

- CIN No.: L67120AP1994PLC017583
- Corporation Members : NSE (CM+F&O+CDS) & BSE (CM)
- Depository Participant : CDSL
- SEBI : INZ00026734

Risk Management Policy including policy on margin collection from clients:

A prudent system of Risk shall protect the Company from Client Default. This policy is made to safe guard the financial health and interest of the Company by allowing the Margins to the client based on their Financial Credit balance and approved collaterals including Pledge of Approved stocks after appropriate hair cut. All the client exposures are controlled through CTCL up loader system and the same can be viewed by the client.

Allowing far away, highly volatile and illiquid Contracts in Derivative products and illiquid shares in equity is at the discretion of senior management. All the trades will be closely monitored to avoid concentrated trades, Trades done in last half hour, to have a watch and avoid unwanted market price / volume/ value manipulation and Non genuine trades.

The Company shall as per the requirements of the Governing and Regulatory Bodies collect Initial Margins, ELM and Mark to Market margins from the clients. In addition to the above margins, we may collect additional Margins depending on the market volatility and the liquidity of the respective equity or commodity derivatives.

The RMS will not allow any trades without upfront margins. The entire peak Margins will be collected, as per the regulations of the Exchanges. The intimation of all the margins to be collected is made to the client on T day basis through mail / post / SMS / physical with due logs maintained and the client is bound to honor the same.

Initial margin to be collected upfront, peak margin to be maintained on running basis, ELM and MTM Margins to be maintained by EOD.

All the peak Margins will be collected as per the guidelines of the Exchanges. In case of Cheque bounces, such Margin obligation liability will be penalized as per the Exchange rules and revised margin file will be uploaded to the exchanges.

For Derivative segment, The Exposure for Futures and Options writing will be based on the SPAN margin as notified by the Exchange from time to time and such additional margins as may be required, as per market volatility may be collected. For buying of options, the exposure is allowed only on clear credit balances. Allowing stock as Collateral after hair cut is at the discretion of the management.

No fresh trading will be allowed in case debit in client Account exceeds 5 trading days.

The automated software shall compute and monitor the margin available towards the exposure on regular and online basis, and the Surveillance team in coordination with the senior management team and Compliance Officer will initiate all necessary RISK MANAGEMENT MEASURES.

Exposure is allowed as a multiple of the margin for intraday CASH segment through MIS window and delivery through CNC. The sell limit in case of deliveries held with us is allowed through CNC.

The effective Risk to the company is controlled at various levels by using the following parameters:

- Qty Limit for each order
- Value Limit for each order
- Value Limit for each User ID

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- Value Limit for each Branch ID
- Security wise for each User ID
- Max Qty & Max Value Limit for single order for each NNF Dealer ID
- Pending order Limit
- And any other such parameters as may be required from time to time.

The above limits are set up under the guidance of the Compliance Officer, based on our Capital adequacy requirements and risks of the corresponding Clients, User ID, Branch ID, and Volatility of the Security and based on market conditions.

Such Limits are reviewed regularly.

As a policy, the Company always allows a set limit, to ensure that no trade is executed without upfront margins as prescribed by the regulators from time to time and does not allow any unlimited limits to the Clients Or User IDs.

Daily record of limits set and re-set is preserved.

All the above are monitored by the RMS Team under the supervision of Compliance Officer. The Compliance Officer will be reporting the same to the Management and the Exchanges on Regular Basis (Quarterly Basis to the Exchange.)

RISKS CONTROL:

The trading rights of the clients shall cease once the client utilizes 100% of the allocated exposure or is @ 50% of loss to the capital computed for exposure calculation.

Upon 75% of the clients' capital loss, 50% random position shall be made squared off by the client, subject to client not infusing clear funds to its margin requirements and / or to cover its loss.

Upon 100% of the clients' capital loss, the entire position of the client shall be made to be squared off. The loss is a % of the capital computed for exposure calculation as per the company policy.

Margin shortfalls in F&O:

Positions of the client may be closed out to the extent of margin shortfall on the T+1 or T day basis, where client is not in a position to fulfill Margin obligations including that of Live MTM and additional Margins as may be levied by the Exchanges and Member from time to time. While computing margin shortfall, value of unapproved securities shall not be considered. INANI reserves the right to consider the stock pledged with INANI for margin purpose.

Even though, Member will be intimating the Margin Short Fall, Open Positions and other obligations, It will be the prime responsibility of the client to monitor their positions and fulfill the Margin Obligations on live basis to avoid default.

The client is said to be in default, when the client is not able to meet the Margin obligations as levied by the exchanges and such additional margins as levied by us from time to time, including that of MTM on dynamic market conditions at any point of time. Even though, we would be informing the client the margin obligation through email, SMS etc.. it is binding on the client to monitor his transactions on live market conditions and make good the Margins, failing which INANI may square off the positions and sell the holdings to the extent of the payment obligation.

INANI shall have the right to sell client's securities or close out client's open positions but it shall not be under any obligations to undertake this exercise compulsorily. INANI shall therefore not be under any

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obligation to compensate /or to provide reasons for any delay or omission on its part to sell client's securities or close open positions of the client. The ultimate responsibility risk and liability of the trades are binding on the client. All the intraday positions are subject to maintenance of upfront margin and peak margin as prescribed by exchanges from time to time.

Intraday Positions: INANI shall have right to close out any intra-day positions taken by the client after a defined "Cut off" time (generally within 15 minutes of the close of the trading hours) Or when the client MTM exceeds 80% of the credit balance available or As decided by INANI depending on the Market Volatility and the client relation. While selling the securities / closing the client's positions, INANI may take into account the sales made by the client, positions closed by the client or collections received from the client till a cut off time. While selling the securities / closing the clients positions, INANI may not take in to consideration cheque's /drafts/ pay orders deposited by the client with it until clear proceeds of such instruments are received by it in its bank account.

The above guidelines can vary at the sole discretion of the Management and the decision taken by the management is binding on the Clients.

The Policies and Procedures forming integral part of the "**M a n d a t o r y document dealing with Policies and Procedures pursuant to SEBI's Circular MIRSD/SE/Cir-19/2009 dated 03rd December 2009**

Policies and Procedures forms integral part of the Mandatory Documents" are adhered to and it forms part of this Risk Management Policy.

Approval Authority:

This Policy was placed before the board in its Board of Directors and meeting held on 14/02/2023 our Managing Director /Compliance Officer Mr. Lakshmikanth Inani was approved on 14/02/2023

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