

POLICY FOR DEBIT BALANCE MORE THAN T+2+5 DAYS

Back ground

With a view to NSE circular ref no. NSE/INSP/20638 dated 26th April 2012 and further clarification vide NSE Circular Ref No. NSE/INSP/29662 dated May 8, 2015 relating to Client funding, it has been decided by the management that we will strictly follow and implement this circular to avoid unnecessary non compliance.

Steps to be taken:

Clients Position will be squared up to meet the Debit balance requirement and in case of any loss arising out of it then company will not be held responsible to meet the loss.

Further the clients exposure can be increased in compliance with the NSE Circular Ref No.NSE/INSP/29662 dated 8th May, 2015.

No client will be allowed trading in their account unless the previous debit balance is cleared.

Exception to the above compliance

If debit balance arises out of client's failure to pay such amount for less than fifth Trading day reckoned from date of pay-in, such debit balances would not be construed as violation relating to funding.

If debit balance arises out of client's failure to pay such amount for more than Fifth trading day reckoned from date of pay-in, and no further exposure is granted to client from the sixth trading day reckoned from the date of pay-in, such debit Balance would not be construed as violation relating to funding.

If debit balances arise out of client's failure to pay such amount for more than fifth trading day reckoned from date of pay-in, and further exposure is granted to client it would be construed as a funding violation even if fully paid collaterals are available for margins.

Delayed Payment Charges or interest charge for the funds deployed by the member may be charged at the rate/s consented by the client.

For the purpose of reckoning debit balance stated above, the debit balance in the client ledger consolidated across segments (not across Exchanges) after giving effect to the release of margin to be considered.

Further, if subsequently any complaint is received regarding selling of collaterals for recovery of debit balance, as per the Regulation 3.11 of Part A of the Capital Market Regulations of the Exchange quoted above, the securities shall be deemed to have been closed out at the closing price declared by the Exchange for fifth trading day reckoned from the date of pay-in.

FOR M/S H K SINGHANIA & CO

COMPLIANCE OFFICER