

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

Brief:

SEBI issued Notification according to which, following categories of associated persons 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 be required to have a valid certificate of NISM Series VII operation & Risk Management (SORM) from (NISM). NSE & BSE has also issued circulars requesting them to comply with the requirement of said SEBI Notification.

Definition of Associated Person:

"Associated Person" means a principal or employee of an intermediary or an Agent or distributor or other natural person engaged in the securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in India.

As required in the aforesaid notification of SEBI, All existing persons associated with "Fortune" as on date of publication and engaged in deals with

- (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 "HKS" 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 or 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, "HKS" considers following activities as basic elementary level / clerical level.

Internal Control or Risk Management

1. Inwarding of 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, uploading on SCORES
8. Attending calls, etc

Activities having a bearing 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.

For M/s Harish Kumar Singhania & Co

Compliance Officer