

POLICY ON PRE-FUNDED INSTRUMENTS AND ELECTRONIC FUND TRANSFER

The below mentioned policy on Pre- funded instruments / Electronic fund transfers has been approved by the Board of Directors. All the employees are required to follow the same and take due care for its proper implementation.

SEBI vide Circular No. SEBI / MRD / SE / Cir-33 / 2003 / 27 / 08 dated August 27, 2003, while specifying the mode of receipt and payment of funds, has permitted the stock brokers to accept Demand Drafts from their clients.

But it was observed that the stock brokers were unable to maintain an audit trail of the funds so received, as the details of the name of the client and bank account-number were not mentioned on such instruments. This may have resulted in flow of third party funds / unidentified money, which was not in accordance with the provisions of the aforesaid circular and would also affect the integrity of the securities market.

So, on June 9, 2011, SEBI vide Circular No. CIR/MIRSD/03/2011 clarified the procedure by which any pre-funded instruments, such as, Pay Order, Demand Draft, Banker's cheque, etc., can be accepted.

In view of the above, following procedures and documentation to be maintained while receiving funds from the clients through pre-funded instruments, such as, Pay Order, Demand Draft, Banker's cheque, etc.:

If the aggregate value of pre-funded instruments is Rs. 50,000/- or more from client per day per client, we may accept the instruments only if the same are accompanied by the name of the bank account holder and number of the bank account debited for the purpose, duly certified by the issuing bank.

And the mode of certification may include the following either:

- Certificate from the issuing bank on its letterhead or on a plain paper with the seal of the issuing bank.
- Certified copy of the requisition slip (portion which is retained by the bank) to issue the instrument.
- Certified copy of the passbook/bank statement for the account debited to issue the instrument.

- Authentication of the bank account-number debited and name of the account holder by the issuing bank on the reverse of the instrument.

It is the duty of the compliance officer to ensure that no Pay Order, Demand Draft, Banker's cheque should be accepted in the organization if the above mentioned criteria is not fulfilled. The compliance officer will also maintain an audit trail of the funds received through electronic fund transfers to ensure that the funds are received from their clients only.

1. Receipt of payment by electronic funds transfer i.e. transfer through NEFT/RTGS

Before passing the entry in our books of account the account details of the client should be ascertained from the narration of the bank statement and same should be matched with our records so as to ensure that the funds have been transferred from the concerned client's account only. In case, it is difficult to ascertain the account details then necessary documents should be obtained from the client so as to ensure that the funds are not received from third party.

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