance@maashitla.com</u> | Tel: 011-45121795

8		Attending calls, etc.	Attending calls, etc.
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However, any of the works (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 times.

In case you have any questions, please direct your query to our Compliance team:

ig@maashitla.com / compliance@maashitla.com

For more Details Kindly look at our website www.maashitla.com or contact us to our Officials at Tel: 011-45121795 or mail us at contact@maashitla.com