VAIBHAV STOCK & DERIVATIVES BROKING PVT. LTD.

Corporate Member: National Stock Exchange of India Ltd. (NSE)

Corporate Office: 301-308, 3rd Floor, Bhagwati House, A/19, Veera Desai Road, Andheri (West), Mumbai - 400 058 Tel.: 91-22-2673 2602/03/04/6570 4167/68/69/70/71 Fax: 91-22-2673 2642 CIN : U67120MH2004PTC235313

Policy for

NISM Series VII-Securities Operation & Risk Management (SORM)

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
- 3. NSE Circular no. NSE/INSP/27495 September 02, 2014
- 4. BSE Notice no.20101215-19 dated December 15,2010
- 5. BSE Notice no. 20140902-8 dated September 02,2014

BRIEF

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:

- 1. Assets or Funds of investors or clients
- 2. Redressal of investor grievances
- 3. Internal control or risk management
- 4. Activities having a bearing on operational risk

Shall be required to have a valid certificate of NISM Series VII – Securities Operation & Risk Management (SORM) from National Institute of Securities Market(NISM). NSE and BSE have also issued circulars requesting the members to comply with the requirement of said SEBI Notification.

NEED FOR POLICY

The Company being a stock broker of National Stock Exchange of India (NSE), provisions of the aforesaid requirement is applicable to all its employees involved in the activities as mentioned above.



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 lever / clerical level.

Internal Control or Risk Management

- 1. Inwarding or collateral's / Cheques
- 2. Person performing market entries
- 3. Maker entry in the database
- 4. Photocopying, printouts, scanning of documents
- 5. Preparing of MIS
- 6. Sending of letters / reports to clients, Exchanges, SEBI
- 7. Attending Calls, etc.

Redressal of Investor Grievances

- 1. Inwarding of complaints
- 2. Seeking documents from clients
- 3. Person performing maker entries
- 4. Maker entry in the database
- 5. Photocopying, printouts, scanning of documents
- 6. Preparing of MIS
- 7. Sending of letters / reports to clients, Exchanges, SEBI updation, data entry, etc
- 8. Attending calls, etc

Activities having being on operational risk and dealing with assets of funds of investors of clients

- 1. Person performing maker entries
- 2. Maker entry in the database
- 3. Preparing of MIS
- 4. Generating of reports, Files
- 5. Photocopying, printouts, scanning of documents
- 6. Dispatching documents to clients
- 7. Sending of letters / reports to clients, Exchanges, SEBI
- 8. Attending calls, etc

However, any of the work (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.

In case of any query, employees are requested to obtain clarification from the Compliance Officer of the Company.

