



NSE/BSE/MCX
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Company Policies

The information in this document has been classified as “**Confidential**”. This classification applies to the most sensitive business information, which is intended strictly for use within **Open Futures**. Its unauthorized disclosure could seriously and adversely impact the owner, its stakeholders, its business partners, and/or its customers leading to legal and financial repercussions and adverse public opinion.

INDEX

1. Index
2. Internal Control Policy & Risk Management
3. Anti Money Laundering Policy
4. Brokerage Charged
5. Error Account Policy
6. Investor Grievance Redressal Policy
7. Policy For Unauthentic News Circulation
8. Code Of Internal Procedures and Conduct for Prevention Of Insider Trading in Shares of The Company (As Amended)
9. Inactive Client Account Policy
10. Surveillance Policy
11. Policy for Client Code Modification
12. RMS Policy
13. Write up of KRA Processing
14. Detail Write Up – What is KYC
15. CKYC Banner
16. Policy for - code of business conduct/ ethics/ Conflicts of Interest Policy
17. Conflict of interest policy
18. Pre - funded policy
19. Policy on Outsource activity policy (we do not outsource any activity)
20. Policy For Refusal of orders for penny stocks
21. Policy for trading in illiquid stocks
22. Technical Glitches in Stockbroker's Electronic Trading System: SEBI
23. Policy for Referral Incentive Schemes
24. Policy - Use of facsimile/scanned signatures on Contract Note
25. Account Opening Process, Documents and Charges
26. Policy for NISM VII series certification.
27. Policy on Freezing / Blocking Client Account for Open Futures Version, Apr 2024 (We are currently not providing online trading facilities to our clients)

INTERNAL CONTROL POLICY & RISK MANAGEMENT

Preface:

This document shall deem to be as official guidelines, policies and procedures to be followed by Open Futures while carrying out its business activities as a Member of BSE Ltd. (Bombay Stock Exchange), NSE and MCX.

The objective of this document is to effectively manage the various risk involved in the business operations which may include default by clients, fraud and infidelity by employees, technological failures, misuse of trading system for market manipulations apart from protecting the interests of investors and ensuring the effective and timely compliance with various applicable Acts, rules, regulations, bye-laws, circulars and guidelines.

Manner of usage:

This document shall be used as guidelines and reference by the key personnel in charge of the activities namely client identification and introduction, surveillance, record keeping and the personnel in charge of executing and authorizing the day to day transactions as well as by the business associates. Who are involved in the activities as mentioned above. The Compliance Officer (CO) shall provide the copy of this document to all such existing as well as new key Personnel and Business Associates from time to time and explain the contents and their responsibilities in this regard.

Risk Management & Internal controls:

1) Registration of Clients:-

- a) It is a policy of the company to carry client registration in house.
- b) KYC procedures as prescribed by SEBI/Stock Exchange are to be strictly followed while ascertaining the identity and verifying the proof of address of the new clients.
- c) No, we do not entertain walk in clients.
- d) We take from clients networth/financial standing details which has to be supported by one of the following documents:-
 - i) Copy of ITR acknowledgement.
 - ii) Copy of Annual Returns.
 - iii) Networth certificate from a Chartered Accountant.
 - iv) Bank Account Statement for last six months.
 - v) Copy of Demat Account holding statement.

- vi) Any other document substantiating ownership of assets.
- vii) Identity Proof of Banking Account and Demat account shall be obtained before entering the details of bank and demat account in the client master database.
- viii) No we do not outsource client registration modalities.
- ix) All client registration documents, once checked, found complete and verified as such and the accounts opened, are securely stored.
- x) Yes, we had properly implement the maker-checker concept as a part of our Internal Check system and by virtue of that we duly allocate the work between the two personnel for filling of form and approval of it in order to avoid any misuse of data on unfilled areas.
- xi) We have a process of updating of client particulars i.e. address, e-mail id, contact details, etc on request of client in written.
- xii) We do UCC though online process after taking on account all due diligence before updating online.
- xiii) No, we don't have any separate marketing division.
- xiv) No, we never launched any promotional scheme till date.
- xv) No, we never offer any freebies to our clients.

2) Closure of Client accounts/ Dormant accounts

Client Accounts which are lying inactive since last 1 year from the account opening date or last transaction date done by client, will be considered as Dormant Accounts and the assets lying therein are returned back. We have categorized them into below mentioned two ways:

1 Year dormant Accounts: are those trading accounts in which trading had not placed since last one year (1 year). In this category , the client code shall be marked disabled in our back office as well as in trading platform, so that no trade can be undertaken/punched in his/her client code. If any such client who is willing to re-initiate trading in its account are required to furnish written request letter of re enablement of its UCC which should be signed by the respective client only & not by POA holder.

Very Old dormant Accounts: are those trading accounts in which trading had not placed since last TWO YEAR. Once the any client code lying inactive since Two years, the client code shall be marked as disabled in our back office as well as in trading platform, so that no trade can be undertaken/punched in his/her client code. If any such client who is willing to re-initiate trading in its account are required to fulfill KYC formalities along with a written request letter of re-enablement of its UCC which should be signed by the respective client only & not by POA holder.

3) Receiving, validating & entering the orders of clients in the trading platform:-

Normally, the new clients shall be assigned and introduced to a specific terminal operator and the operator shall be briefed about client's requirements for trading, investments and his risk taking abilities. Accordingly the terminal operator shall, under instruction from the concerned senior official.

4) Sending contract notes, daily margin statement, quarterly statement of accounts to clients

- a) As a business practice, at the time of execution of the client agreement, we obtained consent from all our clients regarding the issue of ECN and as per references Circular Download no. NSE/INSP/11324 dated 18-Sep-08, the Contract Note which are authenticated by means of digital signatures, encrypted and comply with the provisions of the IT Act, 2000 obtained from certifying authority which we send within 24 hours of execution of trades and margin details are sent on a daily basis to our respective clients, the proof of delivery / dispatch are maintained regularly. Further, in addition to the e-mail communication of the ECNs in the manner stated above, we simultaneously publish the ECN on our designated web site in a secured way and enable relevant access to the clients.
- b) Quarterly statement of account along with d-mat holding is sent by e-mail. But if client requires statement in physical form we send the statement accordingly.
- c) We have maintained the logbook of all the emails which is generated by the system and trail for bounce mails.
- d) The Contract Notes, Daily Margin Statement & Quarterly Statement of Accounts of Financial & Securities to clients through email digitally signed within prescribed time frame of exchange on designated email id registered with us.
- e) Duplicate copies of contract notes and account statement will be maintained in software itself.

5) Collection and Release of Payments to clients :-

- a) The client shall be asked to make the full payment as per the daily debit obligation on T+1 basis. The pay-out of funds shall be made on T+2 basis after confirming the successful pay-in of securities by the client. The exchange/segment wise segregated ledger account shall be maintained with an option to view the exchange position.
- b) Under written authorization from the client, the pay-out of funds can be retained for margins and/or future pay-in obligation and for collection and release of funds the account shall be maintained on a running account basis with exchange net balance criteria.
- c) No third party transfers are allowed.

6) Collection and maintenance of Margins:-

- a) The requirement of collection and maintenance of margins in Cash/Capital Market segment is waived.
- b) In case of the clients having relatively large volume and regular trading activities, the pay-out of funds and securities shall be retained towards the upfront and daily margins under the written authorization from the clients.

7) Collection and delivery of Securities to the clients:-

- a) Collection of deliveries of securities from clients shall normally be called from the clients on T+1 basis.
- b) In case of delivery pay-in obligations of large quantity/value and/or illiquid scrip shall be called for prior to the execution of sell order or as early as possible after the execution of sell order and shall be tendered to the clearing house under early pay-in mechanism.
- c) Deliveries of securities to the clients shall be effected within 24 hours from the pay-out and as far as possible the deliveries shall be given to the clients directly from the clearing house through upload of pay-out break-up files.
- d) In case of the clients who have given written authorization for retention of securities towards margin and/or future pay-in obligations, the pay-out securities of such clients shall be moved and retained in the separate BO account designated as 'Client Margin BO Account'.

8) Default by client**Internal Shortages in Obligation and Internal Auction:**

Clients are required to make Securities / Funds pay in on T+2 day. In case of default in security pay in by the client and the shortage is at member level i.e. internal shortage then close out rate is calculated as 5% above the higher closing price between trading day and pay-in day shall be recovered from the defaulting client and passed on to the respective beneficiary client.

In case of the default of securities pay-in by the client and the shortage is from the exchange, auction value of the respective exchange plus penalty (decided by the member from time to time) plus brokerage and other statutory charges shall be recovered from the defaulting client.

In the case of funds default by the client, the members shall be liquidating the stocks to recover the money. Any shortfall arising out of liquidating securities by the members shall also be recovered from the defaulting client along with interest (decided by the members from time to time).

In case of any default or if any amount is overdue from Client over such period as may be allowed by you, penalty / delayed payment charges ranging from 12% to 21% p.a. (depending upon prevalent market rate) may be charged. However, the client discloses that he/she/it is aware and specifically agree that this is just an additional / ad-hoc facility and shall not be construed / resulted into permanent practice leading to funding by broker in contravention of applicable laws.

Restrictions/Prohibition to take further position or closing existing position: Under any of the circumstances, such as, client's failure to meet pay-in or margin obligations or clearance of outstanding / debit balance with broker before permissible time limit or beyond such period as may be allowed by broker as per its RMS policy, the Client may not be permitted to take any fresh or further position until the full clearance of earlier dues, obligation, outstanding etc. In case of any delay or failure in meeting any obligation, margin requirements etc. from client side, broker might close the existing position or open position WITHOUT ANY FURTHER INTIMATION to the client as per RMS policy. Such Circumstances may include (but not limited to):

- i) failure to meet pay-in obligation on T+2 day,
- (ii) Delay in meeting the pay-in or margin requirement,
- (iii) Delay or failure in clearance of outstanding or dues to the broker,
- (iv) Returning or frequent returning of cheques of the client,
- (v) Unnecessary / Unwarranted dispute from client without any substantial cause/reason,
- (vi) Client's attitude of not coming to the amicable settlement from any dispute that can be settled without involvement of Exchange and/or SEBI,
- (vii) As per prevalent RMS policy of the Broker,
- (viii) Any direction from SEBI / Exchange or such other authorities,
- (ix) Under such other circumstances as the Broker might think just and proper on case to case basis.

Suspension / Deregistering of Client Account:

The Broker and/or client may suspend Client's Trading Account from further dealing in the securities market through the broker in following circumstances:

- 1) Incase of death/lunacy or any other disability of the client
- 2) Incase of breach of any term, condition or covenant of this agreement
- 3) Incase the client has made material misrepresentation in the facts disclosed in his KYC
- 4) If there is commencement of any legal proceedings against the client under any law in force.
- 5) If the action of the client are prima-facie illegal/improper or one that points to price manipulation or that disturbs the normal functioning capital market, whether alone or in conjunction with others.
- 6) In case the client defaults in fulfillment of his exchange related obligations
- 7) Incase of dissolution of partnership firm and the partnership firm or any of its partner being the client of the broker.
- 8) If the client has voluntarily or compulsorily become the subject of proceedings under any bankruptcy or insolvency law or being a company, goes into liquidation or has a receiver appointed in respect of its assets or refers itself under any other law providing protection as a relief undertaking.
- 9) If any covenant or warranty of the client is incorrect or untrue in any material respect.
- 10) If there is reasonable apprehension that the client would be unable to pay its debts or the client has admitted its inability to pay its debt as and when they become payable.
- 11) If a receiver, administrator or liquidator has been appointed or allowed to be appointed for all or any part of the undertaking of the client.
- 12) If there is reasonable apprehension about the clients' solvency or ability to fulfill his obligations. All losses pertaining to this effect shall be borne by the client.
- 13) Dormant or in-active status of client account beyond specified time limit as may be prescribed by Broker.
- 14) Under any circumstances mentioned in (i) to (ix) above.

9) RISK MANAGEMENT

- a) The day to day operations are being looked after by the Compliance Officer.
- b) The on-line surveillance desk is to be monitored by either of these Senior Officer where real time client wise / scrip wise position, MTM, Margin requirements, available margin and exposure limits will all exchange segment are monitored.
- c) Various types of limits on trading terminals are being set up and updated dynamically during the live market.
- d) As off line risk management reports are generated which enables to have a quick look at a glance for the status of any individual account or a group of account or for the clients.
- e) The various compliance requirements of the exchange / segments shall be ensured by the compliance officers under the supervision of the Senior Officer.

10) Square off of positions / Liquidation of securities without consent of clients

- a) Even after regular reminders, if client will fail to make the payment of the margin or pay-in, then we would squared off his/her position and before taking such action in this direction, we telephonically explain all the details to the client about our proposed action in this regard.
- b) Principally, company followed the practice of giving reasonable opportunity of being heard and gave a verbal show cause notice to such type of clients, thereafter, if company thinks it is just and reasonable to square off their position, then action will be taken in that direction.

11) Policy of internal shortage

- a) The opted policy is in line with exchange recommendations.

12) Transfer of trades

- a) Due to efficient fool proof Internal Control System is in place, such type of activities are duly monitored by the authorized persons which restrained the occurrence of any such incident.
- b) If sometime punching of order has been done by the dealer, which results in punching the order in the wrong code shall uploaded in UCC as error code.
- c) We emphasize our dealers to actively participate in the mock trading sessions organized by the NSE ,BSE & MCX from time to time in order to reduce such instances.

13) Investor Redressal Mechanism

- a) The Investor compliant register is maintained as per exchange prescribed format.
- b) At the time of opening of account, we informed to our clients about our dedicated investor grievance email & it is printed on KYC too where they can send their grievances.
- c) Complaints received, if any, by way of letter, telephonic call, personal representation, e-mail, etc are recorded in the Register of Complaints.
- d) Compliance Officer will take care of all those complaints.

14) Allotment /surrender of trading terminals , opening & closing of branches

- a) The limit of the clients are fixed subject to Initial Margin deposited or the funds given by the client, Branch or Sub Broker, as the case may be.
- b) In case of surrender of terminal, we provide facility to the clients for carrying out trade at other terminal by mapping the same at the earliest.
- c) Before any allotment or surrender of any trading terminal, the same will be informed to Exchange via ENIT.
- d) We monitor the circulars released by the NSE on regular basis in order to ensure that the vendor has still on the panel of NSE with whom we had made tie up for the Internet/CTCL based trading.
- e) We do not have any sub-broker.

15) Banking Operations and Payment of Dividend etc.:-

- a) All the bank account shall be reconciled on a regular basis by downloading the bankstatements in electronic form from the websites of respective banks.
- b) The ECS credit of dividends shall be passed on immediately at the time of bank reconciliation through journal entry in the account of relevant clients.
- c) One competent employee dedicated for the banking operations shall remain present in or around the clearing bank and ensure the availability of sufficient funds in all the clearing and clients accounts.

16) Continuity planning / alternate plan in case of disasters etc.

- a) All the Information Technology infrastructure requirements shall be in charge of the Senior Officer.

- b) There shall be sufficient and competent man power to manage the trading system failures during the live market.
- c) There shall be the back-up communication link in addition to the regular link for all the exchange segment and it shall be tested periodically.
- d) There shall be main line power input from two different routes and there shall be sufficient battery back-up through on-line UPS. Apart from that there shall be a system to quickly switch over to the power back-up through the mobile generator van in case of long power failures.
- e) In case of disaster, we can commence the operations from our any of two locations at any time since location have online connectivity, more over we keep back-up zeep, pen drive and cartridges with full data. All our data is loaded on our website which includes client transactions, contracts, ledgers, delivery statement etc. So we are well equipped with our internal system in case of disaster.

17) Detailed policy for client code modification process (including details of personnel authorized to make the modifications, checks in place to ensure that there is no misuse of the facility and escalation of analysis done of client code modifications).

- a) The client code of the trades executed by us are modified only in the circumstances that the order entry of the same may be erroneously put into the system by our dealer in wrong client code. After knowing the error done by dealer he has to report immediately the same to Trading In charge who after checking the genuinity of error done by dealer modifies the trades done on the exchange through client code modification facility provided by the exchange. We are not encouraging any type of client code modifications and only genuine errors resulting in trades are modified by us.
- b) Mr. Kuber Singh (RMS-HOD) & Ms. Bhawna Joshi (Compliance Officer) is authorised to make such modifications on the exchange platform.

18) Brokerage Charged

Open Futures is entitled to charge brokerage within the limits imposed by exchange which at present is as under:

- a. **For Cash Market Segment:** The maximum brokerage chargeable in relation to trades effected in the securities admitted to dealings on the Capital Market segment of the Exchange shall be 2.5 % of the contract price exclusive of statutory levies. It is hereby further clarified that where the sale / purchase value of a share is Rs.10/- or less, a maximum brokerage of 25 paise per share may be collected.
- b. **For Option contracts:** Brokerage for option contracts would not exceed Rs. 100/- (per lot) single side or such other rates as provided by the exchange(s)/SEBI.

The client will pay to **Open Futures**, brokerage, commission, fees, all taxes, duties, levies imposed by any authority including but not limited to the stock exchanges (including any amount due on account of reassessment / backlogs etc.), transaction expenses, incidental expenses such as postage, courier etc. as they apply from time to time to the client's account / transactions / services that the client avails

from Open Futures.

19) Record Keeping

6.1 Registered intermediaries should ensure compliance with the record keeping requirements contained in the SEBI Act, 1992, Rules and Regulations made there-under, PML Act, 2002 as well as other relevant legislation, Rules, Regulations, Exchange Bye-laws and Circulars.

6.2 Registered Intermediaries should maintain such records as are sufficient to permit reconstruction of individual transactions (including the amounts and types of currencies involved, if any) so as to provide, if necessary, evidence for prosecution of criminal behavior.

6.3 Should there be any suspected drug related or other laundered money or terrorist property, the competent investigating authorities would need to trace through the audit trail for reconstructing a financial profile of the suspect account. To enable this reconstruction, registered intermediaries should retain the following information for the accounts of their customers in order to maintain a satisfactory audit trail:

- (a) the beneficial owner of the account;
- (b) the volume of the funds flowing through the account; and
- (c) for selected transactions:

- the origin of the funds;
- the form in which the funds were offered or withdrawn, e.g. cash, cheques, etc.;
- the identity of the person undertaking the transaction;
- the destination of the funds;
- the form of instruction and authority.

6.4 Registered Intermediaries should ensure that all customer and transaction records and information are available on a timely basis to the competent investigating authorities. Where appropriate, they should consider retaining certain records, e.g. customer identification, account files, and business correspondence, for periods which may exceed that required under the SEBI Act, Rules and Regulations framed there-under PMLA 2002, other relevant legislations, Rules and Regulations or Exchange bye-laws or circulars.

20) PMLA

- a) Regular review of procedures and policies on money laundering will be done to ensure its effectiveness.
- b) Customers will be sensitized about requirements of provisions emanating from AML and CFT framework.

*We have a detail policy for PMLA.

