

CORUM SECURITIES PRIVATE LIMITED

50/6A, Harish Mukherjee Road, Kolkata - 700 025

Tel.: 033 2454 0021 / 10 / 44, Fax : 033 2454 8177

E-mail : ID for Investor Grievance : info@corumsecurities.com, jiteshgandhi@corumsecurities.com

CIN - U67120WB2002PTC094505

CORUM SECURITIES PVT LTD

POLICY ON DEBIT BALANCE FOR MORE THAN T+5 DAYS

Circular: - Ref.

Policy created by	Compliance Team
Policy reviewed by	Jitesh Dineshchandra Gandhi
Policy reviewed on	02/01/2024
Policy Approved by	Board of Directors
Policy approved on	02/01/2024

Version - 1.0

CORUM SECURITIES PVT. LTD.

J. S. Gandhi
Authorised Signatory/Director

CORUM SECURITIES PRIVATE LIMITED

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With a view to NSE circular ref no. NSE/INSP/20638 dated 26th April 2012 and further clarification vide NSE Circular Ref No. NSE/INSP/29662 dated May 8, 2015 relating to Client funding, it has been decided by the management that we will strictly follow and implement this circular to avoid unnecessary non-compliance.

Steps to be taken:

- Clients Position will be squared up to meet the Debit balance requirement and in case of any loss arising out of it then company will not be held responsible to meet the loss.
- Further the clients' exposure can be increased in compliance with the NSE Circular Ref No. NSE/INSP/29662 dated 8th May, 2015.
- No client will be allowed trading in their account unless the previous debit balance is cleared.

Exception to the above compliance

- If debit balance arises out of client's failure to pay such amount for less than fifth Trading day reckoned from date of pay-in, such debit balances would not be construed as violation relating to funding.
- If debit balance arises out of client's failure to pay such amount for more than Fifth trading day reckoned from date of pay-in, and no further exposure is granted to client from the sixth trading day reckoned from the date of pay-in, such debit Balance would not be construed as violation relating to funding.
- If debit balances arise out of client's failure to pay such amount for more than fifth trading day reckoned from date of pay-in, and further exposure is granted to client it would be construed as a funding violation even if fully paid collaterals are available for margins.
- Delayed Payment Charges or interest charge for the funds deployed by the member may be charged at the rate/s consented by the client.
- For the purpose of reckoning debit balance stated above, the debit balance in the client ledger consolidated across segments (not across Exchanges) after giving effect to the release of margin to be considered.
- Further, if subsequently any complaint is received regarding selling of collaterals for recovery of debit balance, as per the Regulation 3.11 of Part A of the Capital Market Regulations of the Exchange quoted above, the securities shall be deemed to have been closed out at the closing price declared by the Exchange for fifth trading day reckoned from the date of pay-in.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.



Authorised Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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CORUM SECURITIES PVT LTD

POLICY ON IDENTIFICATION OF CRITICAL ASSETS BASED ON SENSITIVITY

Policy created by	Designated Officer
Policy reviewed by	Technology Committee
Policy reviewed on	02/01/2024
Policy Approved by	Board of Directors
Policy approved on	02/01/2024

Version - 1.0

CORUM SECURITIES PVT. LTD.

J. S. Ghosh
Authorised Signatory/Director

Purpose

The purpose of this Critical Asset Identification Policy is to establish guidelines and procedures for the identification and classification of critical assets based on sensitivity at [Your Company Name], a stock brokerage firm. This policy aims to ensure the prioritized protection and security of assets crucial to the firm's operations, compliance, and client trust.

Scope

This policy applies to all employees, contractors, third-party vendors, and any other individuals involved in the identification and classification of critical assets within the stock brokerage firm.

Policy Guidelines

Asset Identification Criteria

- Assets will be identified based on their significance to the firm's operations, regulatory compliance, and client services.
- Criteria for identification include financial impact, legal requirements, operational dependence, and potential harm in case of compromise.

Data Sensitivity Classification

- Data will be classified based on its sensitivity and importance to the business.
- Each classification level will determine the security controls and access restrictions for the identified critical assets.

Identification Process

- A systematic process will be established to identify critical assets, involving collaboration between business units, IT, security, and compliance teams.
- The identification process will be periodic and reactive to changes in the business environment.

Asset Inventory

- A comprehensive inventory of critical assets will be maintained, including but not limited to financial data, client information, trading platforms, and communication systems.
- The inventory will include details such as asset type, classification, owner, and associated risks.

Access Control

- Access to critical assets will be restricted based on their sensitivity classification.
- Access permissions will be regularly reviewed and adjusted as necessary.

Data Encryption

- Encryption will be applied to critical data assets, both in transit and at rest.
- Encryption protocols will align with industry standards and regulatory requirements.

Physical Security Measures

- Critical physical assets, such as servers and communication infrastructure, will be housed in secure locations with access controls and monitoring.
- Adequate measures will be taken to protect against physical threats.

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CIN - U67120WB2002PTC094505

Incident Response Plan for Critical Assets

- An incident response plan specifically addressing critical assets will be established to ensure a swift and effective response in case of security incidents.
- Regular testing and updates of the incident response plan will be conducted.

