

RCSPL SHARE BROKING PRIVATE LIMITED
CIN: U51909DN2016PTC005503

Registered Office: Shop No. 5, Krishna Palace, Opp. Police Station, Tokarkhada, Silvassa,
Dadar & Nagar Haveli - 396 230, India

Corporate office: 206, 2nd Floor, Time Square, Beside Pariseema Complex, C G Road, Navrangpura, Ahmedabad-380 009

Risk Management Policy

The Risk management policy is developed by us considering the rules and circulars as issued by the SEBI/Exchanges time to time. The said policy is subject to change as per rules/regulation issued by SEBI/Exchange and also as per the ruling market environment. Salient features of the policy are as follow. Currently EPP Securities Private Limited in not engaged in clientele Business.

Deposit

All the sub-brokers and remisers are required to deposit suitable amount to cover the risk involved in settling of the trades of their clients. This deposited amount is not considered for pay-in / payout of the settlement and also no trading limit is being provided on this amount. Same way, the clients are also required to deposit sufficient fund / securities to avail trading limits.

Exposure limits

Exposure limits are allotted to the clients on the basis of his available ledger balance/securities with us. For this purpose, available securities are valued using previous days closing price. Haircut is then applied, VaR margin rate, to this value. Sum of available ledger balance and residual securities value, after applying haircut, is the Exposure limit of the client for Cash segment. In case of F&O segment, besides the aforesaid items, the securities deposited by client against margin requirement are also considered. We accept only those securities which are accepted by the exchange against margin obligation of F&O segment. These securities are also valued after applying proper haircut as instructed by the exchange.

Extra Exposure limits

During the trading session if client wish to have extra exposure limit, he/she is required to inform his concerned group in-charge about it and the concerned group in-charge after evaluating the risk involved can allow the extra exposure limit. Client can deposit the amount with us, which is required to get the extra exposure limit, afterwards.

Margin limits:

Aforesaid exposure limit, allotted to client, is subject to VAR, Extreme loss margin and other margins as charged by the exchange. XTS, supplied by Symphony Fintech Solutions Pvt. Ltd., is being used by us for trading activities. It contains features to control trading limits at ID level, Client level and Scrip level. Available exposure limit of the clients is updated daily at XTS server. On entering the order in the trading system by the client, the trading system (XTS) calculates VAR margin and Extreme loss margin requirement of the entered order and as per available exposure limit allows order to flow to the exchange. If the available exposure limit is not sufficient

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as per the VAR margin and Extreme loss margin requirement the order gets rejected. RMS team on its own discretion can impose additional Margin or increase the margin and can also increase the haircut on script on its risk preparations.

Discretions on limits:

(i) RCSPL Share Broking Pvt. Ltd. Private Limited has discretion to change the limits on the basis of risk perception and other factors Considered relevant (such as broker level/exchange level limits in specific securities or Income declaration or volume Specific exposures based on surveillance measures)

(ii) RCSPL Share Broking Pvt. Ltd. shall not be able to inform the client of such variation, reduction or imposition in advance.

(iii) RCSPL Share Broking Pvt. Ltd. shall not be responsible for client's inability to execute any order on account of any such variation, reduction or imposition of limits.

Controlling

Controlling function is done by the Risk management department. All the sub-broker / remiser are assigned to different executives (Relationship). The concerned executive is authorized for allowing extra exposure limit to the client. The concerned group executive considers the group net position, available exposure limit of the client and as well as the past record of the concerned group and client for deciding the extra exposure limit. It is at the sole discretion of the group executive to allow/disallow the request of client for extra exposure limit. In case the group executive faces some problem he/she forwards the matter to his/her senior for taking the appropriate decision.

Pay-in / Pay-out of funds and securities

Pay-in amount of clients is collected at regular basis. If there is debit ledger balance the securities purchased by the clients are not transferred to his De-mat account. If client fulfills his pay-in obligation the securities are immediately transferred to De-mat account of the client.

Clients are required to deposit deliveries against their securities pay-in obligation at our pool a/c. In case the deliveries are lying with us, against margin obligation, same are released to the pool a/c well in time. There is a facility of at our DP through which the client executes the Power of Attorney in favour of us to the DP for transfer of the shares from his account to our pool a/c. If the shares are lying at the DP account of the client and the client has executed the power of attorney in our favour, DP transfers the shares from the client demat account to our pool a/c. In case of short deliveries, short amount is immediately debited to the client account.

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Monitoring

Risk management department monitors obligation positions of the clients. Concerned group executive contacts the sub-broker / remiser for collection of overdue debits. In such cases either the client fulfills his obligation or else square offs his outstanding position. In case if there is debit balance in client account and no securities are available with us as margin, concerned group executive informs the sub-broker / remiser for collection of the overdue within a time limit. After that the Account department adjusts the default amount of client from the sub-brokerage / commission account of sub-broker / remiser. As per the recent circular we do not carry forward the client position in cash segment over 7 days of trading. In case debit continues to the extent of debit balance securities are sold out in the market on any day after T+1 days and for all the debits outstanding for more than T+1 days the company will charge delay penalty.

Delay Penalty shall be chargeable @18% p.a. on outstanding debit from the date of debit.

In the market event, EPP Securities Private Limited has the risk perception that further trading in the securities /contracts may not be allowed to its clients and/or the market for trade or further position.

The right to sell clients securities or close client's positions, without giving notice to the client, on account of non-payment of Clients dues

EPP Securities Private Limited shall have the right to sell client's securities, both unpaid securities as well as collaterals deposited towards margins, or close out client's open positions, without giving notice to the client where there is a delay /failure of the client to the pay-in obligations and/or there is a failure of the client to bring Margins and/ or additional margins to cover the increase in risk in the market conditions.

EPP Securities Private Limited shall not be responsible for any losses and penalties / charges levied by exchanges(s) caused on such square off.

EPP Securities Private Limited therefore not be under any obligation to compensate / or provide reasons of any delay or omission on its part to sell clients securities or close open positions of the client.

Illiquid Contracts.

RMS shall have 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,

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stocks having low liquidity, illiquid "options", far month "options", writing of "options", and any other contracts which as per the perception of Indira Securities Pvt. Limited are extremely volatile or subject to Market manipulation. Exchange launches contracts from time to time for trading in commodity derivatives and further the liquidity of these contracts is monitored time to time on the basis of their trading volume and availability of buyers and sellers. Trades of the clients on these contracts are blocked /unblocked at our trading /RMS software accordingly. The Concerned officer will be made responsible to monitor every new launched contract and will be responsible to block the same from its back end immediately. When liquidity comes to these contracts the responsibility of the executive will be to unblock the same for trading purpose and/or if any client willingly to trade in these illiquid contracts, he will immediately refer the matter to its RMS Head. RMS head will permit client after monitoring his trades and volumes and will permit the client to further trade in these contracts with caution. The client itself will be liable for the loss incurred done in such trades and EPP Securities Private Limited shall not be responsible for delay in execution of such orders and consequential opportunity loss or financial loss to the client. RCSPL Share Broking Pvt. Ltd. shall have the prerogative to place such restrictions, notwithstanding the fact that the client has adequate credit balance or margin available in his account and/or the client had previously purchased or sold such securities/contracts through RCSPL Share Broking Pvt. Ltd. itself.

Yours sincerely,
For, RCSPL Share Broking Private Limited.



Vanesh Pramod Banchal
Director
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