Anti Money Laundering Policy

Background

The Prevention of Money Laundering Act, 2002 (PMLA) has been brought into force with effect from 1st July, 2005. As per the provision of the Act all the intermediaries registered under section 12 of the SEBI Act, 1992 shall have to maintain a record of all the transactions, the nature and value of which has been prescribed in the rules under PMLA. SEBI has also issued a circular no: ISD/QR/RR/AML/1/06 on Jan 18, 2006 to all intermediaries registered with SEBI under section 12 of the SEBI Act providing guidelines on Anti Money Laundering Standards.

As per the provisions of the Act senior management of the company are fully committed to establish appropriate policies and procedures for prevention of money laundering and terrorist financing and ensuring the effectiveness and compliance with all relevant legal and regulatory requirement. They have formulated a system for identifying, monitoring and reporting and reporting to law enforcement authorities about suspected transactions occurred for Money laundering and terrorist financing.

The Government of India has serious concerns over money laundering activities which are not only illegal but anti-national as well. As a market participant it is evident that strict and vigilant tracking of all transactions of suspicious nature required.

Accordingly the Company has laid down following policy guidelines:

Policy Statement

Open Futures is fully committed to combat any effort of laundering money earned through drug trafficking, terrorism and any other means of organized and serious crimes by any individual or entity. Towards this **Open Futures** has put in place all such processes and procedures of internal control aimed at preventing and impeding any attempt of money laundering and terrorist financing using the services offered by its group companies.

Open Futures has appointed **Ms. Bhawna Joshi Pandey** as the Principal Officer. She will be responsible for implementation of internal controls & procedures for identifying and reporting any suspicious transaction or activity to the concerned authorities.

Purpose & Scope of the policy:

As a Financial Market Intermediary (which includes a stock-broker, sub-broker) we need to maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules under the PMLA. Accordingly all the back office and trading staff is instructed is instructed to observe the following safeguards:

1. No Cash transactions for trading in securities shall be allowed from any client in the normal course of business.
2. Maintain a record of all the transactions; the nature and value of which has been prescribed in the Rules notified under the PMLA. Such

transactions include:

- Cash transactions of the value of more than Rs 10 lakhs or its equivalent in foreign currency.
 - All series of cash transactions integrally connected to each other which have been valued below Rs 10 lakhs or its equivalent in foreign currency where such series of transactions take place within one calendar month.
 - All suspicious transactions whether or not made in cash.
3. Frequent off Market transfers from one BO account to another shall be scrutinized and asked for. In absence of valid reason case or found suspicious, it shall be brought to the notice of Principal Officer.
 4. Trading beyond ones declared income: The turnover of the clients should be according to their declared means of income. Any abnormal increase in client's turnover shall be reported to Principal Officer. The Back Office staff should take due care in updating the clients' financial details and shall periodically review the same.

Policies & Procedures :

Customer Due Diligence :

The 'Know your Client' (KYC) Policy : -

A. While establishing the intermediary – client relationship

No account shall be opened unless all the KYC Norms as prescribed from time to time by the SEBI / Exchanges are duly complied with, all the information as required to be filled in the KYC form (including financial information, occupation details and employment details) is actually filled in and the documentary evidence in support of the same is made available by the client. Moreover all the supporting documents should be verified with originals and client should sign the KYC & MCA in presence of our own staff and the client should be introduced by an existing clients or the known reference.

The information provided by the client should be checked through independent source namely.

Pan No must be verified from Income Tax Web Site

Address must be verified by sending Welcome Letter / Qtly Statement of Account, and in case any document returned undelivered the client should be asked to provide his new address proof before doing any further transaction.

We must exercise additional due diligence in case of the **Clients of Special Category** which include but not limited to :-

- i. Non resident clients
- ii. High networth clients (i.e the clients having networth exceeding 20 Lakhs and doing the intra day trading volume of more than 2 Crore and daily delivery volume more than Rs 20 Lakhs)
- iii. Trust, Charities, NGOs and organizations receiving donations
- iv. Companies having close family shareholdings or beneficial ownership
- v. Politically exposed persons (PEP) of foreign origin

- vi. Current / Former Head of State, Current or Former Senior High profile politicians and connected persons (immediate family, Close advisors and companies in which such individuals have interest or significant influence)
- vii. Companies offering foreign exchange offerings
- viii. Clients in high risk countries (where existence / effectiveness of money laundering controls is suspect, 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.
- ix. Non face to face clients
- x. Clients with dubious reputation as per public information available etc.
- xi. Such Other persons who as per our independent judgment may be classified as CSC.

In case we have reasons to believe that any of our existing / potential customer is a politically exposed person (PEP) we must exercise due diligence, to ascertain whether the customer is a politically exposed person (PEP), which would include seeking additional information from clients and accessing publicly available information etc.

The dealing staff must obtain senior management`s prior approval for establishing business relationships with Politically Exposed Persons. In case an existing customer is subsequently found to be, or subsequently becomes a PEP, dealing staff must obtain senior management`s approval to continue the business relationship.

We must take reasonable measures to verify source of funds of clients identified as PEP.

The client should be identified by using reliable sources including documents / information and we should obtain adequate information to satisfactorily establish the identity of each new client and the purpose of the intended nature of the relationship.

The information should be adequate enough to satisfy competent authorities (regulatory / enforcement authorities) in future that due diligence was observed by the intermediary in compliance with the Guidelines. Each original documents should be seen prior to acceptance of a copy.

Failure by prospective client to provide satisfactory evidence of identity should be noted and reported to the higher authority.

While accepting a client the underlying objective should be to follow the requirements enshrined in the PML Act, 2002 SEBI Act, 1992 and Regulations, directives and circulars issued there under so that we are aware of the clients on whose behalf we are dealing.

c) While carrying out transactions for the client

RMS department should monitor the trading activity of the client and exercise due diligence to ensure that the trading activity of the client is not disproportionate to the financial status and the track record of the client.

Payments department should ensure that payment received from the client is being received in time and through the bank account the details of

which are given by the client in KYC form and the payment through cash / bearer demand drafts should not be entertained.

B. Policy for acceptance of clients:

The following safeguards are to be followed while accepting the clients:

- a. No account is opened in a fictitious / benami name or on an anonymous basis. To ensure this we must insist the client to fill up all the necessary details in the KYC form in our presence and obtain all the necessary documentary evidence in support of the information filled in KYC. We must verify all the documents submitted in support of information filled in the KYC form with the **originals and in-person verification should be done by our own staff. Moreover new client should either be introduced by an existing customer or by the senior official of the company.** In case we have any doubt that in-complete / fictitious information is submitted by the client, we must ask for such additional information so as to satisfy ourselves about the genuineness of the client and the information of the client before accepting his registration.
- b. Factors of risk perception of the client :-

Particulars	Risk Perception
Factors of Risk Perception having regard to :	
Client`s Location (Registered / Correspondence/ other address)	
- Face to Face clients of Delhi NCR	Low Risk
- Face to Face clients of other than Delhi NCR	Low Risk
- Client Introduced by existing Face to Face Clients	Low Risk
- Client Introduced by other Existing Clients	Medium Risk
- Direct Clients of Delhi NCR	Medium Risk
- Direct Clients of other than Delhi NCR	High Risk
- Non resident Clients	High Risk
Nature of Business Activity, Trading Turnover etc	
- Retail clients (average daily turnover < Rs 10 Lakhs or net settlement obligation < Rs 2 Lakhs)	Low Risk
- Retail clients (average daily turnover < Rs 25 Lakhs or net settlement obligation < Rs 5 Lakhs)	Medium Risk
- HNI Clients (average daily turnover > Rs 25 Lakhs or net settlement obligation > Rs 5 Lakhs)	High Risk
Manner of Making Payment	
- Regular payment through A/c payee cheque from the Bank A/c already mapped with us	Low Risk
- Payment through A/c payee cheque from the Bank A/c other than one already mapped with us	Medium Risk
- Payment through Banker`s Cheque / Demand Draft / Cash	High Risk
Client of Special Categories as defined under Para A (a) of these Guidelines	Very High Risk

- c. Ensure that no account is opened where we unable to apply appropriate clients due diligence measures / KYC policies. This shall be applicable in cases where it is not possible to ascertain the identity of the client or information provided by the client is suspected to be non genuine or perceived non co-operation of the client in providing full and complete information. We should not continue to do business with such a person and file a suspicious activity report. We should also evaluate whether there is suspicious trading in the account and whether there is a need to freeze or close the account.

Policy for Recruitment of personnel

The HR Department is instructed to cross check all the references and should take adequate safeguards to establish the authenticity and genuineness of the persons before recruiting. The department should obtain the following documents:

1. Photographs
2. Proof of address
3. Identity proof
4. Proof of Educational Qualification
5. References

Retention of records

Records pertaining to active clients and staff details collected for recruitment shall be kept safely.

Information to be maintained

Company will maintain and preserve the following information in respect of transactions referred to in Rule 3 of PMLA Rules for the period of 10 years.

- I. Client Registration Forms
- II. Contract Note
- III. the nature of the transactions;
- IV. the amount of the transaction and the currency in which it denominated;
- V. the date on which the transaction was conducted; and
- VI. the parties to the transaction.

Employees' Training

Company adopted an ongoing employee training program so that the members of the staff are adequately trained in AML and CFT procedures. Training requirements have specific focuses for frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new customers. It is crucial that all those concerned fully understand the rationale behind these guidelines, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements.

Investors Education

Implementation of AML/CFT measures requires back office and trading staff to demand certain information from investors which may be of personal nature or which have hitherto never been called for. Such information can include documents evidencing source of funds/income tax returns/bank records etc. This can sometimes lead to raising of questions by the customer with regard to the motive and purpose of collecting such information. There is, therefore, a need for the back office and trading staff to sensitize their customers about these requirements as the ones emanating from AML and CFT framework. The back office and trading staff should prepare specific literature/ pamphlets etc. so as to educate the customer of the objectives of the AML/CFT programme.

Reporting to FIU

As per our observations if any transaction of suspicious nature is identified it must be brought to the notice of the Principal Officer who will submit report to the FIU if required.

Above said policies are reviewed by us on regular basis to keep it updated as per the various amendments in the PMLA rules.

Brokerage Charged

Open Futures is entitled to charge brokerage within the limits imposed by exchange which at present is as under:

- a. For Cash Market Segment: The maximum brokerage chargeable in relation to trades effected in the securities admitted to dealings on the Capital Market segment of the Exchange shall be 2.5 % of the contract price exclusive of statutory levies. It is hereby further clarified that where the sale / purchase value of a share is Rs.10/- or less, a maximum brokerage of 25 paise per share may be collected.
- b. For Option contracts: Brokerage for option contracts would not exceed Rs. 100/- (per lot) single side or such other rates as provided by the exchange(s)/SEBI.

The client will pay to Open Futures, brokerage, commission, fees, all taxes, duties, levies imposed by any authority including but not limited to the stock exchanges (including any amount due on account of reassessment / backlogs etc.), transaction expenses, incidental expenses such as postage, courier etc. as they apply from time to time to the client's account / transactions / services that the client avails from **Open Futures**.

Error Account Policy

1. The modification to the client code is to be done only in exceptional cases and not as a routine one.
2. The reason for modification has to be ascertained and analyzed and genuineness is to be established and also its impact on the clients should be studied before the modification. If voice recording is in practice, the same is being studied.
3. Normally as a principle, we are permitted to change client codes of non-institutional clients only for the following objective criteria;
 - a. Error due to communication and/or punching or typing such that the original client code/name and the modified client code/name are similar to each other.
 - b. Modification within relatives (Relative for this purpose would mean 'Relative' as defined under sec. 6 the Companies Act, 1956).
4. For easy identification of error account, we register a fresh client code as "ERROR" in the UCC database of the Exchange for the account which is classified as error account.
5. We will inform the Exchange (through BEFS), by end of day, the reasons for modification of client codes of non-institutional trades based on the aforesaid objective criteria.
6. Therefore it is imperative that the issue should be reported to the senior level Manager/Director/Proprietor and only with his approval, the modification should be carried after being satisfied that it is genuine, the same is required to be done to protect the interests of the client.
7. Hence the facility to modify the client codes should be available only at the Corporate Manager level and should not be given to the branches/franchise/sub-brokers.
8. Training program should be conducted to all the Dealers and they should be explained how code modifications can be misused and what steps should be taken to avoid the same. It also should be explained that code modifications should not be encouraged to the clients except for cases like 'punching errors'/'typing errors'.

INVESTOR GRIEVANCE REDRESSAL POLICY

Table of Content

- **Introduction**
- **Detailed write up on procedure for filing a complaint on a designated email id**
 - **The mail ID will be accessed by the senior management**
 - **Types of Investor Grievances / Complaints**
 - **Key steps undertaken by the Company for handling Investor Grievances basis on the reference number i.e. (Ticket Number) issued to the each complaint lodged by the investors on the company grievance email id grievance@openfutures.in**
- **Step by step process for handling Investor Grievances**
- **Important Definitions**
- **GRIEVANCE ESCALATION DESK (Level 1, Level 2, Level 3, Level 4)**
Available on the company website <https://openfutures.co.in/>
- **Filing compliant on SCORES – Easy & quick Link: <https://scores.gov.in/scores/Welcome.html>**
- **Member Investor Charter (On website)**
 - **Annexure - A (Investor Charter for Stock Brokers) Link: [InvestorCharter – Welcome to open futures](#)**
 - **Annexure – B (Investor Compliant Data) Link: [InvestorCharter – Welcome to open futures](#)**

Introduction

At Open Futures (Group) we believe that Investor service is a vital element for sustained business growth and we want to ensure that our Investors receive exemplary service across different touch points of our company. Prompt and efficient service is essential to retaining existing relationships and therefore Investor satisfaction becomes critical to the company, especially since we follow the Direct-to-Investor model. Investor queries and complaints constitute an important voice of Investor, and this policy details grievance handling through a structured grievance redressal framework.

Detailed write up on procedure for filing a complaint on a designated email id.

The regulator has made it mandatory for each broker member to have a dedicated mail Id for the investor / customers to make his complaints / grievances with the member, and the broker is required to resolve such complaints within a reasonable time after the receipt of such complaints. The company has formed a mail ID grievance@openfutures.in to receive and address the grievances of the investors as and when they become our client/customer.

The mail ID will be accessed by the following personal from the company: -

- Designated Director
- Compliance Officer
- Departmental Heads (Accounts / Back-office / RMS)

The company shall ensure that once a complaint is received from the customer/investor, the same is attended as a top priority and provide the reply regarding the investor query as soon as possible depending on the complexity of the complaint. **All the complaints and enquiries received from the investor should be given a Reference Number i.e. (Ticket Number) for futures communication.** Many times the client enquire for information also on the investor grievance email id, then in such cases the compliance officer will bifurcate the email received as an investor grievance email or an enquiring email. **In case if it is an enquiring email then the same is required to be replied within a maximum of 3 working days. In case if it is an investor grievance then the same has to be replied after thorough study within a period of 7 working days.** In case the compliant/query is of such nature that it requires the attention and discussion of the senior management, then the said complaint/grievance should be discussed by the Investor Grievance Committee and a suitable solution must be communicated to the investor/customer at the earliest.

Types of Investor Grievances / Complaints: -

1. non-receipt / delay in payment:
2. Delay in refund of margin payment
3. Non settlement of accounts
4. non-receipt / delay in delivery or transferring securities
5. non-receipt of documents
6. Non receipt of Bills/ Contract notes
7. Non receipt of Account statements
8. Non receipt of copies of Rights & Obligation Documents.
9. Unauthorized trades / misappropriation
10. Service-related issue.
11. Excess brokerage
12. non-execution of order
13. Wrong execution of order
14. Connectivity / system related problem
15. non-receipt of corporate benefits
16. Other service defaults
17. Closing out / squaring up
18. Dispute in Auction value / close out value
19. Non implementation of arbitration award
20. Others

Key steps undertaken by the Company for handling Investor Grievances are enumerated as follows:

- The Company has designated email id i.e. grievance@openfutures.in for handling Investor grievances on which investor can make a complaint which is provided on the website of the company.
- The Client is also encouraged to register all complaints against the Broker vide letter, phone call and through fax also.
- A correspondence either by letter or mail is mandatorily made to the investor who has submitted written complaints acknowledging receipt of the complaint and assigning him a **Ticket Number** to peruse the case in futures.

- Upon receipt of the complaint, the complaint is entered into a register and tracked till its completion on the basis of the given reference number to the complaint received i.e. **(Ticket Number)**. The Compliance department will take note of the same and discuss the issue with the employee against whom the complaint is directed.
- The Compliance Officer of the Company reviews the investor complaints on weekly basis to find out whether complaint has been resolved within time or not.
- If the issue can be resolved at the Employee level it is done so and the Employee will then talk to the Client and resolve the matter.
- If the issue cannot be resolved at the Employee level, then the Top Management will come into the picture and resolve the issue directly with the Client.
- If the complaint is against the management policy, then the Management will discuss the same and give its recommendation and resolve the issue with the Client.
- If the issue still cannot be resolved with the Client at the Management level, then the issue can be taken up with the Arbitration Committee of the Exchange.

The Company has prescribed service standards for various investor related activities being handled by Open Futures (Group) and process followed by them for handling Investor Grievances are enumerated as follows:

1. At the receiving counter at our company stamp is affixed on every letter.
2. Mail is entered in system through an in-house developed program by Open Futures (Group).
3. **Open Futures (Group)** replies to mails referring to reference numbers i.e. **(Ticket Numbers)**, given to investors within seven days of the receipt of mails.
4. Status of reply given to investor's letters is updated in the mail entry system on fortnightly basis as per the tickets given to the communication.
5. List of pending mail (if any) is taken up by **Open Futures (Group)** with the Compliance Officer and after discussions /verification of records, suitable reply is drafted and issued to the investor.
6. Monthly report on receipt and redressal of investor complaints or grievances is provided to the Company.
7. Status of redressal of complaints from BSE and NSE is informed to them through Letters / email and if any telephonic enquiry is received from them full details of the case and status of redressal are provided over phone.

8. All the investor complaints/grievance received online through “SEBI Complaints Redress System” (SCORES) are checked regularly and replied/resolved expeditiously if any.