Compliance and Legal Considerations

Regulatory Compliance

- The asset identification and protection processes will comply with relevant financial regulations and industry standards.
- Regular audits will be conducted to verify compliance.

Review and Update

This policy will be reviewed regularly and updated as necessary to address changes in the business environment, regulatory requirements, and emerging security threats.

Employee Responsibilities

Employees involved in the identification and management of critical assets are responsible for adhering to this policy and promptly reporting any concerns or incidents.

Training and Awareness

- Employees will undergo training on critical asset identification, classification, and protection.
- Awareness campaigns will be conducted to foster a culture of responsibility and security.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff / Employees /and Directors of the Company.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.


— **Authorised Signatory/Director**

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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CORUM SECURITIES PVT LTD

POLICY ON CLIENT CODE MODIFICATION

Circular: - Ref.

Policy created by	Compliance Team
Policy reviewed by	Jitesh Dineshchandra Gandhi
Policy reviewed on	02/01/2024
Policy Approved by	Board of Directors
Policy approved on	02/01/2024

Version - 1.0

CORUM SECURITIES PVT. LTD.

Jitesh Gandhi
Authorised Signatory/Director

Brief

SEBI issued Notification according to which, following categories of associated persons. Persons associated with a registered stock broker / trading member / clearing member in any recognized stock exchanges, who are involved in, or deal with any of the following

- Assets or funds of investors or clients (b) Redressal of investor grievances
- Internal control or risk management
- Activities having a bearing on operational risk

Shall be required to have a valid certificate of NISM Series VII _ operation & Risk Management (SORM) from (NISM). NSE & BSE has also issued circulars requesting the to comply with the requirement of said SEBI Notification.

Definition of Associated Person

"Associated Person" means a principal or employee of an intermediary or an Agent or distributor or other natural person engaged in the securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in India.

Exemption

Associated persons handling the basic clerical / elementary functions in the aforesaid specified areas shall be exempted from obtaining the certification of NISM Series VII - Securities Operation and Risk Management (SORM).

For this purpose, the company considers following activities as basic elementary level / clerical level1.

Internal Control or Risk Management

- Inwarding of collateral's / Cheques
- Person performing market 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.

Redressal of Investor Grievances

- Inwarding of complaints
- Seeking documents from clients

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- 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

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


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

However, any of the work (as stated herein above) being performed by such persons, obtaining NISM-SORM Certification shall be optional Provided that they are supervised by his / her supervisor who shall have to obtain / continue to have NISM - SORM Certification or such other prescribed certification at all times.

In case of any Query, employees are requested to obtain clarification from the Compliance Officer of the Company.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.


— **Authorised Signatory/Director**
(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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CIN - U67120WB2002PTC094505

CORUM SECURITIES PVT LTD

POLICY ON PRE-FUNDED INSTRUMENTS

Circular: - Ref.

Policy created by	Compliance Team
Policy reviewed by	Jitesh Dineshchandra Gandhi
Policy reviewed on	02/01/2024
Policy Approved by	Board of Directors
Policy approved on	02/01/2024

Version - 1.0

CORUM SECURITIES PVT. LTD.

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CIN - U67120WB2002PTC094505

Background

This is with reference to the SEBI circular No. CIR/MIRSD/03/2011 dated June 09, 2011 regarding pre-funded instruments / electronic fund transfers.

In order to curb the inflow of third party funds/unidentified money, which is not in accordance with the provision of the relevant circular and which also affects the integrity of the securities market, the following mechanism have been put in place:

- If the aggregate value of pre funded instrument is Rs 50000/- or more per day per client, the instruments can be accepted only if the same are accompanied by the name of the bank account holder and number of the bank account debited for the purpose duly certified the issuing bank. The mode of certification may include the following:
 - Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank.
 - Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument.
 - Certified copy of the passbook/ bank statement for the account debited to issue the instrument.
 - Authentication of the bank account number debited and name of the account holder by the issuing bank on the reverse of the instrument.
- Further in case of Electronic fund transfer, we ensure that the funds are received from the respective client account provided by the client. In case the client wishes to transfer the funds from the account which is not registered with us then he needs to provide a documentary proof for the same.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.


Authorised Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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POLICY FOR DEALING WITH CONFLICTS OF INTEREST OF INTERMEDIARIES

(Issued as per the requirements of PMLA Act 2002)

Master Circular: - Ref. SEBI has issued circular No. CIR/MIRSD/5/2013 dated August 27, 2013

Policy created by	Compliance Team
Policy reviewed by	Jitesh Dineshchandra Gandhi
Policy reviewed on	02/01/2024
Policy Approved by	Board of Directors
Policy approved on	02/01/2024

Version - 1.2

CORUM SECURITIES PVT. LTD.

J.D. Gandhi
Authorised Signatory/Director

1. Introduction

Our organization is officially recognized as a stock broker and depository participant, having registered with Market Infrastructure Institutions (MIIs) such as stock exchanges and depositories through the Securities and Exchange Board of India (SEBI). We offer a range of services related to trading and depository operations.

