

POLICY ON INTERNAL CONTROL

VARDHAMAN CAPITAL PVT LTD herewith referred as VCPL, is the SEBI registered Stock Broker & Depository Participant. The under-mentioned policy on Internal Control is created by the Compliance Officer and approved by the Board of Directors on 13/09/2022.

OBJECTIVE

The objective of the policy is to control over the activities, the efficiency of the operations and efficient use of the resources of the company, and enable the company to assess all significant operational, financial and compliance risks appropriately.

More specifically, the system aims to ensure:

- a) Compliance with laws and regulations;**
- b) Implementation of the instructions and directions given by management;**
- c) Proper functioning of the company's internal processes**
- d) Reliability of financial information.**

POLICY

The policy is formulated in accordance to the Rules, Bye laws, circulars and guidelines issued by SEBI, Exchange and the internal Management Policy.

Our present structure of DEPARTMENT WISE job allocation is given below: -

- 1) Client Registration- to look after client registration (KYC), KRA , allocation of clients to dealers/branch/AP.
- 2) Surveillance and Risk management Department- Setting and monitoring trading limit and trading activity, to keep an eye on various alerts generated from back office and exchange.
- 3) Trade Management- Daily trade confirmation by trader/dealer or office bearer ,to look after trade import and contract note (ECN and physical)
- 4) Delivery Department- to look after regular payin and payout to exchange and clients of securities and quarterly settlement incl. margin etc of all segments.
- 5) Account Department-to look out regular payin/payout of funds to exchange and clients, maintaining of books of accounts and statutory obligations.
- 6) Handling of documents:to look after timely dispatches of all the required documents and filing of papers.
- 7) Technology and system -maintaining hardware and softwares, digitally signed documents, website, monitoring sms and emails etc.
- 8) Regulatory compliances: Monitoring of timely filing of documents to the exchange, Govt. dept., statutory bodies and internal audit.
- 9) Department wise allocation of work has been done to achieve maximum efficiency and specialization of employee in each field for minimum error.

The hierarchy of every department has been made as detailed below to achieve full control in day -to-day working.

IMPLEMENTATION OF POLICY

Hierarchy-

- 1)Directors
- 2)Compliance Officer
- 3)Manager/Senior Executive
- 4)DepartmentHead
- 5)Assistant Manager

- The assistant manager will work under the supervision of department head and report him about work done or pending work to department head daily.
- Department head will look after the correctness and timely completion of work and is required to report to senior executive on important issues daily and for other on biweekly basis.
- The Manager/Senior executive will report the matter to compliance officer or management or Director in charge as the case may be.
- The compliance office/ director in charge will hold meeting with all the directors under the chairmanship of managing director/CEO periodically for updating and discussion of matter.

CONCLUSION

We at VARDHAMAN CAPITAL PVT LTD has adopted to work in changing environment by continuously evaluating our working system as per the load factor. We expect each and every employee of the company to follow the above mentioned guideline for utmost satisfaction of client.

The management understands that this policy will help to control all the areas related to day-to-day activity with utmost efficiency, for satisfaction for clients.

APPROVAL AUTHORITY AND REVIEW POLICY:

This policy is approved by the Board of VARDHAMAN CAPITAL PVT LTD

The policy may be reviewed by the Compliance Officer/ Director and place the changes in policy before the Board.

POLICY COMMUNICATION:

A copy of this policy shall be made available to all the relevant staff/persons such as: compliance officer / department in-charge /authorized persons.

Further, a copy of this policy has to be displayed on our website.