BSE - Investor Grievance Cell	NSE - Investor Grievance Cell	MCX Investor Grievance Cell
Tel. No. : 022 2272 8016/97	Tel. No. : 022 2659 8190: : 1800 220 058	Tel. No. : 022-66494040
E-mail Id : is@bseindia.com	E-mail Id : ignse@nse.co.in	E-mail Id : investor complaints grievance@mcxindia.com

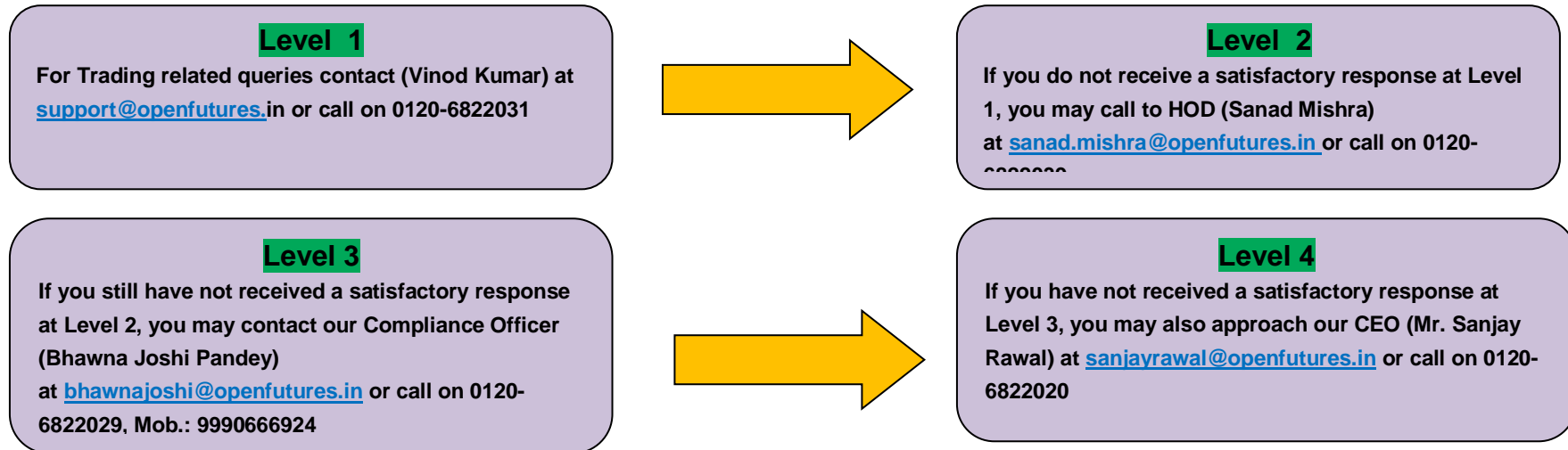
DEFINITIONS

For the purpose of this Policy, the following words will carry the meaning as under:

- a) “Board” means the Board of Directors of company.
- b) “Policy” means this Policy on Investors’ Grievance Redressal Mechanism.
- c) “SCORES” is a web based centralized grievance redressal system of **SEBI** (<http://scores.gov.in>), which enables the investors to lodge and track from anywhere, the status of redressal of such complaints online from the above website.
- d) “Securities” means Securities as defined under the Securities Contract (Regulation) Act, 1956.
- e) “Stipulated Turnaround Time” means the timelines as specified in the “Investor Service Timelines” section of this Policy.

GRIEVANCE ESCALATION

Customer Service is available – Weekdays: 9.00 AM to 6.00 PM



Customer Service is available – Mon-Sat: 9.00 AM to 6.00 PM

In absence of a response/complaint not addressed to your satisfaction, you may lodge a complaint with:

- SEBI at <https://scores.gov.in/scores/Welcome.html>
- Exchange at <https://investorhelpline.nseindia.com/NICEPLUS/>
- Exchange at <https://www.mcxindia.com/Investor-Services>
- Exchange at <https://bsecre.bseindia.com/ecomplaint/frmlInvestorHome.aspx>

*Please quote your Service Ticket/ Complaint Ref No. while raising your complaint at SEBI SCORES/ Exchange portal.

Filing compliant on SCORES – Easy & quick

- a. Register on SCORES portal (<https://scores.gov.in/scores/Welcome.html>)
- b. Mandatory details for filing complaints on SCORES i. Name, PAN, Address, Mobile Number, E-mail ID
- c. Benefits: i. Effective Communication ii. Speedy redressal of the grievances

Member Investor Charter (On website)

Annexure - A (Investor Charter for Stock Brokers) Link: [InvestorCharter – Welcome to open futures](#)

Annexure – B (Investor Compliant Data) Link: [InvestorCharter – Welcome to open futures](#)

Policy for Unauthentic News Circulation

Prohibition on circulation of unauthenticated News:

To Protect Investors to Stop Unauthenticated News Circulation by the Company's Employees/ Temporary Staff or other dealing person and by company Infrastructure.

As per code of conduct for Stock Broker in SEBI (Stock Brokers and Sub-brokers) Regulations, 1992 and SEBI circular Cir/ISD/1/2011 dated March 23, 2011, all SEBI registered market intermediaries are required to have proper internal code of conduct to govern the conduct of its Employees. In view of same, **Open Futures** implements code of conduct for communicating through various modes of communication. Company Proprietor/ Officers / Employees/ Temporary Staff /Voluntary Workers are prohibited from:

1. Circulation of unauthenticated news related to various Scrips in blogs/chat forums/e-mail etc.
2. Encouraging or circulating rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
3. Either forwarding any market related news received in their official mail/personal mail/blog or in any other manner except after the same has been seen and approved by the Compliance Officer.

Our Company Proprietor/ Officers / Employees/ Temporary Staff /Voluntary Workers are restricted from circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.

The Company Proprietor / Officers / Employees/ Temporary Staff /Voluntary Workers will have to seek prior approval from Compliance Officer of **Open Futures** before forwarding any market related news received by them either in their official mail/personal mail/blog or in any other manner and all the reporting with regard to violation of the same shall be done to the designated Compliance Officer.

If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for disciplinary action.

Access Control: Access to Blogs/chat forums/messenger sites etc. has been restricted by **Open Futures** and is not allowed.

This code can be modified/amended/alterd as required from time to time in compliance of the relevant provisions/regulations in this regard.

If any employee fails to follow these regulations he /she will be liable for strict actions.

Code Of Internal Procedures And Conduct For Prevention Of Insider Trading In Shares Of The Company (As Amended)

1. Definitions

- 1.1 “Act” means the Securities and Exchange Board of India Act, 1992 (15 of 1992) and may be referred to herein as the Act;
- 1.2 “Board” means Securities and Exchange Board of India established under Section 3 of Securities and Exchange Board of India Act, 1992.
- 1.3 “Company” means Open Futures in these Codes of Conduct.
- 1.4 “Insider” means any person who,
- i) is or was connected with the company or is deemed to have been connected with the company, and who is reasonably expected to have access, to unpublished price sensitive information in respect of securities of a company, or
 - ii) Has received or has had access to such unpublished price sensitive information.

1.5 “Connected Person” means any person who:-

a) is a director, as defined in clause (13) of section 2 of the Companies Act, 1956 of the Company or is deemed to be director of the Company by virtue of sub-clause (10) of section 307 of that Act; or occupies the position of an officer or an employee of the Company or holds a position involving a professional or business relationship between himself and the Company whether temporary or permanent and who may reasonably be expected to have an access to unpublished price sensitive information in relation to the Company;

Explanation: For the purpose of clause I, the words “connected person” shall mean any person who is a connected person six months prior to an act of insider trading.

1.6 A “Person is deemed to be a connected person” if such person –

- a) is a company under the same management or group, or any subsidiary company thereof within the meaning of sub-section (1B) of section 370, or sub-section(11) of section 372, of the Companies Act, 1956, or sub-clause (g) of section 2 of the Monopolies and Restrictive Trade Practices Act, 1969, as the case may be ; or
- b) is an intermediary as specified in section 12 of the Act, Investment company, Trustee Company, Asset Management Company or an employee or director thereof or an official of a stock exchange or of clearing house or corporation.
- c) is a merchant banker, share transfer agent, registrar to an issue, debenture trustee, broker, portfolio manager, Investment Advisor, sub-broker, Investment Company or an employee thereof, or, is a member of the Board of Trustee of a mutual fund or a member of the Board of Directors of the Asset Management Company of a mutual fund or is an employee thereof who has a fiduciary relationship with the company.
- d) is a member of the Board of Directors or an employee of a public financial institution as defined in Section 4A of the Companies Act, 1956;
or

- e) is an official or an employee of a Self-regulatory Organization recognized or authorized by the Board of a regulatory body; or
 - f) is a relative of any of the aforementioned persons;
 - g) is a banker of the company.
 - h) relatives of the connected person;
 - i) a concern, firm, trust, Hindu Undivided Family, company, Association of Persons wherein the relatives of persons mentioned in sub-clauses (f)(g)(h) have more than 10% of the holding or interest.
- 1.7 “Price Sensitive Information” means any information which relates directly or indirectly to a company and which, if published, is likely to materially affect the price of securities of company;

Explanation:- The following shall be deemed to be price sensitive information:-

- i. Periodical financial results of the company
 - ii. Intended declaration of dividends (both interim and final);
 - iii. Issue of securities or buy-back of securities
 - iv. Any major expansion plans or execution of new projects;
 - v. Amalgamation, mergers or takeovers;
 - vi. Disposal of the whole or substantial part of the undertaking; and
 - vii significant changes in policies, plans or operations of the company
- 1.8 “Un-published” means information which is not published by the company or its agents and is not specific in nature.
- Explanation:-**
Speculative reports in print or electronic media shall not be considered as published information.
- 1.9 “Designated Employee” means
- i. Board of Directors
 - ii. Directors (whether or not they are members of the Board);
 - iii. Employees of the rank of Vice President and above; and
 - iv. Employees of finance / accounts and share department of the rank of General Manager and above posted in the offices in national capital region of Delhi.

- 1.10 “Dependent” means spouse, children and parents of the designated employee.
- 1.11 “Securities” include shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature as may be issued by the company from time to time and which are listed on any Stock Exchanges.
- 1.12 “Dealing in Securities” means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any person either as principal or agent;
- 1.13 “Working day” means the working day when the regular trading is permitted on the stock exchange where securities of the company are listed.
2. Compliance Officer
- 2.1 **Mrs. Bhawna Joshi Pandey** is appointed as Compliance Officer of (**Open Futures**) and she will report to the Proprietor / Chief Executive Officer.
- 2.2 The compliance officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of price sensitive information, pre-clearing of designated employees and their dependents trades through respective department heads, monitoring of trades and the implementation of the codes of conduct under the overall supervision of the Board of the company.
- 2.3 The compliance officer shall maintain a record of the designated employees and any changes made in the list of designated employees.
- 2.4 The compliance officer shall assist all the employees in addressing any clarification regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 and the company’s code of conduct.
3. Preservation of “Price Sensitive Information”
- 3.1 Employees shall maintain the confidentiality of all Price Sensitive Information and not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities.
4. Need to know
- 4.1 Price sensitive information is to be handled on a “need to know” basis, i.e. Price Sensitive Information should be disclosed only to those within the company who need the information to discharge their duty.

5. Limited access to confidential information

5.1 Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

6. Prevention of misuse of “Price Sensitive Information”

6.1 Designated employees of the company shall be subject to trading restrictions as enumerated in the Code.

7. Trading Window

7.1 The designated employees may deal in the shares and securities on any working day during the trading hours as prescribed by the stock exchanges and this shall be called the ‘Trading Window’ except during the period when the trading window is closed. The trading window shall be closed during the time the information referred to in para 7.3 is un-published.

7.2 When the trading window is closed, the designated employees, shall not trade in the company’s securities in such period

7.3 The trading window shall be, inter-alia, closed at the time of:-

- a) Declaration of Financial results (quarterly, half-yearly and annual)
- b) Declaration of dividends (interim and final)
- c) Issue of securities by way of public / rights / bonus etc.
- d) Any major expansion plans or execution of new projects
- e) Amalgamation, mergers, takeovers and buy back
- f) Disposal of whole or substantially whole of the undertaking
- g) Any changes in policies, plans or operations of the company
- h) Any other event that may be decided by the company from time to time.

7.4 The trading window shall be opened 24 hours after the information referred to in para 7.3 is made public.

7.5 Designated employees of the company shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the company’s securities during the periods when trading window is closed, as referred to in para 7.3 or during any other period as may be specified by the company from time to time.

- 7.6 In case of ESOPs, exercise of option may be allowed when trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.
8. Pre clearance of trades
- 8.1 Designated employees of the company and their dependents who intend to deal in the securities of the company above the threshold limit of 20,000 equity shares should pre-clear the transactions as per the pre-dealing procedure as described hereunder.
- 8.2 An application in prescribed form shall be submitted to the Compliance Officer indicating the estimated number of securities that the designated employee intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- 8.3 An undertaking in the prescribed form shall be executed in favour of the company by such designated employee incorporating, inter-alia, the following clauses, as may be applicable:
- a) That the designated employee does not have any access or has not received “Price Sensitive Information” upto the time of signing of the undertaking.
 - b) That in case the designated employee has access to or receives “Price Sensitive Information” after the signing of this undertaking but before the execution of the transaction he / she shall inform the Compliance Officer of the change in his position and that he / she would completely refrain from dealing in the securities of the company till the time such information becomes public.
 - c) That he / she has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.
 - d) That he / she has made a true and full disclosure in the matter.
9. Other restrictions
- 9.1 Designated employees and their dependents shall execute their order in respect of the securities of the company within one week after the approval of preclearance is given. If the order is not executed within one week after the approval is given, the designated employee must pre-clear the transaction again.
- 9.2 Designated employees who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction.
- 9.3 In the case of subscription in the primary market, the designated employees shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

- 9.4 Designated employees shall not take any position in derivative transactions in the shares of the company at any time.
- 9.5 In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his / her reasons in this regard.
10. Disclosure
- 10.1 Designated employees of the company shall be required to disclose following details:
- a) Shareholding of the company and positions taken by them or their dependents in derivatives within 2 working days of joining the company;
 - b) Change in shareholding i.e. acquisition or sale of shares of the Company by them and/ or their dependents from previous disclosure (even if previous disclosure was nil) within 2 working days of such change. For this purpose, change in shareholding means:
 - i. The aggregate value of acquisition/ sale should be Rs. 5,00,000/- or more; or
 - ii. The number of shares acquired / sold should be 25000 or above; or
 - iii. Acquisition or sale of shares should be 1% or more of total shareholding of the Company; whichever is lower.
- 11 Reporting requirements for transactions in securities
- 11.1 Designated employees of the company shall be required to forward half yearly statements (as on 31st March and 30th September) of their securities transactions (buy/ sell) including the statements of their dependents to the Compliance Officer within 14 days of the end of the period.
- 11.2 Designated employees of the company shall be required to forward Annual statement (as on 31st March) of their shareholding in the Company as well as of their dependents to the Compliance Officer within 14 days of the end of financial year.
12. Maintenance of records
- 12.1 The Compliance Officer shall maintain records of all the declarations given by the designated employees for a minimum period of three years.
- 12.2 The Compliance Officer shall place before the Proprietor / Chief Executive Officer of the company on a monthly basis, details of the dealings in the securities by designated employees of the company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in the code.
13. Penalty for contravention of code of conduct

- 13.1 Any designated employee who trades in securities or communicates any information for trading in securities, in contravention of the Code of Conduct may be penalized and appropriate action may be taken by the company.
- 13.2 Designated employees of the company who violate the Code of Conduct shall also be subject to the disciplinary action by the company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc. as may be decided by Managing Director/Proprietor of the Company.
- 13.3 The action by the company shall not preclude the Board from taking any action in case of violation of SEBI (Prohibition of Insider Trading), Regulations, 1992.
14. Information to the Board in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 1992.
 - 14.1 In case it is observed by the company/ compliance officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 1992, the Board shall be informed by the company.

Inactive Client Account Policy

This policy defines the treatment of Dormant/Inactive accounts of the clients maintained with the company (**Open Futures**).

In order to protect the account of customer, Open Futures will deactivate the trading accounts of the client, which are identified as "Dormant" and report them as inactive in UCC.

1. **Definition of Inactive Trading accounts:** In case of trading account the term dormant/Inactive account refers to such account where no transaction have been carried out since last 12 (Twelve) months across all Exchanges.

2. **Transaction in Inactive Trading accounts:** The inactive accounts identified based on the above criteria shall be flagged as 'Inactive' by the Trading Member in UCC database of all the respective Exchanges.

The Members are also required to ensure that any further trading by such client should be allowed only after undertaking sufficient due diligence (including IPV) and obtaining the updated information related to KYC from the concerned Client. Appropriate disciplinary actions may be initiated in case of any trades are executed in any account flagged as 'Inactive'.

Categories:

1 Year dormant Accounts: are those trading accounts in which trading had not placed since last since last 1 (Year). In this category, the client code shall be marked disabled in our back office as well as in trading platform, so that no trade can be undertaken/punched in his/her client code. If any such client who is willing to re-initiate trading in its account are required to furnish written request letter of re enablement of its UCC which should be signed by the respective client only & not by POA holder.

Very Old dormant Accounts: are those trading accounts in which trading had not placed since last TWO YEAR. Once the any client code lying inactive since Two years, the client code shall be marked as disabled in our back office as well as in trading platform, so that no trade can be undertaken/punched in his/her client code. If any such client who is willing to re-initiate trading in its account are required to fulfill KYC formalities along with a written request letter of re-enablement of its UCC which should be signed by the respective client only & not by POA holder.

Procedure to be followed:

- A list of inactive clients shall be prepared from the back office software at regular interval 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 BOLT or NEAT terminals.
- The concerned department shall mark the client status as "inactive" or "dormant" in various front office software of CTCL and IML and backoffice accounting and DP 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 dates, 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 or introducer.
- Dormant client/ Block client has to update their KYC details at the time of fresh order, if required.

3. All trading members are advised to upload correct status of the client code in the UCC database of the Exchanges prior to the execution of the trades.

4. **Return of Clients assets:** Members are required to ensure that all client accounts are settled on monthly or quarterly basis (as per the client preferences) in the manner prescribed from time to time.

In case a member is unable to settle the client accounts due to non-availability of client's bank account and demat account details and non-traceability of client, Members are advised to make all efforts to trace the clients to settle their funds and securities lying with them and maintain an audit trail for such efforts made for tracing such clients and settling funds and securities of such clients. Continuation Sheet

Further in cases where Members are unable to trace such clients in spite of all efforts taken, members are directed to take the following steps:

- i. Open one separate Client Bank/Client collateral Demat account and immediately set aside the funds and securities of these clients in such account.
- ii. Maintain audit trail of UCC wise client funds transferred to/from such bank account and UCC wise / BO ID wise securities transferred to/from such demat account (as the case may be).
- iii. Submit UCC wise/BO ID wise and fund/securities information of such account to the Exchange on quarterly basis. The mechanism and the format of the same will be shared in due course.
- iv. In case of receipt of any claims from such clients, members are advised to settle the accounts immediately and ensure that the payment/delivery is made to the respective clients only.

5. Reporting of client Funds & Securities: Henceforth, Members will not be required to upload the details of such inactive clients having NIL balances in their weekly submission of securities holding to the Exchange as prescribed in NSE Circular NSE/INSP/40743 dated April 12, 2019 and NSE/INSP/41711 dated July 25, 2019 and monthly upload of client funds and securities balances to Exchange under Enhanced Supervision prescribed in NSE Circular NSE/INSP/33276 dated September 27, 2016, NSE/ISC/2017/35268 dated July 3, 2017 and NSE/ISC/36817 dated January 24, 2018.

However, details of clients having funds or securities balances shall be reported even if their UCC has been flagged as 'Inactive'.

Further as per Exchange circulars NSE/INSP/ 49743 dated 27 Sep 2021; NSE/INSP/43488 dated February 10, 2020, and NSE/INSP/46506 dated December 01, 2020 with respect to Treatment of Inactive trading account, the following policy stands modified to include the following directions:

Members are required to flag the client as inactive in UCC database of the Exchange in case the said clients have not traded in the last 12 months across all Exchanges. Members are required to undertake fresh documentation, due diligence and IPV where a client is coming for reactivation after a period of 1 year of being flagged as inactive i.e. after 2 years from their last trading date.

