

Evermore Commodity Brokers Pvt. Ltd.

CIN: U51909HR1993PTC064507

Reg. office- C-092, Super Mart-1, DLF Phase 4, Gurgaon, Haryana-122002

Tel. 0124- 2574092

Email ID: backoffice@evermore.in

CLIENT CODE MODIFICATION POLICY

[Reference : SEBI Circular No. SEBI /HO/CDMRD/DMP/CIR/P/2016/43 29.03.2016]

Preamble -Evermore Commodity Brokers is a Commodity Broker member of MCX and NCDEX. As such, it carries out trading of its clients in respective exchange through various branch offices including offices of its sub-brokers / franchisees / authorised person etc.

While carrying out its functions as a Broker, it might happen sometimes that due to certain reasons, the client codes might not have been entered correctly at the time of either order entry or need to be changed once converted into trades so that proper and correct effect of those vary transactions can be given.

However, SEBI and Exchanges have issued various circulars in this regard. Accordingly, with a view to minimise the errors being committed in this regard, certain objective criteria for identifying genuine errors for client code modification of non-institutional trades and guidelines for the implementation of the requirement of those circulars are given below.

1. To rectify genuine error in entry of client code at the time of placing / modifying the related order, Permission of Head – RMS or such other higher authority designated by the management must be obtained prior to changing the client codes.

2. Such permission shall be given to change client codes of non-institutional clients only for the following criteria:

(a) Error due to communication and/or Punching / Typing error - Such that the original client code / name and the modified client code/name are similar to each other. [For e.g. if the code entered by punching D001 instead of B001 due to communication error]

(b) Modification within relatives (“Relative” for this purpose would mean “relative” as defined under the Companies Act, 2013) EVERMORE COMMODITIES BROKERS PVT. LIMITED [A MEMBER OF MCX, NCDEX]

3. In case of shifting of any trade (Institutional or non-institutional trades) not accepted by any client, such trades MUST be first shifted to designated “ERROR” account and relevant position subsequently liquidated / closed out in the market. Once, the trades have been transferred to such Error Account, the same shall NOT be shifted to some other client code.

4. UCC for such Errors Account MUST be uploaded to respective Exchange. Accordingly, KYC Department is directed to take all necessary steps to upload the same immediately and to report about successful uploading of the same (with documentary evidences, if any) to the Compliance & RMS Team.

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5. Further, the designated employee(s) MUST inform the respective Exchange (as per the mechanism established by them in this regard) on a daily basis by end of day, the reasons for modification of client codes of non-institutional trades based on the aforesaid objective criteria. Further, he/she MUST preserve all related documentary records in this regard so as to assist the Compliance Team at the time of Inspection in this regard.

6. All related employees are STRICTLY warned not to modify any client code in the back-office system or after the close of the modification window provided by the Exchange(s).

7. All concerned or deemed to be concerned employees are strictly advised to comply with this guideline or policy in true letter and spirit.

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INACTIVE / DORMANT ACCOUNT

POLICY & PROCEDURE

Evermore Commodity Brokers Private Limited has formulated policies and procedure to be followed for inactive / dormant client. The policy broadly covers the aspects of time period and procedure for reactivation of account of the clients as stated here under:

About Dormant Account:

- Inactive client means client who is inactive during last 1 Year immediately preceding the end of the previous month.
- A list of inactive clients shall be prepared from the back office software on the last day of every month and shall be submitted to the concerned department after confirmation with the management. The management will approve a final list of inactive clients.
- A copy of the list is also forwarded to dealers who operate our terminals.
- The concerned department shall mark the client status as "Inactive" or "Dormant" in various front office software and back office accounting software.
- After inactive marking, if any orders are received, the dealer shall take reasonable steps to identify the identity of the client and to ensure that the orders are received from the same client. The dealer shall use various techniques like call back, asking personal detail questions, last trade date, outstanding positions etc to confirm the identity of the caller. They may use any other technique which is reasonable. In case of a doubt the case shall be referred to the management or concerned Sub-Broker/Authorized Person or Introducer.
- Dormant client has to update their KYC details at the time of fresh order, if required.

Re-activation of Trading Account:

The dormant account will be activated only after receiving request from the client to re-activate his accounts along with all the required formalities of KYC COMPLIANCE. The re-activating of trading account will require the following details/documents:

1. Proof of identity.
2. Latest Proof of Residential Address.
3. Latest Proof of Bank account.
4. Latest Proof of Demat statement.
5. Financial Details (Applicable for Derivatives Segment).

