

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 COMPLIANCE OFFICER

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. D. Gandhi
Authorised Signatory/Director

As per Regulation 18A of SEBI (Stockbroker) Regulation, 1992, Company will appoint a Compliance Officer who shall be responsible for monitoring the compliance of the Act, rules and regulations, notifications, guidelines, instructions, etc., issued by SEBI or Central Government or Exchanges for redressal of investors' grievances.

The Compliance Officer is required to immediately and independently report to SEBI/Exchanges any non-compliance observed by him.

Following key factors will play an important role and same will be applied throughout the tenure:

- Compliance Officer appointed Shall be a graduate or an equivalent examination from a Government recognized institution.
- At the time of appointment, the candidate should at least have 2 years of prior work experience in banking or financial services, handling Audit/Finance/Compliance/ Legal/Operations/Risk Management functions.
- The eligible candidate should have good understanding of securities market industry, risk management, knowledge of regulations, legal framework and regulatory expectations.
- Compliance officer will obtain NISM-Series-III A: Securities Intermediaries Compliance (Non-Fund) Certification Examination within 1 year from the date of employment in terms of SEBI notification dated March 11, 2013.
- The Compliance Officer shall ensure that the certification is renewed before the completion of its validity, as per the procedure specified by NISM, from time to time.
- In order to ensure that the Compliance Officer is well informed of all relevant laws and amendments thereof, it is essential that there should be a continuing education program for him/her and half-yearly training will be Imparted to the team of compliance officer which will cover subject-wise key regulatory requirements and regulatory changes made in the last six months.
- Any transfer / removal of Compliance Officer will be done with explicit prior approval of the Board/ Partners as the case may be and, after following a well- defined and transparent internal administrative procedure and reasons be recorded in writing.
- In case of any change in Compliance Officer due to any reasons beyond the control of the Company such as death, resignation etc., Company is required to intimate the Exchange within 7 working days of such a change. In case of such unforeseen change, the Compliance Officer should be appointed within three months from the date of death/resignation of the erstwhile Compliance Officer and confirm the same to the Exchange.
- Notwithstanding the above, the office of the Compliance Officer shall not remain vacant for more than 15 calendar days. In the event of resignation/demise etc. Company should appoint an interim Compliance Officer till such time a regular Compliance Officer is appointed within 3 months from the date of vacation of office.
- Company shall ensure that the person appointed as Compliance Officer is "fit and proper" in terms of Schedule II of SEBI Intermediaries Regulations, 2008.
- The Compliance Officer shall have the ability to independently exercise judgement in all matters of compliance and regulations. The Compliance Officer should have the freedom and sufficient authority to interact with regulators/supervisors directly and ensure compliance. In addition, he/she shall have the necessary authority to communicate with any staff of the Company and have access to all records or files that are necessary to carry out entrusted responsibilities in respect of the compliance issues.

CORUM SECURITIES PVT. LTD.

- It shall be ensured that the Compliance Officer or any staff of his office is not assigned any responsibility which brings elements of conflict of interest, especially any role relating to business development/sales. The Compliance Officer shall under no circumstances act in such a dual capacity.
- Company shall ensure that no trading terminal is allotted to the Compliance Officer or any staff of his office except for the purpose of risk management/monitoring/testing or for view only purpose and no trades shall be executed from such terminals.
- Company shall also reserve the right to seek necessary explanations from the Compliance Officer or record his/her statements in terms of the relevant rules/regulations of the Exchange and initiate suitable disciplinary action against him/her including debarment or removal, if he/she is found to have failed to carry out his/her responsibilities in a reasonable manner. All actions in this regard shall be initiated by the Exchange, after following due process and providing an opportunity of hearing to the Company/Compliance officer.

The policy may be reviewed as and when there is any change introduced by any statutory authority or as and when it is found necessary to change on account of need for an Improved compliance.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.


Authorized Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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 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

Objective

To frame the guidelines for rare / exceptional modification to client codes post trade execution and reporting of such Client Code Modifications.

Brief about Client Code Modification

Client Code Modification means modification / change of the client codes after execution of trades in rare or exceptional cases. 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 as a routine process. To prevent misuse of the facility Stock Exchanges levy penalty / fine for all non-institutional client code modification.