Further clarified that member shall flag the client as inactive in UCC database of the Exchange in case clients have not traded in the last 12 months, fresh documentation, due diligence and IPV should be undertaken only when the client seeks reactivation after a period of 1 year of being flagged as inactive i.e. after 2 years from their last trading date. Further, no communication seeking clients to trade in order to prevent accounts from being flagged inactive should be sent.

In order to reactivate the dormant account, client needs to instruct Open Futures in writing in prescribed format in advance at its Mumbai H.O. Such written request DULY SIGNED BY CLIENT may also be sent by way of e- mail to compliance department at support@openfutures.in or from client's own e-mail account registered with open Futures. We shall reactivate the said account subject to fulfillment of such conditions as Open Futures may consider fit and proper and in accordance with Exchange rules and regulations.

The policy shall be amended from time to time under the directions of SEBI and Exchanges.

ACCOUNT RE-ACTIVATION FORM is given below.

Annexure
ACCOUNT RE-ACTIVATION FORM

Date: _____

To
Open Futures,
Regd Office: 401,Chiranjiv Tower
43 Nehru Place,
New Delhi - 110019

(To be filed by Client)

Client Code	
Client Name	

I/We hereby request you to re-activate my /our account and treat this form as intimation for re-opening of the account. I/We hereby confirm that all the information provided to you with initial account opening is the same and I/We agree to abide by the exchange rules and notifications issued till date.

Client's Signature
Date.

SURVEILLANCE POLICY

(Refer revised and New Surveillance Policy)

1. Objective

In accordance with BSE Notice No. 20130307-21 dated March 07, 2013, NSE Circular No. NSE/INVG/22908 dated March 07, 2013 and MCX Circular No. adding members are required to frame surveillance policy for handling effective monitoring of trading activity of client.

This surveillance policy is defined based on the partial modification of Exchange circular nos. NSE/INVG/22908 dated March 07, 2013, and NSE/SURV/40148 dated February 05, 2019, MCX Circular no.: MCX/S&I/796/2020 dated October 26, 2020, BSE Notice No.20210929-43 Dated 29 Sep 2021 Surveillance is an integral part of any organization for monitoring the transactions based on the guidelines provided by the depository / SEBI from time to time.

In compliance with the aforesaid circulars, we (**Open Futures**) adopt and implement below mentioned Surveillance Policy covering areas mentioned in the aforementioned circular. The policy has been approved by its Proprietor in a general meeting held on 01, April 2013 at the Registered Office of the company:

2. What is Surveillance?

Surveillance is the process of collecting and analyzing information concerning markets in order to detect unfair transactions that may violate securities related laws, rules and regulations. In order to ensure investor protection and to safeguard the integrity of the markets, it is imperative to have in place an effective market surveillance mechanism. The main objective of surveillance function is to help maintain a fair and efficient market for securities.

3. Receipt of Alerts from Exchanges / generated on E-Boss, ENIT & FTP

In order to facilitate effective surveillance mechanisms at the Member level, the Exchanges provides following mandatory transactional alerts along with other alerts to the trading members through e-BOSS (BSE) and ENIT (NSE), “SFTP Root path Member ID Folder” (MCX). This facilitates the trading members to effectively monitor the trading activity of their clients. Types of Transactional Alerts provided by Exchange are as follows;

Sr.No.	Transactional Alerts	Segment
1	Significant increase in client activity	Cash
2	Sudden trading activity in dormant account	Cash
3	Clients/Group of Client(s), dealing in common scrips	Cash
4	Client(s)/Group of Client(s) concentrated in a few illiquid scrips	Cash
5	Client(s)/Group of Client(s) dealing in scrip in minimum lot size	Cash
6	Client / Group of Client(s) Concentration in a scrip	Cash
7	Circular Trading	Cash
8	Pump and Dump	Cash
9	Wash Sales	Cash & Derivatives
10	Reversal of Trades	Cash & Derivatives
11	Front Running	Cash
12	Concentrated position in the Open Interest / High Turnover concentration	Derivatives
13	Order book spoofing i.e. large orders away from market	Cash

BSE – Alerts can be downloaded by log-in into e-Boss Surveillance System.

NSE - Alerts can be downloaded by log-in into ENIT- ENIT Compliance- Investigation Department – Transactional Alerts.

MCX– Alerts can be downloaded through SFTP Root path\Member ID\Date Folder

4. Suspicious / Manipulative activity identification and reporting process

Suspicious / Manipulative activity identification and reporting process include gathering of client information, analysing client activity, seeking documentary evidences if required, monitoring the trading activities, record maintenance and reporting.

• Client Information:

- o Implementing Anti Money Laundering Policy Vis a Vis KYC standard for New Clients Acceptance and implementing high standard of due diligence process.
- o Periodic updating of client database and having system to do continuous client due diligence.

- o Identification of Beneficial Ownership
- o Identification of Multiple Accounts/common Accounts/group of Clients
- o Analysing common emails, mobile numbers, address and other linkages
- o Other publicly available information

• **Analysis Client Activity**

Clients' trading pattern or activity shall be analysed based on Alert received /generated through exchange system. There are alerts which require only client confirmation or explanations or trading history analysis and there are other alerts which require documentary evidence viz. Bank Statement or Demat Statement for +/- 15 Days as per Exchange requirements. Here Transaction Alerts falling under Sr. No. 1 & 2 requires only trading history analysis, last 12 months trading turnover analysis, turnover v/s income range comparison and client confirmation on sudden activity in dormant account. Member shall take also reasonable steps to analysis these type of alerts and shall be required to close the status of alerts or report the exchange in case of any adverse findings. In case of transactional alerts Sr. No. 3 to 13, apart from analysing trading history and income comparison, member shall take explanations regarding alerts received from the exchange and also ask for +/- 15 Days' Bank statement in case of Funds Movement and Demat Statement in case of movement of shares and Responsible person shall verify whether the funds / securities for the settlement of such trades actually belongs to the client for whom the trades were transacted or not? Member shall record observation for such transactional alerts and maintain records with regard to such analysis. In case, client failed to provide explanation or documentary evidences, such client(s) shall be deactivated and shall be activated only after they satisfy all requirement of this policy.

5. Time frame for disposition of alerts

All the alerts downloaded will be analysed by Operations Manager & Compliance Manager keeping in view Client Type, Risk Categorization, Income Range Selected and Past Trading Pattern. In case of any adverse findings, same shall be informed to Exchange with comments within 45 days of receipt of Alert. In case of delay in disposition, written extension to be taken from respective exchange and reason for the same shall be documented.

6. Monitoring and reporting:

For effective monitoring, the Company;

- Within 30 days of alert generation shall dispose off the alert, and any delay in disposition, reason for the same shall be documented.
- In case of any Suspicious or any Manipulative activity is identified, the same will be mentioned in the Register to be maintained for the purpose and will be reported to the Stock Exchanges within 45 days of the alert generation.

- a. The Company shall prepare quarterly MIS and shall put to the Directors 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 shall be taken. Also, the Board shall be apprised of any exception noticed during the disposition of alerts. The surveillance process shall be conducted under overall supervision of its Compliance Officer. Compliance Officer would be responsible for all surveillance activities carried out by the Company and for the record maintenance and reporting of such activities.
- b. Internal auditor of the Company shall review the surveillance policy, its implementation, effectiveness and review the alerts generated during the period of audit. Internal auditor shall record the observations with respect to the same in their report.

6. Record Maintenance

Member shall record observation for such transactional alerts and maintain records with regard to such analysis. Record must be maintained as per statutory time frame. A quarterly MIS shall be put up to the Board in case of any adverse findings for further action.

7. Supervision of Compliance Office

In case of any alert downloaded which is suspicious, same shall be informed to Compliance Officer. Any Corrective measures/action to be taken shall be under the supervision of Compliance Officer. Designated Operations Manager / Compliance Officer would be responsible for all surveillance activities carried out by the Trading Member and for the record maintenance and reporting of such activities.

8. Effective Date

This policy shall be made effective from 1st May, 2013 or such extended period as exchange may prescribe.

Prepared by

Bhawna Joshi Pandey
Compliance Officer

Date: 20th Aug. 2024
Place: New Delhi

Approved by

Sanjay Rawal
Director

Policy for Client Code Modification

1. Objective

To frame the guidelines for modification to client codes post trade execution and reporting of such Client Code Modifications and to fulfill compliance in accordance with SEBI requirement or, *(With reference to SEBI circular ref. no. CIR/DNPD/6/2011 dated July 5, 2011, NSE/INVG/2011/18484 and BSE Notice no :20110729-24, Notice date : Friday, July 29, 2011).*

2. Brief about Client Code Modification:

Client Code Modification means modification / change of the client codes after execution of trades. Stock Exchanges provide a facility to modify any client code after the trade has been executed to rectify any error or wrong data entry done by the dealers at the time of punching orders. However, such Client Code modification is subject to certain guidelines as to the time limit within which the client code modification is to be carried out, terminal / system on which such modifications can be done etc. The facility is mainly to provide a system for modification of client codes in case genuine errors in punching / placing the orders. It is to be used as an exception and not a routine. To prevent misuse of the facility Stock Exchanges levy penalty / fine for all non-institutional client code modifications.

3. Scope of the Policy:

This policy covers all the Client Code Modifications carried out / to be carried out in any of the client accounts controlled by HO, subject to the guidelines issued by the SEBI / Stock Exchanges from time to time, in any segment of any exchange for which **Open Futures** is a member broker.

4. “Error Trades” means the trades which will be modified / to be modified / allowed, to be modified subject to guidelines of the SEBI / Stock Exchanges and this policy.

For the purpose of this Policy, only the following types of trades shall be modified / allowed to be modified:

In case of NSE (NOTE: no consistent pattern in such modifications):

- i. client code/name and modified client code/name are similar to each other but such modifications are not repetitive.
- ii. Family Code (spouse, dependent parents, dependent children and HUF)

In Case of BSE:

- i. Punching error / typing error of client codes due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- ii. Trade entered for wrong client due to any miscommunication from the client / authorized representative of the client.
- iii. Modification within family members
- iv. Institutional trades modified to broker error/pro account

In Case of MCX

- i. Punching error / typing error of client codes due to any genuine error or mistake in order entry, while punching the order, by any of dealer.
- ii. Trade entered for wrong client due to any miscommunication from the client / authorized representative of the client.

5. General Conditions:

- (i) The facility for Client Code Modification can be used only in case of Error Trade.
- (ii) The Client Code Modification shall be carried out only on the designated system and / or as per the process as may be prescribed by SEBI / Stock Exchange.

6. Place for Client Code Modification:

Any Client Code Modification shall, subject to compliance of this policy, be carried out by RMS at HO of all the Error Trades happened in Capital Market Segment of NSE, BSE and MCX.

7. Penalty

The penalty or fine, if any, levied on **Open Futures** for any wrong trade occurred due to any miscommunication from the client / authorized representative of the client shall be borne by the client.

- 8. Client Code Modification requests will be accepted only till 3:30 PM IST.

Code Modification Summary

From	To	Allowed/Not Allowed	Penalty/No penalty
Institution	Error	Allowed	No penalty
Non Institution	Error	Allowed	No penalty
Institution	Institution	Allowed	No penalty
Client	Client	Allowed (in certain cases only)*	Penalty
* As per BSE/NSE/MCX-SX notice for permitted changes			
* In BSE BOLT, order type change is different form order code change			
Penalty of 1% or 2% of trade value depending on quantum of changes for the day will be levied by Exchanges			
Client Code Modification requests through "ERROR ACCOUNT" will be accepted only till 3:30 PM IST.			

RMS POLICY

We are running CTCL ids in all our branches and sub-brokers locations except a few where we have given the bolt terminals. This is done in order to exercise proper control over the trading activities.

All our CTCL ids are centrally monitored, and all the limits being given are also through the RMS team in the head office.

Each RMS executive has been given a charge of specific locations which he monitors on day to day basis and he has been entrusted the task of changing the limits if he feels so.

We follow a procedure where there should be minimal manual intervention in the admin terminals. We import a set of files created by our back office which mainly consists of the stocks of the client lying with us and the outstanding F&O net position if any. In addition to this we also import var margin rate file and span file. Lastly we import a deposit file in the system on the basis of which each client is assigned a particular limit.

The computation of the deposit is also automated and the deposit is computed on the basis of the credit balance of the client plus the value of securities lying with us.

We also impose an ageing check on our clients to restrict the further buying in case their debit continues in a stretch for 5 days. This ageing check gets automatically removed when the client comes in credit.

Each RMS executive has also been entrusted the job of recovery of payments from the clients of his assigned branches. Also, he ensures that he receives the periodical balance confirmation from all the clients of his assigned branches. Whenever a particular client comes in debit our RMS executive keeps an eye on that client code.

We have implemented the policy of actual settlement of funds and securities once in quarter/ month to bring transparency in dealing with clients and to avoid disputes in future.

Write up of KRA Processing

SEBI has vide its various circulars viz. MIRSD/SE/Cir-21/2011 dated October 5, 2011, MIRSD/Cir-23/2011 dated December 2, 2011, MIRSD/Cir-5/2012 dated April 13, 2012 and the SEBI (KYC Registration Agency) Regulations, 2011 notified and mandated Uniform KYC Form and supporting documents required to be used by all SEBI registered intermediaries for new client accounts as well as existing active client. The uniform KYC requirement is effective from 1 January 2012.

In view of the above, the KYC form to be used by new investors as well as existing active investor (who trade / invest / deal with us anytime starting from April 16, 2012) for obtaining KYC compliance has been modified. Accordingly, investors will be required to adhere to the new KYC norms.

As per the new KYC procedure, there shall be a common KYC Application Form for all the SEBI registered intermediaries. The New Investors will be required to use the Common KYC Application Form and carry out the KYC process including In- Person Verification (IPV) with any SEBI registered intermediaries. It is mandatory to carry out IPV of investors from the effective date. We shall perform the initial KYC of its new investors. We shall upload the details of the investors on the system of the KYC Registration Agency (KRA). KRA shall send a letter to investor after receipt of initial/updated KYC documents from our side confirming the details thereof. The same process is carried out for the existing active investors also (who trade / invest / deal with us anytime starting from April 16, 2012) Once the investor has done KYC with us, the investor need not undergo the same process again with another SEBI registered intermediary.

Details Procedure:

All clients in our Company are allowed to trade only after they have completed the Registration process including the filling of Account Opening Form & KYC Documents (KYC Documents to be done in case of non KRA Registered clients). For Clients who are already registered under KRA a softcopy of the same is download from KRA Authority and we also take fresh KYC and documents with client consent only.

In case of fresh KRA the scanned copy of the same is uploaded to KRA registering Authority for registration at their end. Further a copy of Rights & Obligations, Risk Disclosure Document, Guidance Note, and Policies & Procedures along with a copy of Tariff Sheet is given to clients. Further there are some other documents which are Non-mandatory to be executed by clients at their discretion. A receipt is taken from the client as a token of his acceptance of all the documents. After verifying the details given by clients, In-person verification is done & the client code is generated and activated in the system.

Detail write up – What is KYC

TABLE OF CONTENT			
1	• What is KYC?	19	• Final Words
2	• The Significance of KYC	20	• How to Check KYC Status?
3	• Types of KYC	21	• What does it mean to be KYC compliant?
	a) Aadhar based KYC	22	• Importance of being KYC Compliant?
	b) In-person Verification	23	• Role of KRA'S
4	• Importance of carrying out KYC	24	• How to check whether you are KYC compliant or not?
5	• What are the Documents Required for KYC	25	• How to check KYC status?
6	• KYC documents list	26	• Conclusion
7	• For Identity Proof	27	• What is e-KYC : Meaning and Process
8	• For Address Proof	28	• e-KYC Process
9	• Types of KYC verification	29	• Types of Aadhaar e-KYC :
10	• Aadhaar-based KYC	□	a) Using Biometrics:
11	• In-Person based KYC	□	b) Using OTP
12	• Understanding the KYC Process	30	• Aadhar e-KYC and government regulations
13	• What is the KYC process	31	• Understanding offline e-KYC
14	• Offline KYC Verification Process	32	• Applying for KYC online
15	• How to Update KYC Details?	33	• How do I complete KYC online?
16	• When should you update KYC	34	• How to change KYC details online?
17	• How to update KYC online	35	• Conclusion
18	• Things to keep in mind about updating KYC	36	• CKYC Banner
		□	□

What is KYC - Meaning, Types, and Importance

Since 2004, the Reserve Bank of India made it compulsory for all Indian financial institutions to verify both the identity and address of all customers carrying out financial transactions with them. Thus, the KYC process was introduced by the RBI as the only mode of verification.

What is KYC?

KYC means to 'know your customer' which is an effective way for an institution to confirm and thereby verify the authenticity of a customer. For this, the customer is required to submit all KYC documentation before investing in various instruments. All financial institutions are mandated by the RBI to do the KYC process for all customers before giving them the right to carry out any financial transactions. Whether the customer uses KYC online verification or opts for offline KYC, this is a simple one-time process.

The significance of KYC

KYC is an important tool as it looks after the financial bodies and keeps illegal activities in check. Many non-individual customers use financial services like trading and mutual fund investment. With KYC, banks have the right to verify the legal status of that entity which also includes cross-checking customers' operating addresses and verifying the identities of their beneficial owners and authorized signatories.

Additionally, the KYC process also requires the nature of employment as well as the business carried out by the customer which is useful in verifying the authenticity of an individual and/or company.

Types of KYC

There are two types of KYC verification processes. Both are equally good, and it is simply a matter of convenience whether one chooses to opt for one type over the other. Both are as follows:

- **Aadhar-based KYC:** This verification process is done online, making it highly convenient for those with a broadband or internet connection. Here, the customer needs to upload a scanned copy of their original Aadhar card. If the customer wishes to invest in a mutual fund, with Aadhar based KYC the opportunity to do so is only up to ₹50,000 a year.

- **In-Person based KYC:** If the customer wishes to invest more in mutual funds per year, they will be required to carry out an in-person verification KYC which is done offline. To do so, the customer can choose to visit a KYC kiosk and authenticate their identity using Aadhar biometrics or can call the KYC registration agency to send an executive to their home/office to carry out this verification.

Importance of carrying out KYC

KYC is essentially required if the customer wants to carry out any kind of financial transaction. After the verification process, the customer gives the financial institution that has conducted the test information about their identity, address, and financial history. This can aid the bank in knowing that the money the customer chose to invest is not one so for any money laundering related purpose.

What are the Documents Required for KYC?

KYC or 'know your customer' is a mandatory verification procedure carried out by financial institutions with the goal of minimizing illegal activities. Since 2004, the Reserve Bank of India has prohibited individuals to open a bank account, trading account or demat account without fulfilling the KYC procedure for KYC.

For any kind of financial transaction, you need to go forth with the KYC process. Once the KYC verification process is done, you have to give the financial institution that has conducted the test information about your identity, address, and financial history. This can aid the bank in knowing that the money you chose to invest was not for any illegal activities.