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PRE FUNDED INSTRUMENTS/ELECTRONIC FUND TRANSFER ACCEPTANCE POLICY

Objective: This policy is framed with the objective of prohibiting the flow of third party funds and unidentified money through pre funded instruments like DD/PO/BANKER CHEQUE and Electronic Fund Transfer like NEFT/RTGS. The objective is to maintain audit trail for such acceptances of such funds and ensure that no third party funds are accepted unless with proper documentary evidences.

Scope: This policy is framed for accepting DD/PO at XXXX Limited. This policy covers all such instruments accepted from the clients at Evermore Commodity Brokers Private Limited.

- a. If the aggregate value of pre-funded instruments is ` 50,000/- or more, per day per client, Evermore Commodity Brokers Private Limited may accept the instruments 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:

- i. Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank.
- ii. Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument.
- iii. Certified copy of the passbook/bank statement for the account debited to issue the instrument.
- iv. Authentication of the bank account-number debited and name of the account holder by the issuing bank on the reverse of the instrument.

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- b. Maintain an audit trail of the funds received through electronic fund transfers to ensure that the funds are received from their clients only.

The accounts staff at Evermore Commodity Brokers Private Limited is responsible for ensuring the compliance and would maintain the relevant documentary evidence for the same which would be produced before the regulatory authorities whenever required.

The compliance officer would periodically review this policy and would ensure its compliance along with the accounts department.

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Prevention of Money Laundering Act, 2002

Evermore Commodity Brokers Private Limited

MCX Member : 40215 : SEBI Reg. No. INZ000022431

NCDEX Member : 00968 Reg. No. INZ000022431

Updated - SEBI Circular dated 12th March 2014 vide circular dated CIR/MIRSD/1/2014
and updated till

July 2016.

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Policy framed based on Prevention of Money Laundering Act, 2002, the Rules framed there under and Circulars issued by Regulatory Authorities.

A. Designated Director

As per the requirement of Prevention of Money Laundering Act, 2002, a Designated Director will be appointed and informed to FIU. Designated Director will ensure overall compliance with the obligations imposed under chapter IV of the Act and the Rules.

B. Principal Officer

As per the requirement of Prevention of Money Laundering Act, 2002, a Principal Officer will be appointed and informed to FIU. Principal Officer will be responsible for reporting any transactions covered under Prevention of Money Laundering Act, 2002.

C. Generation of Alerts

We are having manual system for the generation of alerts as well as for screening of KYC.

D. Risk Assessment

Risk assessment will be based on categorization of clients based on High risk, Medium risk & Low risk. Following criteria is generally used for categorization of clients:

- High risk clients-. All special category clients are considered as High risk clients.
- Medium Risk: Agriculture, Student, and Others.
- All other clients are primarily categorized as Low risk clients

Review of Risk constantly after the On Boarding: The ongoing risk review can trigger the client's risk to be upgraded based on the following parameters or events.

- If it is later realized that the client is a High Net Worth client. The risk would be upgraded to "High"
- If in future it is known that a client is PEP then apart from seeking permission from the management to continue the relationship, the client should be immediately upgraded to High risk
- If it is later realized or the existing client is registered foreign exchange dealer the client will have to be upgraded to High risk.
- If a client is residing in a country which has been recently declared by the FATF as a high risk jurisdiction or an existing client moves base into a high risk

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jurisdiction then naturally in both the cases client will be immediately upgraded to "High" risk.

- If a client registers the authorization or gives a power of attorney to operate his account to somebody else, in that case the account is to be upgraded to "High" risk
- If it is realized by the management that the existing client's reputation is tainted because of a SEBI debarred or any such announcement then the client will be upgraded to "High"
- Any employee of the organization could alert the principal officer and request based on any news item or an event in the public domain which can lead the risk to be made High

Enhanced due diligence measure to be carried out for high risk /special category clients.

- Each trade given by such clients to be verified before execution of trades.
- To obtain Annual Income proof and Financial Statements.
- To verify each receipt of fund from clients. To obtain additional proof in case of Electronic Fund Transfer.

