

Internal Control Policy:

1.0 Objectives:

- To ensure that the company and its various departments are run in accordance with management policies
- To ensure that the company does not suffer any losses due to lack of controls
- To plug the loopholes that could lead to revenue leakages

2.0 Policy:

2.1 Reporting Authorities:

Company has following functional divisions/ departments.

Staff in following departments would report to their respective function heads as under:

Department	Function/ Department Head
Dealings BSE cash	JANAK DALAL
Compliance	JANAK DALAL
Accounts & Finance	JANAK DALAL
Back Office	JANAK DALAL
Back Office Software	Comtek Software technologies Pvt Ltd.
Administration & HR	JANAK DALAL

In particular, matters relating to Compliances or High value transactions should be reported to Proprietor, Mr. Janak Dalal

2.2 Maker- Checker Policies:

All divisions will have maker-checker system in place

There would be two levels of controls exercised. All transactions would be authorized by respective department heads. High value transactions (above 5 lakhs) would require additional authorization of directors.

Cheque signing authority would be restricted to following persons

	Signing Authorities
Client Payout	Done by custodian
Expenses (Non- Client) Cheques	Janak Dalal

2.3 Internal Audit:

Internal auditors would audit various departments as per audit program agreed mutually with the management.

Internal auditors would directly report to the Proprietor.

Client Registration, Documents maintenance:

KYC sent to the Clients through our Head/registered office who introduce new clients. We will not entertain the direct clients without knowing their past history & the financial details.

We have a proper & well trained staff who does the entire KYC activity.