A list of documents is required for the KYC verification process, which almost takes just a few mins or hours to complete. These documents are listed below:

KYC documents list

The documents that are required need to be submitted as hard or scanned copies depending upon the type of KYC. Two broad sets of documents are required for KYC: proof of identity and proof of address, which can overlap, but generally vary. The documents required are as follows:

For Identity Proof

- The UID or unique identification number that comes with an Aadhar card. You can also use your voter ID, passport, or driving license.
- Your PAN card with photograph.
- An essential document bearing the photo of the applicant. This needs to be issued by the State or Central Governments.
- An identity card that is issued by scheduled commercial banks, public sector undertakings, or any public financial institutions.
- Finally, identity cards that are issued by your college, provided that the college is affiliated with Universities or any identification document provided by professional bodies like the ICWAI, ICAI, Bar Council, ICSI, etc.
- Any credit or debit card issued by a bank to an individual bearing the individual's name and address.

For Address Proof

- Voter's card/Passport/Driving License/ Registered Sale Agreement is required or Lease on residence/Maintenance bill of the flat is valid too.
- Your electricity or gas bill, telephone bill, and bill for water consumption are valid too. These bills must not be more than three months old.
- A self-declaration provided by the supreme or high court judges gives the applicant a new address which might be required in case the applicant is convicted for any reason.
- Address proof for KYC can also be issued by any of the following entities: the bank managers of Scheduled co-operative banks/scheduled commercial banks/ Gazetted Officers/ Multinational Foreign Banks/Notary public/Documents issued by any Statutory Authority or government/any representatives that have been elected to the Legislative Assembly or Parliament.
- An identity card by any of the following entities: Statutory/Regulatory Authorities, Public Financial Institutions, Public Sector Undertakings, Central and/or State Government or any of its Departments, Scheduled Commercial Banks.
- Finally, identity cards with the address printed on them issued by your college, provided that college is affiliated with Universities or any identification document provided by professional bodies like the ICWAI, ICAI, Bar Council, ICSI, etc. to students.
- For any sub-account or FII, the Power of the Attorney that is given to the Custodians by the FII/sub-account with the registered address needs to be taken.

- Address proof for KYC in the name of your spouse is valid too.

Types of KYC verification

There are two types of KYC verification processes. They both are equal in terms of their authenticity and it is a matter of convenience whether one chooses to opt for one type over the other.

Aadhaar-based KYC

The first type of KYC verification is defined as an online verification process, which is highly convenient for those with broadband or an internet connection. You need to upload a scanned copy of the original Aadhar card for this type of KYC. If you wish to invest in a mutual fund, with Aadhar based KYC the opportunity to do so is only up to ₹50,000 a year.

In-Person based KYC

On the other hand, in-person KYC verification is carried out offline. To do so, you can choose to visit a KYC kiosk, or mutual fund house and authenticate your identity using Aadhar biometrics. You can also call the KYC registration agency to send an executive to your home or office to carry out this verification.

Understanding the KYC Process

KYC or 'Know your customer' is a verification process, mandated by the Reserve Bank of India, for institutions to confirm and thereby verify the authenticity of customers. To verify their identity and address, they need to submit their KYC documentation before investing in a variety of financial instruments.

The KYC verification process is vital as it ensures that financial bodies are not being used to carry out any illegal activities. With KYC online verification and offline KYC authentication in place, financial authorities like banks and trading platforms can catch any potentially illegal activities.

Furthermore, many non-individual customers use financial services like trading and mutual fund investment. With KYC, banks and financial institutions among others have the right to verify the legal status of that entity which can include cross-checking their operating address and verifying the identities of their beneficial owners.

What is the KYC process?

The process for digital KYC is as follows:

- 1. Collection of Information:** The first step in the KYC procedure is to collect personal information about the customer. They are required to fill an online KYC registration form on their preferred portal through which they wish to carry out financial transactions. Whether the information given is correct and updated will depend on the due diligence of the applicant.
- 2. Uploading of Evidence:** After the information is collected, the applicant is required to validate the information they put in the form with relevant documents. These documents serve as evidence proving that the prior information entered by the user is authentic and not fake.
- 3. Verification:** Once the documents have been uploaded, the template for the documents is both identified and examined against various checks. This ensures that the document has not been tampered with in any way.

Once the document is validated, data is then extracted from the documents. This can be done in two ways:

- 1.** The data can be directly extracted through an OCR wherein the system will directly extract the applicant's data from their documents such as their identity and address proofs. The system then checks for anomalies in the information to validate whether it is authentic.
- 2.** There is data extraction without the OCR wherein the applicant will need to manually enter their information into the application's portal. The system's IDV solution will cross-check the information entered against the information present on the uploaded documents.

Offline KYC Verification Process

The offline KYC process is similar to the online procedure. However, one core difference is the requirement for physical copies of all documents and application forms.

- Download, print, and fill out the KYC form. You can also receive an official copy of this application form from a mutual fund house, or KYC kiosk.

- Within the form, enter your updated information which should spell checked, and must avoid missing any box. You will also be asked for Aadhar and PAN details. Ensure the numbers for both are filled correctly.
- Once the form is filled, visit the nearest KRA with all your documents so you can submit your application in person.
- You need to submit proof of your identity and proof of your address with your application form. Keep a xerox copy of these documents beforehand.
- Additionally, at some mutual fund houses or kiosks, you may have to give a biometric scan which involves fingerprints, handprints, and in some cases a photograph as well.
- Post-submission, an official application number will be assigned that will allow you to check the status of your KYC verification.

The offline KYC procedure takes around one week to be completed whereas the online KYC registration may take a shorter period. However, this can vary based on a slew of factors such as whether or not there were any errors, inconsistencies, or ambiguities in the application form. Hence, ensure that the form is correctly filled with all the latest information.

How to Update KYC Details?

E-KYC or online KYC is an effective way to submit your identity and address proofs online. It is a standardized way to check the authenticity of customers on a portal by the Indian government. To verify their identity and address, customers of the financial service are required to submit KYC documentation before investing in a variety of financial instruments like fixed deposits, mutual funds, and more.

The primary goal is to potentially catch and eliminate illegal activities on any platforms. For most portals — be it mutual funds' investments, brokerage trading platforms, and bank websites — before you create an account you will be required to carry out your KYC. The Reserve Bank of India has made it mandatory for everyone using these platforms.

When should you update KYC?

Updating KYC details online is very rare as it is not a very common thing to do so. However, it's possible to encounter a situation where you may have changed your name or address. Similar to how KYC is generally considered a one time process, so is its update. The scenarios when KYC updates may be required is as follows:

- In case you legally want to change your name then the name on your PAN card, Aadhar card, and latest passport would be different. You need to input your scanned copies of your latest Aadhar/Pan card to get your KYC updated.

- If you change your address by shifting into a new home after marriage, moving out of your house, or moving to a whole different city, a lot of your KYC documents like the Aadhar, PAN, Driving License, and Passport would need to be updated. This is when you can use the online portal to make the KYC update.

If you do not change your address or name for a second time, this process is generally considered as a one-time way to access your financial history and carry out transactions. KYC update is mandatory in case you have updated your personal details again.

How to update KYC online?

Updating your KYC online is a simple process that can be done without the hassle of visiting a kiosk in person. The process is as follows:

1. Log in to the KYC online portal.
2. Look out for an 'Update KYC' button in the settings on that portal.
3. Click on the button and it will open up the set of KYC preferences.
4. Updating whatever needs to be changed is accompanied by uploading the latest scanned copies of relevant documents for changing your name or address.
5. Before your information is saved and goes in for verification, it is required to confirm a one time password that will arrive at your registered mobile number or email.
6. Once the OTP is correctly entered, hit the 'Submit' button. Your information is now under review and you will be notified about whether your KYC verification is completed error-free within the next few days.

Things to keep in mind about updating KYC

Once the latest documents are uploaded as proof, the template for the documents are identified as valid and examined against various checks to ensure that the document has not been tampered with in any manner. This is the final layer of scrutiny that a person's application goes through for the digital KYC process.

Offline KYC updates are not as common as online KYC updates because websites and other portals notify individuals when their personal details do not match their current ones. You need to update your KYC before proceeding with any financial transaction. An offline update of KYC would involve visiting a mutual fund house, bank, or KYC kiosk in person with originals and copies of your latest documents.

Final Words

Both online and offline KYC verification procedures take around one week to be authenticated. The online KYC registration may take a much shorter time, but this can vary based on a slew of factors such as whether or not there were any errors, inconsistencies, or ambiguities in the application form. Hence, your updated information, depending on the portal carrying out KYC may take longer than usual to reflect. However, ensuring the form is correctly filled with all the latest information can expedite this entire process.

How to Check KYC Status?

The Reserve Bank of India made the Know Your Customer (KYC) process mandatory in 2002 for the customers before they begin their investing journey. All the banks had to be KYC-compliant by December 31, 2005. According to the Prevention of Money Laundering Act, 2002, and the Securities Exchange Board of India-KYC Registration Agency (SEBI-KRA) Rules, 2011, it is compulsory for all market participants to follow the KYC guidelines. The main aim of KYC was curbing illegal activities such as money laundering, terror funding, bribery, and other corrupt means of accumulating money.

What does it mean to be KYC compliant?

Complying with KYC guidelines is mandatory if you want to avail financial services or invest in various financial instruments. Being KYC compliant means that the financial house has access to all your personal information and that enables them to not only verify your credentials but also monitor your transaction trail.

Importance of being KYC Compliant?

For any financial transactions, opening a new bank account or applying for a credit card, KYC details are necessary. Similarly, if you are interested in stock markets, mutual funds investments, or want a new sim card for your mobile, KYC compliance is important. Unless you are KYC compliant, you also won't be able to make any changes in the names of your beneficiaries.

Role of KRA'S

Know Your Customer Registration Agencies (KRA's) are registered with the SEBI and maintain a central database regarding all information of investors which can be availed by various intermediaries firms.

There are five KRAs in the country:

- CDSL Ventures Ltd (CVL), a subsidiary of the Central Securities Depositories (India) Limited
- NSDL Database Management Limited (NDML), a subsidiary of the National Securities Depositories (India) Ltd,
- The National Stock Exchange's agency - DotEx International Limited (DotEx),
- CAMS Investor Services Private Limited
- Karvy Data Management Services Limited (KDMS)

Once you are KYC compliant with an intermediary, your data is stored in the central database, and you can continue making financial transactions.

How to check whether you are KYC compliant or not?

Checking KYC compliance online is simple. All you need to do is go to the website of any KRA and provide your PAN details. In the case you are not found to be KYC compliant, follow the steps as below:

1. Offline Compliance: First, you need to download the KYC form and fill out the requisite details. Thereafter, provide your ID and residence proof for which you need to submit documents such as a copy of your PAN card, Aadhar card, passport, driving license, Voter ID, or bank passbook, having your photograph.

For proof of address, you can provide documents, like recent electricity bill, rent agreement, landline bill etc along with your passport size photographs. The filled-up form along with the documents should be submitted to the relevant authorities.

2. Compliance via Aadhar based biometric: If you are interested in mutual fund investment, an authorized person from the fund house will visit your house, collect your Aadhaar card, and map your biometrics such as fingerprints. Your KYC will be validated by matching the fingerprints with the Aadhaar database.

However, Aadhaar-based compliance only allows for annual transactions, which are less than Rs 50,000. To remove this ceiling on investments, you can opt for the In-Person Verification (IPV) through a video call facility to verify your identity and address proof.

3. Online Compliance : Online KYC compliance can also be done via the websites of any KYC Registration Agency (KRA). Thereafter, create your account and provide your personal details. Then you need to enter your Aadhaar number along with the registered phone number. Your information will then be verified through an OTP.

Finally, you will be required to upload a self-attested copy of your Aadhaar card. Post completion, your request will be processed.

How to check KYC status?

After the submission of the KYC form online, the status can be checked online at the KRA's website by entering your PAN card details. All the information about the existing status of your KYC compliance application would appear. If your KYC is not verified, the status will show as pending. Otherwise, the KYC verification status will appear as 'Verified by NDML.

Conclusion

Thus, being KYC compliant is a mandatory requirement before starting your investment journey. As an investor, you can avail multiple benefits, like convenient and digitally secure transactions. However, choosing a trusted and reliable financial partner is necessary before making investments. **Open Futures (Group)** can be your trusted partner to provide you with the best financial services along with a gamut of individually tailored investment plans to help realize your investment goals.

What is e-KYC : Meaning and Process

eKYC, often called paperless KYC, is the process of electronically verifying the customer's credentials. This is mandatory for everyone to avail of the services from any financial institution. It is also called Aadhaar-based eKYC as your identity is verified electronically wherein the service provider can access the details of your Aadhaar from the Unique Identification Authority of India (UIDAI) database. Thus, this provides your proof of identity and address to the service provider instantly, eliminating the need for tedious in-person verification.

e-KYC Process



Aadhaar-based eKYC depends on the information provided by an individual to UIDAI to receive the unique 12-digit Aadhaar number. Upon receiving your Aadhaar number, it is easy to invest in fund houses as they use the eKYC Application Programming Interface (API) to get access to your Aadhar information. Through this, any licensed service provider can then verify a customer.

Types of Aadhaar e-KYC :

There are two types of Aadhaar-based e-KYC :

1. **Using Biometrics:** Here, you have to provide your 12-digit Aadhaar number along with biometrics such as fingerprints or iris scan and if you are interested in investing, then the relevant authority in the fund house will complete the verification process through this method.
2. **Using OTP:** In this case, you have to provide your Aadhaar number, and an OTP will be sent to your registered mobile phone which will then complete the whole transaction process.

Difference between Aadhaar authentication and Aadhaar e-KYC :

There are some differences between Aadhaar authentication and Aadhaar KYC. In Aadhaar e-KYC, the service provider gets access to your data from the UIDAI database, whereas Aadhaar authentication merely establishes your credentials. Simply put, it is not necessary to provide demographic details to get verified by Aadhaar authentication.

Aadhar e-KYC and government regulations:

The Supreme Court in September 2018 provided a monumental judgment by barring private entities from using Aadhaar eKYC for verification. Following that, UIDAI allowed Aadhaar eKYC for authentication purposes to private establishments. The Aadhaar and Other Laws (Amendment) Act, 2019, paved the way for online KYC verification wherein individuals voluntarily use the Aadhaar number to verify their identities, either through Aadhaar-based online KYC verification or through offline eKYC. Thus, the new stringent rules allow KYC verification online only for private entities, which have been verified by the UIDAI which prevents your Aadhaar data from being misused.

Understanding offline e-KYC:

The following offline methods can be used to verify the identity of the customer:

1. **QR Code Scan:** Here, the service provider can scan the QR code provided on your Aadhaar card to get access to the demographic information using a smartphone, without the requirement of accessing UIDAI's Aadhaar database.
2. **mAadhaar App:** This is a mobile-based Open Demat Account App allowing service providers to access demographic data.
3. **Paperless offline KYC:** Here, a customer need not provide a photocopy of the Aadhaar card, and can instead download the KYC XML from UIDAI's web portal. This process absolves the requirement for revealing Aadhaar number (instead a reference ID is shared) and doesn't require biometric verification.

Applying for KYC online?

You can easily complete your KYC online registration by making an application at the web portal of any of the SEBI-licensed KRA's. They include:

1. CDSL Ventures Ltd (CVL)
2. NSDL Database Management Limited (NDML)
3. DotEx International Limited (DotEx)
4. CAMS Investor Services Private Limited
5. Karvy Data Management Services Limited (KDMS)

How do I complete KYC online?

After creating your account at the eKYC portal of any KRA, you need to fill in your personal details like your Aadhaar card number along with your registered phone number on which you will receive an OTP. Post-verification, you have to submit a copy of your self-attested Aadhaar card. Once all this is completed, you can check your status by providing your PAN number at the KRA's web portal.

KYC compliance can also be done via an offline process wherein you just need to download the KYC form online and submit the form along with the requisite documents to the relevant authorities.

How to change KYC details online?

Digital KYC records can be changed by visiting the eKYC portal of your choice, like any KRA wherein you will click on the 'Update KYC' link. Fill in the new details, besides uploading the scanned copy of the updated documents - to establish the proof for the changes after which you will receive an OTP on your registered mobile phone number. Post-verification, you can click on submit and the details will be changed within a week.

Conclusion:

Thus, eKYC is a paperless process to fulfill the mandatory KYC requirements, before you begin your investment journey. KYC obligations through Aadhaar-based eKYC can be completed if you are interested in investing in stock markets. If you are interested in mutual fund investments as per SEBI regulations - OTP-based eKYC mutual fund investments are subject to the limit of only Rs 50,000 per annum and if you want more you can avail of the process of In-Person Verification (IPV) or Biometrics-based verification.

Choosing a trusted and reliable financial partner is vital for making the most of your investments. **Open Futures (Group)** can help you meet your financial goals with the best and diverse investment plans.

CKYC Banner

CERSAI
CENTRAL REGISTER OF SECURITY ASSET RECONSTRUCTION AND SECURITIZATION INTEREST OF INDIA

CENTRAL KYC REGISTRY

Simple

Ask for your **CKYC Identifier** now & open account faster with reduced paper-work

Faster

CKYC Identifier is linked to your KYC data

Secure

No need to submit your KYC documents at any financial institution if you have your CKYC Identifier

To know more login to www.ckycindia.in

POLICY FOR - CODE OF BUSINESS CONDUCT AND ETHICS

Introduction

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It sets out basic principles to guide all employees of the firm. It is supplemented by our Policies, Guidelines and Procedures, which, collectively, provide a framework for prudent decision-making.

All of our employees must conduct themselves in accordance with this Code and seek to avoid even the appearance of improper behavior. In this respect, our tradition is that we will engage in no business or political arrangement that would be embarrassing to us if it were published on the front page of the local paper.

A Firm can create a more restrictive policy if the partners believe such a policy would enhance the spirit and intent of this policy.

This Code also should be provided to and followed by the firm's agents and representatives, including consultants.

If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation.

Employees who violate the standards in this Code will be subject to disciplinary action. If you are in a situation that you believe may violate or lead to a violation of this Code, follow the guidelines described in Section 11 of this Code.

Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which this firm's ethical standards are built. All employees must respect and obey the laws of the cities, states and countries in which we operate. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel. The firm holds information and training sessions to promote compliance with laws, rules and regulations, including insider trading laws.

CONFLICT OF INTEREST POLICY

Introduction

SEBI vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013 issued a General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market. SEBI decided to put in place comprehensive guidelines to collectively cover such entities and their associated persons, for elimination / avoidance of their conflict of interest and educating the Associated Persons as defined in Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007 for the compliance of the guidelines.

SEBI advised to lay down, with active involvement of senior management, policies and internal procedures to identify and avoid or to deal or manage actual or potential conflict of interest, develop an internal code of conduct governing operations and formulate standards of appropriate conduct in the performance of their activities, and ensure to communicate such policies, procedures and code to all concerned;

SEBI guidelines intends Intermediaries and their Associated Persons to comply with the following –

- High standards of integrity in the conduct of business;
- Fair treatment of clients and no discrimination amongst them;
- Avoidance of conflict of personal interest with the client and primacy of clients' interest;
- Appropriate disclosure to the clients of possible source or potential areas of conflict of interest;
- Reducing the opportunities for conflict through prescriptive measures;
- Appropriate restrictions on transactions in securities while handling a mandate of issuer or client;
- Not to deal in securities while in possession of material non published information;
- Not to communicate the material non published information
- Not to manipulate the demand for, or supply of, or to influence prices of, securities.
- Not to have an incentive structure that encourages sale of products not suiting the risk profile of the clients;
- Not to share client information for the personal interest;

We **Open Futures** hereby provide the policy we maintain in order to manage conflict of interest in respect of the duties we owe to our clients.