E. Customer Due Diligence

New customer acceptance procedures adopted include following processes:

- Checking the records with the Client in the barred list.
- Before opening the client account it is also verified that the client is not a part of the Debarred list. This will help us
- In not opening erroneously account of a debarred client or entity. The list used are

http://www.un.org/sc/committees/1267/aq_sanctions_list.shtml

<http://www.un.org/sc/committees/1988/list.shtml>

SEBI Debarred List:- Domestic PEP

- If a client is found matching with UNSC 1267 or UNSC 1988 we would not open the account and immediately inform the Principal Officer/Management for further action which will result in STR filing

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- If a client is found matching with SEBI Debarred we would not open the account unless approved by a senior person on a case to case basis.
- If a client is a Politically Exposed Person we will not open the account
- The screening will be done for UBO and associated entities also like Directors in a private ltd or partners in a trust or trustees in a trust.
- Summarizing the steps of Opening the account are as below:

Checking for KYC and mandatory information in the form.

- In person verification
- Verification with original documents
- Checking of client with screening database consisting of sources mentioned above.
- Verification of Pan with Income Tax Database.
- CSC marking.
- To verify status of client in KRA Agencies website and compliance at the time of account opening as per SEBI {KYC (Know Your Client) registration agency} Regulations, 2011,
- Dispatch Photocopies of KYC and Welcome Letter on the address mentioned in the account opening form.
- Welcome Email along with login details of back office and password to clients designated Email address.

F. Reliance on third party for carrying out Client Due Diligence (CDD):

We shall not rely on any third party for carrying out the customer due diligence ("CDD"). We are solely conducting and are responsible for carrying out the CDD.

For existing clients processes include:

- Review of KYC details of all the existing active clients in context to the PMLA 2002 requirements.
- To verify status of client in KRA Agencies website and compliance at the time of account opening as per SEBI {KYC (Know Your Client) registration agency} Regulations, 2011
- Classification of clients into high, medium or low risk categories based on KYC details, trading activity etc for closer monitoring of high risk categories.

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- Obtaining of annual financial statements from all clients, particularly those in high risk categories at reasonable intervals.
- In case of non individuals client additional information about the directors, partners, dominant promoters, major shareholders is obtained.
- Verify each account with SEBI debarred entity lists and UNSCR lists on daily basis.

G. Risk based approach:

Following Risk based KYC procedures are adopted for all clients:

- Payout/pay-in of funds transferred to /from a third party
- Off market transactions especially in illiquid stock and in F & O, at unrealistic prices
- Trading pattern of clients is observed
- Client demographics are considered

H. Clients of special category (CSC)

- High net-worth clients,
- Trust, Charities, NGOs and organizations receiving donations,
- Companies having close family shareholdings or beneficial ownership,
- Politically exposed persons (PEP). Politically exposed persons are individuals who are or have been entrusted with prominent public functions in a foreign country, e.g., Heads of States or of Governments, senior politicians, senior government/judicial/military officers, senior executives of state-owned corporations, important political party officials, etc. The additional norms applicable to PEP as contained in the subsequent clause 5.5 (Page 19 of the Master Circular) shall also be applied to the accounts of the family members or close relatives of PEPs,
- Companies offering foreign exchange offerings,
- Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, where there is unusual banking secrecy, Countries active in narcotics production, Countries where corruption (as per Transparency International Corruption Perception Index) is highly prevalent, Countries against which government sanctions are applied, Countries reputed to be any of the following - Havens / sponsors of international terrorism, offshore financial centres, tax havens, countries where fraud is highly prevalent,
- Non face to face clients,

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- Clients with dubious reputation as per public information available etc.

High Net worth Clients: High net worth clients could be classified if at the account opening stage or during the course of the relationship, it is realized that the client's net worth is beyond ten crore or income is beyond 1 crore.

Trust, Charity and NGOs: Both public as well private, registered as well non registered trust will have to be classified in the special category. Any Charitable or Nongovernmental organization or a no Profit Organization will be also classified herein.

Close family shareholdings or Beneficial Ownership: In case of close family shareholdings the objective is to understand whether the beneficiaries of two or more accounts, which may also be opened at different times are same, then both need to be marked under this special category.

Politically Exposed Persons: A separate detailed document mentions about PEP identification.

Company offering foreign Exchanges: At the account opening stage if it is to our knowledge that the individual or the entity is registered foreign exchange dealer, then the same may be categorized.

Client in High Risk Country: We avoid to open any account received from client who was residing in a high risk jurisdiction and may have investment proceeds which may have also originated from these countries.

