

Internal Control Policy

M. B. Parikh Finstocks Ltd.

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Contact Persons:

Mr. Mahesh Parikh – Managing Director & Principal Officer (Mob: 98212 28730)

OR

Mr. Imtiyazul Hasan - Compliance Officer (Mob:93241 92103)

Mr. Santosh Patole - Chief Financial Officer (Mob: 93241 90434)

FOR

NSE (CASH & F & O)

NSE Cash Market Segment SEBI Reg. No. INB230776436

NSE Derivative Segment SEBI Reg. No. INF230776436

NSE Currency Derivatives SEBI Reg. No. INE230776436

Depository Membership(CDSL) SEBI Reg. No. IN DP-CDSL 486-2008

Know Your Client

- Only those new clients would be accepted and allowed to trade with us, who would be referred to us by any of the following:
 - 1) Employees
 - 2) Directors
 - 3) Existing Clients (trading in any segment)
 - 4) Shareholders of the Company
 - 5) Directors & Sr. Executives of Associate Company
 - 6) Statutory / Internal Auditor, Company Law Consultant, Company's Legal Advisors, Bankers to the Company.

Note: SEBI/BSE/NSE barred entities would not be entertained.

- On expression of wish for becoming a client by any person, a copy of Client Registration Form (CRF) alongwith other documents and forms will be forwarded to the client. The copy of the CRF will also be accompanied with the list of documents and additional documents or proofs required (KYC as per prescribed Norms/Rules alongwith duly self certified copies of supporting documents thereof).
- On receipt of KYC documents / data, the documents are checked / verified and only after they are found proper they will be counter signed by us. The client code generated & PAN details are counter checked on Income Tax site online, thereafter the data is uploaded to the Exchange of record. The client is advised thereafter.
- Copy of KYC documents will be given to all new clients and as per request to the existing clients.

The following procedures should be adopted for identification of Client:

- As far as possible, no clients will be registered without personal contact / proper introduction / reference & documentation.
- In addition to personal contact, for client identification, proper address and identity proof as prescribed by SEBI as per Uniform Documentary Requirement will be obtained from the client.
- PAN number and a Copy of PAN card will be compulsorily obtained from the client. No trading will be allowed unless the proof of PAN proof is submitted by the client.
- In person verification should be carried out by the employee of Company and stamp should be affixed for in person verification.

Trading Terminal

- The Terminal user should be NCFM certified. Before allowing the user to operate the terminal, the copy of NCFM certificate will be collected and verified with the original.
- The user will be asked to renew the NCFM certificate on its expiry. If the user fails to renew the certificate then he would not be allowed to operate the same any further. The renewed copy of the certificate will be re-obtained and verified with original.
- The guidelines laid down by the Exchange for Approved User and Location of trading terminal will be strictly followed. It would be made sure that there is no issue of trading terminals to unauthorized persons or at unauthorized locations.
- The data regarding new user as well as modification in existing user should be immediately uploaded and documented on modification or issue to the new user as the case may be.

Clients Transactions

- Transactions of all major clients would be monitored, if required and in case of any suspicion from our side of possibility of any malfunctioning by the client. If required the client will be asked to stop such kind of malfunctioning or may be even asked to stop trading.
- No trading will be allowed in illiquid Securities notified by NSE / SEBI.

Order Placement

- The orders will be placed by the respective Dealer as per the instructions from the clients.
- The clients should not be induced to either Buy or Sell.

Other Areas

- Complete confidentiality of Client information should be maintained. No client information would be given except if required by law.
- Proper records as required by various statues will be maintained.

Resolving any disputes / query / complaint

Any disputes / query in transaction should be reported to Managing Director immediately in person or over phone / sms and the same needs to be talked and reported back to client in maximum 48 hours from the receipt of complaint.