This Policy is not intended to, and does not create third party rights or duties that would not already exist if the Policy had not been made available.

Purpose

The purpose of this document is to set out the Company's approach in identifying and managing conflict of interest which may arise during the course of its business activities. The Policy applies to all its directors, employees, any persons directly or indirectly linked to the Company (hereinafter called "related persons") and refers to all interactions with clients.

The aim of our Policy is to identify and prevent conflict of interest which may arise between the Company and its clients or between one client and another. Accordingly, we have adopted a conflict of interest policy setting out the procedures, practices and controls in place to achieve this.

The process entails the following actions:

- I. Identification of conflict of interest situations
- II. Management of conflict of interest situations
- III. Disclosure of conflict of interest and record keeping

Identification of Conflict of Interest situations

For the purposes of identifying the types of conflict of interest that arise in the course of providing investment and ancillary services or a combination thereof and whose existence may damage the interest of a client, the Company takes into account, whether the Company or a relevant person, is in any of the following situations, as a result of providing investment or ancillary services or investment activities or otherwise:

- (a) The Company or relevant person is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- (b) The Company or a relevant person has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest;
- (c) The Company or relevant person has a financial or other incentive to favor the interest of another client or group of clients over the interests of the client;
- (d) The Company or a relevant person carries the same business with the client;
- (e) The Company or a relevant person receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of money, goods or services, other than the standard commission or fee for that service.

Conflict of Interest situation can be divided into two categories:

- (a) Conflict of interest which might arise between Clients and the Company (management, employees, tied agents etc.) and
- (b) Between the clients themselves

Taking into consideration the services the Company offers, potential circumstances giving rise to Conflict of Interest may be related to the Reception and transmission of orders, Execution of orders, Dealing on own account and/or Ancillary services.

The paragraph below specifies some of the major sources of potential conflict of interest, which may arise:

- (iii) In the area of Investment Research and in particular, from the Company's own interest in the sales of financial instrument(s)
- (iv) From payments (e.g. commissions) received from or made to third parties in connection with investment services provided to them
- (v) From performance – related remuneration of employees and agents
- (vi) From other business activities of the Company, especially, from the Company's interest in profits from trading on its own account
- (vii) From personal relations of employees or members of the Company's Board of Directors or parties related to such persons

Management of Conflict of Interest situations

The Company has set up internal policies and has an in-house Compliance Department that is responsible for identifying and managing potential conflict of interest. The above mentioned Department also updates the relevant internal procedures and ensures compliance with such procedures.

The Company maintains and operates effective organizational and administrative procedures to manage the identified conflict of interest. The Company also undertakes ongoing monitoring of business activities to ensure that internal controls are appropriate.

In general, the procedures and controls that the Company follows regarding conflict of interest include the following measures:

- (a) Effective procedures to prevent or control the exchange of information between relevant persons engaged in activities involving risk of conflict of interest where the exchange of that information may harm the interests of one or more clients;
- (b) The separate supervision of relevant persons whose principal functions involve carrying out activities on behalf of, or providing services to, clients whose interests may conflict, or who otherwise represent different interests that may conflict, including those of the Company;
- (c) The removal of any direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where conflict of interests may arise in relation to those activities;
- (d) Measures to prevent or limit any person from exercising inappropriate influence over the way in which a relevant person carries out investment or ancillary services or activities;
- (e) Measures to prevent or control the simultaneous or sequential involvement of a relevant person in separate investment or ancillary services or activities where such involvement may impair the proper management of conflict of interest.

Some of these policies and procedures established to prevent Conflict of Interest are shown below:

- A 'need to know' policy governing the dissemination of confidential or inside information within the Group
- Chinese walls restricting the flow of confidential and inside information within the company and physical separation of departments
- Procedures governing access to electronic data
- Segregation of duties that may give rise to conflict of interest if carried out by the same individual
- Personal account dealing requirements applicable to relevant persons in relation to their own investments
- A gifts and inducements log registering the solicitation, offer or receipt of certain benefits
- The prohibition of external business interests conflicting with our interests as far as the Group's officers and employees are concerned, unless board approval is provided.
- A policy designed to limit the conflict of interest arising from the giving and receiving of inducements
- Establishment of an in-house Compliance Department to monitor and report on the above to the Company's Board of Directors
- Appointment of an internal auditor to ensure that appropriate systems and controls are maintained and report to the Company's Board of Directors
- Establishment of the four-eyes principle in supervising the Company's activities

Disclosure of conflict of interest and record keeping

Where the organizational and administrative arrangements described above are not sufficient to ensure with reasonable confidence that the risks of damage of the client's interests will be prevented, the Company clearly discloses the general nature and/or source of conflict of interest to the Client before undertaking business on his behalf.

Disclosure to Clients is done in sufficient detail to enable the Clients to make an informed decision about the investment and ancillary service in the context of which the conflict arises.

If the Company, however, does not believe that disclosure is appropriate to manage the conflict, it may choose not to proceed with the transaction or matter giving rise to the conflict.

The Company reserves the right to review and/or amend its Policy and arrangements whenever this is deemed to be appropriate. Further information about this summary document is available upon request.

Should you have a question about conflicts of interest please direct your questions to our Compliance Department: bhawnajoshi@openfutures.in

Insider Trading

Employees who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about the firm should be considered confidential information. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is not only unethical but also illegal. If you have any questions, please consult the firm’s Compliance Officer.

Corporate Opportunities

Employees, officers and partners are prohibited from taking personal gain through the use of firms property, information or position without the consent of the partners. No employee may use firms property, information or position for improper personal gain, and no employee may compete with the firm, directly or indirectly. Employees, officers and partners owe a duty to the firm to advance its legitimate interests when the opportunity to do so arises.

Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with the firm’s customers, suppliers, competitors and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

To maintain the firm’s valuable reputation, compliance with our quality processes and safety requirements is essential. In the context of ethics, quality requires that our products and services be designed and produced to meet our obligations to customers. All inspection and testing documents must be handled in accordance with all applicable regulations.

The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships. No gift or entertainment should ever be offered, given, or provided by any firm employee, directly or indirectly through a family member of an employee or agent unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate. Any gift given or received that is valued in excess of Rs.1000 must be reported to the partners.

Payments to Government Personnel

The Legal Framework prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

In addition, the Indian government has a number of laws and regulations regarding business gratuities that may be accepted by Indian government personnel. The promise, offer or delivery to an official or employee of the Indian government of a gift, favor or other gratuity in violation of these rules would not only violate firm policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. The firm's Compliance officer can provide guidance to you in this area.

Confidentiality

Employees must maintain the confidentiality of confidential information entrusted to them by the firm or its customers, except when disclosure is authorized by the firm's Partners or required by laws or regulations. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to the firm or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us. The obligation to preserve confidential information continues even after employment ends.

Protection and Proper Use of firm Assets

All employees should protect the firm's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the firm's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. firm equipment should not be used for non-firm business, though incidental personal use is permitted.

The obligation of employees to protect the firm's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and distribution plans, engineering ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate firm policy. It also could be illegal and result in civil or even criminal penalties.

Statements to the Public

No public statements may be made as a representative of the firm without prior authorization from the Partners.

Any employee who wishes to speak at a public event or submit an article for a publication in a trade magazine or other publication must obtain prior approval from the partners. While we recognize and support your right to engage in legal activities while you are not working, we also must be careful to (1) avoid the employee's position being mistaken for the position of the firm, (2) avoid an interpretation that the firm in any

way endorses the employee's position, and (3) avoid a violation of any other policies of the firm, including those related to conflict of interest and confidentiality of firm property and information.

Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for employees may be made only by the Partners and will be promptly disclosed as required by law or the Stock Exchange rules.

Reporting any Illegal or Unethical Behavior

We all must work to ensure prompt and consistent action against violations of this Code. In some situations, however, it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.

Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.

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Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the issue and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.

Seek help from firm resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor or where you do not feel comfortable approaching your supervisor with your question, discuss it with the partners

You may report ethical violations in confidence and without fear of retaliation. The firm does not permit retaliation of any kind against employees for good faith reports of ethical violations.

POLICY FOR PRE-FUNDED INSTRUMENTS / ELECTRONIC FUND TRANSFERS

Objective:

The objective of the policy is to prevent acceptance of third party funds and to prescribe process to deal with instruments issued by third party when received.

Open Futures does not take pre funded instruments from the clients but there is a policy for exceptional cases.

Title: Acceptance of Prefunded Instrument for trades on Exchanges. Coverage: Head office only.

Terms used in this policy:

1. Prefunded Instruments - Referred as Pay order, Demand Draft, banker's cheque etc.
2. Electronic Fund Transfers - Referred as transfer of funds using net banking

Scope: Acceptance of Prefunded Instruments like Demand Draft/Pay order/Bank Guarantees from a client against Payin Obligation/ Margin.
Procedures: The Prefunded Instruments must be accepted only in following special circumstances;

- 1) If there are Bank Holidays on the following day.
- 2) If the client does not have an account in the bank in which the company has accounts.
- 3) If the client wants to create a position immediately and has no other way of transferring funds.
- 4) If the Bank account of the client is in a cooperative bank, which may take some time for the cheque to be cleared.
- 5) If the company Bank accounts clearing branch is not available in the city/village where the client has his bank account.
- 6) All the procedures prescribed in Cir/MIRSD/03/2011 dated 9/6/2011 Dt 09/06/2011 which is annexed with.
- 7) In case of any receipt of funds by way of Electronic fund transfer, an audit trail to ensure that funds are received from respective client only has to be maintained. Necessary details may be collected from banker at which the amount is received

The Objective of this policy is to minimize the frequency of acceptance of Prefunded Instrument, especially Demand Draft where there is a difficulty in tracking the correct source of Issuance.

Permissible Limits: The Prefunded Instruments must be accepted only in cases mentioned above and not otherwise. Approval for acceptance must be taken by either of the executive Directors or the Managing Director and only then credit should be given.

Policy on Outsourcing
KYC documents: Storage & Retrieval

1 Preamble:

Open Futures is a SEBI Registered Intermediary as a **Stock Broker**. Accordingly, it is required that OPEN FUTURES shall render at all times high standards of service and exercise due diligence and ensure proper care in its operations.

SEBI being a regulatory authority has mandated to all the intermediaries registered with it to comply with various regulatory requirements and guidelines from time to time. One such **Guideline on Outsourcing of Activities by Intermediaries** has been issued by SEBI vide its Circular no. CIR/MIRSD/24/'2011 dated December 15, 2011.

As per these guidelines, Outsourcing means the use of one or more than one third party [“outsourcer(s)”] — either within or outside the group — by a registered intermediary to perform the activities associated with services which the intermediary offers. In other terms, outsourcing involves transferring responsibility for carrying out an activity of an intermediary (previously carried on internally) to an outsourcer for an agreed charge. The outsourcer provides services to the customer (intermediary) based on a mutually agreed service level, normally defined as per mutual terms and conditions or as per a formal contract.

Many commercial benefits have been ascribed to outsourcing, the most common amongst these being:

Reducing the organization’s costs
Greater focus on core business by outsourcing non-core functions
Access to world-class skills and resources
Accordingly, OPEN FUTURES announces this Outsourcing policy.

Though Open Futures is currently not outsourcing any business activity.

2 Objective:

In order to guide the Board (means Board of Directors of OPEN FUTURES) about the assessment of whether and how the outsourced activity(ies) can be outsourced, this comprehensive policy is being announced and implemented. The objective of this policy is to further specify inter-alia about (i) the scope of policy (ii) criteria to select an outsourcer (iii) nature of activities to be outsourced (iv), various controls to reduce the risks associated with outsourcing and (v) to ensure the high standards of services all the time as well as proper care in OPEN FUTURES’s operations.

3 Scope:

The policy applies throughout **ORGANIZATION. Open Futures Group** shall follow various principles for outsourcing as may be prescribed by SEBI in the captioned circular dated 15thDecember, 2011.

4 Policy Segments:

4.1 *Choosing an outsourcer*

OPEN FUTURES shall invite bids from various parties to act as the Outsourcer for the Company. While selecting an outsourcer, OPEN FUTURES shall inter-alia take into account the following:

Outsourcer's resources and capabilities Its financial soundness and capabilities to perform the work within fixed timelines
 Compatibility of the practices and systems of an outsourcer Outsourcer's business reputation and past track record Quality of services provided to other customers Location of an outsourcer

4.2 *Nature of Activities outsourced/ to be outsourced*

Currently Open Futures is not outsourcing any business activities.

However, the core business activities such as compliance functions, execution of orders and monitoring of trading activities of clients, dematerialization of securities, investment related activities, KYC requirements as per SEBI (KRA) Regulations, 2011 etc. shall not be outsourced.

4.3 *Authorities approving Activities*

The Board of Directors of the Company shall be responsible for approving the activities outsourced / to be outsourced. However, the review of the activities outsourced shall be done by the Management Committee of Board of Directors of OPEN FUTURES at regular intervals as it may deem fit in the wake of changing business environment.

4.4 *Review of Policy and Assessing Outsourcing Risks*

In addition to the regular review and monitoring of outsourcing policy, the Management Committee shall have overall responsibility for ensuring that all the ongoing outsourcing decisions taken by the Company and the activities undertaken by the third party are in consonance with the outsourcing policy.

Further the Management Committee shall be responsible for assessing and evaluating the risks during the review of the outsourcing activities and take necessary action in case if any discrepancy is found during the process. The risks associated with outsourcing can be categorized as operational risk, reputational risk, legal risk, country risk, exit-strategy risk, counter party risk, etc

5. **Risk Management Program:**

5.1 *Evaluation of Third Party*

As a part of comprehensive outsourcing risk management program, the Management Committee shall assess the materiality of the outsourced activity based on the following factors:

- a) The impact of failure of third party to adequately perform the activity, on the financial, reputational and operational performance of the Company and on the investors /clients;
- b) Ability of the Company to cope up with the work, in case of non performance or failure by third party by having suitable back-up arrangements;
- c) Regulatory status of third party including its fitness and probity status;
- d) Situations involving conflict of interest between the company and the third party and the measures put in place by the Company to address such potential conflicts, etc.

The result of the risk assessment shall be presented to the Board of Directors for approval prior to signing/ renewing the outsourcing contract. Board of Directors shall decide whether the Company will benefit overall by

outsourcing the function to the outsourcer, taking into account the above factors as presented by the Management Committee. If the risks involved are high and the commercial benefits are marginal (e.g. if the controls necessary to manage the risks are too costly), the function shall not be outsourced.

5.2 *Outsourcing to Related Party*

In case the Company is desirous of appointing any group entity/ associate of the Company as the third party for outsourcing of activities, it shall take due care and ensure that an arm's length distance has been maintained between the Company and the related third party in terms of infrastructure, manpower, decision-making,

record-keeping, etc. for avoidance of potential conflict of interests. Necessary disclosures shall be obtained by the Company from the third party and further the Company shall ensure that the risk management practices adopted by the Company while outsourcing to a related party or an associate would be identical to those followed while outsourcing to an unrelated party.

5.3 *Maintenance of Records*

The records relating to all activities outsourced shall be preserved centrally i.e. at the Corporate/ Head office so that the same is readily accessible for review by the Board and/ or Management Committee as and when needed. Management Committee shall ensure that such records are regularly updated and may also form part of the corporate governance review by the management.

5.4 Reviews by Internal or External Auditors

Wherever felt necessary, the Board shall mandate regular reviews by internal or external auditors of the outsourcing policies, risk management system and requirements of the regulator. Further, the financial and operational capabilities of the third party in order to assess its ability to continue to meet its outsourcing obligations shall be reviewed as and when deem fit and proper.

6 Accountability of the Company:

- 1) OPEN FUTURES shall be fully liable and accountable for the activities that are being outsourced to the same extent as if the service were provided in-house.
- 2) Outsourcing arrangements shall not affect the rights of an investor or client against the Company in any manner. The Company shall be liable to the investors for the loss incurred by them due to the failure of the third party and also be responsible for redressal of the grievances received from investors arising out of activities rendered by the third party.
- 3) The facilities / premises / data that are involved in carrying out the outsourced activity by the third party shall be deemed to be those of the Company and that the Company itself and Regulator or the persons authorized by it shall have the right to access the same at any point of time.
- 4) Outsourcing arrangements shall not impair the ability of SEBI/SRO or auditors to exercise its regulatory responsibilities such as supervision / inspection of the Company.

7 **Due Diligence and Monitoring of the Third Part:**

The Company shall all the time exercise due care, skill, and diligence in the selection of the third party and ensure that the third party has the ability and capacity to undertake the provision of the service effectively.

The due diligence undertaken by the Company shall include assessment of:

- a. third party's resources and capabilities, including financial soundness, to perform the outsourcing work within the timelines fixed;
- b. compatibility of the practices and systems of the third party with the intermediary's requirements and objectives;
- C. market feedback of the prospective third party's business reputation and track record of their services rendered in the past;
- d. level of concentration of the outsourced arrangements with a single third party; sand
- e. the environment of the state/ country/ region where the third party is located.

8 Contract and Agreements:

A formal contract between the Company and the outsourcer shall be entered to protect the interest of both the parties. Proper care shall be taken to ensure that the Outsourcing contract:

- a) clearly defines what activities are going to be outsourced, including appropriate service and performance levels;
- b) provides for mutual rights, obligations and responsibilities of the Company and the outsourcer, including indemnity;
- c) provides for the liability of the outsourcer to the Company for satisfactory performance/ other breach of the contract
- d) provides for the continuous monitoring and assessment by the Company of the outsourcer so that any necessary corrective measures can be taken up immediately, i.e., the contract shall enable the Company to retain an appropriate level of control over the outsourcing and the right to intervene with appropriate measures to meet legal and regulatory obligations;
- e) includes, where necessary, conditions of sub-contracting by the Outsourcer;
has unambiguous confidentiality clauses to ensure protection of proprietary and customer data during the tenure of the contract and also after the expiry of the contract;
- g) specifies the responsibilities of the outsourcer with respect to the IT security and contingency plans, insurance cover, business continuity and disaster recovery plans, force majeure clause, etc.;
- h) provides for preservation of the documents and data by outsourcer;
- i) provides for the mechanisms to resolve disputes arising from implementation of the outsourcing contract;
- j) provides for termination of the contract, termination rights, transfer of information and exit strategies;
- k) neither prevents nor impedes the Company from meeting its respective regulatory obligations, nor the regulator from exercising its regulatory powers; and
- l) provides for the Company and /or the regulator or the persons authorized by it to have the ability to inspect, access all books, records and information relevant to the outsourced activity with the outsourcer.

9 Contingency Plans:

The Company and its outsourcer shall establish and maintain contingency plans, including a plan for disaster recovery and periodic testing of backup facilities. Specific contingency plans shall be separately developed for each outsourcing arrangement, as is done in individual business lines. Further:

- a) The Company shall take appropriate steps to assess and address the potential consequence of a business disruption or other problems at the Company's level as well as at the outsourcer's level.
- b) It shall consider and co-ordinate the contingency plans at both the levels
- c) To ensure business continuity, robust information technology security is a necessity. A breakdown in the IT capacity may impair the ability of the Company to fulfill its obligations to other market participants/ clients/ regulators and could undermine the privacy interests of its customers, harm the Company's reputation, and may ultimately impact on its overall operational risk profile. The Company shall, therefore, seek to ensure that the outsourcer maintains appropriate IT security and robust disaster recovery capabilities.
- d) Periodic tests of the critical security procedures and systems and review of the backup facilities shall be undertaken by the Company to confirm the adequacy of the outsourcer's systems.

