

# **Akshat Capital Services Private Limited**

## **Internal control**

### **1. Details**

- Date of starting of business – 2010 (in MCX-SX) 2010 (IN USE) 2016 (IN BSE)
- **Background of company** – Akshat Capital Services Pvt Ltd is a member of MCX Stock Exchange and United Stock Exchange having SEBI Regn Code of **MCX-SX : INE261394436** , **INF/INB 261478433** and **BSE : EXCHANGE REGD.**

### **2. Client Code Modification: NA as no client registration is yet and only OWN account active.**

- Reasons for the modification of client codes
- Ratio of modification of client codes done at Head office vis-à-vis other offices
- Details of authorized representatives for approval of client code modification w.r.t. error trades.
- Measures taken to reduce the modification of client codes.
- Whether the trades have been modified only for the objective criteria allowed by the Exchange?
- Whether securities taken into ERROR A/c are liquidated in the same A/c?

### **3. PMLA**

- **Compliance w.r.t. Principal Officer and adoption of written policy.:** - We have adopted & implemented a written internal policy to put in place as framework to report cas and suspicious transactions to FIU as per the guidelines of PMLA Rules, 2002 and as prescribed by SEBI and we have appointed Mr. Atul Jain as the principal officer of the Company who would act as a central reference point in facilitating onward reporting of suspicious transactions and for playing an active role in the Identification and assessment of potentially suspicious transactions and shall have access to and be able to report to senior management at the next reporting level or the Board of Directors.
- **Measures taken with regard to Anti money laundering Act** - Time to time we update our policy & system with reference to the circulars issued by concerned regulatory body.

- **System of keeping a check on Volume of trading done by the client is in proportion to his financial details as disclosed in the KYC. :** - We have the policy to insist client to provide financial details for co-relate the same with their trading volume.
- **Alerts for the same generated or not?** NA
- **Any Suspicious Transaction Report (STR) sent to FIU:** - No suspicious transaction found till date.
- **Risk categorization of clients.** - NA as no client registration is yet and only OWN account active.

**4. Introduction/Registration of clients - NA as no client registration is yet and only OWN account active.**

- Basis of accepting as client
- Procedure for In-person verification of clients and maintenance of proof for the same, specifically in respect of out station & sub-broker clients
- Whether Client Registration Documents (CRD) given to new clients & to existing clients, on demand. Also, whether UCC & email ID communicated to clients on CRD or separate letter, and proof for the above.
- Do you outsource client registration modalities?
- Do you entertain walk in clients? If yes, what are risk mitigation measures taken in dealings with such client.
- Process of record keeping and retrieval of client registration document.

**5 Funds: NA as no client registration is yet and only OWN account active.**

- System of pay in and pay out of funds from / to clients
- System & source of pay in and pay out of funds in case of Own trading
- Procedure of Margin collection, if any from clients & maintenance of records thereof
- Any funding is done to the clients
- Credit / transfer of Dividend to the clients / own dividend
- Procedure followed in case of default by client/ authorized person's client
- Any third party transfer of funds? If yes , policy in this regard

**6. Trading Terminal: NA as no client registration is yet and only OWN account active.**

- Procedure of accepting & placing of orders
- Factors determining the trading limit for each terminal / client
- Control over operator to ensure that he is entering authorized trades only

**7. Contract Notes: NA as no client registration is yet and only OWN account active.**

- Whether printing of contract note is centralised? If not, Place from which CN are printed.
- Procedure for printing CN in case of outstation clients / sub broker clients
- Basis of numbering
- System for maintaining duplicates & acknowledgement for CNs

**8. Securities taken as margin: : NA as no client registration is yet and only OWN account active.**

- System of pay in and pay out of securities from / to clients
- Separate Own Beneficiary Account maintained or not
- Separate Client beneficiary account maintained or not
- Client wise segregation of securities maintained or not
- Whether Clients' securities maintained with Member
- Procedure for check on Third party security transfer/ acceptance
- Policy to ensure that client's securities are not mis-utilised for own purposes or for any other client.

**9. Statements of Accounts & Daily Margin Statement : NA as no client registration is yet and only OWN account active.**

- Whether statement of accounts for funds and securities are issued on monthly or quarterly basis.
- Whether statement of accounts is issued from the branches/authorized persons office. If yes, the procedure followed for issuance and the maintenance of the duplicates and proof of delivery.
- Whether statement of accounts are issued physically or digitally?
- Whether daily margin statement is issued as per prescribed format? The mode of sending the same to the clients?

**10. Execution of POA (Power of attorney) (if applicable) - NA as no client registration is yet and only OWN account active.**

- Please specify in whose name POA has been taken (trading member, its employees or representatives or sub-brokers)
- Process adopted for execution of POA

**11. Opening & closing of branches : No Branches**

- Procedure adopted for opening & closing of branches
- In case of closure of branches, how and when do you communicate existing clients?

**12. Closure of client accounts / dormant account : NA as no client registration is yet and only OWN account active.**

- What type of documentation (both inward and outward) undertake for closure of account.
- In case of dormant account (six month), what extra caution taken before execution of trade in such account
- Procedure adopted in case of very old dormant account (2 years old)

**13. Receiving and Execution of Orders**

- Mode of order acceptance at HO/Branches/AP's offices
- Any document is maintained for the clients who personally walk into the office and place the order?
- System for identifying authenticity of caller when the order is placed through telephone.

**14. Brokerage Charged : NA as no client registration is yet and only OWN account active.**

- Brokerage schemes provided to the clients?
- Elaborate on the schemes provided?