Scope of the Policy

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

"**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, genuineness or error if the pre-condition of error modification:

- 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.
- Modification within relatives ('Relative' for this purpose would mean "Relative" as defined under the Companies Act, 1956) iii. 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.
- Trade entered for wrong client due to any miscommunication from the client.
- Modification within family members.
- Institutional trades modified to broker error account.

General Conditions

- The facility for Client Code Modification can be used only in case of Error Trade.
- 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 and this policy.

CORUM SECURITIES PVT. LTD.

J D Gundl
Authorised Signatory/Director

The client code modification shall be carried out after due approval from compliance / senior management i.e. the modification needs to be done by Risk Team only after due approval by Compliance head / Dealing Head or Organization Head.

Internal Control

No client code modification shall be done save and except in unavoidable, rare or exceptional cases, without first informing the CEO or the Business Head and the Senior Sales Traders, Compliance Officer and Head of Back office.

Surveillance

A record for client code modification cases will be maintained on every financial year basis.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.

J D Gandhi

Authorized Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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 REGARDING THE USE OF FACSIMILE SCANNED SIGNATURES FOR PHYSICAL CONTRACT NOTES

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.


Authorised Signatory/Director

The Company will affix facsimile/ scanned signatures on the physical contract notes issued to its clients. The following controls and procedures are being put in place regarding the use of facsimile/ scanned signature:

- Mr. **Jitesh Dineshchandra Gandhi** Designated Director is hereby authorised to affix his facsimile/ scanned signatures in the Contract Notes and other documents issued to its clients.
- The procedure/ controls for the same is as under;
 - The signature shall be scanned and uploaded into the back office systems/software
 - The signature would be affixed only on documents generated by the Back Office Software c. In case of change of authorized signatories, the signatures would be replaced after due Board Approval
- In case Mr **Jitesh Dineshchandra Gandhi** no longer holds the position of Director of the company, then the use of his signature should not be continued afterwards under any circumstances.

The contract note issued with facsimile/scanned signature shall be deemed to have been signed by the authorized signatory notwithstanding any misuse of facsimile/scanned signature and the ultimate responsibility to prove its genuineness shall rest with.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.

J.D.G.
Authorised Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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 - 1167120WB2002PTC094505

CORUM SECURITIES PVT LTD

POLICY ON DEALING WITH INACTIVE AND DORMANT CLIENTS

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

Definition

A Trading account in which no transaction has been carried out for a period of more than 365 days (Three Hundred and Sixty-Five days) i.e., 12 calendar months shall be classified as an Inactive/Dormant Account. The Terms "Dormant" and "Inactive" shall be used interchangeably.

Treatment of Inactive/Dormant Accounts

Transactions in Dormant Trading Accounts

- In case of dormant trading accounts in which no transaction has been placed during the last 365 days (Three Hundred and Sixty-Five days) i.e., 12 calendar months, the account of the client shall be suspended and the client shall not be permitted to execute a fresh transaction in the account unless the client provides either of the following:
 - A written request in hard copy to reactivate the account and process the transaction duly signed by Client and submitted to the company along with the latest 6 months' bank statements for financial updation.
 - Concerned Dealers are required to check the identity of the person before taking down orders.
 - The said client before placing orders has to confirm their KYC requirements as provided earlier and in case the KYC requirement stands changed meanwhile, he will be required to first comply with the latest one.
- The Compliance Team shall take the necessary measures as formulated in this policy to reactivate the dormant clients.

Monitoring of Transactions

- Evaluation for dormant account will be done on a daily basis for Trading accounts.
- Sudden activity in dormant accounts in large volume shall be viewed as a suspicious transaction and report will be generated.
- Such reports shall be reviewed by the Authorized Official.
- Transactions found to be suspicious shall immediately be reported to the Risk Management and Compliance Department.

Others

Return on Assets

The Balances lying in the Dormant Trading accounts shall be returned to the client at the time of the calendar quarterly/monthly settlement. In the event the client wishes to receive the funds/securities from such Trading account before the calendar quarterly/monthly settlement, the Client shall make a request in writing which shall be submitted to us. The funds/securities from such Trading account shall be returned within 7 days from receipt of the request.

Review of Policy

The policy may be reviewed as and when there is any change introduced by any statutory authority or as and when it is found necessary to change on account of business needs or Risk Management Policy.

For M/s. Corum Securities Pvt. Ltd

CORUM SECURITIES PVT. LTD.