10 Confidentiality:

The Company shall take appropriate steps to require that the outsourcer protects confidential information of both the Company and its customers from intentional or inadvertent disclosure to unauthorized persons. The Company shall take proper care to:

- a) protect its proprietary and confidential customer information and ensure that it is not misused or misappropriated.
- b) ensure that the employees of the outsourcer have limited access to the data handled and only on a "need to know" basis and the outsourcer shall have adequate checks and balances to ensure the same.

In cases where the outsourcer is providing similar services to multiple entities, the Company shall ensure that adequate care is taken by the outsourcer to build safeguards for data security and confidentiality.

In instances, where the Outsourcer acts as an outsourcing agent for multiple intermediaries, the Company shall take proper care and ensure that strong safeguards are put in place so that there is no co-mingling of information / documents, records and assets.

11 Disclaimer:

This Outsourcing Policy is prepared by **Open Futures** in terms of SEBI's Circular No. CIR/MIRSD/24/2011 dated 15th December, 2011 for internal circulation only. The use of this Policy or any matter contained herein, in any manner, without the express written permission from OPEN FUTURES may lead to legal proceedings against the user at the sole discretion.

Policy For Refusal of orders for penny stocks

A penny stock can be typified as one which has one or more of the given below characteristics:

- Stock that trades at a relatively low price and /or market capitalization
- Highly speculative and risky because of lack of liquidity
- Large bid-ask spreads
- Showing sporadic volume pattern in tandem with bulk trades
- Association with errant promoters and/or classified under Z or T group by exchanges

Stocks that are on the illiquid stocks list issued by the Bourses periodically are considered as penny stocks. Our RMS reserves the “right to refusal” to trade in such stocks and consequently all losses pertaining to it would be borne by the client. The dealers and clients should refer updated GSM and ASM scrip’s list also before execution of any trade. All margins and conditions associated to GSM and ASM list of shares must be mandatorily adhered to by the clients.

Policy for trading in illiquid stocks

As per SEBI's direction, the Exchanges draw up a list of illiquid securities on monthly basis, based on criteria jointly decided by SEBI, NSE and BSE. The list is then made known through exchange circular.

We as trading member are advised to exercise additional due diligence while executing trades in these securities either in Pro account or on behalf of our clients.

An illiquid stock can be typified as one which has almost all the given below characteristics:

- Highly speculative and risky because of lack of liquidity
- Large bid-ask spreads
- Showing sporadic volume patterns
- Periodically classified by Exchanges in their list of –'illiquid securities', intimated through their daily notices.

Our RMS reserves the "right to refusal" to trade in such stocks and consequently all losses pertaining to it would be borne by the client. The client should also be ready to pay 100% margin pertaining to the scrip, if need be. Such stocks would not be considered for client's exposure or margin. The dealers and clients should refer GSM and ASM scrip's list also before execution of any trade.

Technical Glitches in Stock Broker's Electronic Trading System: SEBI

Table of Contents

- What Is The Definition Of A Technical Glitch?
- What are the Reporting Requirements for Technical Glitches in the Stock Broker's Electronic Trading system?
- What Is A Capacity-Building System By Stockbrokers?
- What Is The Framework For Software Testing?
- What is the monitoring framework for avoiding Technical glitches in Stock Broker's Electronic Trading System?
- What Is Business Continuity Planning (BCP) And Disaster Recovery Site (DRS)?
- What Are Financial Disincentives Provided Under The Circular?
- What Are The Directions For The Dissemination Of Information?
- Conclusion

The interests of the investor are paramount. Therefore, any inconvenience caused to the investor should be strictly resolute as early as possible. In order to ease the process of investing process, technological innovations are introduced in the securities market for efficient and effective management and buying & selling of securities by the investors. With technological innovation, the chances of technological interruptions and technical glitches are also at risk. Therefore, in order to solve this problem, the SEBI has constituted a working committee to provide suitable recommendations for addressing this issue. Based on the express views and recommendations of the working committee, the SEBI has decided to address the issue of Technical glitches in Stock Broker's Electronic Trading System by way of issuing a circular on “**Framework to address the technical glitches in Stock Broker's Electronic Trading Systems**” dated **25th November 2022**.

What Is The Definition Of A Technical Glitch?

As per the circular on Technical glitches in Stock Broker's Electronic Trading System, the term "technical Glitch" could be understood as any malfunction in the systems of a Stock Broker, including malfunction in the software, hardware, network, processes and any other products & services offered by the stockbroker in the electronic format.

In addition to this, the technical glitches in Stock Broker's Electronic trading system must also include any malfunction due to Inadequate infrastructure, Cyber- attacks, or incidents, Procedural errors, omissions or process failures in the system of a Stockbroker or in the systems which are sourced from the third party that lead to the stoppage, slow down and variance in the ordinary functions or operations or services of systems of the stock broker for a continuous period of 5 minutes or more.

What Are The Reporting Requirements For Technical Glitches In The Stock Broker's Electronic Trading System?

As per the circular on Technical glitches in Stock Broker's Electronic Trading System, the stockbroker will undertake the following requirements for any technical glitches in the Stock Broker's Electronic Trading System:

Inform the Stock Exchanges: The stock brokers shall immediately inform the stock exchanges about the incident of technical glitch by not later than 1 hour from the occurrence of such glitch.

Submission of Preliminary Report: The Stockbrokers shall submit a preliminary incident report to the Stock Exchange within T+ 1 day, T being the date of the incident. The report shall further contain the date & time of the incident, details of the incident, the effect of the incident and the action taken to rectify the said incident.

Submission of Root Cause Analysis: The stock broker shall submit a root cause analysis of the technical glitch to the exchange within 14 days from the incident date. The root cause analysis should contain the stockbroker's name, exchange name and code, SEBI Registration Number, name and contact details of a designated officer or reporting officer, Date and time of the Incident, Duration of the Incident, Description of incident, impact on the business, Immediate action taken, date & time of recovery etc.

Communication of Information: The stock brokers have to submit the information stated above by mailing it to the E-mail address: infotechglitch@nse.co.

Examining reports by stock exchanges: The stock exchange shall independently monitor the technical glitches and the report or RCA for appropriate action.

What Is A Capacity-Building System By Stockbrokers?

The increase in the number of investors may burden the stock broker's electronic trading system. Therefore, the stockbroker must undertake adequate capacity planning for continuity in the service. The stock broker shall plan for the entire trading infrastructure, including server capabilities, network availability & the serving capacity of the trading applications. The stock brokers shall, in addition to undertaking capacity planning, also adhere to the following requirements:

Monitor Peak Load: The stock brokers must monitor the peak load in their trading applications, servers & network architecture. It shall be determined based on the highest peak load noted by the stock broker in a calendar year. Further, it is mandatory that the installed capacity must be at least 1.5 times the observed peak load.

Deploy adequate monitoring systems: The stock brokers shall put in place adequate monitoring systems within their networks & systems for the timely alert on the over-utilisation of the capacity if it goes beyond the permissible limit of 70 % of its installed capacity.

Achieve full Redundancy: The stock broker shall aim to achieve full redundancy in their IT system relating to the trading applications to ensure service continuity at the primary data centre.

What Is The Framework For Software Testing?

As per the circular on technical glitches in Stock Broker's Electronic trading System, it is required that the software system of the stock brokers be rigorously tested before they are put to use in production systems since the software applications are subject to updates and changes. The software system can impact the functioning and therefore, the stockbroker must adopt the following framework for carrying out software-related activities and changes:

Adopt Test-Driven Environment: The stock brokers should create a test-driven environment for testing all types of software developed by them or their vendors.

Automated Environments: The software testing can be done in automated environments by specified stock brokers.

Preparation of Traceability Matrix: The stock broker should prepare a traceability matrix between functionalities and unit tests at the time of developing any software to be used in the trading activities.

Implement Change Management Process: The stock broker should adopt a change management process that will help avoid any risk that may arise due to unplanned and unauthorised changes in their software, hardware, network etc.

Periodical Update: The stock broker shall periodically update their assets, including servers, operating systems, databases, network devices and firewalls, IDS or IPS etc., with the latest version.

What Is The Monitoring Framework For Avoiding Technical Glitches In Stock Broker's Electronic Trading System?

In order to avoid any technical glitches in Stock Broker's Electronic trading system, the stock brokers shall actively monitor the technical glitches to mitigate its impact. In this regard, the stock exchanges must build API based logging & Monitoring Mechanism (LAMA), which shall be operated between the stock exchanges and specified stock broker's trading systems. In accordance with this mechanism, the Specified Stock Brokers should monitor the functional parameters & key systems to ensure that their trading system functions properly and smoothly. The stock exchanges shall undertake the following monitoring requirements:

1. The stock exchanges shall use the API gateway to monitor the key parameters to know the health of the trading system of specified stock brokers.
2. The stock exchanges must monitor key parameters in consultation with the stock brokers and shall monitor it on a real-time or near real-time basis.
3. The stock exchanges must maintain a dedicated cell for monitoring key parameters and technical glitches in Stock Broker's Electronic trading system. Further, the dedicated cell immediately specifies the concerned stock broker about the key parameters' breach.
4. The stock exchanges and stock brokers shall maintain a record of the key parameters for 30 days. Further, the data related to technical glitches shall be maintained for 2 years.

What Is Business Continuity Planning (BCP) And Disaster Recovery Site (DRS)?

As per the circular on Technical glitches in Stock Broker's Electronic Trading System, the stock brokers are required to put in place a comprehensive BCP-DR policy which shall outline the standing operating procedure to be followed in the event of any disaster. A suitable framework shall be established to

monitor the critical systems' health and performance during the ordinary business course. The policy shall be reviewed periodically to determine the incident that may affect business continuity.

The other requirements for BCP-DR policy under the circular are:

Minimum Client Base: The stock brokers within the stock exchanges shall mandatorily establish a **business continuity planning or DR** set-up.

DRS to be set up in Different Seismic Zones: The Disaster recovery site shall be established in different seismic zones, whereas, in the case of operational constraints, the chances of geographical separation are not possible. Therefore, the Primary Data Centre (PDS) and DRS shall be separately located from each other by a distance of at least 250 Km. to ensure that both centres are not affected by the natural Disaster. Moreover, the DRS site shall be made accessible to the Primary Data centre for syncing the data across two sites.

Conduct DR Drills or Live trading from the DR site: The stock brokers shall conduct DR drills or live trading from the DR site. The drills shall include conducting all operations from the DR site for at least one full trading day. Further, the frequency of such drills shall be decided by the stock exchanges in consultation with the stock brokers.

Shifting of operation from PDC to DR site: The stock broker shall appoint team members who will make decisions about shifting of operations from the primary site to the DR site, putting adequate resources at the DR site, & setting up mechanism to make DR site operable from the PDC etc.

Correspondence environment between PDC and DRS: There shall be adequate resources in the hands of the stockbroker to handle the operations at PDC and DRS. The hardware and software systems of the application environment of DRS & PDC shall have correspondence between them.

Recovery Time objective (RTO) & Recovery Point objective (RPO): The stock exchanges shall, in consultation with the stock broker, decide:

- **Recovery Time objective (RTO):** The RTO is the maximum time to be taken to restore operations from the DRS after the Disaster declaration.
- **Recovery Point Objective (RPO):** The RPO is the maximum tolerable period for which the data might be lost due to a significant incident.

High Availability, Right Sizing & No single Point failure: The replication architecture, bandwidth & load consideration between PDC and DRS shall be within the RTO and the whole system shall ensure right sizing, high availability & no single point failure. Also, any PDS update must be reflected immediately at the DRS.

Obtain ISO Certification: The specified stock brokers must obtain an ISO certification from the stock exchanges as may be specified by them from time to time if their operation and infrastructure are located in the IT-enabled area.

System auditor to check preparedness of stock broker in shifting operations: The system auditor is required to check the preparedness of the stock broker for shifting its operation from the PDC to DRS and further is required to document the DR drills conducted by the stock brokers.

What Are Financial Disincentives Provided Under The Circular?

The Financial Disincentives, in general words, mean penalties, fines etc. As per the circular on technical glitches in Stock Broker's Electronic trading System, the stock exchanges can put in place financial disincentives which shall be applicable to the stock brokers for technical glitches in Stock Broker's Electronic Trading System and further, it may be imposed if there is non-compliance of the provisions made in this regard.

What Are The Directions For The Dissemination Of Information?

As per the circular on technical glitches in Stock Broker's Electronic trading Systems, the stock exchanges shall publish the information on their website on the instances of technical glitches in Stock Broker's Electronic Trading Systems. They are further required to publish the information and the Root Cause Analysis of such glitches.

Conclusion

The rapid technological development has led the market institution dealing in securities trading to switch to electronic mode from conventional mode. With the development in the field of electronic media, there are associated risks which are also increasing. Henceforth, to provide a safe environment to the investor and prevent them from any unfortunate risks, the SEBI has provided a framework for reporting Technical glitches in Stock Broker's Electronic Trading System. The said framework provides a comprehensive structure to the stock exchanges and stock brokers if there are instances of technical glitches in their trading system. Further, they are required to open a Disaster Recovery Site if in case the primary data centre is not operable due to any incident.

Policy for Referral Incentive Schemes

(Compliance | NSE | 26/12/2019 |

Though our organization –“**Open Futures**” at present does not encourage business generation through referred clients through existing UCC clients, none the less we have formulated the policy keeping in mind the future needs of the organization within the guidelines set by SEBI and Exchanges.

With a view to safeguard the interest of the investors, the following guidelines have been issued by exchanges. Members shall frame an internal policy w.r.t. quantum/maximum limit on the incentive to be provided to the referring person in line with the aforementioned guidelines. Such policy shall be duly approved by its Board in case of corporate trading member. Members shall take adequate steps to review and monitor the adherence to the said policy on a regular basis, at such intervals not later than one year. Any existing schemes which are not in compliance with the aforesaid guidelines, should be withdrawn immediately or suitably modified immediately to comply with the aforesaid guidelines

The rate of the incentive should be flat (i.e. not slab based) and a single rate should be applied across all persons referring the clients.

The referred client shall not be subjected to any kind of trade inducement by the referring person and it shall be ensured that all instructions for placement of orders are obtained from the respective clients only.

The referring person cannot conduct IPV/OSV Member shall be directly and wholly liable in case of any dispute w.r.t. referral program/incentive scheme or calculation of referral income between broker- referred/ referring person. Such disputes/grievances will not be covered under investor protection or grievance redressal measures of the Exchange.

Policy & Terms & Conditions for Referral Incentive Scheme Policy of Open Futures

Till date our organization has not encouraged any such referral policy.

Nevertheless, due to competitiveness and ever changing style of evolving Broking business we have decided to formulate a policy for our organization, keeping in mind future scope and needs:

1. All clients shall be eligible to receive an incentive for referring friends/family and prospective clients at Open Futures provided they meet all the conditions enumerated below.
2. We would share 10% of all brokerage generated from referred clients with the introducer client, only till such time Open Futures continues to carry on this Referral Incentive Scheme.
3. All such referred clients must complete their account opening process & have their trading and demat account activated within 30 days of being referred.

4. Only, the referred accounts opened after 01.01.2022 will be eligible for brokerage sharing.
5. Referred clients from one Client ID will not be transferred to another Client ID.
6. Withdrawal request for any such incentives shall be entertained only after the referred client has generated a brokerage amount of Rs. 1,000 (One Thousand Rupees).
7. Sharing of brokerage will be subjected to all statutory/government taxes and charges applicable at that time. This may include TDS deductions.
8. All eligible amounts available for withdrawal will be deposited towards the client's linked bank account which is in his/her own name and not in any other person's name.
9. Only income generated as trading brokerage will be shared and shall not include any other form of income or charges, charged by the broker.

Only for the client referring another client (not forming part of the main Policy)

I/We, having a trading account with Open Futures hereby agree to and declare the below points with respect to accepting any payment/incentives from Open Futures, with respect to any referral bonus or marketing fee or incentives from Open Futures:

- I/We am/are not forbidden to do any business under the Rules, Bye-Laws and Regulations of National Stock Exchange (NSE), Bombay Stock Exchange (BSE), and or any Recognized Stock Exchange as defined by SEBI;
- I/We have read and understood all the terms, conditions, clauses of the NSE, BSE, and MCX with respect to the "Byelaws" of all the Exchanges, "incentives/referral schemes" rules, and rules with respect to marketing and incentives. I/We understand that by receiving referral incentives from Open Futures, I/We and Open Futures are both bound by the rules of the Exchanges;
- I/We have read NSE Circular NSE/INSP/43029 dated December 26, 2019, and have clearly understood all the terms of the circular. Any dispute/grievance under this scheme cannot be referred to the Investor Grievance Panel at NSE and will be resolved between me and Open Futures Stock Brokers Pvt Ltd as stated in the abovementioned NSE Circular, and any such dispute should not be made public;
- I/We are accepting this incentive from Open Futures only for the referral of new clients/persons, and have not carried out any other activities, such as any financial advisory, inducing persons to use or trade/transact with Open Futures, providing stock tips, managing portfolios etc;
- I/We acknowledge that details of clients referred to by me/us, such as; contract notes, daily margin statement, statement of accounts, will not be sent to me/us from Open Futures without the consent of the referred clients;

- I/We have not, since being eligible to receive any payment/payout from Open Futures, entered into any contracts or published any marketing material/advertisement acting as Open Futures or act as a referral agent of Open Futures without the explicit written permission of Open Futures Stock. I/We understand that publishing any marketing or advertisement material requires permission/intimation towards the Exchanges. I/We will not & have not publish'ed any marketing material without the explicit permission of Open Futures;
- I/We have/will not post the affiliate link of my referral code on public forums without any context, and spam any such groups/platforms/pages on social media;
- I/We hereby declare that, since being eligible to receive any incentives from Open Futures, I/We are not an employee/referral partner/Introducer/Authorized Person/Sub broker of any other Trading Member (apart from Open Futures) of any of the Exchanges. I/We also hereby declare that we are not a Trading Member on any of the Exchanges; and
- I/We are not an employee of Open Futures or any associate/group entity of Open Futures, and I/We are not a relative of an employee of Open Futures
- I/We hereby declare that the above information are true and correct, and if any information is found to be false and incorrect, Open Futures will have the right to recover the entire amount received by me/us through whatever means Open Futures deems proper.
- I/We agree to indemnify Open Futures Stock and its Directors/agents/employees for any damages/claims that may arise from me/us deviating from the Rules/Bye-Laws of the Exchanges, and any terms, conditions, Policies & Procedures of Open Futures
- I/We hereby declare that I/We have read, understood and agree to abide by this Policy, Open Futures terms & conditions, privacy policy and policies & procedures on Open Futures websites.
- I/We hereby understand this policy, along with these terms & conditions with respect to all incentives from Open Futures, regarding referrals towards Open Futures may be changed from time to time by Open Futures, at the sole discretion of Open Futures; or by the Exchanges. Therefore, at all times, I/We shall abide by the change in such Policies and Procedures of Open Futures Stock Brokers Pvt Ltd & Exchanges without any objections in the future.
- I/We hereby understand that Open Futures management reserves all rights to withhold any such incentives to any such referrer, at its sole discretion, for any reason whatsoever.