2. Background

SEBI has issued guidelines vide their circular Ref No. CIR/MIRSD/5/2013 dated August 27, 2013, regarding Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market.

In view of the above, the meaning of "Associated Person" and "Intermediaries" are provided hereunder:

"Associated person" means a principal or employee of an intermediary or an agent or distributor or other natural person engaged in the securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in India;

"Intermediary" means an entity registered under sections 11 or 12 of the SEBI Act, 1992 and includes any person required to obtain any membership or approval from a stock exchange or a self-regulatory organization; therefore, in view of the above all employees, agents (sub broker and AP), distributors engaged in securities business will be covered under this policy.

In order to ensure the protection and primacy of client's interests and to comply with the applicable regulations, we have framed a policy and procedures and aims at preventing situations involving conflicts of interests and resolving such situations if they could arise. This policy describes our approach to the identification, prevention and management of conflicts of interests that may arise in the conduct of our activities.

3. Definition of Conflict of Interest:

Broadly, a conflict of interest is likely to arise when a given situation conflicts with the interests of a client.

The three categories of potential conflict are as follow:

- ✓ Conflicts between clients, for example giving one client preferential treatment in comparison to another client for the same service;
- ✓ Conflicts involving clients and organization and / or its Associated Persons, for example, if we offer a service that would give it a higher return to the detriment of the client's interest;
- ✓ Conflicts involving clients and employees, for example, our employees use confidential information about clients for the purpose of performing transactions on their own account.

4. Identification of Potential Conflict of Interest:

For this purpose, we identify various possible conflicts of interest situations that could arise in the conduct of its activities and that could conflict the interest of a client because of the Company or other related person:

- ✓ Is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
- ✓ Has an interest in the outcome of a service provided to the client or a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
- ✓ has a financial or other incentive to favour the interest of another client (or group of clients) over the interest of the client to whom the service is provided;

CORUM SECURITIES PVT. LTD.

J. S. J.

Authorised Signatory/Director

operates the same business activity as the client receives or will receive from someone other than the client a benefit in connection with the service provided to the client, in any form whatsoever, other than the standard commission or fee for that service.

It is used as a basis to ensure that appropriate organizational arrangements and procedures are in place to prevent and manage potential conflicts of interest and that appropriate controls are performed.

5. Measures to curb conflicts of interests:

Organizational measures:

We are structured in such a way so as to segregate functions that are vulnerable to conflicts of interest. Right from Senior Management level to marketing teams, the functions should be clearly segregated.

Control functions (Compliance, Risk Management) are completely independent and they monitor the business activities on a continuous basis so as to make sure that internal control procedures are appropriate.

Security of confidential information held, is also ensured in a way that limited access is given on a strictly need to know basis only.

The employees are given the opportunity to report any potential or actual conflict of interest situations to the senior management level.

6. Procedures and rules governing the handling of orders and primacy of the client interest:

We comply strictly with the rules of the financial markets in which it operates and does not allow orders to be given preferential treatment. Appropriate training of employees is being conducted to ensure that they are fully aware of their responsibilities and obligations. There may be some complex or specific cases where we believe that control functions are not sufficient to guarantee, with reasonable certainty, that the risk of harming the client interest will be prevented. In these cases, we will clearly inform the client of the general nature and source of the conflict of interest before acting so that the client can take an informed investment decision.

Any service provided by or activity carried on by organization that gives rise to or may give rise to a conflict of interest involving a significant risk of adversely affecting the interest of one or more clients must be recorded and presented before the Management so as to put in place the systems for resorting to such conflicts by reviewing the implementation of the said policy as and when necessary.

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J S Bhandari
Authorised Signatory/Director

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CIN - U67120WB2002PTC094505

Guiding Principles of the Policy:

All employees and Associated Person/s with the Company covered under this Policy shall adhere to following principles and practices to avoid conflict of interest at all points:

To maintain high standards of integrity in the conduct of business at all times.

To ensure to communicate policies, procedures and code to all concerned.

To ensure fair treatment of clients and not to discriminate amongst them;

To ensure that Company's personal interest does not, at any time conflict with our duty towards our clients and clients' interest shall always takes primacy in our advice, investment decisions and transactions;

To make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair our ability to render fair, objective and unbiased services;

Endeavor to reduce opportunities for conflicts through prescriptive measures such as through information barriers to block or hinder the flow of information from one department/ unit to another, etc.;

To place appropriate restrictions on transactions in securities while handling a mandate of issuer or client in respect of such security so as to avoid any conflict;

Not to deal in securities while in possession of material non-published information;

Not to communicate the material non-published information while dealing in securities on behalf of others;

Not to contribute in manipulating the demand for or supply of securities in the market or to influence prices of securities;

Not to provide incentive structure that encourages sale of products not suiting the risk profile of clients;

Not to share information received from clients or pertaining to them, obtained as a result of our dealings, for our personal interest.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff/Employees/and Directors of the Company.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.


Authorised Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024