

RISK MANAGEMENT AND SURVEILLANCE POLICY
of
Pawankumar Parmeshwarlal

- Introduction

To manage the risk in the security Market for the better survival of clients as well as company, we present our RMS Policy which also plays important roles for better and effective Compliance and Comprehensive Management of risk and effective branding of the company in the Market.

- About Risk (What is Risk)

To understand risk management, you must become familiar with the term "risk." Risk is defined as anything which poses a threat to an organization. Risk management is the process of dealing with these threats. Talking about the Risk is basically variability in possible outcomes, usually in reference to the possibility of negative results. One thing that all organizations must understand is that every one of them will face risks in one way or another. Whenever an organization or individual has objectives to meet, they will risk their resources when trying to reach these objectives. This is especially true when it comes to commercial organizations, and risk management is a tool which will allow these risks to be managed in an environment which is uncertain.

- About Risk Management

Risk management is an important concept that many employees, managers, and stakeholders refer to when they are concerned about the effects of a certain move on reaching key objectives.

Risk management is important because it gives the ability to figure out methods for which events can be managed, especially those events that may have an adverse impact on the financial or human capital of the organization. By being able to assess and identify risk, it becomes easier for one to prevent it from occurring, or to quickly address adverse events if and when they do occur.

- Limit Settings

Exposure Limits

The client agrees and confirms to abide by the exposure limits, if any, set by Pawankumar Parmeshwarlal, or by the Exchange or Clearing Corporation or SEBI from time to time.

The Stock Broker/ Trading Member may from time to time, at its sole discretion, impose and vary limits on the orders that the client place (including but not limited to exposure limits, turnover limits, limits as to number, value and / or kind of securities / contracts in respect of which buy or sell orders can be placed etc.) The client is aware and agree that the stock broker/ trading Member may need to vary or reduce the limits or impose new limits urgently on the basis of Member's risk perception and other factors considered relevant by Member and Stock Broker/ Trading Member may be unable to inform to the client of such variation, reduction, imposition in advance. The client agrees that the Pawankumar Parmeshwarlal shall not be responsible for such variation, reduction and imposition of limits.

- **Credit and Settlement**

Trading and Exposure Limit if any set for the client is based on the Funds/Securities lying in the client's account from time to time. In case any position taken in F&O segment it is necessary to maintain adequate upfront initial Margin in the client account. In case of non fulfillment of margin obligations/settlement obligation, Pawankumar Parmeshwarlal may square off whole or part of the positions at its discretion. In case of any outstanding dues arising out of square off of open positions/settlement obligation, Pawankumar Parmeshwarlal may initiate legal proceedings.

- **Margin Requirement**

We hereby classify the risk as under

1. **In Cash Segment**

Margin Requirement in cash segment is at the sole discretion of the Pawankumar Parmeshwarlal. Further, Pawankumar Parmeshwarlal may grant limit in cash segment on a case to case basis. Also Dealer is in direct touch with the client and he is well versed with the client's Financial Position and hence Pawankumar Parmeshwarlal may or may not rely upon the Dealer's decision on limit setting in Cash Segment.

2. In F & O Segment

In F&O segment, Margin is required on upfront basis. Client is allowed to take positions on fulfilling the upfront margin requirement. In F&O segment, Initial Margin is required on upfront basis. Further, Pawankumar Parmeshwarlal may demand any additional margin considering market conditions, client's risk profile etc.

- Refusal of Order

Pawankumar Parmeshwarlal shall have the absolute discretion to accept, refuse or partially accept any buy or sell order for execution from a client, in respect of penny stocks, illiquid stocks, stocks having low liquidity, illiquid "options", far month "options", writing of "options", stocks in S, Z and B2, T and TS category and any other contracts which as per the perception of Pawankumar Parmeshwarlal are extremely volatile or subject to market manipulation. Pawankumar Parmeshwarlal may permit restrictive acceptance of orders in such scrips / contracts in controlled environments. Pawankumar Parmeshwarlal shall not be responsible for delay in execution of such orders and consequential opportunity loss or financial loss to client. Pawankumar Parmeshwarlal may cancel orders in such scrips received from clients before execution or after partial execution without assigning.

- Systemic Management

We ensure to provide uninterrupted trading to the client though in case of any technical fault, there is back up line through Internet via FOW and NOW ctcl platrom. We have transparent dealing mechanism for the trades done by the clients are confirmed through telephone lines.

- Role of Risk Manager

For the better survival of organization as well as clients, the Risk Manager plays important roles and provides co- operation for better Risk Management and Surveillance so as to provide maximum transparency while dealing with the client.

In brief The Risk Manager has to perform following functions:

1. Identify Risk
2. Analyzing Risk

3. Verify the Limit Setting and Exposure Limit
 4. Monitoring Member Wise Margin Limit
 5. Generating Alert on reaching maximum% of loss in the client credit balance.
 6. Co-ordinate with other Department for Collection/Recovery
- Conclusion

The above RMS Policy is designed for better function and investor safe guard which intelligently helps to take decision based on various logics and parameters whether the company is exposed to Risk or not.