

INTERNAL POLICY ON NISM CERTIFICATION (SECURITIES OPERATION AND RISK MANAGEMENT CERTIFICATION EXAMINATION - SERIES –VII)

Introduction

SEBI issued Notification no. LAD-NRO/GN/2010-11/21/29390 dated December 10, 2010, according to which, following categories of associated 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:

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

shall obtain the valid certification of NISM Series VII - Securities Operation and Risk Management (SORM) within two years from the date of such notification. Simultaneously, whenever the company employs any associated person specified as mentioned above, the said associated person shall obtain valid certification of NISM Series VII – Securities Operation and Risk Management (SORM) within one year from the date of his / her employment.

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 level.

S. no.	Internal Control or Risk Management.	Redressal of Investor Grievances	Activities having a being on operational risk and dealing with assets of funds of investors of clients
1	Inwarding or collateral's /Cheques	Inwarding of complaints	Person performing maker entries
2	Person performing market entries	Seeking documents from clients	Maker entry in the database
3	Maker entry in the database	Person performing maker entries	Preparing of MIS
4	Photocopying, printouts, scanning of documents	Maker entry in the database	Generating of reports, Files
5	Preparing of MIS	Photocopying, printouts, scanning of documents	Photocopying, printouts, scanning of documents
6	Sending of letters / reports to clients, Exchanges, SEBI	Preparing of MIS	Dispatching documents to clients

7	Attending Calls, etc.	Sending of letters / reports to clients, Exchanges, SEBI updation, data entry, uploading on SCORES	Sending of letters / reports to clients, Exchanges, SEBI
8	--	Attending calls, etc.	Attending calls, etc.

However, any of the works (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.

All other NISM Certifications including that of Compliance, Derivatives etc as specified by the Regulatory from time to time are to be complied.

Review Policy

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs. The policy may be reviewed by the **Director/Compliance Officer** and place the changes in policy before the Board at the meeting.

Approval Authority

This policy is as approved by the Board of Directors on 01/02/2022.

Reference:-

1. SEBI Notification No. LAD-NRO/GN/2010-11/21/29390 published in the Gazette of India on December 10, 2010.
2. NSE Circular No. NSE/INSP/16536 December 15, 2010
2. NSE Circular no. NSE/INSP/27495 September 02, 2014
3. BSE Notice no. 20101215-19 dated December 15,2010
4. BSE Notice no. 20140902-8 dated September 02,2014