Non Face to Face Client: In person verification is done for all clients. But there may be clients who may register a power for somebody else in their account and in that scenario as the account would be controlled not by the account holder but by some other individual we would treat as a non face to face account and the same would be categorized accordingly.

Client with dubious Public Reputation: If a clients reputation during the opening of the account or post opening the account is known to be not good, then the same is marked in this special category.

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I. Record Keeping:

The Principal Officer will be responsible to ensure that AML records are maintained properly. The company shall also maintain such records, which can permit reconstruction of individual transactions so as to provide evidence of prosecution of criminal behavior.

The company shall maintain and preserve the records for the minimum period prescribed under AML Act and SEBI Act. A record relating to ongoing investigations to be retained until it is confirmed that the case has been closed.

J. Monitoring & Reporting of Suspicious Transactions:

Suspicious transactions as per our back office and Exchange records are scrutinized and inquired into from concerned entities/clients and based on input decide to report to FIU-IND.

Ongoing monitoring of accounts which includes

- Identification and detection of apparently abnormal transactions.
- Generation of necessary reports/alerts based on clients' profile, nature of business, trading pattern of clients for identifying and detecting such transactions. These reports/alerts are analyzed to establish suspicion or otherwise for the purpose of reporting such transactions.

Following parameters are used:

- Large number of accounts having common parameters such as common partners / directors / promoters /
- If market transactions through DP Accounts;
- Suspicious off market transactions;
- Clients of high risk countries, including countries where existence and effectiveness of money laundering controls is suspect or which do not or insufficiently apply FATF standards, as 'Clients of Special Category'. Such clients should also be subject to appropriate counter measures.

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Monitoring of Transactions

Ongoing monitoring is an essential element of effective KYC procedures. **Evermore Commodity Brokers Private Limited** can effectively control and reduce their risk only if they have an understanding of the normal and reasonable activity of the customer so that they have the means of identifying transactions that fall outside the regular pattern of activity.

Evermore Commodity Brokers Private Limited shall have in place a comprehensive transaction monitoring process from a KYC/AML perspective **Evermore Commodity Brokers Private Limited** shall put in place strong transaction alerts which will provide proactive signals on suspicious transactions and possible money laundering. **Evermore Commodity Brokers Private Limited** AML monitoring team shall endeavor to update the list based on current understanding of the market scenario and trading patterns followed by clients. Surveillance team shall review internal alerts if any and also monitor the alerts provided by the exchanges per their circular NSEINVG/22908 dated March 7, 2013.

On the basis of criticality of the breach, observation of account behavior, repetitive breaches, the AML Monitoring Team shall send a query to the concerned Business. Responses would be expected within 7 working days. If the alerts still persist or the AML Monitoring Team is not satisfied with the responses, then the AML query team shall send the query to the Compliance Head for resolution.

Action for SEBI debarred entities

If any person's/ entity name appears on SEBI debarred list and that person is our client, we immediately stop the trading of that client.

IDENTIFICATION OF BENEFICIAL OWNER

Check would be done for actual beneficial ownership and control of the particular account. We need to obtain the details with respect to Shareholders / promoters (Holding more than 25 % or more of share capital of Corporate entities) , Partners (Holding more than 15 % or more of capital or profits of partnership firm.), Unincorporated association or body of individuals (Holding more than 15 % or more of property or capital or profits of juridical person) from the non individual clients and wherever possible it has to be verified

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independently. Where the client is a trust, identify the beneficial owners of the client and take reasonable measures to verify the identity of such persons, through the identity of the

settler of the trust, the trustee, the protector, the beneficiaries with 15% or more interest in the trust and any other natural person exercising ultimate effective control over the trust through a chain of control or ownership.

Where the client or the owner of the controlling interest is a company listed on a stock exchange, or is a majority-owned subsidiary of such a company, it is not necessary to identify and verify the identity of any shareholder or beneficial owner of such companies.

Where no natural person is identified the identity of the relevant natural person who holds the position of senior managing official

Verify the sources of funds for funding the transaction. We shall also take care at the time of settlement regarding nature of transaction, movement/source of transaction, etc. Periodically to ask for clients financial details to determine the genuineness of transaction. Special care would be taken in case of non individual accounts such as corporate, partnership firms etc, where the ownership structure is opaque. In all such cases the accounts would be activated only post approval from the compliance department.