Policy - Use of facsimile/scanned signatures on Contract Note

NSE circular Ref. No. NSE/INSP/32524 dated June 06, 2016, BSE notice 20160607-4 dated 7th Jun, 2016 regarding policy implementation in relation to “use of facsimile/scanned signatures” on Contract Note.

We at Open Futures are not using facsimile signature on contract notes and/or other documents being sent to our clients. Our organization uses digital signature for sending all the contract notes and bills. Actual authorized person’s signature is taken in case of physical contract notes if any taken out.

The policy shall be amended from time to time under the directions of SEBI and Exchanges.

Open Futures (Group) Member-NSE/BSE/MCX

(Account Opening Process, Documents and Charges)

What is a Trading Account?

A normal operation in the stock market starts when you invest in the market. For a start, when you buy shares with a market value, the shares bought by you get transferred to your demat account to be securely deposited; the transfer of shares is possible through your trading account. And at the time of selling shares from your demat account to the stock market, the trading account will be the medium where the transfer and amount of your shares will be settled in your bank account. A trading account links the demat account, bank account, and the stock market. If you want to trade in the share market, it is important to open a trading account.

Open Futures Account Opening Charges 2023-24

Open Futures account opening charges are Rs 200 for a trading account

Services	Charges
Trading Account Opening Charges	Rs 200
Account AMC Charges	Rs 0 (Free)
Intraday Trade	0.05% of Turnover
Equity Delivery	0.5% of Turnover
Equity Delivery Futures	0.05% of Turnover
Equity Delivery Option	0.05% of Turnover
Call & Trade Services	Nil charges

Open Futures is India based stock broker. Open Futures offers online stock and commodity trading to retail customers. Since its inception in Aug 2009, Open Futures has grown significantly.

You need to know about what some of the trading charges meant. You can understand them by the following detail mentioned below:

Security Transaction Tax (STT): STT tax is charged on both buying and selling of equity delivery, and selling of intraday equity, futures and options trading. It's a direct tax applied to every security exchange in the stock market.

Transaction/ Turnover Charges: It refers to the charges levied by different exchanges to settle your trade. You can also call it the trade clearing charge from the stock exchange.

Call and Trade: This call and trade charge applies to the trader who trades with the help of an advisor who also undertakes the trade according to the investor's will. Charges for this trade apply to each order.

Stamp Charges: Previously, according to the stamp duty act of 1899, every instrument transacted had to pay the stamp charges in different states. But now, from July 2020, the government decided to replace the current system with the new uniform stamp duty charges on each financial instrument.

GST: A GST charge is around 18% of taxes applied on brokerage on your transaction charges.

Square-off charges: These are the charges when you can square off your open position on intraday trade. These charges can vary from different brokers.

SEBI Charges: These charges depend upon your securities transaction. SEBI is regulatory for the stock market.

DP charges: The depository participant charges start at ₹20 along with GST applied per scrip irrespective of volume at the time of selling the stock from the demat account. This charge is collected by the depository participant.

Annual Maintenance Charges (AMC): AMC refers to the yearly maintenance charge for your trading account. Many brokers offer demat accounts and trading accounts clubbed AMC to lower the cost of overall trading.

Open Futures Account **Online / Offline

To trade (in stock, commodity or currency) or to invest (in stocks, mutual funds) with Open Futures, a customer has to open a trading account and a client should have demat account. The demat account is not mandatory for customer planning to trade only in derivatives.

Open Futures offers 2 types of trading accounts:

- Trading account for equity and currency derivatives.
- Commodity account to trade commodity futures on MCX.
One customer account has access to all the segments, but each segment has to enable separately at the time of account opening or at later point of time.

****Currently Open Futures (Group) is not providing "Online" Services.**

Pre-requisites for buying/ selling shares in Securities market

Savings Bank Account

- Savings Account can be in any bank
- Transfer/ receipt of funds from buying/ selling of securities

Accounts needed to trade in securities market

Trading Account

- With SEBI registered StockBroker (Trading Member/ TM)
- To buy/ sell securities

Demat Account

- With a SEBI registered Depository Participant (DP)
- To hold shares in Demat (electronic) mode

Forms to be Filled to open a new Trading & **Demat Account

**Please Note: Open Futures is not a depository participant.

To open trading account with **M/s Open Futures**, client would need to follow the below given Procedure:-

- The investor needs to fill form for Opening of Trading Account.
 - Know Your Client (KYC) Form:** To provide basic information of the new investor. Two modes of KYC are:
 - Physical KYC
 - e-KYC (Online KYC) (Currently Open Futures is not providing online KYC services)
- 1. Account Opening Form: Details of various services and charges being applied on the new investor.

Documents Required to open Trading Account with Open Futures

<u>PROOF OF IDENTITY</u>	<u>PROOF OF ADDRESS</u>
<ul style="list-style-type: none"> ➤ Permanent Account Number (PAN) Card – Mandatory ➤ Voter ID Card ➤ Driving Licence ➤ Passport ➤ Aadhar Card ➤ Any Other valid identity card issued by Central or State Government 	<ul style="list-style-type: none"> ➤ Voter ID Card ➤ Driving Licence ➤ Passport ➤ Ration Card ➤ Aadhar Card ➤ Bank account statement or Bank Passbook ➤ Utility bills, e.g. electricity or gas bill.

- PAN Card: Mandatory Document & also Proof of Identity.
- Same document like Driving License/ Passport.

Proof of Income (For Investors who chose to trade in <u>Derivatives –F&O/Commodities</u> / <u>Currency</u>)	Proof of Client Bank Account (any one)
Bank account statement for last 6 months	Cancelled Cheque (with name of investor above sign here section)
Latest Salary Slips/ Form 16 in case of salaried person	Bank Passbook {with Indian Financial System Code (IFSC)}
Copy of ITR Acknowledgement	
Passport	
Copy of Net-worth Certificate issued by a Chartered Accountant	
Statement of Demat holdings	

➤ If investor is unable to produce the originals of these documents for verification, he may submit self-attested photocopies

Officially Valid Documents (OVD)

S. No.	Officially Valid Documents (OVD)
1.	Passport
2.	Driving License
3.	Proof of possession of Aadhaar Number
4.	Voter's Identity Card
5.	Job card issued by MGNREGA duly signed by an officer of the State Government
6.	Letter issued by the National Population Register containing details of name, address
7.	Any other document as notified by the Central Government in consultation with SEBI

- In case OVD furnished by the investor does not contain updated address, then certain deemed OVDs (like Electricity Bill, Property Tax receipt, etc.) for the limited purpose of proof of address may be submitted.
- If OVD furnished by the investor does not contain updated address, then following documents/ equivalent e-documents shall be deemed to be OVDs (only as proof of address):

S. No.	Deemed Officially Valid Documents (OVD)
1.	Utility Bill , not more than two months old of any service provider (electricity, telephone, post-paid mobile phone, piped gas, water bill)
2.	Property or Municipal tax receipt
3.	Pension or family pension payment orders (PPOs), if they contain the address
4.	Letter of allotment of accommodation from employer issued by Government departments, statutory or regulatory bodies, PSUs, etc.

➤ Investors submitting Investors submitting above mentioned documents as proof of address shall submit OVD with current address within a period of 3 months of submitting the above documents.

1. Copy of your PAN card
2. Aadhar (Mandatory for opening an account online)
3. Cancelled cheque or latest Bank statement
4. Photo or scanned copy of your signature
5. Income proof - For trading in Futures and options. You can submit 6-month Bank statement, Latest salary slips, Form-16, Income Tax Return Acknowledgment, Demat holding statement, or Networth certificate from a CA.

Documents in Account Opening Forms - Trading Account

MANDATORY DOCUMENTS

- Rights & Obligations of Stock Broker and Investor.
- Uniform Risk Disclosure Documents.
- Do's and Don'ts for trading on Exchanges.
- Policies and Procedures of Stock Broker.
- Tariff Sheet.

VOLUNTARY DOCUMENTS**

- Running Account Authorization.
- Power of Attorney (PoA).
- Electronic Contract Note (ECN) Declaration.
- Consent for electronic communication and receiving alerts (Email/SMS)

** (to be submitted only if investor is availing of additional services)

Fields that are to be filled in the account opening form

1. Type of account (Ordinary, NRI, NRI-Non-Repatriable or HUF)
2. Account holder information (name, address, telephone no., email id etc.)
3. Second holder details
4. Guardian details
5. Extra information for NRIs (foreign address, RBI reference no. and RBI reference date)
6. Bank details (Account no. , account holder's name etc.)
7. Financial details (PAN no. , district or ward no.)
8. Photograph
9. Declaration (Holder's name and signature)

Open Futures account opening time.

Open Futures account opening time after applying offline application, it takes 2 days to process the application.

Open Futures Account Opening Status

Open Futures takes 2 working days to open the account after they receive the signed account opening forms. The customer receives an email confirmation after the account is opened.

If you do not receive a welcome email after 2 days, please give a call to Open Futures support team and they can tell you the status of account opening.

Open Futures Account Opening Form PDF

Open Futures Account Opening Form PDF is available for download on its website. Here are the steps to download Open Futures Account Opening Form PDF-

1. Visit Open Futures's website at openfutures.co.in
2. Click <https://openfutures.co.in/#>
3. In the Member Area Section, we have separate forms- One of (**Open Futures's**) to trade in equity, futures and options on NSE, BSE and commodity on MCX and other one for (**Open Futures & Commodities Pvt. Ltd.**) to trade in the Commodity on the MCX platform. Download the specific form as per your trading preference.

Open Futures Account Closure

The **Open Futures** trading account get deactivated if you do not use them for one year. This dormant trading account can be activated by calling Open Futures.

If you are a client of Open Futures and not using the account anymore or moved to another broker, it is recommended to close the account with **Open Futures**. It also reduces the chance of misusing the account by someone else.

Open Futures customer may close the accounts with Open Futures at any point of time. The only way to close the account with Open Futures is to submit an application for Account Closure. Accounts can be closed online or by contacting customer support. The application form can be downloaded from the Open Futures's website. Customer can fill the form, sign it and courier it to the Open Futures's registered office.

Closing your account offline

1. Print and fill the account closure form, which is available on the company website.

Send it to the following address (via post, registered post, speed post or courier):

Open Futures,
401,Chiranjiv Tower,
43 .Nehru Place, New Delhi-110019
Tel.: 011-46662029

Your account closure will be processed within 5-7 working days.

Note:

- It may take up to 2 working days to close the account. Customers receive an email notification with the status updates on the account closing procedure.
 - Clear all the dues before closing the account.
 - Transfer all your securities from the Open Futures demat account to your other demat account.
 - Open Futures do not charge anything for account closure. **Steps to take if your broker is not closing your Trading Account**
-

Brokers are normally hungry for clients and no broker wants to lose clients. Hence most brokers will try and dissuade you from closing your trading account. However, in case you have decided not to continue, the broker has no choice but to process your closure request, subject to there being no dues on the account. However, if the broker still finds reasons to not close your trading account, here is what you can do:-

- As a first step, write to the broking head with documentary proofs and account status details. Normally, at this stage, the request will be processed within a week if all else is clear.
- As a second step, you can escalate the issue of non-closure of the trading account to the CEO and authorized Compliance Officer of the broking house. Mention the trail and the fact that you have escalated to the broking head. Take acknowledgments of all such submissions. Compliance officers must report complaints and non-resolutions to the stock exchange and SEBI regularly. Cases rarely cross this stage in most cases.
- The next step is regulatory escalation if no progress after writing to the broking head, compliance officer, and the CEO. Normally, if the dispute is regarding the Demat issue, escalate to NSDL or CDSL. If the issue pertains to the trading account, escalate to NSE / BSE.
- If at this stage, you still don't find any progress, you can file an official complaint with the SEBI SCORE system and note down the reference number. This should be a last resort if the broker is still not closing your account despite reminders from the depository and the exchange. SCORE system is online and is available on the SEBI website. It also provides an automated audit trail.
- Finally, don't forget to put pressure on social media and various discussion forums. Now there is no guarantee this will work, but companies are becoming increasingly conscious of their social media presence, so it helps to build public opinion quickly and in an economical way. You can use forums like Twitter handles, Facebook pages, LinkedIn groups.

Rights of a New Investor

- A client should receive a copy of the signed KYC within 7 days.
- Select type of account (Running Account / Bill to Bill).
- Decide on the Stock Exchange and Segment in which you want to trade.
- Decide in the shares/ derivatives/ mutual funds where you want to trade.
- To receive user id and password and other credentials of the account, in cases where you have opted for Online trading.

NISM-Series-VII: Securities Operations and Risk Management Certification Examination

With Reference to SEBI notification no. LAD-NRO/GN/2010-11/21/29390 dated December 10,2010 and exchange circular NSE/INSP/16536 dated December 15, 2010 & NSE/INSP/27495 dated September 2, 2014, persons associated with a registered stock broker/trading member /clearingmember who are involved in , or deal with any of the below mentioned functions are required to have a valid NISM-Series-VII Certification:

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

It is further decided by SEBI, the requirement of passing NISM Series VII certification would be optional for those associated persons handling the basic clerical or elementary functions in the above stated areas and whose work is supervised by NISM Series VII Securities Operations and Risk Management Certification certified personnel. The activities that can be classified as basic elementary level / Clerical level are as follows:-

1. Internal control or risk management

- Inwarding of collateral's/cheques
- Person performing maker entries
- Maker entry in the database
- Photocopying, printouts, scanning of documents
- Preparing of MIS
- Sending of letters/reports to clients, Exchanges, SEBI
- Attending calls, etc.

2. Redressal of investor grievances

- Inwarding of complaints
- Seeking documents from clients
- Person performing maker entries
- Maker entry in the database
- Photocopying, printouts, scanning of documents
- Preparing of MIS
- Sending of letters/reports to clients, Exchanges, SEBI Updation, data entry,uploading on SCORES.
- Attending calls, etc.

3. Activities having a bearing on operational risk and dealing with assets or funds of investors or clients

- Person performing maker entries
- Maker entry in the database
- Preparing MIS
- Generating reports, Files
- Photocopying, printouts, scanning of documents
- Dispatching documents to clients
- Sending of letters/reports to clients, Exchanges, SEBI
- Attending calls, etc.

In the light of above it is decided that all the employees of RRBMSDL has to pass the NISM series VII Certification except the employees who are EITHER indulged in basic clerical or elementary functions OR not involved in , or deal with any of the activities mentioned in SEBI notification no. LAD-NRO/GN/2010-11/21/29390.

The said policy shall be reviewed at the regular interval of time.

Policy on Freezing / Blocking Client Account for Open Futures
Version, Apr 2024

1. Background: SEBI vide circular no. SEBI/HO/MIRSD/POD-1/P/CIR/2024/4 dated January 12, 2024 and NSE Circular no NSE/INSP/61529 Dated April 08, 2024, BSE Notice No. 20240112-30 , Notice Date : 12 Jan 2024, MCX Exchange circular no. MCX/INSP/036/2024 dated January 19, 2024 regarding Framework for Trading Members to provide the facility of voluntary freezing/blocking of online access of the trading account to their clients.

It is pertinent to mention that:

- a. Freezing/blocking is only for the online access to the client's trading account, and there shall be no restrictions on the Risk Management activities of the Trading Member.
 - b. The request for freezing/ blocking does not constitute request for marking the client's Unique Client Code (UCC) as inactive in the Exchange records
2. In view of the above Open Futures has framed the following policy governing the outline of the modus operandi. In addition to branch trading Open Futures is extending the facility of internet trading through browser based and EXE based followed by mobile trading. Presently we will be providing the following method of communications through which the client may request for voluntary freezing/ blocking of the online access of trading account if any suspicious activity is observed in the trading account: -
 - a) Email from registered e-mail ID: A dedicated email ID stoptrade@openfutures.co.in has been opened where client can send their request for freezing/ blocking from their email ID registered with us. Clients are requested to send their freezing/ blocking request without any ambiguity along with UCC. Similarly for un-freezing/ un-blocking, clients are requested to send their request at the email ID stoptrade@openfutures.co.in from their registered email ID mentioning the same. Requests sent for such freezing/ blocking and un-freezing/ un-blocking may not be addressed by Open Futures if it is not sent from client's registered email ID or sent to any other email ID of Open Futures.
 - b) SMS from registered mobile number: A dedicated mobile number **9910325788** has been assigned where clients can send their request for freezing/ blocking from their mobile number registered with us. Clients are requested to send their freezing/ blocking request in the following manner:

- For freezing/ blocking type: **“BLOCK” FOLLOWED BY UCC WITHOUT SPACE** Example: if your UCC is W114X100 then message will be **“BLOCKW114X100”** and send it to 9910325788
- For un-freezing/ un-blocking type: **“UNBLOCK FOLLOWED BY UCC WITHOUT SPACE”** Example: if your UCC is W114X100 then message will be **“UNBLOCKW114X100”** and send it to 9910325788.

Requests sent for such freezing/ blocking and un-freezing/ un-blocking may not be addressed by OPEN FUTURES if it is not sent from client’s registered mobile number or sent to any other mobile number of OPEN FUTURES.

3. OPEN FUTURES shall take the following actions on the receipt of such request through any modes of communications for freezing/blocking of the online access of the trading account from the client:

- Verify whether request is received from the registered mobile number/e-mail ID of the client.
- Freeze / block the online access of the client's trading account and simultaneously cancel all the pending orders, if any, of the said client.
- Issue the acknowledgement to the registered email ID or mobile number of the client stating that the online access to the trading account has been frozen / blocked and all the pending orders in the client’s trading account, if any, have been cancelled.
- Details of open positions (if any) would also be communicated to the registered email ID of the client along with contract expiry information within one hour from the freezing/blocking of the trading account.
- The timelines for freezing/ blocking of the online access of the clients’ trading account is as under:

Scenario	Timelines for issuing acknowledgement as well as freezing / blocking of theonline access of the trading account.
Request received during the trading hours andwithin 15 minutes before the start of trading hour.	Within 15 minutes of receiving therequest.
Request received after the trading hours and 15 minutes before the closure of trading hour.	Before the start of next trading session

4. **OPEN FUTURES** shall maintain the appropriate records/logs including request received to freeze/block the online access of trading account, confirmation given for freezing/blocking of the online access of the trading account and cancellation of pending orders, if any, and sent them to the clients for the time limit as prescribed by the Regulator.
5. **Re-enabling the client for online access of the trading account:** - The Trading Member shall re-enable the online access of trading account after carrying out necessary due diligence including validating the client request and unfreezing / unblocking the online access of the trading account.

****** Currently we are not providing any online trading facilities to our client.



NSE/BSE/MCX
Reg. Office: 401, Chiranjeev Tower, 43 Nehru Place,
New Delhi - 110019

Company Policies

(Policy shall be reviewed as and when necessary.)

EFFECTIVE DATE(S)
This Policy is effective from April03, 20011. Last reviewed in 20th August 2024.

Document Approval Dates:
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