J D Gandhi
Authorized Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024

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 Investor Grievance Redressal Mechanism

| | |
|--------------------|--------------------------------|
| 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.


Authorised Signatory/Director

1. Purpose

Our organization is dedicated to addressing all complaints related to service deficiencies or causes for grievance in a timely and effective manner. Recognizing that prompt and efficient resolution of client and investor grievances is crucial for providing excellent service, we have established a clearly documented policy for redressing investor grievances. Through this policy, we aim to ensure the existence of a suitable mechanism for receiving and addressing complaints, with a specific emphasis on resolving grievances fairly and expeditiously.

This policy seeks to ensure that:

- ✓ Grievances, if any, are resolved in a proper and time-bound manner, providing detailed advice to the client or investor. In cases where resolution requires additional time, an interim response acknowledging the grievance or complaint will be issued.
- ✓ The Compliance Officer will provide a monthly report on client grievances to the Directors of the company, including details such as the client's name and account number, nature of the complaint, date of receipt, and the status of resolution. Grievances unresolved for more than 21 days will be justified by the Compliance Officer.
- ✓ Proper records of all received and resolved grievances will be maintained by the Compliance Officer.
- ✓ All personnel and employees at customer-facing channels and other support departments will undergo periodic training in handling client complaints.
- ✓ The Grievance Redressal Mechanism along with updated contact details and email IDs, will be provided to clients and uploaded on the company's website.
- ✓ Clients shall be treated fairly at all times.
- ✓ Clients shall be informed of avenues to raise their queries and complaints within the organization, and their rights if they are not satisfied with the resolution of their complaints.
- ✓ Queries and Complaints shall be treated efficiently and fairly.
- ✓ The employees of our organization shall work in good faith and without prejudice, towards the interests of the Clients.

2. Awareness of the Grievance Redressal Mechanism

- ✓ Client queries/ complaints arise due to lack of understanding or a deficiency of service experienced by Clients. Deficiency of service may include lack of explanation, clarifications, understanding which escalates into shortfalls in the expected delivery standards, either due to inadequacy of facilities available or through the attitude of staff towards Clients.
- ✓ Clients can seek clarification to their query and are further entitled to make a complaint in writing, orally or telephonically.
- ✓ All queries/ complaints received shall be handled & coordinated by Investor Grievance Officer and shall inform the Client on the status of the Client query.
- ✓ In case Clients do not receive a response within 21 working days of approaching us or if they are not satisfied with the resolution received from the Company, they can escalate their issues to respective Stock Exchange / Depository.

CORUM SECURITIES PVT. LTD.

Clients can also escalate their issues to Securities and Exchange Board of India (SEBI) and update their complaints on SCORES (SEBI Complaints Redress System). SCORES allows the client to lodge his complaint online with SEBI and subsequently view its status at <http://scores.gov.in> and can obtain any feedback, assistance on contacting SEBI Office on Toll Free Helpline at 1800 22 7575/ 1800 266 7575.

- ✓ Clients can also escalate their issues Online Dispute Resolution (ODR) portal that provides an efficient and convenient avenue for clients to address grievances. To initiate the ODR process, a client typically begins by accessing the designated online platform established by the service provider or organization. Here, the client can submit details about their grievance, attaching relevant documents or evidence to support their case. This online environment facilitates a transparent and accessible dispute resolution process, enabling clients to track the progress of their case in real-time. Ultimately, ODR empowers clients by providing them with a user-friendly and technologically-driven means to resolve grievances swiftly and fairly.

Communication can be done through the following sources -

Clients are requested to approach the Investor Grievance Officer

- ✓ Clients can call the Investor Grievance Officer on _____ any working day between 10.00 am & 6.00 pm to provide feedback & register their queries / complaints.
- ✓ Clients can send an email to _____.
- ✓ Clients can write a letter to us with their query/complaint at the registered office address.
- ✓ Clients can also write to us by accessing the website - _____.