For this purpose, "**beneficial owner**" is the natural person or persons who ultimately own, control or influence a client and/or persons on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person or arrangement.

Others

In case of existing clients, if any names appear in the UNSCR lists as and when stock exchange issue any circular/ notification in this regard, we immediately deactivate that client.

In case we upload any STR to FIU IND, or any other confidential information of any client, we keep secrecy and it is known only by compliance officer and principal officer.

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K. Reporting of Suspicious Transactions:

- All suspicious transactions will be reported to FIU. Member and its employees shall keep the fact of furnishing information in respect of transactions referred to in clause (D) of sub-rule (1) of rule 3 strictly confidential.
- The background including all documents/office records /memorandums/clarifications sought pertaining to such transactions and purpose thereof shall also be examined carefully and findings shall be recorded in writing. Further such findings, records and related documents should be made available to auditors and also to SEBI /Stock Exchanges/FIU-IND/Other relevant Authorities, during audit, inspection or as and when required. These records are required to be preserved for **Five years** as is required under PMLA 2002.
- The Principal Officer and related staff members shall have timely access to customer identification data and other CDD information, transaction records and other relevant information. The Principal Officer shall have access to and be able to report to senior management above his/her next reporting level or the Board of Directors.

L. Employee`s Hiring/Training

Hiring of Employees:

All employee accounts will be subjected to the same AML procedures as the customer accounts, under the supervision of the Principal Officer

Adequate screening procedures to be in place to ensure high standards when hiring employees, having regard to the risk of money laundering and terrorist financing and the size of the business, we ensure that all the employees taking up such key positions are suitable and competent to perform their duties.

Employees' Training:

An ongoing employee training program should be conducted by the Principal Officer and Senior Management. Participation of all the Key Employees in the Seminars conducted by various Regulatory bodies from time to time be made mandatory so that the staff are adequately trained in AML and CFT procedures.

All the Circulars issued by various Regulatory bodies including that of PMLA, are circulated to all the staff Members and the same are also being discussed in length, in the Training Program'. Training program shall have special emphasis on frontline staff,

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back office staff, compliance staff, risk management staff and staff dealing with new clients. It is crucial that all those concerned fully understand the rationale behind these directives, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements.

Our training will include, at a minimum: how to identify red flags and signs of money laundering that arise during the course of the employees' duties; what to do once the risk is identified; what employees' roles are in the firm's compliance efforts and how to perform them; the firm's record retention policy; and the disciplinary consequences (including civil and criminal penalties) for non-compliance with the PMLA Act.

M. Audit and Testing of Anti Money Laundering Program.

The Anti Money Laundering program is subject to periodic audit, specifically with regard to testing its adequacy to meet the compliance requirements. The audit/testing is conducted by Trading Member's own personnel not involved in framing or implementing the AML program. The report of such an audit/testing is placed for making suitable modifications/improvements in the AML program.

N. Maintenance of record of transactions prescribed under Rule 3 of PML Rules as mentioned below:

- all cash transactions of the value of more than rupees ten lakh or its equivalent in foreign currency;
- all series of cash transactions integrally connected to each other which have been valued below rupees ten lakh or its equivalent in foreign currency where such series of transactions have taken place within a month and the aggregate value of such transactions exceeds rupees ten lakh;
- all cash transactions where forged or counterfeit currency notes or bank notes have been used as genuine and where any forgery of a valuable security has taken place;
- all suspicious transactions whether or not made in cash and by way of as mentioned in the Rules.

O. Appointment of a Designated Director:

In addition to the existing requirement of designation of a Principal Officer, the registered intermediaries shall also designate a person as a 'Designated Director'. In

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terms of Rule 2 (ba) of the PML Rules, the definition of a Designated Director reads as under:

“Designated Director means a person designated by the reporting entity to ensure overall compliance with the obligations imposed under chapter IV of the Act and the Rules and includes –

- (i) The Managing Director or a Whole-time Director duly authorized by the Board of Directors if the reporting entity is A company,
- (ii) The managing partner if the reporting entity is a partnership firm,
- (iii) The proprietor if the reporting entity is a proprietorship concern,
- (iv) The managing trustee if the reporting entity is a trust,
- (v) A person or individual, as the case may be, who controls and manages the affairs of the reporting entity if the reporting entity is an unincorporated association or a body of individuals.

