



Guidelines on Identification of Beneficial Ownership

As Parwati Capital Market Pvt. Ltd. is a PRO Trading Firm and we don't have any clients but if in near future Company decides for client trading all the guidelines by SEBI will be taken care and all necessary guidelines and policies will be re-generated.





BLOG CHAT POLICY

Parwati Capital Market Pvt. Ltd. does not promote any kind of technical or financial advice to anyone. What's app group is maintained within the office staff to update news which are available in public domain.





Client Acceptance Policy

As Parwati Capital Market Pvt. Ltd is a PRO Trading Firm no Client level tradings are performed but if in near future Company decides for client trading all the guidelines by SEBI will be taken care and all necessary guidelines and policies will be re-generated.



GUIDELINES ON OUTSOURCING OF ACTIVITIES

MEANING

Outsourcing may be defined as the use of one or more than one third party – either within or outside the group - by a registered intermediary to perform the activities associated with services which the intermediary offers. It has been observed that often the intermediaries resort to outsourcing with a view to reduce costs, and at times, for strategic reasons.

PRINCIPLES FOR OUTSOURCING FOR INTERMEDIARIES

1. Assessment of activities to be outsourced
2. Comprehensive outsourcing risk management programme
3. Due - diligence
4. Outlining Outsourcing relationship
5. Confidentiality of the information outsourced
6. Concentration of outsourced services in the hands of a select few third parties

RISKS INVOLVED IN OUTSOURCING OF ACTIVITIES

1. Operational risk
2. Reputational risk
3. Legal risk

Applicability & Conclusion

The board has decided not to outsource any core functional/ operational activities of the company. Hence guidelines as discussed above are not applicable for us.





Internal control Policy

1. Details

Parwati Capital Market Pvt. Ltd. (hereinafter referred to as the 'COMPANY') a body corporate, registered under the provisions of the Companies Act 1956, is a SEBI registered broker of the National Stock Exchange of India Ltd. (NSE), BSE Ltd. (BSE), Multi Commodity Exchange (MCX) and Central Depository Services (India) Ltd. (CDSL).

As a PRO Trading Firm the Company does not entertain clients trading and all the trading activities are performed for self only.

There is a proper AML Policies which are reviewed in line with SEBI Guidelines.

Own Funds are used for trading and making Pay-In & Pay-Out of Exchange Obligation.

2. Opening & closing of branches

Parwati Capital Market Pvt. Ltd's Board of Directors only decide to open and Close Branches of their own.

The Company has no policy for Authorized Participant & Sub Brokers.

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Policy on CLD Modification

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Policy on Conflict of Interest

Parwati Capital Market Pvt. Ltd.

Parwati Capital Market Pvt. Ltd is a PRO Trading firm the policy and procedure shall seek to identify circumstances which may give rise to conflicts of interest entailing a material risk of damage to Company's interests, establish appropriate procedures and systems to manage those conflicts, and ensure the maintenance of such procedures and systems in an effort to prevent actual damage to Company's interests through conflicts identified this policy seek to

- Maintain high standard of honesty and trustfulness in the business of securities market.
- Ensure that Parwati Capital Market Pvt. Ltd along with any person acting for and behalf of PCMPL shall not deal in any script if they have information about the script which is not being published and shall not communicate to anyone about any unpublished information about the script.





Policy on Pre Funded Instruments

As Parwati Capital Market Pvt. Ltd. is a PRO Trading firm hence Pre funded instrument like Demand Draft/ Pay Order/ Banker's cheque of third party will not be accepted.





Policy regarding treatment of Inactive Account

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Member : National Stock Exchange of India Ltd.
: BSE Limited

Depository Participant : Central Depository Services (India) Ltd.

RISK MANAGEMENT POLICY

A Risk Management System is integral to an efficient Risk System. As a PRO trading firm we have put in place comprehensive risk management system, which is constantly upgraded as per the Exchange, SEBI & PMLA norm and also as per Market Movement.

Parwati Capital Market Pvt. Ltd. (PCMPLTD), is a Proprietary Trading entity, conducts its business operations based on sound Risk Management Policies to pursue prudent business practices and, for providing hassle free trading facility to its employees. The function of Risk Management being an ongoing exercise is reviewed periodically and necessary measures are initiated to enhance its overall effectiveness.

Various Risk Management Measures implemented by PCMPLTD are detailed below:

1) Human Resource Deployment -

New people are deputed as Dealers with specific roles. They work in tandem with the entire and are specially deployed to undertake planned actions in case the anticipated risks come true.

2) DEALERS'S ACCOUNT – ACTIVATION, MAINTENANCE ETC. :-

For a new dealer, NISM certification is required for each segment. Surveillance department verifies the credentials of the dealer before activating the Software. The dealer can only do trades in trading accounts/ terminals registered under their name. Each user receives a different user id, and they need to create a unique password to access their account. In case a dealer forgets its password, it can only be unlocked by the IT department.

3) DEALER'S EXPOSURE LIMIT:

Exposure limits of CM/ FO/ CDS/COM segments for each Dealer is different. Dual level of checks are put in place for exposure limit of each dealer.

The exposure limit is set in the backend of the Algo Software's, and At the corporate level also the exposure limit is set.

Regd. Off. : Merlin Infinite, Unit 707, 7th Floor, DN-51, Sector-V, Salt Lake, Kolkata
Phone : (033) 4604-8895 / 1558 ♦ E.mail : dp@parwaticapital.com
NSE - CM / F&O / CD / Commodity, BSE - CM / F&O / CD / Commodity
SEBI Regn. No. : INZ000205936 ♦ CIN : U67120WB2002PTC094249
CDSL : SEBI Regn. No. IN-DP-CDSL-311-2005, DP ID : 12040200



4) TRADE RESTRICTIONS ON SCRIPS:

Daily BAN files are run to all ALGO software's, disabling trades in those scripts & minimizing the risk.

5) FIXING OF LIMITS

PCMPL fixes the limits at the surveillance level to restrict and monitor the trades based on the price of the shares. Broadly, limits for the following be fixed:

- a) Quantity limit for each order
- b) Value Limit for each order
- c) Value limit for each User ID

In case the dealer places an order beyond the limits stipulated by the company, an error message that "Order quantity exceeds the order quantity limit value" will be displayed to the dealer. In case the dealer wants to place an order for higher quantity / value, he / she should immediately contact the Mid Office and get the approval.

6) Mark To Market Limits

Each dealer is fixed with Mark to Market Limit, and when the mark to market limits breaches then the dealer is restricted to place the orders from system, he has to only reverse his position.

Since, Parwati Capital Market Pvt. Ltd. (PCMPLTD) is an arbitrage firm, so no one is allowed to have any short of naked positions at the end of the day.