Contact details at Stock Exchange/ Depository:

| NAME OF STOCK EXCHANGE / DEPOSITORY | WEB ADDRESS | CONTACT TELEPHONE NOS. | CONTACT TELEPHONE NOS. |
|---------------------------------------------|----------------------------------------------------------|--------------------------|--------------------------|
| NATIONAL STOCK EXCHANGE OF INDIA LTD | www.nseindia.com | (91 22) 2272 8517 / 8097 | is@bseindia.com |
| BOMBAY STOCK EXCHANGE LTD | www.bseindia.com | (91 22) 2659 8190 / 91 | ignse@nse.co.in |
| MULTI COMMODITY STOCK EXCHANGE OF INDIA | www.mcxindia.com | (91 22) 6649 4070 | grievance@mcxindia.com |
| CENTRAL DEPOSITORY SERVICES (INDIA) LIMITED | www.cdslindia.com | 1800-200-5533 | complaints@cdslindia.com |
| NATIONAL SECURITIES DEPOSITORY LIMITED | www.nsdl.co.in | (91 22) 2499 4200 | relations@nsdl.co.in |

Contact details at Securities & Exchange Board of India:

| Addresses of SEBI Offices | Contact Telephone Nos. | Contact E-Mail Id |
|-------------------------------------------------------------------------------------------------|----------------------------------------|--------------------------------------|
| SEBI - HEAD OFFICE: SEBI BHAVAN, PLOT NO. C4 - A, "G" BLOCK, BANDRA KURLA COMPLEX, BANDRA EAST, | (91 22) 2644 9200 (91 22) 2644 9000 | iggc@sebi.gov.in sebi@sebi.gov.in |

| | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|----------------------------------------------|
| MUMBAI - 400 051 | 4045 9000 | sundaresanvs@sebi.gov.in |
| SEBI - NORTHERN REGIONAL OFFICE: 5TH FLOOR, BANK OF BARODA BUILDING, 16, SANSAD MARG, NEW DELHI - 110 001 | (91 11) 2345 6085 (91 11) 2372 4001 - 05 | sebinro@sebi.gov.in narendrar@sebi.gov.in |
| SEBI - EASTERN REGIONAL OFFICE: L&T CHAMBERS, 3RD FLOOR 16, CAMAC STREET KOLKATA - 700 017 | (91 33) 2302 3110 (91 33) 2302 3000 | sebiero@sebi.gov.in amarn@sebi.gov.in |
| SEBI - SOUTHERN REGIONAL OFFICE: OVERSEAS TOWER, 7TH FLOOR, 756-L ANNA SALAI, CHENNAI - 600002 | (91 44) 2888 0105 (91 44) 2888 0222 (91 44) 2852 6686 | sebisro@sebi.gov.in manjeshsr@sebi.gov.in |
| SEBI - WESTERN REGIONAL OFFICE: UNIT NO. 002, GROUND FLOOR SAKAR I, NEAR GANDHIGRAM RAILWAY STATION, OPP. NEHRU BRIDGE ASHRAM ROAD, AHMEDABAD - 380 009 | (91 79) 2658 7108 (91 79) 2658 3633 - 35 | sebiwro@sebi.gov.in sudeepm@sebi.gov.in |

3. Internal Mechanism to handle Client Queries / Complaints

- ✓ Register of Complaints shall be centrally maintained; however, all the Branches are required to maintain Grievance Register at the Branch Level for registration of Client Grievances.
- ✓ All the clients shall be informed about the e-mail for redressal of Client Grievance.
 - Through Welcome Letter at the time of Opening the Trading Account.
 - Display on official Web-Site.
 - Display on the Notice Board of the Head & Branch Offices.

4. Educating Staff on Handling Complaints (Training):

The Grievance Redressal Team is specially trained for handling queries/ complaints. Training includes both operations and soft skills, as different clients perceive and react differently to the aspects of complaint handling. The staff is encouraged to have an open attitude towards service recovery and winning the clients' confidence.

5. Reporting of Queries / Complaints:

On a monthly basis queries/ complaint with the resolution shall be informed to the Exchange and Depository in the specified format as mandated.

6. Record Maintenance:

- ✓ Investor Grievance Officer of the Grievance Redressal Team shall be responsible for the record maintenance of such activities, under the supervision of The Compliance Officer.
- ✓ The Compliance Officer shall be assisted by the Investor Grievance Officer and shall have the discretion to take assistance/help from any professionals and/or software for the better monitoring and implementation of Grievance Redressal Policy, with prior approval of the Board of Directors, without diluting the accountability and responsibility of the Compliance Officer.

CORUM SECURITIES PVT. LTD.

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.

J D Gandhi

Authorised Signatory/Director

(Jitesh Dineshchandra Gandhi)

Designated Director

Dated: - 02/01/2024