P. Investors Education:

As the implementation of AML / CFT measures being sensitive subject and requires us to demand and collect certain information from investors which may be of personal in nature or has hitherto never been called for, which information include documents evidencing source of funds / income tax returns / bank records etc. and can sometimes lead to raising of questions by the client with regard to the motive and purpose of collecting such information. There is, therefore, a need for us to sensitize the clients about these requirements, as the ones emanating from AML and CFT framework. We shall circulate the PMLA Circulars and other specific literature/ pamphlets etc. so as to educate the client of the objectives of the AML/CFT program. The same shall also be emphasized on, in the Investor Awareness programmes conducted by us at frequent intervals of time. The importance of the same is also made known to them at the time of opening the account.

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Q. Procedure for freezing of funds, financial assets or economic resources or related services:

Member is aware that Under section 51A of Unlawful Activities (Prevention) Act, 1967, the Central Government is empowered to freeze, seize or attach funds and other financial assets or economic resources held by, on behalf of, or at the direction of the individuals or entities listed in the Schedule to the Order, or any other person engaged in or suspected to be engaged in terrorism. The Government is also further empowered to prohibit any individual or entity from making any funds, financial assets or economic resources or related services available for the benefit of the individuals or entities listed in the Schedule to the Order or any other person engaged in or suspected to be engaged in terrorism. The obligations to be followed by intermediaries to ensure the effective and expeditious implementation of said Order has been issued vide SEBI Circular ref. no: ISD/AML/CIR-2/2009 dated October 23, 2009, which needs to be complied with scrupulously.

R. Others

This Policy is to be made available to the persons engaged in the Commodity Broking operations for compliance purpose.

Clients are to be categorized into low, medium and high risk based on perceived risk depending upon client's background, type of business activity, transaction etc.

The periodicity of updating of documents taken during the client due diligence (CDD) process will be every year

As per Company's policy, we are not relying on third party for client due diligence.

Mr. Pramod Bothra has been appointed as designated director as per PMLA requirement.

This PMLA policy will be reviewed every half year on the basis of circulars issued by statutory authority from time to time and this updated policy should be approved in the meeting of Board of Directors

All the clauses of this PMLA Policy should be reviewed periodically. Review of policy is to be done by any official other than the official who originally drafted the policy

Designated Principal Officer:

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In the case of any further information / clarification is required in this regards, the
"Principal Officer" may be contacted.

List of Persons Designated for PMLA

Name of Designated Director: Mr. Pramod Bothra

Contact No: 9892445544

Email ID: pb@evermore.in

Name of Principal Officer: Mr. Pramod Bothra

Contact No: 9892445544

Email ID: pb@evermore.in

For Evermore Commodity Brokers Private Limited

Director

Evermore Commodity Brokers Pvt. Ltd.

CIN: U51909HR1993PTC064507

Reg. office- C-092, Super Mart-1, DLF Phase 4, Gurgaon, Haryana-122002

Tel. 0124- 2574092

Email ID: backoffice@evermore.in

SURVEILLANCE POLICY

The surveillance policy of the Company is approved by its Board vide Board Meeting dated 28/03/2013.

With respect to the transactional alerts being downloaded from the Exchanges/generated by the Company, the following activities will be carried out based on UCC parameters:

Client(s) Information

Due Diligence of its client(s) will be carried out on a continuous basis. It will also be ensured that key KYC parameters are updated on a continuous basis as prescribed by SEBI and latest information of the client is updated in UCC database of the Exchange. Based on this information, the Company will establish groups / association amongst clients to identify multiple accounts / common account / group of clients.

Analysis

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

- A. Seek explanation from such identified Client(s) / Group of Client(s) for entering into such transactions.
- B. Seek documentary evidence such as bank statement / demat transaction statement or any other documents to satisfy itself:
 - i) In case of funds, 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, demat account statements of the Client(s)/Group of Client(s) from which securities pay-in has been met, be sought.
 - ii) The period for such statements may be at least +/- 15 days from the date of transactions to verify whether the funds / securities for the settlement of such trades actually belongs to the client for whom the trades were transacted.
- C. After analyzing the documentary evidences, the Company will record its observations for



such identified transactions or Client(s)/Group of Client(s).

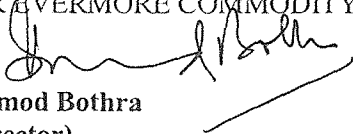
D. In case adverse observations are recorded, the Company will report all such instances to the Exchange within 45 days of the alert generation. The Company may seek extension of the time period from the Exchange, wherever required.

Monitoring and reporting

Following procedure will followed for monitoring and reporting of alerts:

- A. Receipt of Alerts from Exchanges / generated
- B. Time frame for disposition of alerts and if there is any delay in disposition, reason for the same shall be documented.
- C. Suspicious / Manipulative activity identification and reporting process
- D. Record Maintenance
- E. 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. Reasons for pendency shall be discussed and appropriate action will be taken. The Board shall be apprised of any exception noticed during the disposition of alerts.
- F. The surveillance process shall be conducted under overall supervision of its Compliance Officer.
- G. Compliance Officer will be responsible for all surveillance activities carried out by the Company and for the record maintenance and reporting of such activities.
- H. Based on facts and circumstances, the Company will exercise its independent judgment and will take adequate precaution.

FOR EVERMORE COMMODITY BROKERS PVT.LTD.


Pramod Bothra
(Director)

INVESTOR GRIEVANCE MECHANISM**SEBI Rules, Regulations and Circular Reference No.**

- **Regulation 6A(1) (e) & 26 (iv) of Stock broker regulation**

Redressal of grievances of the investors within one month of the date of receipt of the complaint.

- **MRD/DoP/Dep/SE/Cir-22/06 dated December 18, 2006**

All the brokers/sub-brokers are to designate an e-mail ID of the grievance redressal division/compliance officer exclusively for the purpose of registering complaints by investors.

Maintenance of records for Investor Grievances**1. Complaint Register:**

To be kept by Broker at all offices (at HO, Branch and at sub-broker's office)

2. Dedicated Investor Grievance Email ID:

To be informed to investors/clients through Welcome letter, Contract Notes and on Website.

3. Investor Grievance handling Mechanism:

Documented Policy for Investor grievance handling to be specified for e.g. Compliance officer regularly access investor grievance e mail ID and Complaint Register to verify for the complaints if any.

Internal Audit Requirement

a	Number and value of investor complaints pending at the beginning of half year:-
b	Number and value of investor complaints received during half year
c	Number and value of investor complaints resolved during half year
d	Number & value of investor complaints pending as on the last day of half year

e	Give breakup of the pending investor complaints from branch/Head office/sub broker
f	Comment on investor grievance handling mechanism of the member.
g	Summary on nature of complaints received and action taken by the member
h	What is the duration of the longest pending investor complaint?
i	Whether specific action plan is framed by the member in respect of long pending complaints?
j	Whether designated email id for investor grievance is created and informed to the investors?
k	Whether complaints received on the designated email ID are being looked into to address the same?

Common questions:-

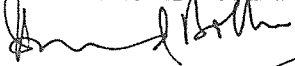
1. To provide one annexure which covers reconciliation if the list is big?
2. Arbitration is to be considered if it is in progress. If judgment came than no need to mention it.
3. To obtain snapshot of e mail ID in box.
4. Duration means last reply of complaints
5. E mail ID should be specific for investor grievances only
6. E mail ID to be informed through KYC/CN

Investor Redressal Mechanism

At the end of day, we checked our mail box for investor grievances and retrieve if any complaint. And we follow up with client to resolve the complaint till his satisfaction. Branch wise Register of Complaints is maintained. As we have not received any complaints. Periodically feedback by concerned officer is obtained.

In case of long pending complaints we immediately takes follow up if there is no response from client side. Our reply and clarification goes immediately after receiving the same. If the same is outstanding at exchange side we also call exchange official to know the status of the complaint. Our director personally attends the complaint at IGRC and arbitration.

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Pramod Bothra
 (Director)

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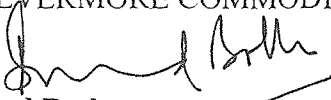
111, Essel House, 10 Asaf Ali Road, New Delhi - 110 002

Tel. 011 - 2323 1963, 2323 8983

POLICY - FOR DISTRIBUTION OF UNAUTHENTICATED INFORMATION TO CLIENTS

Whenever we got any news regarding any scrips for any type of movement in the companies and /or any financial figure, we first check the reliability of the sources from where this news have came. We do not do any buying or selling in the scrip on the basis of news only. We also do not spread any news which are base less or which spoils the integrity of the market. We don't rely on the news published in the news paper but we rely only on the companies news articles or annual report of the companies.

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Pramod Bothra
(Director)